



Comhairle Contae an Chabháin
Cavan County Council

**AMENDED CHIEF EXECUTIVES REPORT ON
SUBMISSIONS RECEIVED ON THE DRAFT
CAVAN COUNTY DEVELOPMENT PLAN
INCORPORATING A LOCAL AREA PLAN
FOR CAVAN TOWN 2022-2028**



A handwritten signature in black ink, appearing to read 'Tommy Ryan'.

Tommy Ryan

Chief Executive Cavan County Council

Section One

1.0 Introduction

Cavan County Council have 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. 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.

A draft Plan was adopted in May 2021 by the Elected Members following receipt of the Chief Executives Draft Plan in March 2021.

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 for the period 2022-2028. This is expected to take place in June 2022.

1.1 Purpose of the Chief Executives Report

The purpose of the Chief Executives report is to present the outcomes of the public consultation phase carried out on the Draft Development Plan, which was on display from 28th May 2021 until 6th August 2021. Under Section 12(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 from the public consultation process of the Draft Plan, not later than 22 weeks after giving notice that the Draft Development Plan has been prepared and available for inspection. This report must be submitted to the Elected Members of the Planning Authority for their consideration.

The legislative requirements state a Chief Executives Report shall

- List the persons or bodies who made written submissions/observations
- Summarise the recommendations, submissions and observations made by the Office of the Regulator, the Regional Assembly and the submissions and observations made by any other person.
- 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

This Chief Executive Report has been prepared in light of these requirements.

1.2 Layout of the Chief Executive Report

Section 1 of the Chief Executives Report sets out the structure of the report, the process and next steps in making a new Cavan County Development Plan incorporating a Local Area Plan for Cavan Town 2022-2028. An outline of the consultation undertaken for the Draft Plan is also set out (which resulted in 142 no. submissions during the statutory public consultation state (Stage 2). All submissions received within the public consultation period, have been considered in preparation of this Chief Executive's Report.

Section 2 covers the Written Statement/Appendices/Accompanying Documents and Maps respectively. There is an analysis of the submissions received, followed by the Chief Executive's response to these issues and associated recommendations.

Recommendations proposed by the Chief Executive are indicated in this report as 'Chief Executives Recommendation'. New text to the draft development plan is shown as red text. Deletions to the text of the draft development plan is shown as ~~text with a strikethrough~~. Amendments to land use zoning maps are outlined and indicated with a letter. Flooding amendments on land use zoning maps are outlined and indicated as 'F1, F2 etc'.

1.2.1 Amended Chief Executives Report

A further submission in relation to lands in Virginia, Co. Cavan from Patrick and Brendan O'Reilly. This submission had been received during the period prescribed for receipt of Written Submissions/Observations but was at the time recorded as having been received within the said prescribed period. This submission was uploaded to the Cavan County Council website on the 18th January 2022. This report is an Amended Chief Executives Report, which includes reference to and consideration of this submission. This amended Chief Executive's Report is solely for the purpose of taking this additional submission into consideration.

1.3 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

1.4 Draft Development Plan Consultation Phase

The draft consultation stage was held from 28th May 2021 to 6th August 2021.

A total of 142 written submissions were received during this period, 2 submissions were withdrawn and two duplicate submissions were received also. There were also a number of submissions submitted outside of the statutory period which cannot be considered. Cavan County Council wishes to express their appreciation to those who made submissions. The extent and detail of the submissions received highlights the significant level of public interest in the plan making process.

The consultation process comprised a number of elements as follows:

1.4.1 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 14th June and 21st June 2021:

- Cavan Town
- Ballyjamesduff
- Ballyconnell
- Gowna
- Bailieborough
- Cootehill

The events were informal in nature due to Covid restrictions. The Draft Cavan County Development Plan incorporating a Local Area Plan for Cavan Town, the Appendices and all Environmental Reports including the Strategic Environmental Assessment (SEA), the Strategic Flood Risk Assessment (SFRA) and the Natura Impact Statement (NIS) was available to the public and was displayed at the events. Large numbers attended the information evenings, with a strong presence from community groups. 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 6th August 2021.

1.4.2 Promotion

The commencement of public consultation period for display of the Draft Development Plan was advertised in The Anglo Celt on Thursday 27th May 2021. Notices of public consultation evenings were

published on 10th June 2021 and the 17th June 2021. 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 link to the Draft Development Plan, Appendices and the Environmental Reports. Follow up emails regarding dates of the public events were also issued. LEO also included a link to the Draft Development Plan, the Appendices and the Environmental Reports in their Ezine to their members.

Radio adverts on Northern Sound advertising the public consultation events also ran during this period. These were targeted to the most listened to slots.

Plans were also available for viewing and purchase at the Planning Office by appointment during this period.

1.4.3 Online

A tab under the Planning section of the Cavan County Council Website was set up called 'Cavan County Development Plan Review 2022-2028' in addition to a link on the Cavan County Council homepage. This dedicated webpage includes all the information regarding the Review of the Development Plan and a link to the Draft Development Plan, Appendices and Environmental Reports, in addition to links for previous stages of the plan making process and submission received as part of Stage 1.

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. Regular notifications relating to the Plan review were issued through the Council's social media feeds

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

1.5 Next Steps

Not later than 22 weeks after the notice of the Draft going on display, the Chief Executive is required to produce a report which lists the submissions received, summarises the issues raised, and set out responses and recommendations accordingly.

Not later than 12 weeks, following the consideration of the Draft Plan and the Chief Executive's Report, where it appears to the Members that the Draft Plan should be accepted or amended, they may, by resolution, accept or amend the Draft and make the Development Plan accordingly.

Where a proposed amendment would, if made, be a material alteration of the Draft Plan, notice of the proposed amendment must be published inviting submissions from the public. Should amendments be made which would constitute material alternations to the Draft Plan, not later than 3 weeks there is a further public display period giving people an opportunity to comment on the proposed amendments only.

This is followed by the preparation of a further Chief Executive's Report on any submissions received on the proposed amendments. Members may then make the Development Plan with or without the proposed amendments or with modifications of a minor nature to the proposed amendments as they consider appropriate.

1.6 Consideration of Submissions

Following the initial recording of all 142 submissions (Amended Appendix 1), each submission was categorised in line with themes as follows:

- Section 2 : Northern and Western Regional Assembly
- Section 3: Office of the Planning Regulator
- Section 4: Prescribed Bodies and Stakeholders
- Section 5: General Submissions
- Section 6: Zoning Submissions
- Section 7: Protected Structures
- Section 8: Chief Executive Errata
- Section 9: Appendices

Amended Appendix 1 List of submissions by Ref. No. & Name of Persons/Bodies

Appendix 2 Cavan Town Amendments Map (with Flooding)

Appendix 3 Amendment Maps with Flooding for Virginia, Ballyjamesduff, Bailieborough, Kingscourt, Cootehill, Belturbet, Mullagh, Ballyconnell

Appendix 4 Small Town and Village Amendment Maps with Flooding for Ballinagh, Ballyhaise, Shercock, Killeshandra, Arvagh, Kilnaleck, Swanlinbar, Butlersbridge, Blacklion, Lough Gowna, Bawnboy, Crossdoney, Crosskeys, Dowra, Kilcogy, Mountnugent, Redhills, Stradone.

Appendix 5 Virginia Zoning Map with Bypass

Appendix 6 Infrastructure Assessment Report

Appendix 7 Core Strategy Chapter

Appendix 8 Housing Strategy Chapter

Appendix 9 Statement of Compliance with National Guidelines

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.

Northern and Western Regional Assembly

This submission has commented on the Draft Plan on a Chapter by Chapter basis.

Core Strategy - The submission notes that Cavan Town remains the key settlement of the County and thereafter Virginia is identified as Tier 2 and labelled as a Self-Sustaining Growth Town, with towns like Bailieborough, Ballyjamesduff, Kingscourt and Cootehill falling into Tier 3- Self Sustaining Towns. The re-ordering of Virginia is considered reasonable and consistent with the RSES. The RSES however refers to Virginia as a 'Place of Strategic Potential' and the same terminology is recommended.

County Cavan – The Core Strategy fully aligns with the NPF Implementation Roadmap adopting a county population of 85,900 in 2028.

Cavan Town – A growth rate has been envisaged with a rise from 10,914 in 2016 to 12,5000 in 2028 and these figures apportioned are consistent with the RSES.

Virginia – The population growth for Virginia is 31% to 2028. The town has a low Jobs to Residents Workers (0.600) and it is an ambition of the plan to focus on potential employment lands with 3 number sites identified for development.

Chapter 2 - Settlement Strategy – The rural area strategy is largely consistent with the goals of the RSES. The County holds a Rural - Urban population ratio of 70%-30% with the draft Plan seeking a target of 65% growth in population in the larger urban settlements.

Cavan Housing – Almost 700 units are targeted with a density of 18-22 units per hectares which is well below the Residential Density advocated in the Sustainable Residential Development in Urban Areas (2009) Guidelines. Circular letter NR UP 02/2021 clarifies that suburban and high density urban approaches are not applied uniformly and that development responds appropriately to the character scale and setting of the town or village.

The extent of Residential Strategy Reserve lands in Cavan Town LAP merits review and clarification. How residential expansion/housing growth is to be achieved either sequentially or via compact growth would merit further clarification by way if additional narrative and through the use of visuals.

Community and Sports Facilities - The advancement of Regional Sports Centre and Community Hub are consistent with the RSES.

Employment Land – The IDA Park in the Dublin Road is nearing capacity and the need for additional Enterprise/Employment Lands for Cavan Town is consistent with the RSES.

Transport/LTP – The plan should commit to a specific timeline for the preparation of the LTP in the short term- within 2 years of adoption of the plan is considered achievable.

Urban Regeneration - There is no outline of timeframe for the completion of 2 of the Masterplans identified in the Cavan Town and Environs LAP. The numerous Public Realm projects mentioned in the LAP would benefit from accompanying map and text.

Virginia – The lack of appropriately zoned land in order to reduce the commute of a large cohort of workers to the GDA is identified as a serious constraint. The Map of Virginia should include route options for the N-3 by-pass. The timeframe for the completion of the Masterplans should be outlined.

Small Towns - Additional clarification is needed on the policies which align with the ambition that Local Authorities provide alternatives to the one off rural housing, which include a programme for serviced sites in smaller towns and villages.

Chapter 3 – The Housing Need Demands Assessment set out in Chapter 3 correlates with the overall projections for County Cavan and its settlements outlined in the Core Strategy. The Housing Strategy and its Objectives in Chapter 3 are consistent with the aims of the RSES.

Chapter 4 – Sustainable Communities – a central aim of the plan is to create sustainable communities across Environmental, Social and Economic spheres and the promotion of educational facilities. The goals set out in Chapter 4 ‘cross cut’ with much of the Core Strategy and Settlement Hierarchy for Cavan which aim to permit additional housing within towns and villages, close to services, reduce the need to travel and enhance sustainability through other measures including public realm. All of these are consistent with the RSES.

Chapter 5 - Climate Change - Cavan has adopted its Climate Change Adaption Strategy in 2019. Decarbonising Zones within County Cavan is required to be done by each Local Authority under the Climate Action Plan. The Draft Plan should elaborate on whether this zone has been identified and the timeline for the process to commence.

Chapter 6 – The vision is the plan is for the pursual of economic growth across the county positioning Cavan as a place to do business to invest and enrich standards of living. The Plan notes the significant labour catchment in the County and this type of broader approach to Economic Planning is consistent with the Planning for the Sub-Regions. The core elements of Cavan’s future economic strategy are consistent with the themes outlined within the RSES:

- Availability of appropriately located and serviced land
- Place making for enterprise
- Supporting towns including revitalisation

These are broadly welcomed by the Assembly.

The emerging trend of Home Working is set out in Section 6.20, however this does not contain any form commitments to unleash the potential across the county. There is an opportunity to consider more ambitious policy interventions which include measures that can be quantified over the coming years.

Chapter 7 - Transportation and Infrastructure – It is suggested to divide Transport and Infrastructure into separate chapters.

Local Transport Plans - It is noted that there is no timeline for completion of the Cavan Town LTP and that the Transport Studies for Bailieborough, Cootehill and Kingscourt date back to 2009 and therefore it would be timely to consider an update for these plans and consideration should be given to preparation of a LTP for Virginia.

The Strategy for Trails and Greenways is included in this chapter including details of ongoing work to a number of Greenways including the Kingscourt to Navan (Boyne Valley) Route. The manner in which these projects are to be sequenced could benefit from additional clarity. The timeframe for the N3 Park and Ride should be outlined.

The support for the North South Interconnector is consistent with the goals of the RSES in which the Interconnector is identified as a Major Regional Project.

The preparation of a Renewable Strategy within 2 years of adoption of the Plan could be potentially problematic insofar as there is no Wind Energy policy for the County beyond what is in the draft Development Plan. This approach is not consistent with the RSES and would not be consistent with the Wind Energy Guidelines or the ability of the County to meet future obligations in the area of Climate Change. Reference needs to be made to the Interim Wind Energy Guidelines.

The section on Biomass should be reviewed to achieve consistency with the RSES and RPO's 4.27, 4.28 and 4.29. and should include for Bio Refining Hubs across the Region.

Rights of Way within the County should be illustrated by Map alongside text with specific mapping in the Appendices.

Chapter 8 Environment, Water and Drainage - This chapter has been detailed and has been deemed consistent with the RSES.

Chapter 9 - Tourism Consideration should be given to inclusion of Cavan as Destination Town and a hierarchy of attractions in the County and mentions of recent Funding under RRDF/Failte Ireland could be included.

Chapter 10 - Natural Heritage the protection of natural heritage in the County, including the County's European Sites is consistent with the RSES. A clear time based objective is necessary for the undertaking of a Landscape Character Assessment for the County.

Chapter 11 – The Plan is commended for its inclusion of Record of Protected Structures and the extent of ACA's in the County including smaller towns and villages. The Archaeological Heritage Objectives including those concerning the UNESCO Geopark and other key assets such as Lough Oughter Castle is consistent with the RSES.

Chapter 12 – Rural - The critical role of rural communities is noted in the Plan and the submission notes that 70% of the population resides outside main towns. The policies in relation to agricultural activity,

Broadband and the rural enterprises in this chapter do not inherently conflict with the goals and objectives of the RSES.

Chapter 13- Development Management – The Council is commended for the extensive scope of work associated with this Chapter and fully supports the approach to flexible application of requirements to provide car parking spaces given the emphasis on compact growth.

Chapter 14 – The Assembly commend Cavan County Council on the explanations and elaborations on Land Use and Zonings in this chapter.

Chief Executive’s Opinion on Issues Raised

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. The Council appreciate the due regard and acknowledgements contained in the submission relating to same.

Core Strategy

It is considered appropriate to refer to Virginia as a “Place of Strategy Potential” throughout the Draft Plan to reflect terminology used in the RSES.

Recommendation 1: Amend Section 2.10.2 Self Sustaining Growth Town – Virginia

The RSES identifies Virginia as ~~a location with strategic development potential~~ a “Place of Strategic Potential” of a regional scale.

Recommendation 2:

Amend Section 2.3 Self-Sustaining Growth Town Virginia

2.3.1 Context

This written statement provides an overview of the development strategy for Virginia. Virginia has been identified in the Northern and Western Regional Spatial and Economic Strategy (RSES) as a ~~Town~~ a Place of Strategic Potential performing important sub-regional functions for employment, housing and services. Virginia is identified as a hub for the east of the County with the RSES identifying the need to address the commuting out of the county by providing employment and support services. It is described as a Self Sustaining Growth Town in the County Settlement Hierarchy. The town has significant service

and employment functions, good regional transport links and has the capacity for continued growth to become more self sustaining.

Chapter 2 Housing

Compact Growth, Regeneration and Sequential Development

Compact growth and regeneration are a key focus of the draft plan with a central objective to regenerate Cavan Town by making better use of under-used land and the existing built-up urban footprint and to drive the delivery of not only quality housing but also employment choice. Cavan County Council is committed to making better use of under-used, vacant or derelict land and buildings in Cavan Town through active land management and the regeneration of the town centre. Furthermore, it is a priority of the Council to enable infill and appropriate brownfield redevelopment in order to maximise the efficient use of existing infrastructure and services. The plan contains a suite of development objectives to support, encourage and enable this approach.

The draft Plan fully supports that the housing delivery in the towns and villages comprises of 30% of all new homes within the built-up footprint of existing settlements. Reference is made to this throughout the draft Plan and the Planning Authority notes the NPF, 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'* and the RSES for the Northern and Western Region, RPO 3.2 (c) – *'Deliver at least 30% of all new homes that are targeted in settlements with a population of at least 1,500 (other than the Galway MASP and the Regional Growth Centres), within the existing built-up footprints'*.

The draft Plan seeks to achieve more compact and sustainable growth through consolidating a greater share of future development within the existing built footprint of settlements, to include new homes, businesses and amenities. This aids to support the regeneration of existing urban areas and will comprise of the re-use of existing buildings that are derelict or vacant as well as the development of infill sites and urban sites. The Core Strategy has outlined ambitious targets that meet the requirements of the RSES and NPF in this regard. The revision to the Core Strategy has segregated the infill and brownfield sites allocation from existing residential where potential may come from underutilised sites. To further demonstrate how the draft plan will achieve this 30% ambition, Settlement Consolidations sites have been included in the zoning maps of the serviced towns and villages of the County. These areas are mainly town centre zonings, some adjacent mixed-use sites in Cavan Town and in Virginia and also some infill proposed residential sites. Whilst the focus for the delivery on compact growth is in the larger settlements, there is potential in the smaller towns and villages to achieve sustainable and appropriate redevelopment. These Settlement Consolidation Sites capture the town/village core area and immediate lands within the towns and villages of the county. These sites offer the most potential for compact growth and there is substantial backlands associated with same. Many of the towns and villages have included Masterplans to ensure that these backland areas are developed in an orderly and plan led manner. Revisions have been made to the Core Strategy, Table 11 (see appendix 7) of

the draft which provides housing supply figures for both (a) town core, infill, brownfield and existing residential and (b) Settlement Consolidation Sites. The combination of both demonstrates the Council's commitment to developing consolidated sustainable places.

Throughout the draft local area plan an emphasis is placed on building community with a high standard of design, around the principles of place-making, green infrastructure, permeability and connectivity alongside the integration of community and recreational facilities. Such policy and development objectives are further strengthened with the introduction of a new land use zoning "Neighbourhood Centre" in Cavan Town. The objective of the Neighbourhood Centre Zoning as stated in Section 14.4.1 is to "Protect, provide and/or improve local centre facilities". Section 14.4.2 outlines the Vision as: "Provide a mix of local community and commercial facilities for the existing and developing communities of the county. The vision is to ensure local centres contain a range of community, recreational and retail facilities, including medical/dental surgeries and childcare facilities, at a scale to cater for both existing residential development and zoned undeveloped lands, as appropriate, at locations which minimise the need for use of the private car and encourage pedestrians, cyclists and the use of public transport. The development will strengthen local retail provision in accordance with the County Retail Strategy. Taking into account the relatively modest house construction over the past development plan period, the Local Area Plan seeks to allocate zoned residential lands in close proximity to neighbourhood centres, where communities have built up. The proposed residential zoned lands are also considered to be located within where there is good infrastructure for walking and cycling to the town centre. Reference is also made to the Cavan Town "Asset and Project Overview January 2021" as contained in Appendix 25 of the draft plan. This document provides a moment in time overview of assets and projects for Cavan Town. The development strategy for Cavan Town is to support new housing and population growth, consistent with the Core Strategy, facilitating compact growth together with providing a viable alternative to rural one-off housing. This strategy grounded in the neighbourhood approach is fully compliant with current guidelines and the concept of sustainable growth.

Density

It is considered that the tailored approach to density is necessary to promote sustainable development and the required regeneration of the towns and villages of Cavan. This density approach is in compliance with the Core Strategy and necessary to facilitate Cavan County Council meeting the projected housing requirements of the county over the plan period.

Due cognizance should be directed to the unique topography in the towns and villages of County Cavan, their difficult levels and ground conditions and the overall impact that this results in, regarding the developability of such lands. As such, a standard density will not produce the number of dwellings required to achieve sustainable growth. High quality urban developments is the key to the success of the towns and villages. This is required to provide the attraction that is needed to reduce the number of one off dwellings in the countryside. Dwellings capable of expanding with growing families and a home

for life is the key to success of the residential properties in the county. With this in mind national density standards cannot be achieved in most cases. Levels throughout this drumlin county are extremely difficult and in order to provide satisfactory private and public open space, additional lands in residential housing developments are required. The Planning Authority are however mindful that higher densities provide for more compact and sustainable growth. Most of the towns and village cores are capable of achieving higher densities (see table below). Infill and brownfield sites are also likely to be suitable to higher densities with the lands provided further from the town capable of achieving slightly lower densities. This is considered appropriate. It is considered appropriate to amend section 13.4 Residential Development of Draft Plan to reflect same and incorporate this proposed tailored approach to residential density.

Recommendation No. 3:

Amend Section 13.4 Residential Development

13.4.1 Residential Density

Generally, the number of units to be provided on a site should be determined with reference to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), the accompanying Urban Design Manual (2009) or any update thereof and the Smarter Travel policy. The concept of 15–20-minute walkable communities will be sought and created, and accordingly appropriate residential densities will be encouraged within walking distance to town centres and public transport infrastructure. Due to the difficult topography of County Cavan, there are many instances where specified densities cannot be achieved. **The densities outlined in the table below indicate approximate key residential outputs over the life time of the plan and site density will be determined on a case by case basis.**

Recommendation 4: Insert Table in Section 13.4.1 page 558

	Density in town/Village Core	Density in Brownfield and Infill Sites	Density in Proposed Residential	Density in Proposed Low Density Residential
Cavan Town	30-35	22-30	18-22	8-10
Virginia	25-30	20-25	16-20	8-10
Self Sustaining Towns	25-30	18-25	14-18	8-10
Medium Towns	20-25	16-20	12-16	8-10

Small Towns	17-20	14-17	10-14	8-10
Villages Category 1 and 2	8-12	8-12	8-12	8-10

Residential Density Development Objectives

It is a development objective of Cavan County Council to:

- RD 01 Encourage **densities in accordance with the above table throughout the County** ~~density of 18-22 units per ha in Cavan Town and 8-20 units per ha in the remainder of the County~~ in accordance with the Core Strategy.
- RD 02 In Villages and Community Nodes any development shall take cognisance of the prevailing scale and pattern of development and services availability.
- RD 03 Ensure densities of proposed developments reflect the key attributes and character of the surrounding/adjoining area.**

Residential Strategic Reserve

It is an objective in the draft Plan to include lands in Cavan Town that will provide for and protect the future housing requirements of the town. These lands have been identified as Strategic Residential Reserve. The vision for these lands is that multiple type residential development will not be permitted on these lands within the lifetime of the plan and consideration will be given to alternative uses in exceptional circumstances where it has been demonstrated that the alternative use better facilities sustainable development and would not prejudice the principle use of these lands for urban residential expansion. It is considered that the designation of lands as strategic Reserve ensures the proper long term planning of the town. This is a mechanism used to protect and ensure that no unsuitable uses are approved on the lands in question during the lifetime of the plan. The extent of same is noted, which is without prejudice to the fact that this landbank of Strategic Residential Reserve has been considerable reduced, with the removal of lands west of Cavan Town in the draft Plan.

With the commitment in the draft Plan to undertake a Local Transport Plan for the Cavan Town, it is considered premature to remove the remaining lands subject to this zoning until such time as the Local Transport Plan is complete.

The removal of lands arising from the overlay of the flooding maps, along with the changing of zoning to lands north of the town, is deemed a sufficient sustainable reduction. It is considered that there is no further requirement to reduce the extent of Residential Strategic Reserve.

Masterplans

It is considered appropriate to amend text relevant to the proposed Masterplans identified throughout the towns of the County to clarify that public consultation will form an integral part of the masterplan preparation. Text will also be inserted to note Cavan County Council will take a lead role in conjunction with all other relevant persons for the preparation of such plans.

Recommendation 5: Amend and add text in the following sections:

2.2.12 Masterplans

Masterplans are required for 3 specified sites in Cavan Town as per the Land Use Zoning Map. They will establish strategic planning principles for each area as per its specifications below. It will set out an overall urban design framework for the development of the area. ~~The Masterplan will be prepared by the applicant/s in consultation with the Planning Authority and shall be agreed by the Council and lodged as part of any Planning Application.~~ **The Planning Authority will take a lead role in the preparation of masterplan, in conjunction with all other relevant parties, masterplans shall be agreed prior to lodgement as part of any Planning Application.** Notwithstanding, the fact that the lands have been zoned in the Plans, no significant planning permission for development will be granted until the Masterplan for development of the area, as a whole, has been agreed with the Planning Authority.

Each Masterplan shall include as a minimum.

- A written statement and a plan or series of plans indicating the objectives, in such detail as may be determined by the Planning Authority, for the proper planning and sustainable development of the area to which it applies.
- Proposals in relation to the overall design of the proposed development including maximum heights, external finishes of structures and general appearance and design, including that of the public realm. Designs should be sympathetic to the nature of the area as well as sympathetic to the town.
- Plans for the likely phasing of development.
- Plans which are consistent with the policies and objectives of the County Development Plan.
- Guidance on high quality architectural treatment with respect to topography, urban structure and built form consistent with the established character of the town.
- Issues pertinent to the sustainable management and conservation of Biodiversity shall be considered in all Masterplans.
- **A full public consultation strategy.**

2.3.11 Masterplans

Masterplans will be required for specified sites in Virginia as per the Land Use Zoning Map. They will establish strategic planning principles for each area as per its specifications below. A Masterplan will be required prior to the granting of planning permission. It will set out an overall urban design framework for the development of the area. ~~The Masterplan will be prepared by the applicant/s in consultation with~~

~~the Planning Authority and shall be agreed by the Council and lodged as part of any Planning Application.~~ **The Planning Authority will take a lead role in the preparation of masterplan, in conjunction with all other relevant parties, masterplans shall be agreed prior to lodgement as part of any Planning Application.** Notwithstanding, the fact that the lands have been zoned in the Plans, no planning permission for substantial development will be granted until the Masterplan for development of the area, as a whole, has been agreed with the Planning Authority.

Development Objective

It is a development objective of Cavan County Council to:

VMP 01 Require, with respect to areas which have been identified as Masterplans, the preparation of a Masterplan. Masterplans shall be lodged with a planning application, prior to development applications being considered on the subject site.

Each Masterplan shall include as a minimum:

- A written statement and a plan or series of plans indicating the objectives, in such detail as may be determined by the Planning Authority, for the proper planning and sustainable development of the area to which it applies.
- Proposals in relation to the overall design of the proposed development including maximum heights, external finishes of structures and general appearance and design, including that of the public realm. Designs should be sympathetic to the nature of the area as well as sympathetic to the town.
- Plans for the likely phasing of development.
- Plans which are consistent with the policies and objectives of the County Development Plan.
- Guidance on high quality architectural treatment with respect to topography, urban structure and built form consistent with the established character of the town.
- Issues pertinent to the sustainable management and conservation of Biodiversity shall be considered in all Masterplans.
- **A full public consultation strategy.**

2.7.11 Masterplan 1

~~Prepare a Masterplan, in conjunction with relevant stakeholders, for backlands development subject to following:~~

The Planning Authority will take a lead role in the preparation of the masterplan, in conjunction with all other relevant parties, masterplans shall be agreed prior to lodgement as part of any Planning Application. This Masterplan shall contain the following:

- a. The construction of a new access road from the Kells Road to the Rocks Road to serve the Masterplan area.

- b. Development shall support, contribute to and consolidate the town core function while complying with the highest urban design standards.
- c. Development shall provide safe and accessible pedestrian linkages between the development and the existing town core, amenity areas and community facilities.
- d. The location of the proposed access points will be determined at planning application stage. Access roads shall be improved in order to accommodate additional traffic.
- e. Necessary social and physical infrastructure is to be provided, as appropriate.
- f. **A full public consultation strategy.**

2.10.11 Masterplan 1

Prepare a Masterplan for this area to incorporate Residential, Employment, Public and Community uses. The need and quantum of such uses shall be identified as part of the Masterplan preparation and shall be in accordance with the Core Strategy of the Plan. ~~The Master Plan shall be prepared in conjunction with relevant departments of Cavan County Council. On completion, the Masterplan shall be submitted to the Planning Authority for approval prior to the submission of any planning application.~~ **The Planning Authority will take a lead role in the preparation of the masterplan, in conjunction with all other relevant parties, masterplans shall be agreed prior to lodgement as part of any Planning Application.** Proposals shall ensure the residential amenities of existing and future residents are protected and details of traffic impacts and road safety. Pedestrian and cyclist linkages to the Town centre shall be of paramount importance. Piecemeal development will not be permitted, only an overall integrated proposal will be acceptable. Proposals for the site shall be subject to the Environmental policies and objectives of this Plan. Details of how the Masterplan will address Sustainable Design Principles shall be clearly addressed in the Masterplan. **A full public consultation strategy shall form part of the masterplan preparation.**

Programme for Serviced Sites

The Draft Plan encourages and contains a strong policy formation including development objectives to facilitate the regeneration of towns and villages throughout the County as a major priority action. Cavan County Council concurs with the RSES that towns and villages throughout the County need to be re-imagined and deficits in terms of economic, physical or social infrastructure and provisions require focus, support and investment. It is also agreed that the preparation and delivery of a programme of services sites, led by Cavan County Council is another key component to aid the regeneration of our towns and villages, whilst also providing an alternative to a one off rural house. It is proposed to insert a new objective to support the preparation of this programme within one year of the adoption of the plan. This will further support development objectives relating to the provision of services sites: STC 09, p. 209, FDW 14, p. 438, ST 15, p. 208 and RA 01, p. 56.

Recommendation 6: Insert new Small Towns Sustainable Communities Development Objective, page 209:

STC 10 Prepare a programme lead by Cavan County to identify and prioritise a programme for serviced sites in appropriate smaller towns within 1 year of the adoption of the development plan. This programme will incorporate a rolling 2-year implementation plan.

Recommendation 7: Insert new Village Development Objective

CDO 29 Prepare a programme lead by Cavan County to identify and prioritise a programme for serviced sites in appropriate villages within 1 year of the adoption of the development plan. This programme will incorporate a rolling 2-year implementation plan.

Chapter 5 Climate Change

It is considered appropriate to insert text in Section 5.5 Decarbonising Zone of the Draft Plan to provide details and an objective relating to a decarbonising zone planned for the County.

Recommendation 8: Insert the following Text and Objective in Section 5.5 Decarbonising Zone

5.5 Decarbonising Zone

A Decarbonising Zone (DZ) is a spatial area identified by the local authority, in which a range of climate mitigation, adaptation and biodiversity measures and action owners are identified to address local low carbon energy, greenhouse gas emissions and climate needs to contribute to national climate action targets. A Decarbonising Zone incorporating Cavan Town and surrounding areas, as identified by Cavan County Council, will be progressed, subject to departmental approval.

Decarbonising Zone Development Objective

It is a development objective of Cavan County Council to:

DZ 01 Support a decarbonising zone incorporating Cavan Town and surrounding areas, subject to Departmental approval.

Chapter 6 Economic Development

Remote Working

Section 6.19 Smart Enterprise and accompanying development objectives in addition to Section 6.20 Home Based Economic Activity and Remote Working and accompanying development objectives articulate Cavan County Council's support for the emerging trend of Home Working. Both sections also advocate and facilitate the development of "Smart Places" which in turn promotes Cavan as part of a Smart Region as referenced in Section 6.6 of the RSES. To future convey Cavan's support for the latter, it is considered appropriate to add a new development objective which aims to promote Cavan as part of a "Smart Region."

Recommendation 9: Insert a new objective HBEA 06, page 368:

HBEA 06 Support the development of “Smart Places” and promote Cavan as part of a “Smart Region”.

Cavan Town Employment and Enterprise Zoned Land

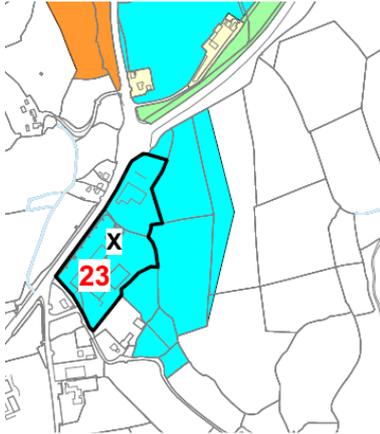
The Draft Plan aims to promote the key town of Cavan as a primary employment and attractive investment location in the County and region. It is the policy of Cavan County Council to support Cavan’s role as an important employment hub by promoting the location of economic development and clustering of related enterprises to Cavan town. The Council recognise that the provision of appropriate locations for employment is essential to further facilitate economic development in a sustainable manner. The optimum location for employment and enterprise development in Cavan town has been identified on lands where economic clustering can be delivered and/or where new opportunities exist. The zoning of lands south of Cavan Town adjacent to N55 as General Enterprise and Employment is to facilitate the expansion of the existing Corlurgan Business Park and to further facilitate clustering of like industries at this location. In the interest of clarity, the existing business park should be included within the Development Plan boundary, zoned as General Enterprise and Enterprise and have access routes outlined. The inclusion of lands zoned as General Enterprise and Employment east of Cavan town of the N3 remain included as General Enterprise and Employment as Cavan County Council consider this a key site occupying attributes of a strategic employment site, which has had previous planning permission for a light industry campus development. The site, although holding its previous zoning has been substantially reduced by in the region of 70%. The primary reason for the reduction in size is to allow other previously unzoned land be included in this plan as a means to offer choice and to facilitate economic development at various scales including domestic, indigenous and foreign direct investment.

Recommendation 10: Amend Cavan Town Zoning Map

To include Corlurgan Business Park within the Development Plan Boundary of Cavan Town LAP and zone as

General Enterprise and Employment with Map Based Specific Objective Number 23 as per X on Cavan Town Amendments Map in Appendix 2.

The new Map Based Specific Objective shall read as ‘Development at this location shall require connection to public services’.



Placemaking for Economic Development

The Plan aims to enable and promote sustainable economic development in County Cavan to best facilitate economic growth and opportunities across all sectors, delivering jobs and enriching the standard of living for all. The Plan contains policies and development objectives to support the resilience and expansion of Cavan's indigenous economy and work towards growing Cavan's wider economic base through promotion of Cavan as a strategic location for businesses to relocate and expand.

Supporting and promoting business development and the creation of new employment opportunities are core to creating and maintaining economic prosperity in County Cavan and maintaining a high quality of life. The *Strategic Economic Framework* has been prepared to support and inform the development of County Cavan through the identification of investment opportunities, areas of economic expansion and new growth employment opportunities. This Strategic Economic Framework provides a platform for County Cavan to facilitate sustainable economic growth through a series of dedicated and strategic actions. All actions are in line with, and complementary to, national, regional and local frameworks and policy documents. This Strategy has been informed by the *Cavan Economic Study* which was undertaken to identify the existing economic context of the county and its relationship with the surrounding region. A comprehensive socio-economic assessment of the county and its nine principal towns was undertaken to ascertain the characteristics of the county formation. The study comprised a population and demographics assessment, including educational attainments; a review of industries of employment, commuting patterns, and commercial vacancy rates. Examining the commuting patterns of the county's population proved very beneficial as it allowed for greater insights into the functional relationship of the resident and working populations and between County Cavan, its neighbouring counties and the wider region. Please refer to Appendix 3 of the draft Plan.

In addition, Cavan County Council proactively developed Town and Village Revitalisation Plans for 20 Towns and Villages across the County. The Plans showcase how improvements can enhance the

town/village as an attractive place in which to live, work, and visit. They also seek to enhance and improve the long-term socio economic, cultural and environmental benefits for residents, businesses, communities and visitors. The outcomes of the Revitalisation Plans are threefold – to deliver successful strategies across spatial development, economic development and community development. One of the main objectives of the development plan is to facilitate more jobs within the County thereby improving the jobs ratio and reducing the volume of outbound commuting.

The RSES identifies that improving the alignment between the location of residential development and employment is one of the key challenges facing the region. This Development Plan supports a counter commuting strategy aimed to leverage the economic and social assets of Cavan County, together with the educated and skilled workforce and relevant policy interventions. The need to identify additional economic lands and strategic sites in key settlements which are experiencing significant out bound commuting due to the extent of their resident populations and the lack of local employment is a key development objective of this Development Plan.

The Draft Plan aids the co-ordinated approach to economic development within the Council and allows for a plan-led evidence-based approach for future economic growth. Using a collaborate approach the development plan operates within a network of other influencing plans and strategies, including the LECP. In terms of economic development, the key functions of a development plan include:

- Link the economic and spatial dimensions of the Plan by aligning economic growth with the settlement hierarchy focusing on key employment locations as drivers for growth and recognising the critical role of rural places in the economic development of the County.
- Provide an adequate quantum of appropriately zoned lands to facilitate current and future economic opportunities and employment creation.
- Ensure that such lands maximise the existing or planned infrastructure provision.
- Identify key business and industry sectors where opportunity exists for employment growth within the county.
- Maximise the strategic location of Cavan of being part of the Border Region and the close proximity to the Greater Dublin Area.
- Foster a highly skilled and educated workforce.
- Promote economic clusters and regeneration of obsolete or inefficient economic lands.
- Nurture positive communities and create appealing places for people to live and work in, that in turn attract new businesses and employees.
- Provide a coherent approach to economic development that guarantees confidence and clarity for applicants, develops and investors involved in the development process.

The overall strategy proposed in the Draft plan takes account of a number of facets that contribute to the sustainable economic growth of the County, including:

- Locations of Employment
- Availability of Land and Supporting Infrastructure

- Placemaking for Enterprise and Employment
- Town and Village Centre Regeneration and Revitalisation
- Public Realm
- Compact Growth & Regeneration
- Design
- Skills and Innovation
- Smart Enterprises
- Home Based Economic Activity and Remote Working
- Investment and Support
- Quality of Life
- Green Economy

This plan aims to promote Cavan as a key location for economic development supporting the provision of increased levels of employment through the expansion of the existing enterprise ecosystem in Cavan.

The overarching challenge for the Council is to assist in creating more jobs so that more people who live in Cavan can work in Cavan. It will also support the provision of physical and social infrastructure and zoned lands to realise the delivery of strategic employment lands in central accessible locations. The optimum location for employment and enterprise development within the County has been identified on lands which are appropriately zoned; brownfield sites/regeneration lands and areas where economic clustering can be delivered and/or where new opportunities exist. The provision of services for all employment related lands will be a priority for the County during this plan period.

Cavan County Council acknowledge that a successful and sustainable local economy is dependent upon the existence of supporting infrastructure that is of high quality and has sufficient capacity. Failure to ensure adequate infrastructure is available and improved in keeping with the development of the county will adversely impact on the capability of the county to attract new investment or encourage expansion of existing companies.

Adequate infrastructure is essential to facilitate future economic development in the County and Cavan County Council will continue to work with infrastructure providers to secure adequate water services, effective public transport, energy, telecommunications, waste management and education facilities to support employment development. Quality of life considerations are also a key component for investment and this Plan will seek to protect the attributes that make Cavan attractive. Indicators such as commuting times, availability of key services, recreation opportunities and the quality of the built and natural environment are important. The Plan contains a wealth of development objectives which aim to improve quality of the environment and life for the citizens of Cavan, for example: community infrastructure, public realm, regeneration, etc.

Chapter 7 Transport and Infrastructure

Local Transport Plans

It is considered appropriate to specify a specific timeframe for the preparation of Local Transport Plan and amend Section 2.2.6 Physical Infrastructure and appropriate objectives to reflect same.

Cavan County Council agrees that the NTA play a lead role regarding the formulation of future Transport Plan and considers it appropriate to amend LUR 04 on page 386 to reflect same.

Local Transport Plans

Recommendation 11: Amend the following objectives:

KTC 05 ~~Prepare~~ **Commence the preparation of a** Local Transport Plan (LTP) for Cavan Town in conjunction with the National Transport Authority (NTA) and other relevant stakeholders **within one year of the adoption of the County Development Plan incorporating Cavan Town Local Area Plan.**

CNR 02 Support the implementation of the Cavan Town Transportation Plan 2007 and **commence the preparation within one year of the adoption** ~~prepare a local transport plan over the lifetime~~ of the Local Area Plan as a revision to the 2007 Transport Plan.

Recommendation 12: Amend Section 2.2.6 Physical Infrastructure

Paragraph 2:

~~During the lifetime~~ **Within one year of the adoption of the Local Area Plan**, a Local Transport Plan will be ~~completed~~ **commenced** for Cavan town and Environs Area. In the interim, the Cavan Town and Environs Transportation Plan 2007 will be used to prioritise links and guide traffic movements into, out of and around the town.

Recommendation 13: Insert new objectives in Virginia Physical Infrastructure Development Objective:

VI 04 **Commence the preparation of a Local Transport Plan (LTP) for Virginia in conjunction with the National Transport Authority (NTA) and other relevant stakeholders within two years of the adoption of the County Development Plan.**

Recommendation 14: Add a new objective to Bailieborough Physical Infrastructure Development Objectives:

BI 03 **Commence the preparation of a Local Transport Study for Bailieborough in conjunction with the National Transport Authority (NTA) and other relevant stakeholders within the lifetime of the adopted County Development Plan.**

Recommendation 15: Add a new objective to Cootehill Physical Infrastructure Development Objectives:

CPI 04 Commence the preparation of a Local Transport Study for Cootehill in conjunction with the National Transport Authority (NTA) and other relevant stakeholders within the lifetime of the adopted County Development Plan.

Recommendation 16: Add a new objective to Kingscourt Physical Infrastructure Development Objectives:

KI 03 Commence the preparation of a Local Transport Study for Kingscourt in conjunction with the National Transport Authority (NTA) and other relevant stakeholders within the lifetime of the adopted County Development Plan.

Recommendation 17: Add a new objective to Ballyjamesduff Physical Infrastructure Development Objectives:

BJDI 03 Commence the preparation of a Local Transport Study for Ballyjamesduff in conjunction with the National Transport Authority (NTA) and other relevant stakeholders within the lifetime of the adopted County Development Plan.

Recommendation 18: Amend Land Use and Transportation Development Objective:

LUR 04 Engage with the NTA in conjunction with the Northern and Western Regional Assembly in the creation of a coordinated sustainable transport plan for the Northern and Western Region to guide and inform local policy in the development of more sustainable modes of transportation.

Virginia Bypass

The NTA have selected the preferred route section of the N-3 Virginia Bypass. As a result it is considered appropriate to indicate same on the Virginia Land-Use zoning map.

Recommendation 19: Amend Virginia Land Use Zoning Map to include the preferred route selection of the N-3 Virginia Bypass.

(Please refer to appendix 5 for details.)

Renewable/Wind Energy

The submission highlights that the plan does not include a Renewable Energy Strategy including wind energy capacity, landscape character assessment or and sensitivity mapping. Although the submission notes the intention to prepare a strategy within 2 years of the adoption of the plan, this does not sufficiently address the urgency of climate action as expressed by the 2030 targets. It is noted that this should be prioritised at this stage of the plan making process in order to ensure consistency with the SPPR, and national policy objectives including NPO 55 and RPO 56 (low carbon economy) and RPO 87 (Low carbon energy future).

EDO 05 of the Draft Plan states '*Prepare a Cavan County Renewable Energy Strategy within two years of the adoption of this plan*'. It is considered appropriate that a more ambitious commencement date should be contained within the plan. Therefore, the above objective should be revised to read "*Commence preparation of a Cavan County Renewable Energy Strategy within 6 months of the adoption of this plan*'.

Recommendation 20:

EDO 05 (and CC24) from '~~*Prepare a Cavan County Renewable Energy Strategy within two years of the adoption of this plan*~~'.

To '~~*Commence preparation a Cavan County Renewable Energy Strategy within 6 months of the adoption of this plan*~~'.

Biomass

It is considered appropriate to amend Section 7.10.4 and insert new objectives to ensure greater consistency with the RSES and in particular RPO's 4.27, 4.28 and 4.49.

Recommendation 21: Insert new objectives in Biomass Development Objectives

BD 05 Support the National Policy Statement on the Bioeconomy (2018), and the exploration of opportunities in the circular resource-efficient economy.

BD 06 Support the potential creation of scaled local multi-feedstock bio-refining hubs across the northern and western region as well as potential creation of bio-districts/clusters.

BD 07 Supports the future-proofing of infrastructure planning to allow for the potential upgrading of existing industrial sites to bio-refining plants while also supporting the use of bio-renewable energy for the sustainable production of bio-based products.

Rights of Way

Cavan County Council acknowledges the importance of providing a comprehensive overview of the rights of way within the County as part of the development plan process. Within the Draft Plan Cavan County Council have adopted a balanced approach to this very complex issue. Cavan County Council consider it appropriate to insert a new objective ROW 04 on page 416, to state the Council's commitment to a complete a thorough study of rights of ways within the County.

Recommendation 22: Insert a new objective ROW 04:

ROW 04 Explore the feasibility of commissioning a study to carry out comprehensive analysis of rights of way in the County within two years of adoption of the development plan.

Gas and Electricity

It is considered appropriate to add a new objective to Gas and Electricity Development Objectives to better reflect and support Section 8.2 of the RSES.

Recommendation 23: Insert a new Gas and Electricity Development Objective, page 410:

GE 09 Support the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.

Chapter 9 Tourism

Destination Town

It is considered appropriate to add a new Section 9.4.1 relating to Destination Towns and to include relevant new development objectives pertaining to same.

Recommendation 24: Insert a new section 9.4.1 Destination Towns and new Destination Towns Development Objectives:

9.4.1 Destination Towns

As part of Ireland's Ancient East programme Cavan Town has been designated as a Destination Town. The continued expansion of the tourism sector in Cavan will require additional visitor facilities, additional bed-nights (across all sectors of accommodation) in the destination town. The RSES states that over the next decade, it is estimated Ireland will have to increase its bed-stock by approximately 50%. This plan supports the provision of the required supporting infrastructure, including improvements to the public realm, transport links, accommodation, night-time economy and harnessing our natural and built heritage and developing our cultural infrastructure.

Under the Destination Towns Initiative, Cavan has secured €540,518 to enhance public spaces in a manner to engage, improve “sense of place” and enhance visitor experience. The following works will be undertaken in Cavan Town as part of the project:

- Public realm works at Townhall and the junction of Townhall Street and Farnham Street
- Enhancement of the town’s heritage town trail
- A review and updating of tourism signage and waymarking throughout the town
- Planting, seating and lighting.

Destination Towns Development Objectives

It is a development objective of Cavan County Council to:

DT 01 Ensure provision is made for the expansion in accommodation and facilities and necessary supporting infrastructure within Destination Towns, whilst supporting the sustainable development of our natural and built heritage.

DT 02 Establish potential tourist and amenity attractions of scale in the Cavan, in partnership with Fáilte Ireland, and the relevant Local Authorities.

DT 03 Ensure that “Discovery Points” targeting Irelands Ancient East are included for Cavan as enablers for increasing bed nights and visitor numbers.

Hierarchy of Attractions

It is considered appropriate to insert a section to outline the hierarchy of visitor attractions in the County, in Section 9.3 Tourism in Cavan, paragraph 2, page 457.

Recommendation No. 25: Amend Section 9.3 Tourism in Cavan, paragraph 2, page 457.

Cavan is a county with substantial heritage and cultural assets, along with a scenic, unspoilt and rich natural environment, within easy reach of Dublin, Belfast and the North West. **The following highlights key visitor attractions in the County:**

1. County Cavan Museum
2. Cavan Burren Park
3. Killykeen Forest Park
4. Dun Na Ri Forest Park
5. The Shannon Pot
6. Clogh Oughter Castle
7. St. Killian’s Heritage Centre
8. Cavan Adventure Centre
9. Killinkere Visitor Farm

RRDF/Failte Ireland Funding

It is considered appropriate to update the following sections to detail recent Fáilte Ireland funding and RRDF: Section 9.3 Tourism in Cavan, page 459, Section 2.5.9 Page 138, Section 2.8.9 Regeneration and Placemaking page 176 and Section 2.6.5.

Recommendation No. 26: Insert the following to Section 9.3 Tourism in Cavan, page 459:

Cavan County Council has secured €4.8 million for a new Discovery Centre at the Shannon Pot, alongside enhancements including a new elevated walkway for Cavan Burren Park under Fáilte Ireland's Platforms for Growth Capital Investment Programme. The Shannon Pot project involves the development of a new state of the art Discovery Centre, comprising of a three-part complex containing the main visitor exhibition area, reception area, ticket box, public amenities, a café, and a retail shop. In addition to a looped trail at the Discovery Centre which will take visitors on a journey around the pot itself. Developments at the Cavan Burren Park will include an upgrade of the existing car park, the visitor centre and its immediate surrounds, a new outdoor amphitheatre meeting area and a new 450 metre elevated walkway.

Recommendation No. 27: Insert the following to Section 2.5.9, page 138:

To date, Bailieborough has benefited from a number of regeneration projects including the development of a trail around Castle Lake, Outdoor Education Facility at Town Lough and works to the car park, footpaths and public lighting in addition to a public space in the Courthouse.

Funding in excess of €1.4 million has been announced under the Rural Regeneration and Development Fund for the Bailieborough Courthouse and Community Hub, which will redevelop this building in the town centre as an economic, community and cultural hub that will include a visitor centre, museum, cultural and exhibition space. The Visitor Centre will tell the story of Bailieborough and the surrounding area and will be the first Plantation Museum in Ireland. The community space will provide for essential community services including remote working and youth facilities.

Recommendation No. 28: Insert the following to Section 2.8.9 Regeneration and Placemaking, page 176

Ballyconnell has benefitted from a number of regeneration projects including the construction of a 5.5km walking and cycling trail from Ballyconnell to Ballyheady Bridge, improved car parking, lighting and signage, landscaping and development in Ballyconnell Park and seating, canopies and lights to create outdoor meeting and event space.

Funding of nearly €800,000 has been announced under the Rural Regeneration and Development Fund for the renovation and redevelopment of a protected structure, the Market House in Ballyconnell into a Community, Remote Working and Tourism hub.

Recommendation No. 29: Insert the following to Section 2.6.5

There are a number of large employment providers within the town including Abbott Ireland and Abcon Industrial Ltd. The town has significant potential for economic development and employment provision with a number of vacant business and industrial units in the town and the “Enterprise Technology Centre Hub” located on Station Road.

Funding of over €850,000 was allocated by the Rural Regeneration and Development Fund for Cootehill Industrial Estate Cootehill Cavan. This project involves the construction of an access road and services into an underdeveloped industrial estate in Cootehill to allow its future expansion. It includes the construction of a roadway, and provision of electricity, water, gas, lighting and broadband. Cootehill is situated on the border between Cavan and Monaghan and is the primary industrial location on that border. This project will significantly contribute to the development of businesses in the area creating employment opportunities and enhancing the attractiveness of the area as a place to live.

Chapter 10 Natural Heritage

The comments in relation to the inclusion of a specific timeframe for the preparation of a Landscape Character Assessment are noted. It is considered appropriate the amend section 10.16 Landscape Categorisation – Analysis of County Cavan and accompanying development objectives to reflect a clear time based objective for the undertaking of a Landscape Character Assessment for the County.

Recommendation No. 30: Amend the following section and Landscape Categorisation Development Objective:

10.16 Landscape Categorisation – Analysis of County Cavan

To date Cavan County Council has not prepared a Landscape Character Assessment. ~~During the lifetime of this plan,~~ **Within 6 months of the adoption of the plan,** Cavan County Council will undertake to ~~complete~~ **commence** a comprehensive Landscape Character Assessment building on the existing Landscape Categorisation contained in Appendix 14.

Recommendation No. 31:

Amend the following objective:

~~LC8 – Undertake~~ **Commence the preparation of** a Landscape Character **Assessment within 6 months of the adoption of the development plan.** ~~during the lifetime of this plan.~~

Recommendation No. 32:

Section 7.10 of the Plan:

Refer to the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017*.

Office of Planning Regulator

This submission commences by acknowledging the considerable work of the Local Authority in the preparation of the draft Plan. A key function of the Office of Planning Regulator (OPR) is to ensure consistency with legislative and policy requirements relating to planning.

Recommendations made by the OPR on the draft plan relate to 'clear breaches of the relevant legislative provisions, of national and regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28'. Cavan County Council are therefore required to implement or address recommendations made by the OPR.

Observations made by the OPR take 'the form of a request for further information, justification on a matter or clarification regarding particular provisions of the plan on issues that are required to ensure alignment with policy and legislative provisions'. The planning authority are requested by the OPR to action an Observation.

General Overview

- Growth target for Cavan town (17%) is too modest
- Preparation of a Local Transport Plan for Cavan Town is key to achieving more sustainable transport patterns and this should be prepared in tandem with the LAP
- Growth for Virginia and Cootehill should be reviewed to ensure the rate and pace of development is in line with employment, infrastructure and supporting facilities of the towns
- The plan appears to be promoting greater growth in the open countryside at the expense of serviced settlements in tiers and Cavan Town in particular. This approach undermines the regional function of Cavan Town and would result in a pattern of development that is car dependent, energy intensive and difficult to service with public transport.

The submissions is set out in different Key Themes generally relating to chapters of the draft plan. each theme has a number of recommendations and/or observations. The key themes are

1. Core Strategy and Settlement Hierarchy
2. Compact Growth and Regeneration
3. Development Management Standards
4. Rural Housing and Rural Regeneration
5. Economic Development and Employment (including Retail)
6. Sustainable Transport and accessibility
7. Climate Action and Renewable Energy
8. Flooding
9. Environment, Heritage and Amenities
10. General and Procedural Matters

Theme 1: Core Strategy and Settlement Hierarchy

The Core Strategy and other elements of the plan are generally consistent with the NPF Roadmap population projections for Cavan and the related NPF 50:50 City housing demand projection scenario identified by the ESRI.

Observation 1 Core Strategy

Clarify method uses to interpolate 2022 population

Demonstrate consistency with longer term population targets for the County in the NPF and Key Town in RSES and amend and supplement the information in Core Strategy Table to include forecast of population figures for the years 2022-2031 with specific reference to Tiers 1 to 4.

Clarify the 2040 growth figure for Cavan Town detailed in Table 6 NPF/RSES Population Targets.

With regard to the Settlement Hierarchy the draft plan is considered to be consistent with established pattern of development, and the upper settlement tiers are consistent with the NPF and RSES, however a greater distinction between serviced and unserved villages should be made.

Observation 2 Settlement Hierarchy

Clarify and where necessary amend the settlement hierarchy in respect of the 12 Category 1 and Category 2 villages. Consideration should be given to placing all serviced villages in a single category under Tier 6.

A number of concerns are outlined in relation to the distribution of population and housing growth which the OPR consider has the potential to divert housing from medium and smaller towns and undermine the growth of Cavan Town to a regional scale. Issues include

Cavan Town allocated on 17% of housing growth over plan period with 27% to Tier 3 and 21% to Tier 7.

Both Virginia and Cootehill have been allocated a significant population growth which would increase their 2016 population by 32.5% which is contrary to NPO9. Virginia has wastewater treatment plant capacity constraints which may constrain its growth. Tier 3 and 4 have also been afforded very high growth rates which have not taken account of wastewater treatment constraints in Ballyjamesduff and Kingscourt.

34% of future housing supply is proposed in Tier 5, 6 and 7 with only 13% earmarked for serviced settlements.

Forecasted increase in population of 4.9% in Rural Cavan has not been informed by an evidence-based approach.

Recommendation 1 Housing Target Distribution

Having regard to NPO's 15, 16 and 20, the planning authority is required to rebalance the overall allocation of population growth across the settlement hierarchy to achieve more sustainable distribution of growth focused on towns and serviced villages across the County. The PA is required to

- (i) Increase population allocation in Key Town of Cavan to ensure it reaches its minimum uplift of 30%.
- (ii) Review housing growth targets for Tier 2 and 3 settlements taking account wastewater treatment capacity constraints and ensure breach of NPO 9 does not occur. Population growth for Virginia and Cootehill is not justified and inconsistent with NPO9.
- (iii) Increase the level of growth to Tier 5 and 6 settlements to ensure balanced growth of Rural Settlements and Rural Villages and sustainable transport
- (iv) Reduce and rebalance the distribution of Tier 7 Rural Cavan in order to demonstrate consistent with NPO's 16, 18a, 18b and RPO 3.3. A clear evidence based approach is required to determine the demand for one off rural housing in the open countryside over the plan period as required under NPO 20 and under Sustainable Rural Housing Guidelines for Planning Authorities.

The OPR commended the preparation of zoning maps and settlement strategies for the 9 higher order towns and a dedicated Cavan Town LAP.

In Cavan Town, there is insufficient justification for the extent of rezoning of existing Phase 1 residential land along Keadue Lane and Cock Hill where significant lands are proposed for rezoning to Amenity and Open Space. Some of these lands could contribute to compact and sequential development and consolidation of the town.

OPR considers that the quantity of land zoned for residential use and a mixture of residential and other uses, remains in excess of the housing targets set out in the Core Strategy

Virginia Masterplan area M3 does not appear to have been fully considered in the context of the core strategy figures.

The extensive Strategic Residential Reserve zoning in Cavan Town vastly exceeds the quantity of land zoned for new residential development. The wording supporting the objective in the draft plan (Section 14.8) would benefit from additional clarity to make it clear that such lands will not be considered for development under the lifetime of the plan. the development of single houses on these lands would not be inconsistent with the Core Strategy proposed under the draft Plan.

The 'Whitelands' approach to zoning in Tier 5, 6 and 7 would benefit from further clarity to enable delivery of compact growth and regeneration. The quantity of zoned lands relative to cumulative housing

supply target is high. Clarification is required on the zoning objectives of these 'Whitelands' zoning with particular reference to deliver obligations under Part 5.

Recommend densities of housing development as per the Guidelines on Sustainable Residential Development in Urban Areas (2009) and Circular NRUP 02/2021 Residential Densities in Towns and Villages are not reflected in Table 11 of the Core Strategy. These densities are considered unjustifiably low.

The quantity of land zoned needs to be reviewed (and possibly reduced) having regard to the need to rebalance the growth across the settlement hierarchy. A clear distinction needs to be made between developed and undeveloped residential zoned land to demonstrate consistent with Section 10(2A) of the Act.

Recommendation 2 – Residential Land Supply

Review density assumptions in Core Strategy Table 11 to ensure residential densities within the ranges in Sustainable Residential Development in Urban Areas Guidelines and Circular NRUP 02/2021 Residential Densities in Towns and Villages have been applied.

Reduce provision of all zoned residential lands and land zoned for mix of residential and other uses including whitelands to align with the quantity of land necessary to accommodate housing supply targets in Core Strategy

Provide justification for rezoning of Phase 1 residential lands around periphery of town core along Keadue Lane and Cock Hill and remove such zonings in the absence of robust justification.

Significantly reduce quantity of land zoned strategic residential reserve in Cavan Town. Remove land located adjoining Kilnavarragh Lane, southwest of Cavan town centre, located in Flood Zones A and B.

Provide justification for extent of 'whitelands' in Killeshandra and Swanlinbar where it is proposed to extend outside current development boundary e.g. along R199 in Killeshandra and east of Erne Business Park in Swanlinbar.

Distinguish between land that is developed and undeveloped in established residential development

Refine 'whitelands' approach to zoning to include specific local objectives such as open space, focal spaces, amenities and areas subject to flooding, thereby facilitating compact growth and ensuring sequential approach to zoning of lands

Clarify Strategic Residential Reserve objective and vision to ensure no residential development proposals including single housing will be considered until after lifetime of the plan.

Observation 3 Residential Land Supply and Part V

Clarify specific wording in relation to Whitelands to ensure Part V social and affordable housing is delivered.

In relation to Zoning of land, standardised tiered approach to differentiate between tier 1 (serviced land) and tier 2 (lands that can be serviced during the plan period) for all land use zoning types should be applied.

Recommendation 3- Tiered Approach to Zoning

Demonstrate that a tiered approach to zoning has been applied which should have regard to provisions of an Infrastructural Assessment Report and in accordance with Appendix 3 of the NPF.

Theme 2 Compact Growth and Regeneration

The draft plan should promote and recognise projects like the Rural Regeneration and Development Fund projects in Bailieborough and Ballyconnell in relevant sections of the plan similar to Virginia Civic, Cultural and Library Services.

The settlement strategy could be further strengthened by incorporating specific objectives/measures from the town revitalisation plans into the draft Plan and establishing measurable targets and timelines against which the implementation can be monitored and measured.

The Settlement Strategies would benefit from incorporation of some of the information contained in Appendices 24 and 25 to further articulate and illustrate concepts and proposals for specific sites in the urban settlements. It should be clarified how these masterplans are to be delivered in the future.

It is not clear how 30% of the future housing requirement within the existing built-up footprint of all settlements can be delivered in accordance with NPO 3c and Strategic Aim IV of the NPF and objective CSD 08 of the draft plan. Measurable data is necessary to facilitate monitoring of the plan and to establish if the 30% target has been achieved at the end of the plan period. Monitoring could be strengthened but establishing measurable targets and timelines against which the implementation can be monitored and measured.

Recommendation 4 Compact Growth

Quantify areas of settlements which will contribute to cumulative delivery of 30% of all new homes within the built up footprint of existing settlements

Provide 2 additional columns in Table 11 of the Core Strategy to quantify the area (in hectares) and housing yield from zoned 'Existing Residential' in the revised Core Strategy Table 11.

Theme 3- Development Management Standards

Density standards in RD01 are not consistent with Section 28 Guidelines on Sustainable Residential Development in Urban Areas (2009) and Circular NRUP 02/2021. The topographical constraints in Cavan Town can be dealt with on a site specific rather than blanket adoption of very low densities that will result in further sprawl in Cavan and other towns and unsustainable car-dependent development.

The draft Plan does not identify areas where increased building height will be actively pursued or seek to deliver on Specific Planning Policy Requirements (SPPR)1.

The presumption against new apartment type accommodation in small towns and villages is contrary to the spirit and intention of Sustainable Urban Housing – Design Standards for new apartments, Guidelines for Planning Authorities (2018)

There are a number of prescriptive standards promoted in Chapter 13 that could mitigate against the principle of promoting appropriate density and compact growth

Recommendation 5- Development Management Standards

Ensure residential densities are within ranges advised in Sustainable Residential development in Urban Areas Guidelines and Circular NRUP 02/2021 Residential Densities in Towns and Villages. Provide clear justification in instances where recommended densities are unable to be achieved.

Provide information to show that the draft Plan and Housing Strategy is consistent with specific planning policy requirements in the Urban Development and Building Heights Guidelines for Planning Authorities (2018) by demonstrating consistency with SPPR1 and explicitly addressing SPPR2, SPPR3 and SPPR4.

Provide clarity on expected minimum densities for town/village centre and infill brownfield sites acknowledging that these will be determined on a site specific basis

Amend draft Plan to proactively promote apartment development in all urban areas

Observation 5- Development Management Standards

Review car parking standards to ensure appropriate maximum standards are included for both residential and commercial development in urban areas in accordance with NPO 13

Review site coverage and plot ratio standards and minimum separation distances and focus on assessing individual development proposals on performance-based criteria dependent on location and individual site characteristics in accordance with the provisions of NPO 13.

Theme 4 - Rural Housing and Rural Regeneration

It is imperative that the development plan policy supports against ribbon development and over-spill development from urban areas, and supports the National Strategic Outcomes of compact growth, sustainable mobility, transition to a low carbon and climate resilient society and sustainable management of environmental resources.

Recommendation 6 Rural Housing Policy

Review policy framework for rural areas under Strong Urban Influence to be consistent with NPO 19 based on the core consideration of demonstrable economic or social need (not links) to live in a rural area. SUI01 should be reviewed to ensure that references to landowners and family members is related to social and economic need and ensure commensurate restrictions are included such that the dwelling is the first home.

Amend rural housing policy objectives and specific criterion demonstrating rural generated housing and rural generated housing need, such that policy measures for rural one-off housing in rural areas under 'Strong Urban Influence' are distinct and separate to other defined areas in compliance with NPO15, NPO16 and NPO 19.

Review Rural Typologies in the draft Plan to facilitate the provision of single housing in the countryside consistent with NPO19 and NPO 20 and to ensure appropriate compact growth within settlements.

Further clarification is required regarding the implementation of initiatives including the delivery of serviced sites.

The role of function of lower order settlements and villages (Tier 6 and 7) is unclear in the settlement hierarchy. The OPR considers a stronger policy is required which promotes and favours new housing in Serviced Rural Villages and/or Settlements in the first instance in preference to the open countryside.

It is unclear how the 20% target for delivery of all new housing in rural areas on brownfield sites can be achieved which may include proactive land management, site acquisition and assembly and preparation of development briefs to bring forward lands that might not otherwise be developed.

Recommendation 7- Rural Regeneration

Include a more proactive strategy for the regeneration of rural settlements and villages that include proactive measures to ensure 20% target for the delivery of all new housing in rural areas on brownfield sites can be achieved.

Include further objectives and/or measures which directs both rural and urban generated housing to serviced rural settlements and villages in the first instance

Provision of clear targets and provisions for monitoring residential development permitted as single rural houses

Observation 4- Regeneration Delivery

Set out clear timeline and strategic approach to implementing the Revitalisation Plans and to set measurable targets (perhaps by settlement at the upper levels) and timelines against which the implementation can be monitored and measures

Incorporate appropriate details relating to Masterplans into Chapter 2 Settlement Strategies to include visual representation, mapping and graphics for the towns of Cavan, Virginia, Bailieborough and Cootehill.

Provide clarification on how the masterplans are to be delivered and timelines for the preparation of masterplans in Mullagh, Kingscourt and Belturbet and remaining masterplan sites in Virginia e.g. Pottle

Provide further policy context regarding regeneration projects funded under the RRDF such as Bailieborough and Ballyconnell in relevant sections of the settlement strategy.

Theme 5 -Economic Development and Employment

There is good cross referencing and synergy between the economic objectives of the plan, the core strategy and settlement hierarchy.

The spatial location of some of the General Enterprise and Employment zoned land in Cavan land needs to be considered.

New Enterprise and Employment lands south and east of the N55 and the eastern side of the N3 to the north east of the town has been zoned notwithstanding a substantial area of land zoned for Enterprise and Employment Strategic Reserve located on the western side of the N55 and closer to the town centre.

Landuse zoning facilitating employment development that in itself is not conducive to walking and cycling modes militates against the objectives of consolidation of the existing built urban footprint and conflicts with objectives in the draft Plan to build a much stronger urban core and vibrant town centre.

The OPR query the rationale for zoning land identified as M6 in Virginia given its location outside the development boundary and the area with the specific objective 6 at the edge of the settlement which has a demesne landscape adjoining the lake and the presence of a large, established residential unit.

There is no evidence-based approach included in the plan to support the extensive zoning particularly new and additional development lands for Enterprise and Employment in Bailieborough at the northern and southern extremities of the town.

Recommendation 8 – Employment and Enterprise Zoned Land Supply

Provide evidence based justification for the quantity and location of all employment generating land use zonings in the towns of Cavan, Virginia and Bailieborough.

Reconsider and appropriately reduce the quantity of land required to accommodate employment growth in Cavan Town. Remove all landuse zonings afforded to land south and east of the N55 and N3

Reconsider and appropriately reduce the quality of land zoned as General Enterprise and Employment from M6 lands in Burrencarragh and provide justification for zoning of land with Specific Objective 6.

Rural Economy and Tourism

Cavan Town is key Destination Town under tourism destination branding for 'Irelands Ancient East' and 'Irelands Hidden Heartlands' and this could be reflected better in the draft Plan.

Objective REE 01 supports the establishment or suitable expansion of small scale businesses in rural areas. REE 02 clarifies the requirement to demonstrate that the proposed location is suitable and that the proposal would not be viable at an alternative location. This policy should be reviewed to remove any ambiguity and to clarify that commercial development should locate in rural towns and villages in the first instance unless the development is location or resource specific.

There is a number of objectives in the draft Plan that support the development of holiday and tourist accommodation. These objectives do not encourage the location of such facilities in the first instance within towns and villages, which would contribute to reduction in town centre vacancy rates and declining population.

Observation 6 -Rural Tourism

Review/reword development objectives TV 02 and TV 04 to ensure that commercial type development and tourist/holiday type accommodation is encouraged to locate in towns and villages. Such provision shall only be acceptable in rural areas, outside of towns and villages, if it is location specific or resource based.

Retail

The proposed retail hierarchy provided in the County Retail Strategy differs from the settlement hierarchy and such anomalies result in a lack of transparency within the draft Plan and confuses the role and function of the settlement hierarchy the distinction between Tier2 and 3 towns in the settlement hierarchy is blurred and the sub-regional status of Virginia as permitted in the RSES is not recognised in the retail hierarchy.

Retail and settlement hierarchies generally align as the retail hierarchy influences the extent of retail development that is permitted in a town or village.

Clear guidance needs to be provided that all types of retail use including retail comparison, convenience and retail warehousing are not permitted on Employment and Enterprise land use zonings.

The OPR notes that retail warehouse zoning is afforded to the Lakeland Retail Park including two adjoining convenience stores (Supervalu and Polonez). It is noted that retail convenience use is not permitted under retail warehousing zoning and consideration should be given to addressing this discrepancy.

Recommendation 9 Retail Policy

Clarify the role and function of all settlements in the county to ensure that both the Settlement Hierarchy and the Retail Hierarchy generally align

Ensure there is clarity and consistency in terms of type and quantum of retail floorspace permitted within the various tiers of settlement hierarchy and address anomalies within Tiers such as the limitation on convenience outlets.

Observation 7 -Retail Provision

Clarify that all types of retail use including retail comparison, convenience and retail warehousing are not permitted on General Enterprise and Employment zoned land.

Theme 6 -Sustainable Transport and Accessibility

It is unclear how the proposed settlement strategy or any specific measures will reduce travel demand or maximise the efficiency of the transport networks in the manner envisaged under the Government's Smarter Travel Policy.

The allocation of 23% of future population growth to the Rural Cavan areas will militate compact growth and sustainable travel patterns.

The OPR is concerned that the LAP for Cavan Town has been prepared in advance of the Local Transport Plan. There are no specific transport proposals or measures within the LAP which support the implementation of the Cavan Town Transportation Plan 2007.

The Planning Authority should give consideration to the preparation of Area Based Transport Assessment or similar for Tier 2 and 3 settlements.

Recommendation 10- Transport and Accessibility

Review its approach to sustainable movement and accessibility under Chapter 7 of the draft plan to provide for sustainable transport strategies

Include targeted objectives for what the plan intends to achieve in terms of sustainable transport over the plan period

Commit to the preparation of new Local Transport Plan in accordance with the requirements of the RSES within one years of the adoption of the County Development Plan, whilst also making provision for a material alteration to the Local Area Plan as necessary.

Review related policy objectives CNR01 and 02

Include route options for the proposed N3 Virginia By Pass and overlay same on land use zoning maps for Virginia

Theme 7 -Climate Action and Renewable Energy

The plan would benefit from the inclusion of any additional strategic aim which promotes climate change action and a reduction in greenhouse gas emissions

The definition of settlement boundaries, zoning of lands for specific uses and the establishment of guiding policies for Rural Cavan including smaller towns and settlements are vital tools available to the planning authority in promoting effective integration of land use and transportation policies.

Objective WE 03 only encourages and supports the development of small scale wind energy development and single turbines in urban and rural areas and Industrial Parks. It is considered this is overly restrictive approach to wind far development and may undermine national policy on climate action and reduction of GHG emissions

The draft plan does not identify how the county will contribute to realising national climate change and renewable energy targets including specific targets in megawatts for wind energy potential set out in the Climate Action Plan 2019.

The Plan does not include a Renewable Energy Strategy including wind energy capacity, landscape character assessment or sensitivity mapping. The plan does not sufficiently address the urgency of climate action as expressed by the 2030 targets.

Recommendation 11 – Renewable Energy

Indicate how the plan will contribute to meeting national renewable energy targets, including specific targets in megawatts for wind energy potential in the county. You are advised to demonstrate appropriate metrics which could include Cavan's share of estimates of additional national renewable electricity target as defined by the % of national land area represented by the county, linked back to the cumulative renewable energy production potential of the areas designated for renewables development

Provide an evidence based Renewable Energy Strategy for a policy framework that is consistent with relevant Section 28 Guidelines to support the delivery of the targets above

Review development objective WE 03 in light of above

Theme 8 -Flooding

A number of zonings in Flood Zone A and B, which have not been subject to a Justification Test have been identified in Ballyjamesduff, Belturbet, Cavan Town, Kingscourt and Mullagh.

A justification test must be undertaken to assess the appropriateness of land use zoning for areas that are considered to be of a moderate to high flood risk including existing developed areas of towns and cities in Flood Zone A and B. The OPR advises de-zoning land at flood risk in instances where surplus zoned land is identified.

Recommendation 12 – Flooding

Review the Strategic Flood Risk Assessment (SFRA) to ensure consistency with Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014 and to determine if there is sufficient information to inform the land use zoning decisions, or if further detailed analysis is required. In particular undeveloped land identified for development purposes in Flood Zone A and B in Ballyjamesduff, Belturbet, Cavan Town, Kingscourt and Mullagh needs to be re-examined. Further land identified as whiteland in Crossdoney, Crosskeys, Dowra, Killeshandra, Kilnaleck, Redhills, Shercock and Swanlinbar should be reviewed. Land deemed to be of moderate or high flood risk and is sequentially preferable and could contribute to compact growth and higher density development, it will be necessary to undertake a Justification Test.

Observation 8 – Flood Risk Mappings

Planning Authority is requested to overlay flood risk maps on the zoning maps for each settlement to provide greater transparency regarding flood risk and the need for site specific flood risk assessments.

Theme 9 - Environment, Heritage and Amenities

The approach to public rights of way is considered acceptable, although a clear time frame should be included in ROW 01.

Observation 9- Public Rights of Way

Amend ROW 01 to include an 18 month timeframe for preparation of the maps and identifying public rights of way and incorporation into the plan by way of variation

Environmental Reports

There is scope to enhance the integration between environmental reports and the draft Plan preparation process, including any analysis or discussion of the councils deliberations of the draft Plan prepared by the executive or any analysis of the direction or motions of the elected members in the process of preparing the draft plan for public display.

The findings of the SFRA could be better integrated into the SEA.

Theme 10 -General and Procedural Matters

A statement of Compliance with ministerial Guidelines has not been provided.

Recommendation 13- Compliance with Ministerial Guidelines

Provide a Statement of Compliance with Ministerial Guidelines to demonstrate how the planning authority has implemented the policies and objectives of the Minister contained in the guidelines or if applicable, that the planning authority has formed the opinion that it is not possible, because of the nature and characteristics of the area or part of the area of the development plan, to implement certain policies and objectives of the Minister contained in the guidelines

Extent of Documents

- Office is concerned with 25 Appendices make it difficult for the public to navigate.
- Consideration should be given to incorporation of single map/diagram pages into the Written Statement thereby reducing the number of Appendices.
- A Table of Contents should be introduced to the Appendices.
- Consideration should be given to reducing significant explanatory text detailing national and regional policy documents resulting in the plan being easier to follow and proviso of greater focus on the key objectives for the plan period.
- The green colour used to identify Retail Warehouse land use zoning is similar to the green colour afforded to Sport and Recreation land use zoning

Summary

The OPR requests that the authority addresses the recommendations outlined in the submission and notify the OPR within 5 working days of the decision in relation to the draft plan. where the authority does not comply with the recommendations of the OPR, the CE shall inform the OPR and give reasons for its decision. The extensive work required by the authority should be prioritised to ensure that the OPR can conclude that the plans adoption is in alignment with the authorities' wider statutory obligations.

OPR Observation No1 Core Strategy

Chief Executives Opinion

In the preparation of the Core Strategy Table and population growth targets for the County, a forecast of population figures for the years 2022 and 2031 and 2040 were calculated. These are now included in the revised Core Strategy Table in appendix 7.

Additional figures as estimated have been set out in the revised core strategy table for the requested years.

The 2040 growth figure for Cavan town is set out in the Core Strategy as being aligned with the RSES target of at least 30% population growth on 2016 levels. The actual figure considered is 30.016% growth to 2040, achieving approx. 15% by 2028.

Chief Executives Recommendation

Recommendation No. 33

Insert revised Core Strategy Chapter 1, as per Appendix 7, with amendments denoted.

OPR Recommendation No 1 Housing Target Distribution

Chief Executives Opinion

The draft plan has sought to primarily allocate the calculated population growth in the County into the towns, villages and rural areas of the County. The approach taken in the County was to acknowledge the historical growth that has occurred in the towns and villages and to offer an alternative to the one-off dwelling which can be clearly directed into the smaller towns and villages. The criteria used to develop the settlement hierarchy is clearly outlined on page 41 of the draft Plan. The OPR submission has sought to increase the allocation in Cavan Town, take account of wastewater treatment capacity in Virginia, Ballyjamesduff, Kingscourt and Cootehill, to increase the allocation in the small towns and villages and to reduce and re-balance the allocation to rural areas in light of these changes.

It is acknowledged that Cavan Town as the key town in the County should receive a greater allocation of the population share. A revised Core Strategy Chapter has been prepared with adjustments to population share within the County.

It is recommended to increase the Housing Supply Target in Cavan Town from 692 units to 829 units. This increase has been achieved by adjusting the Cootehill Target and by the adjustment of Village Category 2 being placed into Village Category 1 (removed for rural). The Core Strategy Chapter in Appendix 8 provides details of same. Having regard to Virginia being a Place of Strategic Importance, the housing supply target is considered to accord with the Settlement Hierarchy and sustainable development.

Having regard to the Draft Development Plan Guidelines 2021 which were issued in August 2021, following the preparation of the draft plan, it is considered appropriate to avail of choice in Cavan Town in accordance with Section 4.4.3 of same. In accordance with Section 4.4.3 of the Draft Development Plan Guidelines for Planning Authorities, August 2021, Cavan County Council considers it is necessary in Cavan Town to provide additional land and sites for residential than would equate to meeting precisely the projected housing demand for that settlement. This approach recognises that a degree of choice in development sites should be provided locally is desirable to avoid restructuring the supply of new housing development through inactivity on a particular landholding or site.

The guidelines permit the identification of additional sites/lands to ensure sufficient choice for development potential is safeguarded. This additional land has been clearly set out in the Core Strategy and the Planning Authority have considered the following:

- Additional provision is considered appropriate in Cavan Town as it is a Key Town as identified in the RSES and is targeted for significant growth in same. To ensure delivery of the growth targets for this settlement, it is considered appropriate to avail of the additional provision as provided for under Section 4.4.3 of the Draft Development Plan Guidelines.

The additional provision is consistent with the 25% uplift of the required quantum of zoned land

- Cavan town has capacity in terms of water and sewerage to meet the assigned housing targets in the Core Strategy. Lands identified in the zoning map for the town includes sites that are serviced or serviceable.
- A comprehensive analysis of the amount of infill and brownfield sites has been identified along with a clear identification of consolidation sites to display how the zoning plans have complied with the requirement that 30% of all new residential development in settlements comprise of brownfield or infill development within the boundary/built footprint of the existing built up area. The zoning map for Cavan Town is considered to be in adherence to NPO 3 of the NPF.
- The location of the additional lands within the settlement is considered consistent with sequential development patterns, town centre first principles, proximity to services and facilities which thus reduces carbon emissions. The phasing of lands in Cavan Town is not considered necessary in this instance, given the close alignment of land use zoning and housing supply targets and given the high degree of sequential consolidation lands provided for in Cavan Town.

Issues in relation to wastewater treatment capacities has arisen in some of the County's Self Sustaining towns since the preparation of the draft plan. From discussions with Irish Water, these issues are expected to be resolved by 2024 and it is therefore not considered appropriate to alter the settlement strategy.

Chief Executives Recommendation

Recommendation No. 34

Insert revised Core Strategy Chapter 1, as per Appendix 7, with amendments denoted.

Recommendation No. 35

Insert new Section 2.14 on page 64 and renumber existing 2.14 to 2.17 accordingly

In accordance with Section 4.4.3 of the Draft Development Plan Guidelines for Planning Authorities, August 2021, Cavan County Council considers it is necessary in Cavan Town to provide additional land and sites for residential than would equate to meeting precisely the projected housing demand for that settlement. This approach recognises that a degree of choice in development sites should be provided locally is desirable to avoid restructuring the supply of new housing development through inactivity on a particular landholding or site.

The guidelines permit the identification of additional sites/lands to ensure sufficient choice for development potential is safeguarded. This additional land has been clearly set out in the Core Strategy and the Planning Authority have considered the following:

- Additional provision is considered appropriate in Cavan Town as it is a Key Town as identified in the RSES and is targeted for significant growth in same. To ensure delivery of the growth targets for this settlement, it is considered appropriate to avail of the additional provision as provided for under Section 4.4.3 of the Draft Development Plan Guidelines. The additional provision is consistent with the 25% uplift of the required quantum of zoned land
- Cavan town has capacity in terms of water and sewerage to meet the assigned housing targets in the Core Strategy. Lands identified in the zoning map for the town includes sites that are serviced or serviceable.
- A comprehensive analysis of the amount of infill and brownfield sites has been identified along with a clear identification of consolidation sites to display how the zoning plans have complied with the requirement that 30% of all new residential development in settlements comprise of brownfield or infill development within the boundary/built footprint of the existing built up area. The zoning map for Cavan Town is considered to be in adherence to NPO 3 of the NPF.
- The location of the additional lands within the settlement is considered consistent with sequential development patterns, town centre first principles, proximity to services and facilities which thus reduces carbon emissions. The phasing of lands in Cavan Town is not considered necessary in this instance, given the close alignment of land use zoning and housing supply targets and given the high degree of sequential consolidation lands provided for in Cavan Town.

Recommendation No. 36

Amend zonings in Cavan town to provide for additional Residential Zonings as indicated by C, D, G, I, J, L, M, P, R, U and S on Cavan Town Amendments Map in accordance with Section 4.4.3 of the Draft Development Plan Guidelines for Planning Authorities, August 2021 and as per Cavan Town Amendment Map in Appendix 2.

Recommendation No. 37

Amend Core Strategy Table 11 on page 63 to reflect the additional provision of residential lands in Cavan Town in accordance with Section 4.4.3 of the Draft Development Plan Guidelines for Planning Authorities, August 2021 and as per Core Strategy Chapter in Appendix 7.

OPR Recommendation No 2 Residential Land Supply

Chief Executives Opinion

Item (i) The Planning Authority, whilst being mindful of the fact that County Cavan is a rural county considered that increased densities should be encouraged in town and village centre zonings and in brownfield sites that are close to the town centres.

Item (ii) The Core Strategy and zoned lands align with respect to allocation of proposed residential.

Item (iii) The OPR have raised an issue with regard to two number of plots being dezoned. The first is located on Keadue Lane and the second in Cock Hill. No map has been provided, however, there are two number plots at these locations that were previously zoned Phase 1 Residential. As part of the work undertaken for the Vacant Site Levy extensive examination of all Phase 1 and Phase 2 residential lands was carried out in Cavan Town. Due to the difficult topography that exists in Cavan Town much of the Phase 1 lands were deemed financially unviable to develop, despite its proximity to town core. One such plot was located along Keadue Lane and as such this lands was removed from the draft Plan as Proposed Residential and zoned as Amenity.

The second plot referenced is located in Cock Hill and comprises of a small infill site in close proximity to Killymooney Lough. This land was removed by Motion by Elected Members at adoption of the Draft Development Plan stage. It is noted that a zoning request for this plot of land has been received and this will be further examined as part of this submission (Please refer to submission by Darren Sherry in Section 6).

Item (iv) Flood zoning mapping have been supplied with the draft Plan and it is not the intention of the draft Plan that lands zoned in Flood Zoned A or B would be permitted development outside what is considered appropriate as per the Flooding Guidelines. In the interests of clarity, however, the zoning maps for the towns and villages of the County is overlaid with the Flooding Maps and this will clearly identify any lands unsuitable for certain types of development or unsuitable for development at all.

(v) Swanlinbar and Killeshandra are small towns and villages located west of Cavan Town. As part of the review of the development plan, extensive work was carried out in each of the towns and villages. The Whitelands approach ensures that these towns and villages can grow sustainably. The two sites referenced in this submission are lands adjacent to industries/employment lands in both of these towns. It is considered in the interests of proper planning and sustainable development to include and provide for lands that generate employment opportunities and extensions in all of the County's small towns and villages. As such it is considered that these sites are wholly suitable for inclusion in the Whitelands zoning. In the interests of clarity, however, a Specific Objective relating to the intended use of these lands can be included in the maps of these two towns in the draft Plan

(vi) Lands that is zoned as Existing Residential in accordance with Chapter 14 of the draft Plan is catering for existing residential properties. It is an objective of this zoning to protect and enhance the amenity of developed residential communities. It is the opinion of the CE that these are accurately

depicted in the landuse zoning maps associated with the draft plan. However in accordance with the new draft Development Plan Guidelines, the Core Strategy has been amended to include Existing Residential Zoning.

(vii) It is acknowledged that Whitelands include existing residential, existing enterprise and employment, existing public and community and existing amenity and public open space. The importance of amenity areas and sports and recreation has been widely acknowledged in the draft Plan and it is not intended that the zoning of same undermines any protection in the plan. It is considered appropriate to acknowledge the existing amenity and sports and recreational areas that exist in Whitelands and to promote their protection in the plan.

(viii) It is an objective in the draft Plan to include lands in Cavan Town that will provide for and protect the future housing requirements of the town. These lands have been identified as Strategic Residential Reserve. The vision for these lands is that multiple type residential development will not be permitted on these lands in the lifetime of the plan and consideration will be given to alternative uses in exceptional circumstances where it has been demonstrated that the alternative use better facilitates sustainable development and would not prejudice the principle use of these lands for urban residential expansion.

It is considered that the designation of lands as Strategic Residential Reserve ensures the proper long-term planning of the town. It also ensures that no unsuitable uses are approved on the lands in question during the lifetime of the plan. The extent of same is noted, however Phase 3 lands have been removed west of Cavan Town in the draft Plan.

With the commitment in the draft Plan to undertake a Local Transport Plan for the Cavan Town and with the removal of lands arising from the overlay of the flooding maps, along with the amendment of lands north of the town, it is considered that there is no further requirement to reduce the extent of Residential Strategic Reserve.

Chief Executives Recommendation

Recommendation No. 38

Amend Section 13.4 Residential Development

13.4.1 Residential Density

Generally, the number of units to be provided on a site should be determined with reference to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), the accompanying Urban Design Manual (2009) or any update thereof and the Smarter Travel policy. The concept of 15–20-minute walkable communities will be sought and created, and accordingly appropriate residential densities will be encouraged within walking distance to town centres and public transport infrastructure. Due to the difficult topography of County Cavan, there are many instances where specified densities cannot be achieved. **The densities outlined in the table below indicate approximate**

key residential outputs over the life time of the plan and site density will be determined on a case by case basis

Recommendation 4: Insert Table in Section 13.4.1 page 558

	Density in town/Village Core	Density in Brownfield and Infill Sites	Density in Proposed Residential	Density in Proposed Low Density Residential
Cavan Town	30-35	22-30	18-22	8-10
Virginia	25-30	20-25	16-20	8-10
Self Sustaining Towns	25-30	18-25	14-18	8-10
Medium Towns	20-25	16-20	12-16	8-10
Small Towns	17-20	14-17	10-14	8-10
Villages Category 1 and 2	8-12	8-12	8-12	8-10

Residential Density Development Objectives

It is a development objective of Cavan County Council to:

RD 01 Encourage the densities in accordance with the above table throughout the County density of 18-22 units per ha in Cavan Town and 8-20 units per ha in the remainder of the County in accordance with the Core Strategy.

RD 02 In Villages and Community Nodes any development shall take cognisance of the prevailing scale and pattern of development and services availability.

RD 03 Ensure densities of proposed developments reflect the key attributes and character of the surrounding/adjoining area

Recommendation No. 39

Overlay land use zonings with Flooding Maps on Smaller towns and villages (Whitelands). Please refer to Appendix 4.

Recommendation No. 40

Insert text to objective in section 14.10.1, page 607

With respect to lands within Flood Zones A and B, permissible Uses shall be constrained to those water compatible and less vulnerable uses as relevant to the particular Flood Zone, (please refer to the accompanying Strategic Flood Risk Assessment and Plan Section 13.7.2).

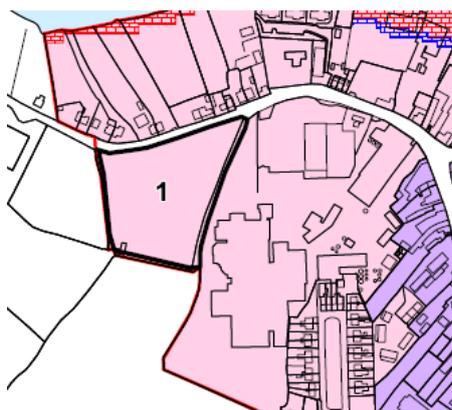
Recommendation No. 41

Overlay land use zonings with Flooding Maps and amend land use zonings as outlined in Appendix 2 and Appendix 3.

Recommendation No. 42

Item (v) Include a new Map Based Specific Objective in SSO 12/ 1 page 233 in Swanlinbar and KSO 14/ 1 page 222 in Killeshandra and amend Maps as contained in Appendix 4.

‘Lands are identified as being suitable for enterprise and employment’



Killeshandra



Swanlinbar

Recommendation No. 43

Strategic Residential Reserve

Amend Section 14.8, Subsection 14.8.2 and 14.8.3, Page 604

14.8.2 Vision:

~~Multiple residential type development~~ Residential development of any type will not be permitted on these lands during the lifetime of the Plan.

Consideration will be given to alternative uses on these lands only in exceptional circumstances i.e. where it has been demonstrated that the alternative use better facilitates sustainable development and would not prejudice the principle use of these lands for urban residential expansion in the future.

14.8.3 Permitted in Principle:

Allotments

~~Guest House~~

Open Space/Park

Park and Ride

~~Residential~~

Institution/Retirement Home

Sports Facility

Telecommunications

Tourism-Recreational

Recommendation No. 44

Addition of text in Section 14.10, Whitelands, Vision, page 607

14.10.2 Vision:

This zone is for mixed use development outside of the small town and village town cores. This zone is to cater for the continued growth and development of the small towns and villages whilst recognising their main function which is to support and provide services for local population. It provides for self-sustaining development. It is envisaged that their population will remain stable and limited growth will be encouraged as well as additional services such as employment, educational, leisure or similar. There shall be a strong emphasis on the creation and maintenance of a sense of identity and local character in the proposed development of these areas. Residential development should be of a high quality and appropriate density and accompanied by sufficient detail to justify its requirement. Applications for residential development shall be assessed in the context of the overall population allocation in the core strategy and shall not be permitted where this allocation is significantly exceeded. Individual applications which would exceed the existing population by more than 10% shall not be permitted. Small-scale residential development which will alleviate the pressures for one-off housing in the open countryside will be permitted in these areas.

It is acknowledged that existing amenity, sports and recreational areas have been zoned as Whitelands and the importance of these facilities to these towns and villages is paramount to the proper planning and sustainable development of the area. These facilities are protected from any inappropriate or non conforming use.

OPR Observation No 3 Residential Land Supply and Part V

Chief Executives Opinion

Part V will be applied to lands zoned as Whitelands in the draft Development Plan. Alterations to the Housing Strategy will be applied in order to clarify this.

Chief Executives Recommendation

Recommendation No. 45

Amend Chapter 3 Housing Strategy with amendments denoted as indicated in Appendix 8.

OPR Recommendation No 3 Tiered Approach to Zoning

Chief Executives Opinion

The Planning Authority engaged comprehensively with Irish Water (IW) in the preparation of the Draft Plan. The advice from both IW and the Council's Water Services Department was used to inform zoning decisions.

The NPF standardised methodology that addresses the differentiation between zoned land that is available for development and zoned land that requires significant further investment in services for infrastructure for development to be realised was also considered in determining land use zonings.

In this regard, the Draft Plan indicates that lands have only been identified for development where they are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development. These lands are also positioned within the existing built-up footprint of established settlements or contiguous to existing developed lands. In order to demonstrate this, an Infrastructural Assessment Report is included in Appendix 6.

Chief Executives Recommendation

No Change Recommended.

OPR Recommendation No 4 Compact Growth

Chief Executives Opinion

The draft Plan fully supports that the housing delivery in the towns and villages comprises of 30% of all new homes within the built-up footprint of existing settlements. Reference is made to this throughout the draft Plan and the Planning Authority notes the NPF, 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'* and the RSES for the Northern and Western Region, RPO 3.2 (c) – *'Deliver at least 30% of all new homes that are targeted in settlements with a population of at least 1,500 (other than the Galway MASP and the Regional Growth Centres), within the existing built-up footprints'*.

The draft Plan seeks to achieve more compact and sustainable growth through consolidating a greater share of future development within the existing built footprint of settlements, to include new homes, businesses and amenities. This aids to support the regeneration of existing urban areas and will comprise of the re-use of existing buildings that are derelict or vacant as well as the development of infill sites and urban sites. The Core Strategy has outlined ambitious targets that meet the requirements of the RSES and NPF in this regard. The revision to the Core Strategy has segregated the infill and brownfield sites allocation from existing residential where potential may come from underutilised sites. To further demonstrate how the draft plan will achieve this 30% ambition, Settlement Consolidations Sites have been included in the zoning maps of the serviced towns and villages of the County. The

yield to achieve this 30% is outlined in Table 11 Core Strategy Table within "Town Core, Mixed Use and Brownfield/Infill Sites & Existing Residential Yield" and "Proposed Residential Yield". These areas are mainly town centre zonings, some adjacent mixed-use sites in Cavan Town and in Virginia and also some infill proposed residential sites. Whilst the focus for the delivery on compact growth is in the larger settlements, there is potential in the smaller towns and villages to achieve sustainable and appropriate redevelopment. These Settlement Consolidation Sites capture the town/village core area and immediate lands within the towns and villages of the county. These sites offer the most potential for compact growth and there is substantial backlands associated with same. Many of the towns and villages have included Masterplans to ensure that these backland areas are developed in an orderly and plan led manner.

Revisions have been made to the Core Strategy Table (Table 11) of the draft Plan to quantify the housing yield from zoned Existing Residential.

Chief Executives Recommendation

Recommendation No. 46

Insert revised Core Strategy Chapter 1, as per Appendix 7, with amendments denoted.

Recommendation No. 47

Insert revised Zoning Maps for Cavan Town, Virginia, Ballyjamesduff, Bailieborough, Kingscourt, Cootehill, Belturbet, Mullagh and Ballyconnell outlining Settlement Consolidation Areas as per Appendix 2 and 3.

Recommendation No. 48

Insert new text Section 2.2 page 71

Section 2.2 Settlement Consolidation Sites

The National Planning Framework sets targets for brownfield/infill housing development of 30% in order to support the regeneration of existing urban areas. NPF compact growth objectives together with Town Centres First principles are focused on the reuse of previously developed buildings and land and building up 'infill' sites, especially those that are centrally located in settlements at all scales. The development plan process has a strategic role to play in facilitating new development and investment in settlements so that it can support the provision of new homes in areas of greatest housing demand as well as people living closer to employment, recreational opportunities and other services. Ensuring that a significant portion of new development reflects the compact growth and town centres first agenda is also a key dynamic in addressing climate change, through reducing dependence on car-based

transport, the extent of green-field land consumption and costly and inefficient infrastructure provision and use.

In formulating a framework for development, the development plan must therefore ensure that there is a close correlation between the identification of lands and sites for development with infrastructural capacity and spatially focused investment, while ensuring that a substantial element of future growth contributes to the regeneration of cities, towns and villages.

In order to clearly demonstrate Cavan County Councils commitment to the revitalisation of the towns and villages of the County, as well as achieving the target of 30% of new homes to be in existing towns and villages built up footprints, each town and village has identified Settlement Consolidation Sites (on proposed residential lands) that identifies areas that will contribute to this commitment. Please note revised Table 11 in Appendix 7 which provides housing supply figures for both (a) town core, infill, brownfield and existing residential and (b) Settlement Consolidation Sites. The combination of both demonstrates the Council's commitment to developing consolidated sustainable places.

Settlement Consolidation Sites Development Objectives

It is a development objective of Cavan County Council to:

SCZ 01 Support the regeneration of underused town centre and brownfield/infill lands, promote measures to reduce vacancy and the underuse of existing building stock and support initiatives that promote the reuse, refurbishment and retrofitting of existing buildings within urban centres and targeted settlements in the County in order to achieve sustainable compact growth targets of 30% of all new housing to be built within the existing urban footprint of targeted settlements in the County.

SCZ 02 Require at least 30% of all new homes that are targeted in settlements to be located within the existing built-up footprint of the settlements, in an effort to make settlements more compact and reduce unsustainable urban sprawl and ribbon development.

OPR Recommendation No 5- Development Management Standards

Chief Executives Opinion

(i)and (iii)

It is considered that the topography in the towns and villages of County Cavan is unique in their difficult levels and ground conditions. As such, a standard density will not achieve the number of dwellings required to achieve sustainable growth. High quality urban developments is the key to the success of the towns and villages. This is required to provide the attraction that is needed to reduce the number of one-off dwellings in the countryside. Dwellings capable of expanding with growing families and a home for life is the key to success of the residential properties in the county. With this in mind national density standards cannot be achieved in most cases. Levels throughout this drumlin county are extremely

difficult and in order to provide satisfactory private and public open space, additional lands in residential housing developments are required. The Planning Authority are however mindful that higher densities provide for more compact and sustainable growth. Most of the towns and village cores are capable of achieving higher densities as per the following table. Infill and brownfield sites are also likely to be suitable to higher densities with the lands provided further from the town capable of achieving slightly lower densities. This is considered appropriate.

(ii)

The draft plan has included a policy to comply with Urban Development and Building Height Guidelines and thus will encourage appropriate buildings heights throughout the County having regard to individual towns and villages. It is considered that Cavan Town would benefit from a Building Height Strategy, and it is considered appropriate to include this as an action of the draft Plan.

(iv)

The draft plan has included a reference in Section 13.4.1, that apartments are unsuitable in smaller towns and villages of the County. This has been based on the County's previous experiences with apartment buildings located in unsuitable and lower tier centres. The Planning Authority acknowledges the need for different tenures throughout the County and acknowledge the need for sustainable use of serviced lands. The development of large standalone apartment type blocks, however, is not considered to be a suitable type development in the smaller towns and villages of the County. To satisfy any need for this type of tenure in these towns and villages, it is considered that over the shop type units, dwelling house conversions into smaller units utilising the existing stock within these town and village cores or sensitive backland development is sufficient. This provides the Smaller towns and villages with smaller units, reduces vacancy rates of existing stock, provides living accommodation with the small town and village core and thus creates a vibrancy to these settlements.

Chief Executives Recommendation

Recommendation No. 49

Additional text in Section 13.4.1, reword Development Objective RD01 and new Development Objective RD03 page 559

13.4.1 Residential Density

Generally, the number of units to be provided on a site should be determined with reference to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), the accompanying Urban Design Manual (2009) or any update thereof and the Smarter Travel policy. The concept of 15–20-minute walkable communities will be sought and created, and accordingly appropriate

residential densities will be encouraged within walking distance to town centres and public transport infrastructure. Due to the difficult topography of County Cavan, there are many instances where specified densities cannot be achieved. **The densities outlined in the table below indicate approximate key residential outputs over the lifetime of the plan and site density will be determined on a case-by-case basis**

Insert Table in Section 13.4.1 page 558

	Density in town/Village Core	Density in Brownfield and Infill Sites	Density in Proposed Residential	Density in Proposed Low Density Residential
Cavan Town	30-35	22-30	18-22	8-10
Virginia	25-30	20-25	16-20	8-10
Self-Sustaining Towns	25-30	18-25	14-18	8-10
Medium Towns	20-25	16-20	12-16	8-10
Small Towns	17-20	14-17	10-14	8-10
Villages Category 1 and 2	8-12	8-12	8-12	8-10

Residential Density Development Objectives

It is a development objective of Cavan County Council to:

RD 01 Encourage **densities in accordance with the above table throughout the County** ~~density of 18-22 units per ha in Cavan Town and 8-20 units per ha in the remainder of the County~~ in accordance with the Core Strategy.

RD 02 In Villages and Community Nodes any development shall take cognisance of the prevailing scale and pattern of development and services availability.

RD 03 Ensure densities of proposed developments reflect the key attributes and character of the surrounding/adjoining area.

Recommendation No. 50

Insert the following new Development Objective BHDO 04 in Section 13.4.2, page 559 of the draft Plan.

Building Height Development Objectives

It is a development objective of Cavan County Council to:

BHDO 04 Commence a Building Height Strategy for Cavan Town within 2 years of the adoption of the Development Plan.

Recommendation No. 51

Amend text in Section 13.4.1 page 567

13.4.14 Apartments

The provision of apartment schemes shall be generally encouraged in appropriate locations, at a suitable scale and extent. Primarily this will be town centre locations and proximate to public transport and in the appropriate settlements. ~~There is a presumption against new apartments type accommodation in small towns and villages of the County~~ Apartment type accommodation in small towns and villages of the county shall comprise of over the shop type, conversion of existing housing stock type proposals or small scale sensitive backland type only. This offers these centres, where the needs arise, to provide for this type of accommodation whilst also providing a suitable use for the reuse of existing and vacant buildings in the small town and village core. Apartment accommodation in small towns and villages shall be of an appropriate scale and extent and in suitable locations only. The extent of development on the site along with the type, scale and density of developments in the vicinity of the site will be a key consideration.

Proposals for new apartment schemes shall be designed in line with the design criteria as set out in the 2018 Ministerial Guidelines – Sustainable Urban Housing -Design Standards for New Apartments- Guidelines for Planning Authorities or any subsequent update. Whilst these guidelines set out minimum design standards, standards above these are encouraged in the interests of creating attractive living environments and sustainable communities.

OPR Observation No 5 Development Management Standards

Chief Executives Opinion

The adopted National Planning Framework in NPO 13 seeks in urban areas that planning and related standards including building heights and car parking will be based on performance criteria to achieve well-designed high-quality outcomes in order to achieve targeted growth. The NPF seeks to have standards that will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected. In this regard, the draft Plan sets out car parking standards in Table 7.4, page 406. Notes

included in the car parking table have allowed for flexibility in the application of standards. The standards set are the maximum and this will be clarified.

Chief Executives Recommendation

Recommendation No. 52

Insert amended SC 01 in Section 13.4.3, page 560

Site Coverage Development Objectives

It is a development objective of Cavan County Council to:

~~SC 01 Site coverage shall generally not exceed 80%. Higher site coverage may be permissible in certain limited circumstances such as adjacent to public transport corridors, to facilitate areas identified for regeneration purposes and in specific areas where an appropriate mix of both residential and commercial uses is proposed.~~

SC 01 Individual development proposals will be assessed on performance-based criteria dependent on location and individual site characteristics in accordance with the provisions of national policy NPF NPO 13.

Recommendation No. 53

Insert amended PR 01 in Section 13.4.4, page 560

Plot Ratio Development Objectives

It is a development objective of Cavan County Council to:

~~PR 01 As a general rule, the indicative maximum plot ratio standard shall be 1.0 for housing at the edge of town locations with an indicative maximum plot ratio of 2.0 in town centre locations.~~

PR 01 Individual development proposals will be assessed on performance-based criteria dependent on location and individual site characteristics in accordance with the provisions of national policy NPF NPO 13.

Recommendation No. 54

Insert new text in title block Table 7.4: Parking Standards – Page 406

Table 7.4: Parking Standards

DEVELOPMENT	MAXIMUM CAR PARKING REQUIREMENT	BICYCLE STANDARDS
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Recommendation No. 55

Insert new text to Notes on Car Parking, page 408

Notes on Parking Standards

- Where the parking standards shown in table 7.4 do not cover the type of development proposed, the requirement shall be calculated relative to the most appropriate standards.
- Car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targets growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.
- In exceptional circumstances, the Council may at their discretion accept a reduced parking requirement, where the applicant has clearly demonstrated that this would not impact on road safety or traffic flow, and where it is considered to be in the interests of the proper planning and sustainable development of the area.
- The Planning Authority will specify, in certain developments, the requirement for a number of disabled car parking spaces and a number of parent and child spaces.
- Parking layouts shall make provision for commercial and service vehicles depending on the type attracted to the development and should provide for manoeuvring space to enable vehicles to exit the site in forward gear.
- Minimum perpendicular car-parking space dimensions shall be 5 x 2.5 metres. Minimum parallel car-parking space dimensions shall be 6 x 2.4 metres. Car parking design should comply with the standards set out in the publications listed in section 4.1.12.
- A bicycle stand comprises of a shelter with a minimum of 5 racks per stand.

OPR Recommendation No 6 -Rural Housing Policy

Chief Executives Opinion

It is considered reasonable to review the development objectives for rural housing based on rural need and not links to an area. The draft development plan has included strong objectives to ensure that small towns and villages are attractive to reside in and it is appropriate to ensure that applicants for rural housing seek to reside there in the first instance.

Chief Executives Recommendation

Recommendation No. 56

Alter text in Section 12.13.2 Rural Housing page 535

Rural generated housing

The Planning Authority considers that the following broad categories constitute a rural generated housing need.

- A. Persons who are an intrinsic part of the rural community who have strong social or economic links ~~need to live in~~ to the area and who are an intrinsic part of the rural community,
- ~~• Building their first home~~
 - That the dwelling is their first home
 - Returning emigrants who lived for substantial parts of their lives in rural areas, then moved abroad and who now wish to return to reside near other family members, to work locally, to care for elderly family members, or to retire
 - Persons currently residing in the local rural area and who can demonstrate a social or economic requirement for a permanent residence there.
 - Persons who need to reside near elderly parents so as to provide security, support and care, or elderly people who need to reside near immediate family.

Recommendation No. 57

Insert new Rural Housing Development Objective RH 12, page 536

RH 12 Ensure that both rural and urban generated housing is directed to serviced rural settlements and villages, applicants will be required to demonstrate measures taken to locate in such settlements in the first instance.

Recommendation No. 58

Amend Areas Under Strong Urban Influence Development Objective SUI 01, page 537

SUI 01 That development within 'Areas under Strong Urban Influence' shall be restricted to landowners and their immediate family members with a demonstrable social or economic need .**

Recommendation No. 59

Amend Areas Under Strong Urban Influence Development Objective SUI 0, page 537

SUI 02	Accommodate rural generated, housing need from individuals for permanent residential development in strong urban influence who have strong social or economic links need to the area to locate in the area and who are an intrinsic part of the rural community, subject to good planning practice, in matters of location, siting, design and the protection of environmentally sensitive areas and areas of high landscape value, environmental carrying capacity and landscape protection consideration.
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OPR Recommendation No 7 -Rural Regeneration

Chief Executives Opinion

The Planning Authority currently monitors all dwellings approved planning permission in both urban and rural locations and this is set to continue upon adoption of the draft Development Plan. This exercise is carried out to determine trends in any town village or rural location and also to ensure compliance with the Core Strategy of the current Development Plans 2014-2020.

It is considered that the proactive measures to ensure delivery of at least 20% target for the delivery of all new rural housing on brownfield sites already exists in the current Development Contribution Scheme, where applicants are only charged for the extension of existing dwellings in the cases of renovation, extension and new build.

Chief Executives Recommendation

Recommendation No. 60

Insert new Core Strategy Development Objective CSD 11, page 65

CSD 11 Monitor and manage the delivery of Residential development in County Cavan to ensure that it is in line with the Core Strategy. The Planning Authority shall maintain a record of residential developments permitted in individual settlements, as well as residential development permitted as single rural houses in order to ensure compliance with the populations allocated in the Core Strategy Table.
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Chief Executives Opinion

Cavan County Council has proactively developed Town and Village Revitalisation Plans for 20 Towns and Villages across the County. These Plans showcase how improvements can enhance the town and villages of the County as attractive places in which to live, work, and visit. They also seek to enhance and improve the long-term socio economic, cultural and environmental benefits for residents, businesses, communities and visitors. The outcomes of the Revitalisation Plans are threefold – to deliver successful strategies across spatial development, economic development and community development.

The Revitalisation Plans provide each town and village with a suite of projects and proposals that would aid revitalisation and renewal. Their aim and function is an influencer to Town Teams, Tidy Towns, Community Groups and the Local Authority alike to prioritise and explore funding streams available in a plan led manner. The Plans were prepared following extensive public consultation and are not intended to have a timeline for meeting targets. These plans set out smaller to larger scale development propels and ideas that can be used in funding applications.

Any Masterplans that have been completed are included in the Appendices of the draft Plan and the vision of Masterplans that have not been commenced has been clearly expressed in the draft Plan. It is considered appropriate to amend text relevant to the proposed Masterplans identified throughout the towns of the County to clarify that public consultation will be form an integral part of the masterplan preparation. Text will further be inserted to note Cavan County Council will take a lead role in conjunction with all other relevant persons for the preparation of such plans.

At the time of preparation of the draft Plan, no funding had been announced for the Rural Regeneration and Development Fund in Bailieborough and Ballyconnell. Details of this can now be inserted as a material amendment.

Chief Executives Recommendation

Amend and add text in the following sections:

Recommendation No. 61

2.2.12 Masterplans

Masterplans are required for 3 specified sites in Cavan Town as per the Land Use Zoning Map. They will establish strategic planning principles for each area as per its specifications below. It will set out an overall urban design framework for the development of the area. ~~The Masterplan will be prepared by the applicant/s in consultation with the Planning Authority and shall be agreed by the Council and lodged as part of any Planning Application.~~ **The Planning Authority will take a lead role in the preparation**

of masterplans, in conjunction with all other relevant parties, masterplans shall be agreed prior to lodgement as part of any Planning Application. Notwithstanding, the fact that the lands have been zoned in the Plans, no significant planning permission for development will be granted until the Masterplan for development of the area, as a whole, has been agreed with the Planning Authority.

Each Masterplan shall include as a minimum.

- A written statement and a plan or series of plans indicating the objectives, in such detail as may be determined by the Planning Authority, for the proper planning and sustainable development of the area to which it applies.
- Proposals in relation to the overall design of the proposed development including maximum heights, external finishes of structures and general appearance and design, including that of the public realm. Designs should be sympathetic to the nature of the area as well as sympathetic to the town.
- Plans for the likely phasing of development.
- Plans which are consistent with the policies and objectives of the County Development Plan.
- Guidance on high quality architectural treatment with respect to topography, urban structure and built form consistent with the established character of the town.
- Issues pertinent to the sustainable management and conservation of Biodiversity shall be considered in all Masterplans.
- A full public consultation strategy.

2.3.11 Masterplans

Masterplans will be required for specified sites in Virginia as per the Land Use Zoning Map. They will establish strategic planning principles for each area as per its specifications below. A Masterplan will be required prior to the granting of planning permission. It will set out an overall urban design framework for the development of the area. ~~The Masterplan will be prepared by the applicant/s in consultation with the Planning Authority and shall be agreed by the Council and lodged as part of any Planning Application.~~ **The Planning Authority will take a lead role in the preparation of masterplan, in conjunction with all other relevant parties, masterplans shall be agreed prior to lodgement as part of any Planning Application.** Notwithstanding, the fact that the lands have been zoned in the Plans, no planning permission for substantial development will be granted until the Masterplan for development of the area, as a whole, has been agreed with the Planning Authority.

Development Objective

It is a development objective of Cavan County Council to

VMP 01 Require, with respect to areas which have been identified as Masterplans, the preparation of a Masterplan. Masterplans shall be lodged with a planning application, prior to development applications being considered on the subject site.

Each Masterplan shall include as a minimum:

- A written statement and a plan or series of plans indicating the objectives, in such detail as may be determined by the Planning Authority, for the proper planning and sustainable development of the area to which it applies.
- Proposals in relation to the overall design of the proposed development including maximum heights, external finishes of structures and general appearance and design, including that of the public realm. Designs should be sympathetic to the nature of the area as well as sympathetic to the town.
- Plans for the likely phasing of development.
- Plans which are consistent with the policies and objectives of the County Development Plan.
- Guidance on high quality architectural treatment with respect to topography, urban structure and built form consistent with the established character of the town.
- Issues pertinent to the sustainable management and conservation of Biodiversity shall be considered in all Masterplans.
- **A full public consultation strategy.**

2.7.11 Masterplan 1

~~Prepare a Masterplan, in conjunction with relevant stakeholders, for backlands development subject to following:~~

The Planning Authority will take a lead role in the preparation of the masterplan, in conjunction with all other relevant parties, masterplans shall be agreed prior to lodgement as part of any Planning Application. This Masterplan shall contain the following:

- e. The construction of a new access road from the Kells Road to the Rocks Road to serve the Masterplan area.
- f. Development shall support, contribute to and consolidate the town core function while complying with the highest urban design standards.
- g. Development shall provide safe and accessible pedestrian linkages between the development and the existing town core, amenity areas and community facilities.
- h. The location of the proposed access points will be determined at planning application stage. Access roads shall be improved in order to accommodate additional traffic.
- e. Necessary social and physical infrastructure is to be provided, as appropriate.
- f. A full public consultation strategy.**

2.10.11 Masterplan 1

~~Prepare a Masterplan for this area to incorporate Residential, Employment, Public and Community uses. The need and quantum of such uses shall be identified as part of the Masterplan preparation and shall be in accordance with the Core Strategy of the Plan. The Master Plan shall be prepared in conjunction with relevant departments of Cavan County Council. On completion, the Masterplan shall~~

~~be submitted to the Planning Authority for approval prior to the submission of any planning application.~~
The Planning Authority will take a lead role in the preparation of the masterplan, in conjunction with all other relevant parties, masterplans shall be agreed prior to lodgement as part of any Planning Application. Proposals shall ensure the residential amenities of existing and future residents are protected and details of traffic impacts and road safety. Pedestrian and cyclist linkages to the Town centre shall be of paramount importance. Piecemeal development will not be permitted, only an overall integrated proposal will be acceptable. Proposals for the site shall be subject to the Environmental policies and objectives of this Plan. Details of how the Masterplan will address Sustainable Design Principles shall be clearly addressed in the Masterplan. A full public consultation strategy shall form part of the masterplan preparation.

This statutory plan is a blueprint for economic development for the county over this plan period and beyond. It aids the co-ordinated approach to economic development within the Council and allows for a plan-led evidence-based approach for future economic growth. Using a collaborate approach the development plan operates within a network of other influencing plans and strategies, including the LECP. In terms of economic development, the key functions of a development plan include:

- Link the economic and spatial dimensions of the Plan by aligning economic growth with the settlement hierarchy focusing on key employment locations as drivers for growth and recognising the critical role of rural places in the economic development of the County.
- Provide an adequate quantum of appropriately zoned lands to facilitate current and future economic opportunities and employment creation.
- Ensure that such lands maximise the existing or planned infrastructure provision.
- Identify key business and industry sectors where opportunity exists for employment growth within the county.
- Maximise the strategic location of Cavan of being part of the Border Region and the close proximity to the Greater Dublin Area.
- Foster a highly skilled and educated workforce.
- Promote economic clusters and regeneration of obsolete or inefficient economic lands.
- Nurture positive communities and create appealing places for people to live and work in, that in turn attract new businesses and employees.
- Provide a coherent approach to economic development that guarantees confidence and clarity for applicants, develops and investors involved in the development process.

Recommendation No. 62

Insert new text in Section 2.5.9 Page 138

To date, Bailieborough has benefited from a number of regeneration projects including the development of a trail around Castle Lake, Outdoor Education Facility at Town Lough and works to the car park, footpaths and public lighting in addition to a public space in the Courthouse.

Funding on in excess of €1.4 million has been announced under the Rural Regeneration and Development Fund for the Bailieborough Courthouse and Community Hub, which will redevelop this building in the town centre as an economic, community and cultural hub that will include a visitor centre, museum, cultural and exhibition space. The Visitor Centre will tell the story of Bailieborough, and the surrounding area and will be the first Plantation Museum in Ireland. The community space will provide for essential community services including remote working and youth facilities.

Recommendation No. 63

Insert new text in Section 2.8.9 Regeneration and Placemaking page 176

Ballyconnell has benefitted from a number of regeneration projects including the construction of a 5.5km walking and cycling trail from Ballyconnell to Ballyheady Bridge, improved car parking, lighting and signage, landscaping and development in Ballyconnell Park and seating, canopies and lights to create outdoor meeting and event space.

Funding of nearly €800,000 has been announced under the Rural Regeneration and Development Fund for the renovation and redevelopment of a protected structure, the Market House in Ballyconnell into a Community, Remote Working and Tourism hub.

Recommendation No. 64

Insert new text in Section 2.6.5, Page 146

There are a number of large employment providers within the town including Abbott Ireland and Abcon Industrial Ltd. The town has significant potential for economic development and employment provision with a number of vacant business and industrial units in the town and the “Enterprise Technology Centre Hub” located on Station Road.

Funding of over €850,000 was allocated by the Rural Regeneration and Development Fund for Cootehill Industrial Estate Cootehill Cavan. This project involves the construction of an access road and services into an underdeveloped industrial estate in Cootehill to allow its future expansion. It includes the construction of a roadway, and provision of electricity, water, gas, lighting and broadband. Cootehill is situated on the border between Cavan and Monaghan and is the primary industrial location on that border. This project will significantly contribute to the development of businesses in the area creating employment opportunities and enhancing the attractiveness of the area as a place to live.

OPR Recommendation No 8 – Employment and Enterprise Zoned Land Supply

Chief Executives Opinion

The Plan aims to enable and promote sustainable economic development in County Cavan to best facilitate economic growth and opportunities across all sectors, delivering jobs and enriching the standard of living for all. The Plan contains policies and development objectives to support the resilience and expansion of Cavan's indigenous economy and work towards growing Cavan's wider economic base through promotion of Cavan as a strategic location for businesses to relocate and expand.

Supporting and promoting business development and the creation of new employment opportunities are core to creating and maintaining economic prosperity in County Cavan and maintaining a high quality of life. The *Strategic Economic Framework* has been prepared to support and inform the development of County Cavan through the identification of investment opportunities, areas of economic expansion and new growth employment opportunities. This Strategic Economic Framework provides a platform for County Cavan to facilitate sustainable economic growth through a series of dedicated and strategic actions. All actions are in line with, and complementary to, national, regional and local frameworks and policy documents. This Strategy has been informed by the *Cavan Economic Study* which was undertaken to identify the existing economic context of the county and its relationship with the surrounding region. A comprehensive socio-economic assessment of the county and its nine principal towns was undertaken to ascertain the characteristics of the county formation. The study comprised a population and demographics assessment, including educational attainments; a review of industries of employment, commuting patterns, and commercial vacancy rates.

Examining the commuting patterns of the county's population proved very beneficial as it allowed for greater insights into the functional relationship of the resident and working populations and between County Cavan, its neighbouring counties and the wider region. Please refer to Appendix 3. The Plan aims to address this issue

This statutory plan is a blueprint for economic development for the county over this plan period and beyond. It aids the co-ordinated approach to economic development within the Council and allows for

a plan-led evidence-based approach for future economic growth. Using a collaborate approach the development plan operates within a network of other influencing plans and strategies, including the LECP. In terms of economic development, the key functions of a development plan include:

- Link the economic and spatial dimensions of the Plan by aligning economic growth with the

settlement hierarchy focusing on key employment locations as drivers for growth and recognising the critical role of rural places in the economic development of the County.

- Provide an adequate quantum of appropriately zoned lands to facilitate current and future economic opportunities and employment creation.
- Ensure that such lands maximise the existing or planned infrastructure provision.
- Identify key business and industry sectors where opportunity exists for employment growth within the county.
- Maximise the strategic location of Cavan of being part of the Border Region and the close proximity to the Greater Dublin Area.
- Foster a highly skilled and educated workforce.
- Promote economic clusters and regeneration of obsolete or inefficient economic lands.
- Nurture positive communities and create appealing places for people to live and work in, that in turn attract new businesses and employees.
- Provide a coherent approach to economic development that guarantees confidence and clarity for applicants, developers and investors involved in the development process.

One of the main objectives of the development plan is to facilitate more jobs within the County thereby improving the jobs ratio and reducing the volume of outbound commuting. The Cavan Economic Study contains an analysis of Cavan as a commuter destination, please see Appendix 3.

The RSES identifies that improving the alignment between the location of residential development and employment is one of the key challenges facing the region. This Development Plan supports a counter commuting strategy aimed to leverage the economic and social assets of Cavan County, together with the educated and skilled workforce and relevant policy interventions.

The need to identify additional economic lands and strategic sites in key settlements which are experiencing significant out bound commuting due to the extent of their resident populations and the

lack of local employment is a key development objective of this Development Plan. The overall strategy proposed in the Draft plan takes account of a number of facets that contribute to the sustainable economic growth of the County, including:

- Locations of Employment
- Availability of Land and Supporting Infrastructure
- Placemaking for Enterprise and Employment
- Town and Village Centre Regeneration and Revitalisation
- Public Realm
- Compact Growth & Regeneration
- Design
- Skills and Innovation
- Smart Enterprises
- Home Based Economic Activity and Remote Working

- Investment and Support
- Quality of Life
- Green Economy

This plan aims to promote Cavan as a key location for economic development supporting the provision of increased levels of employment through the expansion of the existing enterprise ecosystem in Cavan.

The overarching challenge for the Council is to assist in creating more jobs so that more people who live in Cavan can work in Cavan. It will also support the provision of physical and social infrastructure and zoned lands to realise the delivery of strategic employment lands in central accessible locations.

The optimum location for employment and enterprise development within the County has been identified on lands which are appropriately zoned; brownfield sites/regeneration lands and areas where economic clustering can be delivered and/or where new opportunities exist. The provision of services for all employment related lands will be a priority for the County during this plan period.

Cavan County Council acknowledge that a successful and sustainable local economy is dependent upon the existence of supporting infrastructure that is of high quality and has sufficient capacity. Failure to ensure adequate infrastructure is available and improved in keeping with the development of the county will adversely impact on the capability of the county to attract new investment or encourage expansion of existing companies.

Adequate infrastructure is essential to facilitate future economic development in the County and Cavan County Council will continue to work with infrastructure providers to secure adequate water services, effective public transport, energy, telecommunications, waste management and education facilities to support employment development. Quality of life considerations are also a key component for investment and this Plan will seek to protect the attributes that make Cavan attractive. Indicators such as commuting times, availability of key services, recreation opportunities and the quality of the built and natural environment are important. The Plan contains a wealth of development objectives which aim to improve quality of the environment and life for the citizens of Cavan, for example: community infrastructure, public realm, regeneration, etc.

Towns and villages play a key role in terms of serving the economic, social. Cultural and community needs of people and their hinterland

In terms of specific sites the Planning Authority comments as follows

N-55- this is a small allocation of lands adjoining Corlurgan Business Park which has its own access off the national route. It is considered appropriate to permit an extension of the small-scale enterprises that exist at this location in the adjoining lands

N-3 -existing lands zoned in the current Development Plan for Cavan Town and Environs are exhausted and the serious deficiency in available zoned lands in Cavan Town have been expressed to the Planning Authority. With this in mind additional lands by way of extension of the existing IDA Park have been zoned within the speed limit of the N3. The lands zoned a Strategic Employment Lands in the draft Plan have been reduced due to the overlay of the zoning maps and are not readily available. These lands require some investment in infrastructure and access and thus it is considered appropriate to allow the infrastructure and first phases of development on these lands in this plan period.

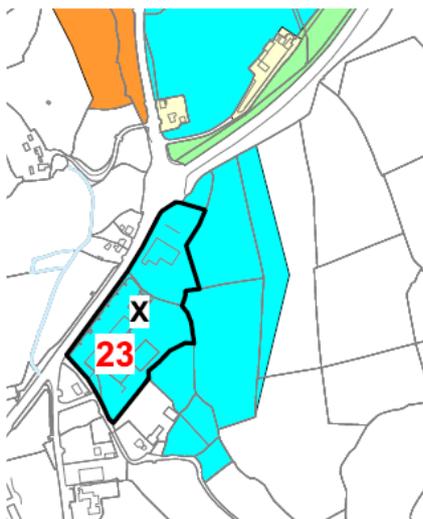
In light of flooding overlaid on Cavan Town Land Use Zoning Map, the potential for General Enterprise and Employment in the town has been compromised. To address this, lands in the north of Cavan Town, currently zoned as Residential Strategic Reserve and within the Bypass of Cavan Town, are considered appropriate to include as General Enterprise and Employment.

Chief Executives Recommendation

Recommendation No. 65

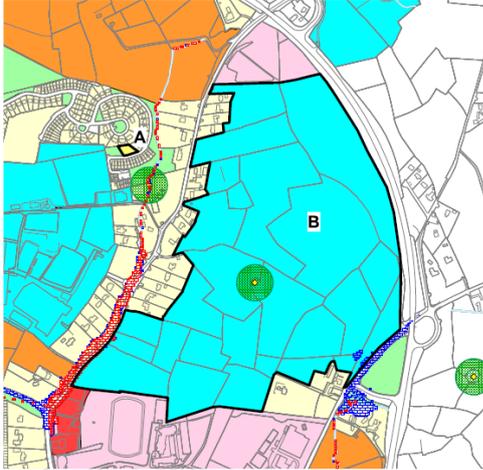
To include Corlurgan Business Park within the Development Plan Boundary of Cavan Town LAP and zone as General Enterprise and Employment with Map Based Specific Objective Number 23 as per X on Cavan Town Amendments Map in Appendix 2.

The new Map Based Specific Objective shall read as '**Development at this location shall require connection to public services**'.



Recommendation No. 66

Amend zoning to lands marked 'B' on attached Map for Cavan town from Residential Strategic Reserve to General Enterprise and Employment' as shown on appendix 2.



Recommendation No. 67

Overlay the Virginia Bypass and eliminate lands from landuse zoning as hatched - Please see Appendix 5.

OPR Recommendation No 9 -Retail Policy

Chief Executives Opinion

The 2012 Retail Planning Guidelines provides a retail hierarchy for the state as follows:

- Metropolitan
- Regional
- Sub-Regional
- District Centres
- Small Towns and Rural Areas

Small towns and rural areas are categorised in the Guidelines as the fourth tier of the state hierarchy comprising a large number of small towns between 1500 and 5,000 population.

The settlement hierarchy and retail hierarchy generally align in the Draft Plan. The Cavan County Retail Strategy aligns with the settlement strategy for Cavan Town, Virginia, Ballyjamesduff, Bailieborough, Kingscourt and Cootehill. Tier 3 of the retail strategy differs in that this tier is divided into 2 subcategories of settlements, to reflect the difference in scale of activity noted during the

undertaking of Retail Strategy surveys. Tier 3a includes Ballyconnell and Belturbet which are within Tier 3 of the county settlement hierarchy, while Mullagh which is also within Tier 3 of the county settlement strategy is placed on Tier 3b of the Retail Hierarchy. Mullagh would not appear to perform as high a service role as Ballyconnell or Belturbet and this may be related to its positioning relative to higher tier towns and other larger centres to the south. Arvagh and Ballinagh are considered to perform a similar retail function to Ballyconnell or Belturbet, both of which have sizeable rural hinterlands.

Whilst accepting that there are a number of minor differences between the retail strategy and settlement strategy, such differences relate only to lower tier settlements below 1500 population as outlined above and are considered non-material. The differences do not result in any settlement being positioned outside the tiers set in the national hierarchy as outlined in the 2012 Retail Planning Guidelines.

The OPR notes that retail warehouse zoning is afforded to the Lakeland Retail Park including two adjoining convenience store operators (Supervalu and Polonez). It is noted by the OPR that retail convenience use is not permitted under retail warehouse zoning. The OPR requests that consideration should be given to addressing this discrepancy and affording an appropriate alternative landuse zoning to the convenience stores which permits the established use.

The National Planning Framework, the Regional Spatial and Economic Strategy and the Retail Planning Guidelines support the provision of retail in town and village centres through the sequential approach. This approach is supported in the Draft Plan. The convenience stores referred to above are not located in the centre of Cavan Town. It is not considered appropriate, therefore, to include a landuse zoning to support these convenience uses given their location. The approach in the Draft Plans does not affect the continues use of these stores. Section 14.1.4 Non-Conforming Uses of the Draft Plans addresses this issue as follows:

“Non-conforming uses” are established uses that do not confirm to the primary zoning objectives of the Plan. These include instances where such uses; were in existence on 1st October 1964 (i.e. prior to planning legislation), have valid permission or are unauthorised but have exceeded the time limit for enforcement proceedings. Any proposals for the expansion, improvement, or alteration of such uses will be considered on their individual merits. Development proposals that relate to the intensification of non-conforming uses, will be permitted only where the proposed development would not be detrimental to the amenities of the surrounding area and is consistent with the proper planning and sustainable development of the area.

The approach in the Draft Plan ensures the delivery of a strategic and sustainable land use zoning approach, prevention piecemeal and ad-hoc zonings throughout the county to reflect all non-conforming uses.

Having regard to the need to prioritise retail provision within the town core and to adopt a sequential approach to development as set out in the *Retail Planning Guidelines 2012*, along with the need to

preserve the capacity of the national road network as set out in Section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012), the OPR requests the planning authority to clarify that all types of retail use including retail comparison, convenience and retail warehousing are not permitted on General Enterprise & Employment zoned land.

'Retail Comparison' and 'Retail Shops – Major' are not permitted in this zoning in the Draft plan. 'Retail Shops – Local' and 'Retail Warehousing', whilst not permitted in principle, are not excluded for consideration on General Enterprise & Employment zoned land. It is recommended that 'Retail Shops – Local' and 'Retail Warehousing' are included in the not permitted category under the General Enterprise and Employment zoning to ensure the proper development of these enterprise and employment generating land.

Chief Executives Recommendation

Recommendation No. 68

Section 14.15.4 in Chapter 14, page 617

'Retail Shops – Local' and 'Retail Warehousing' to be included in the not permitted category under the General Enterprise and Employment zoning.

OPR Recommendation No 10 -Transport and Accessibility

Chief Executives Opinion

Cavan is a rural County with limited public transport, thus the importance placed on transport and sustainability in the draft Plan. The issues raised above are similar to the submissions received from the Northern and Western Regional Assembly, the National Transport Authority and Transport Infrastructure Ireland. Cavan County Council is fully committed to the preparation of a Local Transport Plan for Cavan Town and will commence same within one year of adoption of the plan. Local Transport Plans will be commenced in Virginia within 2 years of adoption of the development plan. Local Transport Studies for Ballyjamesduff, Bailieborough, Kingscourt and Cootehill will be commenced within the lifetime of the adoption of the Plan. It is considered appropriate that the draft Plan commits to these.

It is considered appropriate to remove lands within the bypass corridor with the exception of existing developed areas to the south of the corridor line, within the existing Virginia development plan boundary.

It is further noted that lands at Burrencarragh are appropriate to remain for the general enterprise and employment lands at this location.

Lands at Burrencarragh are considered to be a strategic employment site in accordance with the NPF and the RSES which note that there are opportunities to further enhance the economic performance of

Virginia by capitalising on its strategic location and the associated national and international connectivity that this provides. The lands in question are considered appropriate for large scale employment generating uses of a strategic importance with a notable land requirement. RSES recognises the existing “Food Cluster of AW Ennis and Glanbia” and its potential. These lands will help achieve growth at this area. The development of this site will promote sustainable economic development in Virginia through the promotion of identified economic growth areas which provide employment opportunities and reduce the volume of long distance commuting.

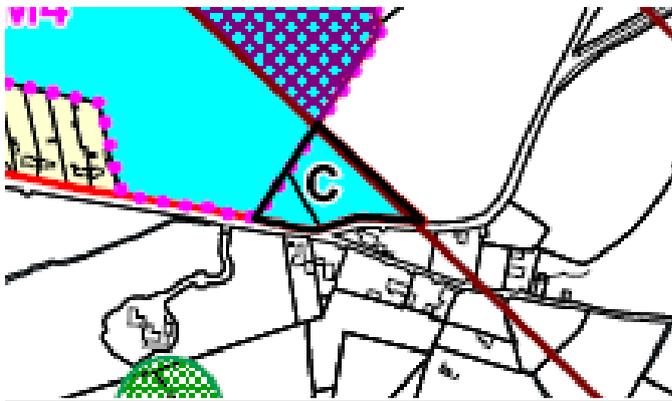
Chief Executives Recommendation

Recommendation No. 69

Overlay the Virginia Bypass and eliminate lands from landuse zoning as hatched - Refer to the Appendix 5.

Recommendation No. 70

Include lands adjacent to Virginia Bypass Emerging Route and zone as Enterprise and Employment as outlined on Map below and marked ‘C’ on Virginia Map in Appendix 3.



Recommendation No. 71

Amend Cavan Town Development Objective, page 50

KTC 05 ~~Prepare~~ **Commence the preparation of a** Local Transport Plan (LTP) for Cavan Town in conjunction with the National Transport Authority (NTA) and other relevant stakeholders **within one year of the adoption of the County Development Plan.**

Recommendation No. 72

Amend Cavan Town General Development Objective CNR 02, page 77

CNR 02 Support the implementation of the Cavan Town Transportation Plan 2007 and **commence the preparation of within one year of the adoption** ~~prepare a local transport plan over the lifetime~~ of the Local Area Plan as a revision to the 2007 Transport Plan.

Recommendation No. 73

Amend Section 2.2.6 Physical Infrastructure, Paragraph 2, page 79

~~During the lifetime~~ **Within one year of the adoption of the Local Area Plan**, a Local Transport Plan will be ~~completed~~ **commenced** for Cavan town and Environs Area. In the interim, the Cavan Town and Environs Transportation Plan 2007 will be used to prioritise links and guide traffic movements into, out of and around the town.

Recommendation No. 74

Amend objective KTC 05 in Cavan Town Development Objective, page 50

KTC 05 ~~Prepare~~ **Commence the preparation of a** Local Transport Plan (LTP) for Cavan Town in conjunction with the National Transport Authority (NTA) and other relevant stakeholders **within one years of the adoption of the County Development Plan.**

Recommendation No. 75

Add a new objective to Virginia Physical Infrastructure Development Objectives, page 102

VI 04 Commence the preparation of a Local Transport Plan (LTP) for Virginia in conjunction with the National Transport Authority (NTA) and other relevant stakeholders within two years of the adoption of the County Development Plan.

Recommendation No. 76

Add a new objective BI 03 to Bailieborough Physical Infrastructure Development Objectives, page 133

BI 03 Commence the preparation of a Local Transport Study for Bailieborough in conjunction with the National Transport Authority (NTA) and other relevant stakeholders within the lifetime of the adopted County Development Plan.

Recommendation No. 77

Add a new objective CPI 04 to Cootehill Physical Infrastructure Development Objectives, page 146

CPI 04 Commence the preparation of a Local Transport Study for Cootehill in conjunction with the National Transport Authority (NTA) and other relevant stakeholders within the lifetime of the adopted County Development Plan.

Recommendation No. 78

Add a new objective KI 03 to Kingscourt Physical Infrastructure Development Objectives, page 159

KI 03 Commence the preparation of a Local Transport Study for Kingscourt in conjunction with the National Transport Authority (NTA) and other relevant stakeholders within the lifetime of the adopted County Development Plan.

Recommendation 79: Add a new objective to Ballyjamesduff Physical Infrastructure Development Objectives:

BJDI 03 Commence the preparation of a Local Transport Study for Ballyjamesduff in conjunction with the National Transport Authority (NTA) and other relevant stakeholders within the lifetime of the adopted County Development Plan.

OPR Recommendation No 11 -Renewable Energy

Chief Executives Opinion

The OPR notes that while relevant objectives support, promote and prioritise solar, geothermal, biomass and hydro developments, Objective WE 03 only encourages and supports the development of small-scale wind energy development and single turbines in urban and rural areas and Industrial Parks.

WE 03 states: “*Encourage and support the development of small-scale wind energy development and single turbines in urban and rural areas and Industrial Parks, provided they do not negatively impact upon environmental quality, landscape, wildlife and habitats or residential amenity or other relevant planning consideration.*”

The objective is overly restrictive with reference to ‘small scale’. Reference to small-scale should be removed from the objective so that it reads “*Encourage and support the development of wind energy development and single turbines in urban and rural areas and Industrial Parks, provided they do not negatively impact upon environmental quality, landscape, wildlife and habitats or residential amenity or other relevant planning consideration.*”

The OPR highlights that the plan does not include a Renewable Energy Strategy including wind energy capacity, landscape character assessment or and sensitivity mapping. Although the Office notes the intention to prepare a strategy within 2 years of the adoption of the plan, this does not sufficiently address the urgency of climate action as expressed by the 2030 targets. While the Office fully appreciates the resources involved in the preparation of such a strategy, this should be prioritised at this stage of the plan making process in order to ensure consistency with the *SPPR*, and national policy objectives including *NPO 55* and *RPO 56* (low carbon economy) and *RPO 87* (Low carbon energy future).

EDO 05 of the Draft Plan states ‘*Prepare a Cavan County Renewable Energy Strategy within two years of the adoption of this plan*’. It is considered appropriate that a more ambitious commencement date should be contained within the plan. Therefore, the above objective should be revised to read “*Commence preparation of a Cavan County Renewable Energy Strategy within 6 months of the adoption of this plan*’.

LC8 of the Draft Plan states “*Undertake a Landscape Character Assessment during the lifetime of this plan.*” It is considered appropriate that a more ambitious commencement date should be contained within the plan. Therefore, the above objective should be revised to read “*Undertake a Landscape Character Assessment within 6 months of the adoption of this plan*”.

The OPR notes that while the draft Plan references the *Wind Energy Guidelines 2006* it does not refer to the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017*.

The OPR requests the planning authority to indicate how the development plan will contribute to meeting national renewable energy targets, including specific targets in megawatts for wind energy potential in the county. In the absence of any nationally or regionally determined targets for County Cavan specifically, the OPR advises the planning authority to demonstrate appropriate metrics in this regard, which could include Cavan’s share of estimates of additional national renewable electricity target as defined by the % of national land area represented by the county. In this respect the OPR notes that the draft Plan does not identify how the county will contribute to realising national climate

change and renewable energy targets including specific targets in megawatts for wind energy potential set out in the *Climate Action Plan 2019* (8 MW of onshore wind energy by 2020).

Cavan County Council represents 2.7% of the Country's landmass. This represents 216 MW based on a pro rata calculation of national landmass v national target for 8GW for on shore wind by 2030, based on the Climate Action Plan 2019.

The maximum export capacity of all operational turbines in County Cavan at present is 136.16 megawatts (source SEAI).

Windfarm Name	Maximum Export Capacity (MW)
Corneen Wind Farm	3
Raragh 2 Wind Farm	11.5
Liffey Autoproduction Project	1.6
Liffey Autoproduction Project (extension)	1.42
Carrickallen Wind Farm	22
Bindoo (1a)	48
Mountain Lodge (2)	24.8
Mountain Lodge (3)	5.82
Mountain Lodge Wind Farm	3
Shalvey Poultry WT	0.02
Gartnaneane II Wind Farm	4.5
Gartnaneane (1) Wind Farm	10.5
Lios na Carraige	0.02

Regarding permitted wind infrastructure in County Cavan, 204.1 MW are permitted in total. Therefore, 67.94MW of wind energy is permitted but not constructed in the county.

It is evident that Cavan County Council has a proven track record in the delivery of wind energy infrastructure (it should be noted that 2 no. solar farms have been permitted in the county also.) It is also likely that by 2030, the county will have exceeded its share of national wind target as defined by the % of national land area represented by the county. The OPR suggests specific targets in megawatts for wind energy potential in the county should be provided. It is considered more appropriate that such renewable targets are set through the renewable energy strategy (to be commenced within 6 months

of plan adoption), which will be grounded on a strong evidence base serving to ensure maximum efficiencies in the delivery of renewable energy in the county.

Chief Executives Recommendations

Recommendation No. 80

Revise Objective WE 03 Page 412 as follows:

“Encourage and support the development of ~~small-scale~~ wind energy development and single turbines in urban and rural areas and Industrial Parks, provided they do not negatively impact upon environmental quality, landscape, wildlife and habitats or residential amenity or other relevant planning consideration.”

Recommendation No. 81

Amend the following section and Landscape Categorisation Development Objective:

10.16 Landscape Categorisation – Analysis of County Cavan

To date Cavan County Council has not prepared a Landscape Character Assessment. ~~During the lifetime of this plan,~~ **Within 6 months of the adoption of the plan,** Cavan County Council will undertake to ~~complete~~ **commence** a comprehensive Landscape Character Assessment building on the existing Landscape Categorisation contained in Appendix 14.

Recommendation No. 82

Amend the following objective:

~~LC8 Undertake~~ **Commence the preparation of** a Landscape Character **Assessment within 6 months of the adoption of the development plan.** ~~during the lifetime of this plan.~~

Recommendation No. 83

Section 7.10 of the Plan:

Refer to the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017*.

Recommendation No. 84

Amend text in Section 7.10, page 410

It is the intention of Cavan County Council to prepare a Renewable Energy Strategy within a ~~two-year~~ **6 month** period of the adoption of this development plan, in order to guide and measure how Cavan County Council can facilitate a low-carbon future in the County by supporting the sustainable development of the renewable energy sector in Cavan

OPR Recommendation No 12 -Flooding

OPR Observation No 8 -Flood Risk Mappings

Chief Executives Opinion

The draft Plan as submitted has included a full suite of Land Use Zoning Maps and Flooding Maps. Section 14.2 Flooding, page 593 of the draft Plan states that Flood Zones A and B have been identified by the Strategic Flood Risk Assessment. This also states that these zones generally limit new development, but facilitate development uses that may require small scale development such as small extensions. The draft Plan has indicated that development proposals on these lands shall be accompanied by a detailed Flood Risk Assessment carried out in accordance with the Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014 which shall assess the risks of flooding associated with the proposed development. The draft Plan has clearly set out that proposals will only be considered favourable where it is demonstrated that they would not have adverse impacts or impede access to watercourse, floodplain or flood protection and management facilities, or increase the risk of flooding to other locations and be in accordance with the proper planning and sustainable development of the areas.

In the interests of clarity, however, it is considered that the land use zoning maps for the towns and villages of the county should be overlaid with the flooding maps. Flood Zone A and B have been overlaid for the 9 larger towns within the County. The effected towns from this exercise are Cavan Town, Virginia, Ballyjamesduff, Kingscourt, Belturbet and Mullagh. Lands effected have been either rezoned to Amenity and Open Space or removed from the development boundary due to these flooding constraints. Appendix 2 and 3 shows the towns in question and clearly outlines the sites proposed to be amended as a result .

With regard to lands identified as Flood Zone A and B within the small towns and villages of the County that are subject to Whiteland zoning approach, it is considered appropriate to add text to the objective of Section 14.10 White Lands to clearly specify that with respect to lands within Flood Zones A and B as per the zoning maps that permissible uses shall be constrained to those water compatible and less vulnerable uses as relevant to the particular Flood Zone.

Chief Executives Recommendation

Recommendation No. 85

Overlay land use zonings with Flooding Maps and amend land use zonings.

Large towns please refer to Appendix 2 and Appendix 3.

Smaller towns and villages (Whitelands) please refer to Appendix 4.

Recommendation No. 86

Insert text to objective in section 14.10.1, page 607

With respect to lands within Flood Zones A and B, permissible Uses shall be constrained to those water compatible and less vulnerable uses as relevant to the particular Flood Zone, (please refer to the accompanying Strategic Flood Risk Assessment and Plan Section 13.7.2).

OPR Observation No 9 -Public Rights of Way

Chief Executives Opinion

Potential public rights of way have been identified in the draft Plan. It is considered appropriate to proceed with caution in the absence of clear guidance on the issue of Public Rights of Way in the County. Cavan County Council will continue to pursue public access to the natural and built heritage of the County via walking routes, greenways etc. It is considered that the preparation of maps identifying public rights of way and incorporation into the Plan by way of Variation should commence 2 years from adoption of the Plan.

Chief Executives Recommendation No. 87

Amend Rights of Way Development Objective ROW 03 in Section 7.11, page 416

ROW 03 ~~Undertake~~ **Commence** a review of walking and cycling routes in the county, protect existing public rights of way for the common good, and bring forward proposals for the creation of public rights of way, which give access to places of recreational utility or natural beauty, particularly in relation to lakes, rivers and forests and areas of historical, archaeological importance within two years of adoption of the Plan.

OPR Recommendation No 13 - Compliance with Ministerial Guidelines

Chief Executive Opinion

It is considered appropriate to add the Statement of Compliance with Ministerial Guidelines as an appendix to the Draft Development Plan. It is considered that the Draft Development Plan contains development objectives to ensure compliance with all relevant guidelines within same.

Chief Executives Recommendation

Appendix 9 contains Statement of Compliance with Ministerial Guidelines to be inserted to the Draft Plan Appendices.

Section Three: Submissions

3.0 Introduction

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

Prescribed Bodies and Stakeholders

Transport Infrastructure Ireland

This submission has included a number of recommendations under the following various headings.

Managing Investment and Statutory Guidance

- Include as a Core Strategy Objective to reflect the official policy requirements –
 - To maintain the strategic function, capacity and safety of the national roads network
 - To ensure that the existing extensive transport networks, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users
- That the draft plan includes a commitment to undertake a Local Transport Plan for Cavan Town which should be informed by the ABTA process and the findings and recommendation of the LTP to be incorporated into the LAP on completion
- Revise Section 7.2.6 and Section 7.2.9 in draft plan to avoid duplication

Spatial Planning and National Roads Guidelines

1. Re-word Development Objective NR 05 of the draft Plan to delete the text with the strikethrough

NR 05	Prevent, except in exceptional circumstances, the creation of additional access points from new developments or the generation of increased traffic from existing accesses to national roads, to which speed limits greater than 60kmph apply.
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2. To include a new objective in Section 12.13 of the Draft Plan to assist applicants for single houses which states the following:

'The policy of the Planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60kmph apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.'

3. Having regard to the policies promoting rural enterprise and economic development in the plan, TII requests appropriate cross reference is included in the Plan between Development Objectives NR 05 and policy objectives included in Chapter 6 (Economic) and Chapter 12 (Rural) and in Development Management Standards in Chapter 13.
4. To include a new policy objective to include the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways reflecting policy outline in the Retail Planning Guidelines, 2012.
5. TII welcomes development Objective NR 01 which outlines the commitment to maintain and protect the safety, capacity and efficiency of national roads and national roads junctions. TII recommends that particular care is exercised in the assessment and management of development proposals in the plan relating to development objectives or the zoning of locations at or close to junctions on the national road network in accordance with official policy.

Transport Planning and National Road Schemes

1. National road improvement schemes should be developed complementary to safeguarding the strategic function of the national road network and proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII
2. Review text associated with Objective GR 08 (General Road Development Objective) and NHDS 2, NHDS 3 to ensure consistency with requirements of Article 6(3) and 6(4) of the Habitats Directive and demonstrate consistency with NHDS 4 and NHDS13.

Other Transport Proposals

1. Incorporate reference to TII Publications Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads' in the Development Plan in association with the reference to DMURS.
2. Consider extending policies and objectives relating to Workplace Travel Plans/Mobility Management Planning to address existing and established trip intensive locations. as well as a requirement for new large scale trip generating developments.
3. Where there may be implications for the national road network, the TII would welcome consultation on proposed cycling and walking network across County Cavan. Proposals impacting on national roads should be progressed consistent with national policy, TII publications and should be complementary to safeguarding the strategic function of national roads.
4. TII would welcome consultation on the proposed Park and Ride proposals in County Cavan. Proposals impacting national roads should be progressed consistent with official policy.

Ancillary Policy Provisions and Issues

1. TII would welcome the inclusion of a policy position reflecting the requirements of Section 2.8 of the Guidelines Spatial Planning and National Roads relating to the provision of service areas and roadside facilities on national roads in the draft plan and the requirement for a forward

planning approach to the provision of off-line motorway service areas at national road junctions. Appropriate update to the development management section relating to 'Service Stations' could also be addressed.

2. Recommend a new objective outlining that –
'the capacity and efficiency of the national road network draining regimes in County Cavan will be safeguarded for national road drainage purposes'.
3. TII would welcome an objective in relation to renewable energy and the safeguarding of national road network, indicating that grid connections routing options should be developed to safeguard the strategic function of the national road network.
4. That applications for PV Farm developments would be accompanied by a glint and glare assessment
5. That the future Cavan County Renewable Energy Strategy should have regard to official policy on development management and access to national roads.

Other Specific Policies and Objectives

1. TII notes Section 13.6.7 of the draft plan that deals with signage standards, however it recommends that the plan is updated to incorporate reference to Section 3.8 of the DOECLG Spatial Planning and National Roads Guidelines and TII's Policy on the Provision of Tourist and Leisure Signage on National Roads
2. Recommend inclusion of a new development objective that requires development proposals to identify and implement noise mitigation measures, where warranted, for development proposals in the vicinity of existing or proposed national routes.

Settlement Plans/Development Strategies

TII requests that the issue of Master planning is addressed in the draft plan to address deficiencies in consultation, liaison and evidence based requirements.

Cavan Town

Ensure that the development of 'General Enterprise and Employment' zoning on the N3 Dublin Road, should progress complementary to safeguarding the strategic function of the national road

That the 'General Enterprise and Employment' zoning to the north of Cavan Town, adjoining the N3 with the junction of R-212 is not supported by the evidence base and plan led approach required by Guidelines

That the 'General Enterprise and Employment' zoning south of Cavan Town adjoining the N55 relies on direct access to national road and as such is at variance with national guidelines.

Virginia

That 'General Enterprise and Employment' lands subject to Masterplan M5 and M6, which both adjoin the national road are at variance with Section 28 Ministerial Guidelines and should be reviewed.

That zoning designations and development objectives do not compromise the proposed road scheme for Virginia Bypass

Bawnboy

That review of the settlement boundary identified for Bawnboy ensures that it is appropriately aligned with national road speed limits

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. It is the aim of the draft Plan to recognise the importance of the role of national road infrastructure and to protect same. The draft plan has made a commitment to undertake a Local Transport Plan for Cavan Town in the draft Plan and the timeline for same will be clarified. The draft Plan has referenced the requirement of new developments in the County to adhere to the *Spatial Planning and National Roads - Guidelines for Planning Authorities' (2012)*. In this regard reference is made the National Road Development Objectives on page 400, NR01 to NR06. It is considered that these satisfy the request for development management proposals including retail, economic and one-off housing. It is considered appropriate to clarify issues in relation to consideration of national routes in development proposals and also that clarity is inserted in relation to the requirement for Appropriate Assessment.

The Roads Department are continuing to liaise with the TII in relation to the provision of a Park and Ride facility along the N3. No sites have been identified to date.

The draft Plan has included for the provision of a number of Masterplans as identified in the Zoning Maps of the larger towns. TII have sought clarity on same and further clarity in relation to consultation is recommended.

A number of individual sites and towns have been noted in the TII submission.

Cavan Town

- The additional lands identified as General Enterprise and Employment is located within the 60km speed limit and are considered to be extensions of similar land use. The lack of zoned enterprise and employment lands and the need for clustering of similar land uses are a consideration is the zoning of this land.
- The Enterprise and Employment zoning north of Cavan town and at the junction of R-212 has been identified for a number of development plans as Enterprise and Employment following that grant of planning permission for such use. The current development plan has substantially reduced the size and extent of this zoning for this use in the current plan.

- The 'General Enterprise and Employment' Zoning south of Cavan Town adjoining the N55 is for expansion of the small scale units already in existence and is not intended to have direct access to national road.

Virginia

- It is considered appropriate to remove lands within the bypass corridor with the exception of existing developed areas to the south of the corridor line, within the existing Virginia development plan boundary.
- It is further noted that lands at Burrencarragh are appropriate to remain for the general enterprise and employment lands at this location.

Lands at Burrencarragh are considered to be a strategic employment site in accordance with the NPF and the RSES which note that there are opportunities to further enhance the economic performance of Virginia by capitalising on its strategic location and the associated national and international connectivity that this provides. The lands in question are considered appropriate for large scale employment generating uses of a strategic importance with a notable land requirement. RSES recognises the existing "Food Cluster of AW Ennis and Glanbia" and its potential. These lands will help achieve growth at this area. The development of this site will promote sustainable economic development in Virginia through the promotion of identified economic growth areas which provide employment opportunities and reduce the volume of long distance commuting.

Bawnboy

- The draft Plan has not extended the zoning of lands outside of the speed limit of Bawnboy village.

Chief Executive Recommendation

Recommendation No. 88

Delete text in the following National Road Development Objective NR 05 , page 400

<p>NR 05 ——— Prevent, except in exceptional circumstances, the creation of additional access points from new developments or the generation of increased traffic from existing accesses to national roads, to which speed limits greater than 60kmph apply.</p>
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Reword NR 05 to

NR 05 To protect the capacity, efficiency and safety of the national road network in County Cavan by complying with the 'Spatial Planning and National Roads -Guidelines for planning authorities' (2012).

Recommendation No. 89

Insert a new objective in Section 12.13, page 532 of the Draft Plan to assist applicants for single houses which states the following:

It is a goal of this plan to respect the long tradition of people living in rural areas in County Cavan and promote sustainable rural settlements as a key component in achieving strong and vibrant rural communities.

The Plan aims to;

- Sustain and renew established rural communities in the small towns and villages and wider countryside areas.
- Strengthen the established structure of villages and smaller settlements in rural areas to support local economies and to accommodate additional population in a way that supports the viability of local infrastructure and services.
- Ensure that key assets in rural areas such as water quality and the natural and cultural heritage are protected to support quality of life and economic viability.
- **Avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads for single houses, to which speed limits greater than 60kmph apply.**

It is necessary to carefully manage rural housing development. The provision of more sustainable housing options for rural communities will be facilitated by the plan through building up the capacity of our rural villages and Community Nodes to accommodate future housing needs of rural dwellers.

Recommendation No. 90

Add the following text to Rural Areas Economic Development Objective RE 01, Chapter 6 – Page 358

Rural Areas Economic Development Objectives

It is a development Objective of Cavan County Council to

RE01 Consider proposals for enterprise and employment uses on their merits in rural locations and where their specific location offers amenity, environmental and economic advantage. Such enterprises

or industrial projects, new or expanded, may sometimes require sites outside settlements, because of their size or other specific site requirements. Such projects will be assessed taking account of:

- The contribution of the proposed development in the County's economy
- The contribution of the proposed development to the county's environment and the principles of sustainable development
- Assessment of any potential environmental effects
- **Impact on traffic safety including the impact on the capacity and safety of the road network.**
- The economic viability and availability of alternative sites; and
- National Planning policy

It will be the responsibility of the developer to consider all environmental impacts, both direct and indirect. The Council will consider not only the immediate needs and benefits, but the wider long term environmental effects of the proposal.

Recommendation No. 91

Add new Development Objective AS 03 to Section 12.13.2.6 Access and Sightlines for Rural Applications, page 543

Access and Sightlines for Rural Applications Development Objectives

It is a development objective of Cavan County Council to:

AS 03 **Restrict the creation of additional access points from new developments or the generation of increased traffic from existing accesses to national roads, to which speed limits greater than 60kmph apply.**

Recommendation No. 92

Reword NHDS 2 Development Objective for Designated Sites, page 479

Delete NHDS 2-

~~**NHDS2** Ensure that no plans, programmes or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European Sites arising from their size or scale, land take, proximity, resource requirements, emissions, transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted (either individually or in combination with other plans, programmes, or projects).~~

Reword to -

NHDS 2–Ensure an Appropriate Assessment is carried out in respect of any plan or project not directly connected with or necessary for the management of the site but likely to have a significant effect on the

integrity of a European Site(s), either individually or in-combination with other plans or projects, in view of the site's conservation objectives.

Recommendation No. 93

Amend text in NHDS 3 Development Objective for Designated Sites, page 479

NHDS 3 - Ensure that any plan or project that could have an adverse impact on a NHA, pNHA, SAC, SAC, SPA, SPA (either by themselves or in combination with other plans and projects) or upon the conservation objectives of the site or would result in the deterioration of any habitat or any species reliant on that habitat will ~~not be permitted~~. **will be subject to the requirements of Article 6(3) and Article 6(4) of the Habitats Directive.**

Recommendation No. 94

Amend text in GR 08 - General Road Development Objectives, page 399

GR 08 Development of road projects will be subject to the outcome of the Appropriate Assessment process **in accordance with Article 6(3) and Article 6 (4) of the Habitats Directive.** ~~Where adverse effects on European site integrity are identified, alternative routes or designs will be developed to ensure that the project will not adversely affect the integrity of any European Site(s), either alone or in combination with any other projects. If despite the implementation of mitigation measures, there remains a risk that the proposals will adversely affect the integrity of any European Site(s), the project will not be progressed unless and alternative solution can be implemented which avoids/reduces the impact to a level that the integrity of the European Site(s) is (are) unaffected.~~

Recommendation No. 95

Insert new Development Objective NR 07 in National Road Development Objectives, page 400

NR 07 On urban streets and roads within the 50/60 kmph zone implement the recommendations of the Design Manual for Urban Roads and Streets (DMURS 2019). Within Transition zones on National Roads developments shall conform to 'The Treatment of Transition Zones to Towns and Villages on National Roads.

Recommendation No. 96

Add text in Mobility Management Plans Development Objective MMP 01, page 402

Mobility Management Plans Development Objective

It is a development objective of Cavan County Council to

MMP 01	Require Mobility Management Plans for proposed, existing and established trip intensive developments, to be submitted with applications.
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Recommendation No. 97

Add additional text to Section 13.6.8 Service Stations, page 580

<p>The role of service stations has become more diverse with the expansion from merely selling fuel to also providing convenience services and goods, including functioning as rest areas. Ancillary uses include tyre repair, collection points for online retail activity and self-service laundrettes. Service stations should be located on the outskirts of a town or village and inside the 50km to 60 km speed limits. <i>Service stations and associated truck parking facilities in locations at or near national roads will be assessed having regard to Section 2.8 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012).</i></p>

Recommendation No. 98

Add additional development objective NR 07 to National Road Development Objectives, page 400

NR 07	Seek to safeguard the capacity and efficiency of the national road network draining systems in County Cavan
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Recommendation No. 99

Add additional text to SED 03 Solar Energy Development Objective, page 413
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SED 03 Ensure that the assessment of solar energy development proposals will have regard to the following:

- | |
|---|
| <ul style="list-style-type: none">• Sensitivities of the county's landscape• Visual impact on protected views, prospects, scenic routes, as well as local visual impacts• Impacts on nature conservation designations, archaeological areas and historic structures, public rights of way and walking routes• Local environmental impacts, including those on residential• Visual and environmental impacts of associated development, such as access roads, plant and grid connections |
|---|

- Scale, size and layout of the project and any cumulative effects due to other projects
- The impact of the proposed development on protected bird and mammal species
- Impact of the grid connection from the proposal to the ESB network
- Impact on drivers of glint and glare from the proposed development
- Impact of the grid connection routing systems on the national road network

Recommendation No. 100

Add new Signage Development Objective SIGN 03 on Page 580

SIGN 03 Have regard to Section 3.8 of the DOECLG Spatial Planning and National Roads Guidelines and TII's Policy on the Provision of Tourist and Leisure Signage on National Roads

Recommendation No. 101

Add new text to Section 7.4.1 National Roads page 396

7.4.1 National Roads

The N3, N54, N55, N87 and N16 traverse the County providing important linkages within, into and out of the County. Cavan has a total public road network of 3,000 KM in length of which approximately 126 km comprises of National Primary and Secondary Roads.

The Council will preserve a corridor to enable design options for National Road Improvements and upgrade projects to be advanced.

Significant investment and improvements in the existing road infrastructure have been made by the Local Authority in terms of upgrades, realignments, maintenance, traffic management measures, traffic calming measures and road safety measures. It is important to protect and maintain the carrying capacity of this road network in the future as deemed necessary and as resources allow. In doing so, regard will be made to the Spatial Planning and National Roads Guidelines for Planning Authorities 2012, relating to development affecting National Primary and Secondary roads, including motorways and associated junctions.

Consideration also needs to be given to avoid adverse impacts when introducing noise sensitive uses in proximity to existing and future national roads. Where warranted, proposals should include mitigation and should have regard to Section 3.7 of the DoECLG 'Spatial Planning and National Roads Guidelines'.

The policy objectives within this plan will seek to support and encourage sustainable and compact forms of development, which will have minimal impact on the carrying capacity, efficiency and safety of the road network.

Recommendation No. 102

Add text to N02 Noise Development Objective, page 450

N 02 Require all developments to be designed and operated in a manner that will minimise and contain noise levels **having regard to relevant national guidelines and in the absence of national guidelines, to relevant international standards, where appropriate. Seek identification and implementation of noise mitigation measures, where warranted, for developments proposed in the vicinity of existing or proposed national roads.**

Recommendation No. 103

Add the additional text to Section 2.2.12 Masterplans page 89

2.2.12 Masterplans

Masterplans are required for 3 specified sites in Cavan Town as per the Land Use Zoning Map. They will establish strategic planning principles for each area as per its specifications below. It will set out an overall urban design framework for the development of the area. ~~The Masterplan will be prepared by the applicant/s in consultation with the Planning Authority and shall be agreed by the Council and lodged as part of any Planning Application.~~ **The Planning Authority will take a lead role in the preparation of masterplan, in conjunction with all other relevant parties, masterplans shall be agreed prior to lodgement as part of any Planning Application.** Notwithstanding, the fact that the lands have been zoned in the Plans, no significant planning permission for development will be granted until the Masterplan for development of the area, as a whole, has been agreed with the Planning Authority.

Each Masterplan shall include as a minimum.

- A written statement and a plan or series of plans indicating the objectives, in such detail as may be determined by the Planning Authority, for the proper planning and sustainable development of the area to which it applies.
- Proposals in relation to the overall design of the proposed development including maximum heights, external finishes of structures and general appearance and design, including that of the public realm. Designs should be sympathetic to the nature of the area as well as sympathetic to the town.
- Plans for the likely phasing of development.
- Plans which are consistent with the policies and objectives of the County Development Plan.
- Guidance on high quality architectural treatment with respect to topography, urban structure

and built form consistent with the established character of the town.

- Issues pertinent to the sustainable management and conservation of Biodiversity shall be considered in all Masterplans.
- **A full public consultation strategy.**

Add the additional text to Section 2.3.11 Masterplans page 114

2.3.11 Masterplans

Masterplans will be required for specified sites in Virginia as per the Land Use Zoning Map. They will establish strategic planning principles for each area as per its specifications below. A Masterplan will be required prior to the granting of planning permission. It will set out an overall urban design framework for the development of the area. ~~The Masterplan will be prepared by the applicant/s in consultation with the Planning Authority and shall be agreed by the Council and lodged as part of any Planning Application.~~ **The Planning Authority will take a lead role in the preparation of masterplan, in conjunction with all other relevant parties, masterplans shall be agreed prior to lodgement as part of any Planning Application.** Notwithstanding, the fact that the lands have been zoned in the Plans, no planning permission for substantial development will be granted until the Masterplan for development of the area, as a whole, has been agreed with the Planning Authority.

Development Objective

It is a development objective of Cavan County Council to

VMP 01 Require, with respect to areas which have been identified as Masterplans, the preparation of a Masterplan. Masterplans shall be lodged with a planning application, prior to development applications being considered on the subject site.

Each Masterplan shall include as a minimum:

- A written statement and a plan or series of plans indicating the objectives, in such detail as may be determined by the Planning Authority, for the proper planning and sustainable development of the area to which it applies.
- Proposals in relation to the overall design of the proposed development including maximum heights, external finishes of structures and general appearance and design, including that of the public realm. Designs should be sympathetic to the nature of the area as well as sympathetic to the town.
- Plans for the likely phasing of development.
- Plans which are consistent with the policies and objectives of the County Development Plan.
- Guidance on high quality architectural treatment with respect to topography, urban structure and built form consistent with the established character of the town.
- Issues pertinent to the sustainable management and conservation of Biodiversity shall be considered in all Masterplans.

- A full public consultation strategy.

Amend text to Section 2.7.11 Masterplan 1, page 168

2.7.11 Masterplan 1

~~Prepare a Masterplan, in conjunction with relevant stakeholders, for backlands development subject to following:~~

The Planning Authority will take a lead role in the preparation of the masterplan, in conjunction with all other relevant parties, masterplans shall be agreed prior to lodgement as part of any Planning Application. This Masterplan shall contain the following:

- The construction of a new access road from the Kells Road to the Rocks Road to serve the Masterplan area.
- Development shall support, contribute to and consolidate the town core function while complying with the highest urban design standards.
- Development shall provide safe and accessible pedestrian linkages between the development and the existing town core, amenity areas and community facilities.
- The location of the proposed access points will be determined at planning application stage. Access roads shall be improved in order to accommodate additional traffic.
- Necessary social and physical infrastructure is to be provided, as appropriate.
- A full public consultation strategy.

Amend text to Section 2.10.11 Masterplan 1, page 204

2.10.11 Masterplan 1

Prepare a Masterplan for this area to incorporate Residential, Employment, Public and Community uses. The need and quantum of such uses shall be identified as part of the Masterplan preparation and shall be in accordance with the Core Strategy of the Plan. ~~The Master Plan shall be prepared in conjunction with relevant departments of Cavan County Council. On completion, the Masterplan shall be submitted to the Planning Authority for approval prior to the submission of any planning application.~~

The Planning Authority will take a lead role in the preparation of the masterplan, in conjunction with all other relevant parties, masterplans shall be agreed prior to lodgement as part of any Planning Application. Proposals shall ensure the residential amenities of existing and future residents are protected and details of traffic impacts and road safety. Pedestrian and cyclist linkages to the Town centre shall be of paramount importance. Piecemeal development will not be permitted, only an overall integrated proposal will be acceptable. Proposals for the site shall be subject to the Environmental policies and objectives of this Plan. Details of how the Masterplan will address Sustainable Design Principles shall be clearly addressed in the Masterplan. A full public consultation strategy shall form part of the masterplan preparation.

Recommendation No. 104

Overlay the Virginia Bypass and eliminate lands from landuse zoning as hatched -Refer to the Appendix 5.

Recommendation No. 105

Add additional text to Section 2.3.11.6 Masterplan 6, Lands at Burrencarragh, page 116

2.3.11.6 Masterplan 6 Lands at Burrencarragh

Prepare a Masterplan for the strategic employment site at Burrencarragh which is considered to be a potentially suitable site for development of an economic hub, in accordance with the NPF and the RSES. These set out that there are opportunities to further enhance the economic performance of Virginia by capitalising on its strategic location and the associated national and international connectivity that this provides. RSES recognises the existing “Food Cluster of AW Ennis and Glanbia” and its potential. These lands will help achieve growth at this area. The lands in question are considered appropriate for large scale employment generating uses of a strategic importance with a notable land requirement. The aim of this site is to promote and facilitate the sustainable growth of Virginia as a hub for the east of the County, in terms of economic and services. The development of this site will promote sustainable economic development in Virginia through the promotion of identified economic growth areas which provide employment opportunities locally and reduce the volume of long distance commuting.

These lands are identified to attract large scale occupiers and employers that is more dependent on larger volumes of commercial vehicle movements that would otherwise be less appropriate operating from lands immediately abutting/closer to Virginia Town centre. Having regard to the location of this site, small scale or one off developments will not be permitted. It is recognised that a significant road improvement will be required to create a viable and sustainable access to these lands. Any development of the land shall be done in consultation with the IDA, Enterprise Ireland and Transport Infrastructure Ireland. **It is noted that the emerging preferred route for the By Pass of Virginia has included a link road through these lands. Development of the Masterplan shall adhere to Section 2.6 of the Spatial Planning and National Roads, Guidelines for Planning Authorities, 2012.** A Masterplan will be required which shall address the following issues;

- Access and traffic.
- The requirement for Appropriate Assessment.
- Assessment of environmental impacts.
- Linkages to Virginia Town.
- Feasibility of proposed use.
- Study of cumulative benefits for the county.
- Impacts on Virginia Town

- Details of how the Masterplan will address Sustainable Design Principles

In addition, proposals for the site, for which a Masterplan shall be prepared, shall be subject to the Environmental policies and objectives of this Plan, in relation to plans, projects or developments which are likely to have a significant impact on the environment.

Irish Water

Irish Water set out that they are willing to continue with their ongoing engagement with Cavan County Council in the preparing of the draft Cavan County Development Plan.

Issues raised in the submission include:

The Wastewater Treatment Plant in Bailieborough, Virginia, Ballinagh, Shercock, Dowra, Kilnaleck is close to lands with potential for the development of sensitive receptors. Consideration should be given to restricting development in these instances. the EPA recommends a buffer of 50 metres for smaller WWTP's and a greater buffer for WWTP's that are greater than 1500PE.

Wastewater

The submission has included a table providing an overview of the ability of Irish Water to cater for the planned growth in the settlements as per the Core Strategy. Capital investments are ongoing at Bailieborough, Ballyjamesduff, Kingscourt and Cootehill to address capacity constraints. It is projected that these will be completed within the lifetime of the Development Plan by 2024. A project is underway in Virginia and this is due for completion in 2024. A project in Ballyconnell to provide additional capacity is being progressed under the Irish Water Small Towns and Villages Growth Programme.

Suggested changes to the draft plan are

Section	Comment
Volume 1- Ballyjamesduff 2.4.4	Amended pe from 6600 to 5,200 Upgrade will meet Wastewater Discharge Licence Emission Limit Values
Volume 1, Bailieborough, 2.5.2, 2.6.4, 2.7.4	Projects are underway to upgrade Bailieboro, Cootehill and Kingscourt WWTPs
Objectives relating to linear parks and wildlife corridors along riverbanks	Plan should allow for access to and maintenance of existing Irish Water Infrastructure e.g. outfalls, pipelines, within these corridors and additional

	land may be needed along riverbanks to provide new assets like WWTP extensions
Masterplans	Consideration needs to be given to the servicing of these sites and the potential impacts on Irish Water assess like the need to divert pipes.
Section 6.14.1 Water and Wastewater services	There are a number of projects that need to be included e.g. Virginia WWTP upgrade
Groundwater, Water Development. Groundwater and Water Quality objectives	Recommended condensing GW03 and GW07, GW03 and W01, GW04 and W02, GW05 and W04 Section 8.4.1 heading should be Groundwater and Surface Water
8.4.3 Wastewater- Capital Investment Plan Wastewater Treatment Plant Early Contractor Involvement	Suggest that text is amended to clarify that Bailieborough Kingscourt and Cootehill projects are current at gate 1 stage (feasibility study). Virginia and Cootehill at gate 2 stage. Virginia increase in capacity will be to 6000pe and Ballyjamesduff to 5200 pe.
8.4.3 FDW 15	Move this objective to section 8.5 Water Supplies
12.12 Quarrying Objective Q08	Suggest amendment to this objective to include for Drinking water supplies
Chapter 13 Development Management	Include text that all new residential and industrial developments wishing to connect to Irish Water network are to be assessed through Irish Water's New Connection Process.
Mult-unit developments on non-serviced lands FDW14	As per the Draft Water Services Guidelines for Planning Authorities (Jan 2018) Section 5.3- there is a general presumption that development will be focused into areas that are not serviced by public water supply and wastewater collection networks
Environmental Reports	Contents of this submission should be taken into account in the Environmental reports 2020 Environmental Reports

An appendix to this submission indicates that the following towns have

Spare Capacity – Cavan Town, Belturbet, Shercock, Arva, Kilnaleck, Killeshandra, Butlersbridge, Lough Gowna, Swanlinbar

Potential spare capacity – Mullagh, Ballyconnell, Ballyhaise, Blacklion,

No spare Capacity – Bailieborough, Ballyjamesduff, Kingscourt.

Limited spare capacity- Cootehill,

Project Underway – Virginia

Chief Executive’s Opinion on Issues Raised

The submission from Irish Water is noted and welcomed. The preparation of the draft Development Plan was carried out in consultation with Irish Water and the Water Services Department of the Local Authority. The submission includes a number of recommendations to text in the draft plan and provides updated information on services and timetables for infrastructure upgrades available since the preparation of the draft Plan.

It is acknowledged that capacity constraints have arisen since the preparation of the draft Plan in towns including Bailieborough, Ballyjamesduff and Kingscourt. Virginia was already highlighted as having capacity issues. Following discussions with Water Services Department of the Local Authority and having regard to the strategic importance of towns like Virginia, Bailieborough, Ballyjamesduff and Kingscourt, it is not considered appropriate to alter the Core Strategy and Settlement Framework of the County. It is expected that these capacity constraints will be resolved by 2024.

A number of recommendations in relation to the text of the draft Plan have been made by Irish Water. Text associated with the preparation of Masterplans has already included for the provision of infrastructure for the development.

Chief Executive Recommendation

Recommendation No. 106

Add new Foul Drainage and Wastewater Development Objective FDW 19, Page 438

FDW 19	Development proposals in close proximity to Wastewater Treatment Plants shall provide, where deemed necessary, for a minimum buffer of 50 metres (for smaller WWTP’s) and greater for WWTP’s that are greater than 1500PE.
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Recommendation No. 107

Amend Section 2.4.4 Physical Infrastructure, page 121

2.4.4 Physical Infrastructure

Ballyjamesduff is served by an existing wastewater treatment plant which requires upgrade. Plans to increase current capacity from 2200 PE to ~~6600PE~~ 5200PE and upgrade the process to meet the ~~Urban Waste Water Treatment Regulations~~ Wastewater Discharge Licence Emission Limit Values are ongoing requirements are ongoing. Water supply is from Lough Nadreegeel.

Recommendation No. 108

Add additional text in Bailieboro- Section 2.5.4 Physical Infrastructure, page 133

2.5.4 Physical Infrastructure

Bailieborough is served by an existing wastewater treatment plant ~~which requires upgrade~~ which has a project underway to upgrade its plant. Water supply is from Skeagh Lough. Green infrastructure is essential to delivering the Town's economic competitiveness, an improved quality of life and improved social inclusion.

Recommendation No. 109

Add additional text in Cootehill - Section 2.6.4 Physical Infrastructure, page 146

2.6.4 Physical Infrastructure

Cootehill is served by an existing wastewater treatment plant ~~which requires upgrade~~ which has a project underway to upgrade its plant. Water supply is from Coragh Lough.

Recommendation No. 110

Add additional text in Kingscourt- Section 2.7.4 Physical Infrastructure, page 159

2.7.4 Physical Infrastructure

Kingscourt is served by an existing wastewater treatment plant ~~which requires upgrade~~ which has a project underway to upgrade its plant. Water is from a borewell at Descart, Co. Monaghan (Groundwater Supply).

Recommendation No. 111

Add new Foul Drainage and Wastewater Development Objective FDW 20, Page 438

FDW 20 Development proposals including those for linear parks and wildlife corridors along riverbanks shall plan for access and maintenance of existing Irish Water Infrastructure.

Recommendation No. 112

Add text into Section 6.14.1 Water and Wastewater Services, page 359

6.14.1 Water and Wastewater Services

The assurance of high-quality water availability and appropriate capacity wastewater treatment is also a critical element to the future economic development of the county. Notable improvements as of 2017 to the water and wastewater infrastructure have been undertaken in recent years including Cavan Sewerage Scheme, Cavan Regional Water Supply Scheme Water Treatment Plant Upgrade, Bailieborough Water Mains Rehabilitation, and Ballyconnell Water Mains Rehabilitation, **Kingscourt Water Treatment Plant upgrade, Countywide rehabilitation of elements of the water and wastewater infrastructure, upgrades to the disinfection process at all water treatment facilities.** However, other essential infrastructure and supply works remain outstanding.

Recommendation No. 113

Delete GW 07 and add text to GW 03 in Groundwater Development Objectives, page 433 and Re Number GW 07 to GW 13 to GW 07 to GW 12

GW 03 Support the implementation of the relevant recommendations and measures outlined in the relevant River Basin Management Plan 2022-2027, and associated Programme of Measures, or any such plan that may supersede same during the lifetime of the plan. Development proposals shall not have an unacceptable impact **on water quality**, the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands **and wetlands.**

~~**GW 07** Ensure that development would not have an unacceptable impact on water quality and quantity including surface water, ground water, designated source protection areas, river corridors and associated wetlands.~~

Recommendation No. 114

Delete W 01 Water Services Objective, page 440 and renumber from W01 to W 06 to W01 to W 05.

<p>W-01 Support the implementation of the relevant recommendations and measures outlined in the relevant River Basin Management Plan 2022-2027, and associated Programme of Measures, or any such plan that may supersede same during the lifetime of the plan. Development proposals shall not have an unacceptable impact on the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands.</p>

Recommendation No. 115

Delete W 02 Water Services Objective, page 440 and renumber from W01 to W 06 to W01 to W 04.

<p>W-02 Contribute towards, as appropriate, the protection of existing and potential water resources, and their use by humans and wildlife, including rivers, streams, wetlands, groundwater and associated habitat and species in accordance with the requirements and guidance in the EU Water Framework Directive 2000 (2000/60/EC). The European Union (Water policy) Regulations 2003 (as amended), the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (as amended), the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (groundwater) Regulations 2010 (as amended) and other relevant EU Directives, including associated national legislation and policy guidance (including any superseding versions of same).</p>
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Recommendation No. 1146

Rename Section 8.4.1 Groundwater to Section 8.4.1 Groundwater and Surface Water page 432

Recommendation No. 117

Amend text in Section 8.4.3 Wastewater – Capital Investment Plan, Wastewater Treatment Plant Early Contractor Involvement (CIP WWTP ECI) programme, page 436

8.4.3 Wastewater – Capital Investment Plan, Wastewater Treatment Plant Early Contractor Involvement (CIP WWTP ECI) programme

This investment programme includes for County Cavan, the following wastewater treatment plants - Bailieborough, Ballyjamesduff, Kingscourt, Cootehill, & Virginia. **Bailieboro, Kingscourt and Cootehill projects are currently at Gate 1 stage (Feasibility study) and Virginia and Cootehill are at Gate 2 stage.**

~~Feasibility Study reports are completed for these sites and Bailieborough, Ballyjamesduff, Kingscourt, Cootehill, & Virginia were progressed to gate 2 works, (Planning, Design, EIA), in early 2020.~~

ECl contractor has been appointed (VWI) and will now progress the work packages from gate 2 stage to completion and has received the following Project Brief packages;

1. **Virginia:** Increase current capacity from 2000 PE to ~~6075PE~~ **6000PE**- Upgrade process to meet the current WWDL requirements.
2. **Ballyjamesduff:** Increase current capacity from 2200 PE to ~~6600PE~~ **5200PE** - Upgrade process to meet the UWWTR requirements

It is envisaged that similar preliminary design exercises will commence for Cootehill, Bailieborough and Kingscourt Projects throughout 2021.

Recommendation No. 118

Delete FDW 15 and renumber from Foul Drainage and Wastewater Development Objectives page 438 and insert into new Water Development Objectives, W05 page 441

FDW 15 Support the development of group water supplies and public drinking water supplies throughout the county.
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W 05 Support the development of group water supplies and public drinking water supplies throughout the county.

Recommendation No. 119

Amend Section 12.12 Quarrying, Objective Q 08 page 532

Q 08 Ensure that development for aggregates/mineral extraction, processing and associated processes does not significantly impact on the following

- Existing and proposed Special Area of Conservation and Special Protection Areas
- Existing and proposed Natural Heritage Areas.
- Areas of importance for the conservation of fauna
- Areas of significant archaeological potential
- In the vicinity of a recorded monument
- Sensitive landscapes

- **Drinking Water Supplies**
- Ensure that all quarrying activities and projects associated with the extractive industry comply with all relevant Planning and Environmental Legislation

Recommendation No. 120

Amend Foul Drainage and Wastewater Development Objective FDW 08 page 437

FDW 08	Ensure 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, subject to connection agreements with Irish Water. New developments connecting to Irish Water network shall be assessed through Irish Water's New Connection Process.
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Department of Housing, Heritage and Local Government

This submission sets out the heritage related observations/recommendations in relation to the draft plan

Archaeology (underwater)

There are over 40 protected wreck sites (mainly logboats) located in the rivers and lakes of Cavan and likely to be more. It is recommended that Section 11.8.2 is updated to refer to and protect all archaeological objects situated underwater.

Nature Conservation

Volume 1

1.15 Core Strategy Development Objectives – it is recommended that CSD05 is updated to include reference to the potential impact on the integrity of European Sites and Annexed Habitats and Species.

Include in CSD05 the requirement for screening for Appropriate Assessment for development and an objective that there will be no net loss in biodiversity from development proposals in the lifetime of the plan.

Section 1.10.12- Map Based Specific Objective (Mullagh)- the department highlight recent guidance produced by Inland Fisheries Ireland with respect to development around waterways and in urban habitats which should be applied to all development near waterways in Cavan.

1.11.9 Natural and Built Heritage – the department welcomes this objective to require native planting of trees, hedgerows and vegetation.

Chapter 5 Climate Change – The Department would welcome more emphasis on improving Green Infrastructure to enhance biodiversity and connectivity between European Sites by the use of inclusion of ecosystems scoring approach in the Plan and improvement of Green Infrastructure by using the ecosystems scoring approach and environmental sensitivity mapping.

7.3.2 Greenways and 9.8 Greenways, Cycling and Walking

There is a need to apply precautionary principle when screening for Appropriate Assessment and/or undertaking AA for greenways, blueways and peatways.

7.10 Renewable Energy

Recommend that all wind energy proposals are subject to a carbon benefit analysis.

Inclusion of a policy objective requiring wind energy developments to incorporate robust long term monitoring plans and examine impacts on biodiversity of wind farms.

Impacts of nitrogen deposition on sensitive Natura 2000 sites to be taken into account when considering locations of bio energy proposals.

Chapter 9 Tourism

Proposals near lakes and waterways should be screened for AA, and assessed for impacts to biodiversity at the earliest stage of planning including Environment Impact Assessment

Chapter 10 Natural Heritage

Record 10.2.2 to EU Birds and Habitats Directives.

Appropriate Assessment should be include as an overarching policy in the Plan.

Include an objective in the Plan for development that is not subject to EIA or AA that states, 'Ecological Impact Assessment (EclA) will be required for any proposed development likely to significantly impact on natural habitats and/or species.

10.3.4 National Peatlands Strategy

Recommend the inclusion of a clear policy objective in relation to development on peat to ensure clarity in relation to the requirements of the planning code.

Include an objective to support the aims of the National Peatlands Strategy and the implementation of the National Raised Bog SAC Management Plan 2017-2022 and Peatlands Climate Action Scheme

Wetlands

Undertake to survey and monitor all wetland sites in Cavan during the Plans lifetime

That a minimum level of assessment for any proposals that affects a listed/named wetland site in the county above 0.1ha like a EclA.

10.13 Woodlands, Trees, Hedgerows and Stonewalls.

Include a policy objective where woodland, tree, hedgerow removal is proposed which may affect bat species is subject to regime of strict protection under the EC (Birds and Habitats) Regulations, 2011, as amended.

Volume 5

Natura Impact Report (NIR)

Lighting objectives LP01 and LP03 – mitigation for light pollution should have regard to EUROBATS and Darksky circular.

The Department note that LW04 on page 37 of the NIR is included as mitigation, however the Department is concerned that increased access to waterways can have a negative effect on biodiversity in general and increase disturbance to fauna.

The Department recommends that biodiversity, flora and fauna monitoring should include the following

- Monitoring of nitrogen deposition due to bioenergy projects
- Monitoring of wind energy projects
- Monitoring of one off rural houses
- Monitoring of the development of walking and cycling routes
- Monitoring of Wetland sites

This allows for corrective action and intervention if environmental damage is noted the Department would welcome a clear and specific monitoring plan to be included with the Strategic Environmental Report that clearly outlines how it is proposed to record the impacts of plan implementation on biodiversity, both in terms of biodiversity loss and biodiversity enhancement during the lifetime of the plan.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The draft Plan includes policies and objectives to protect the Built and Natural Heritage of the County.

CCC will consider the inclusion of an ecosystem scoping approach as part of the preparation of a Landscape Character Assessment, Habitat Mapping and the Wetlands Survey, in addition to other relevant surveys which the plan objectives support.

Section 13.3 includes requirements in the assessment of planning applications that the requirement for Appropriate Assessment is included. Appropriate Assessment is considered to be an overarching policy throughout the draft Development Plan.

The preparation of Cavan Biodiversity Plan is currently underway and actions relating to monitoring will form part of same.

Volume 4 of the Natura Impact Report references in relation to lighting are noted. Lighting Development Objectives LP -01 and LP-03 have been integrated into the Plan and are considered to be clear and specific within the context of being objectives within a plan that provides a framework for proper planning and sustainable development at County level. It is expected that any mitigation measures that emerge from lower tier plans or individual projects may have a greater degree of detail associated with them, considering their position in the decision making/consent granting framework hierarchy.

In relation to LW 04 on page 37 of the NIR, it is noted that text was added to LW04 to be included on the mitigation table 'subject to the protection of environmentally sensitive areas and the requirements of the Habitats Directive'. The SEA Monitoring Programme is set out in Section 10 of the SEA Environmental Report and addresses all of the relevant requirements. Additional detail will be added to some sources in order to address issues raised in this submission.

Chief Executive Recommendation

Recommendation No. 121

Insert the following text into Section 11.8.2 Importance of Archaeological Heritage, page 508

11.8.2 Importance of Archaeological Heritage

County Cavan has a wealth of archaeological heritage including the prehistoric Cavan Burren Park which is part of the UNESCO Cuilcagh Lakelands Geopark, the thirteenth century Lough Oughter Castle, earthworks, historic burial grounds, crannogs and ringforts. Archaeology, as a study enables us to understand how these humans interacted with their environment, how their societies worked and their development into present day. It marks a connection to our distant past, an educational tool and a heritage tourism asset. Once lost, such elements can never be replaced, this non-renewable resource must be protected.

There are a number of categories of monuments under the National Monuments Acts:

- National Monuments in the ownership or guardianship of the Minister or a local authority or National Monuments which are subject to a preservation order.
- Historic monuments or archaeological areas recorded in the Register of Historic Monuments.
- Monuments recorded in the Record of Monuments and Places.
- **Underwater archaeology**

Recommendation No. 122

Add additional text to Core Strategy Development Objective CSD 05, page 64

CSD 05	In the assessment of development proposals, to take account of transport corridors, environmental carrying capacity, availability and/or capacity to provide waste water and water supply services, potential to conflict with Water Framework Directive objectives, potential to impact on the integrity of European sites and Annexed Habitats and species, features of biodiversity value including ecological networks, impact on landscape and visual characteristics, education and other socioeconomic objectives. Development proposals may require screening for Appropriate Assessment and there shall be no net loss in Biodiversity from development proposals in the lifetime of the plan.
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Recommendation No. 123

New Water Development Objective W 07 page 441

W 07	Support the development in the County of green infrastructure, river walkways (in accordance with the principles of Planning for Watercourses in the Urban Environment, A guideline Developed by Inland Fisheries) and access from amenities, residential areas and community services to the town centre.
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Recommendation No. 124

Amend Wind Energy Development Objective WE 02, page 412

WE 02	Ensure that the assessment of wind energy development proposals will have regard to the following:
	<ul style="list-style-type: none">• sensitivities of the county's landscapes;• visual impact on protected views, prospects, scenic routes, as well as local visual impacts;• impacts on nature conservation designations, archaeological areas and historic structures, public rights of way and walking routes;• local environmental impacts, including those on residential properties, such as noise and shadow flicker;• visual and environmental impacts of associated development, such as access roads, plant and grid connections;• scale, size and layout of the project and any cumulative effects due to other projects;• the impact of the proposed development on protected bird and mammal species;

- impact of the grid connection from the proposed wind farm to the ESB network.
- Carbon benefit analysis

Recommendation No. 125

Amend Biomass Development Objective BD 01, page 414

BD 01 Facilitate the development of projects that convert biomass to energy, subject to proper planning considerations including the impact of nitrogen deposition on sensitive Natura 2000 sites.

Recommendation No. 126

Insert new Development Objective for Non Designated Sites NHND 5, page 481

NHND 5 Require an Ecological Impact Assessment (EclA) for any proposed development which have a significant impact on rare, threatened and or protected species and non-designated habitats of biodiversity value.

Recommendation No. 127

Insert a new Development Objective for Landscape Character/ Natural Heritage Climate Change Development Objectives LCC 02, page 496

LCC 02 Support the aims of the National Peatlands Strategy and the implementation of the National Raised Bog SAC Management Plan 2017-2022 and Peatlands Climate Action Scheme

Recommendation No. 128

Insert new Wetlands Development Objective WL 3, page 487

WL3 Where it is intended to fill or reclaim or carry out a development proposal on a wetland area, the minimum level of assessment on a site above 0.1ha shall be an ecological impact assessment and an Appropriate Assessment where necessary. ~~will be required.~~

Recommendation No. 129

Amend Woodlands, Trees, Hedgerows and Stonewalls Development Objective WTHS 7 in Section 10.13, page 488

WTHS7 Encourage the retention of hedgerows and stonewalls and other distinctive boundary treatments in rural areas and prevent loss and fragmentation, where possible. Where removal of a hedgerow or stone wall is unavoidable, mitigation by provision of the same type of boundary will be

required and where removal is proposed which may affect bat species it shall be subject to regime of protection under the EC (Birds and Habitats) Regulations, 2011, as amended.

Recommendation No. 130

Amend Lighting Development Objective LP 01, LP 03 in Section 8.10, page 450

LP 01	Control lighting in urban, and rural and sensitive areas in accordance with Euronats and Darksy Circular and in particular sensitive locations, in order to minimise impacts on residential amenity, habitats and species of importance.
LP 03	Ornamental lighting of public buildings, bridges, monuments and public spaces must not fall beyond the area intended or directed skywards. Architecturally sensitive tones such as passive, warm coloured lights should be considered before blue or rich white lights and only used where necessary in accordance with Eurobats and Darksy Circular.

Recommendation No. 131

Amend GW 03 Groundwater Development Objective, page 433

GW 03	Support the implementation of the relevant recommendations and measures outlined in the relevant River Basin Management Plan 2022-2027, and associated Programme of Measures, or any such plan that may supersede same during the lifetime of the plan. Development proposals shall not have an unacceptable impact on the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands and species, in County Cavan and in any areas that are hydrologically or hydrogeologically linked, including areas in Northern Ireland.
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Department of Education

The Department has examined the implication of the proposed population increase of the County on projected school place requirements in the larger urban settlements.

The Department has welcomed a number of development objectives in the draft plan concerning education and has indicated that Objective CE11 concerning school design is not necessary along with the second sentence of Objective CE 10.

The Department request that all existing and future school sites are mapped on the Councils GIS system.

The Department has considered the Draft Plan in the context of projected population growth in the county to 2031. Based on its analysis the Department anticipates that some requirements for additional educational accommodation may emerge over the lifetime of the plan.

Cavan Town

It is served by 3 mainstream primary schools and 3 (non-fee paying) post primary schools. At primary level, it is considered that the existing schools could meet any requirement arising from the increased population. At post-primary level, it is anticipated that additional potential requirement arising from the projected population could be met by expansion of existing facilities

Virginia

Virginia is served by 1 mainstream primary school and 1 post primary school. The level of potential increase in school place requirements is relatively modest and it is considered it can be met by existing facilities.

Ballyjamesduff

The town is served by 1 mainstream primary school and 1 post primary school. It is anticipated that any additional school place requirements arising from the draft plan could be met at the existing facilities.

Bailieborough

The town is served by 2 main primary schools and 1 post primary school. At primary level it is anticipates that any additional school place requirements could be met at existing facilities. At post primary, a potential increase in school place requirements in the Bailieborough School Planning Area (which includes Kingscourt) would require consideration of the capacity of both schools to meet any potential future need.

Kingscourt

The town is served by 2 mainstream primary schools and 1 post primary school. The post primary school in Kingscourt is in the Bailieborough School Planning Area and the 2 settlements are geographically close. Therefore, any potential increase in school place requirements in this area would require consideration of both facilities in how best to meet any potential future requirement.

Cootehill

The town is served by 2 mainstream primary schools and 1 post-primary school. At primary level, it is anticipated that any additional school place requirements arising from the draft plan could be met at existing facilities. At post primary level, a potential need for additional school places could be met by expansion of the existing facility, if required.

Belturbet

The town is served by 3 mainstream primary schools and 1 post primary school. At both primary and post primary level, it is anticipated that any additional school place requirements arising from the draft plan could be met at existing facilities.

Mullagh

The town is served by 1 mainstream primary school and it is anticipated that any additional school place requirements arising from the draft plan could be met at this existing facility. Mullagh is located in the Virginia School Planning area and any potential additional requirement for post-primary places can be met in Virginia.

Ballyconnell

The town is served by 2 mainstream primary schools and additional school place requirements arising from the draft plan could be met at existing facilities. At post primary, an amalgamation has been agreed between St Bricin's Post Primary School in Belturbet and St Mogue's Post Primary school. A new site is required in order to provide a new building. The Department has undertaken and continues a site identification process in respect to a suitable permanent site for a new school.

The Department has not identified any significant requirement for additional mainstream school place provision in any other settlement in the county. In terms of special schools, no immediate need has been identified but if a need arises the Department will get in touch with the Council. It is vital to protect existing school zonings and have land buffers around them wherever possible in order to cater for future needs.

Chief Executive's Opinion on Issues Raised

This submission is positive in nature and is welcomed and noted. There is strong support for the retention and expansion of education facilities in the draft Plan thus acknowledging the importance of education for the development of the county as a whole. The presence or absence of a school in the towns and villages of the County is a consideration in the settlement Hierarchy of the County. In each of the towns and villages in the County there is strong support for the retention and expansion of education facilities. Section 13.6.4 and Section 4.5 of the Plan supports education facilities in the County.

With regard to Objective CE11 concerning school design, it is considered not necessary, in addition to the second sentence of Objective CE 10.

Chief Executive Recommendation

The importance of delivery of schools sites and provision for extensions to existing schools has been included in the draft Plan. The anticipated needs of the school above is key to delivery of a draft Plan

that will meet the needs of their growing communities. The needs above have been considered in the preparation of the draft Plan.

Recommendation No. 132

Amend Childcare and Educational Development Objective, CE 10, page 294

CE 10	Ensure the needs of communities including education facilities are appropriately provided for in newly developed areas in the County.
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Recommendation No. 133

Amend Childcare and Educational Development Objective, CE 11, page 294

CE 11	Encourage the use of existing educational facilities and school playing fields for other community purposes. In new schools, it will be a requirement in the design of the school to provide dual use facilities and take account of community requirements.
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Department of Transport

The Department is developing a new national sustainable mobility policy which will be published later this year. Many of the key objectives on sustainable mobility in Chapter 7 of the draft Plan align with the key areas being considered in the development of the new sustainable mobility policy.

The new national sustainable mobility policy will replace the following documents Smarter Travel, A Sustainable Transport Future 2009-2020, and the National Cycle Policy Framework. See Sections 7.2.4 and 7.2.5 – the plan may need to change the wording to reflect this.

Reference should be made to:

- The ‘whole of Government’ National Disability Inclusion Strategy (NDIS) 2017-2022 which includes specific actions assigned to Local Authorities.
- United National Convention on the Rights of Persons with Disabilities
- The DMURS Interim Advice Note- COVID 19 Pandemic Response

Local Authorities are a key stakeholder in the ‘whole journey approach’ to making public transport fully accessible to people with disabilities to all elements that constitute a journey. This ensures a universal design approach to the built environment, including footpaths, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters.

The publication by the National Transport Authority (NTA) of its ‘Local Link Rural Transport Programme Strategic Plan 2018-2022, is the successor to the Rural Transport Initiative (RTI) so all reference to the RTI can be deleted. (7.2.12 page 385 and PT04 page 393).

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The Department of Transport has welcomed the comprehensive draft development plan. The submission notes that many of the key objectives in the draft plan on sustainable mobility align with the key areas being considered in the development of the new sustainable mobility policy such as the importance of integrating land use and transport policies and the delivery of high quality, permeable pedestrian and cycling networks as part of the transition to a climate resilient society.

Recommendation No. 134

Delete Section 7.2.12 Rural Transport Initiative and insert new text page 385

~~7.2.12 Rural Transport Initiative~~

~~The Rural Transport Initiative (RTI) supports rural transport services in the County, The RTI Project provides community based, door to door, flexible transport services, and facilitates passengers to access a wide range of services, which include shopping, health, day care and social activities on a regular basis. Services can also be scheduled to link with public and private transport services locally.~~

7.2.12 Local Link Rural Transport Programme Strategic Plan 2018-2022

This document supports the provision of a quality nationwide community based public transport system in rural Ireland which responds to local needs.

Recommendation No. 135

Amend Public Transport Development Objective PT 04 on Page 393

PT 04 Support the Rural Transport Initiative Local Link Rural Transport Programme which aims to address rural social exclusion and the integration of rural transport services with other public transport services. the provision of an integrated rural community public transport system as a means of reducing social isolation and as a viable long term sustainable public transport option.
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Recommendation No. 136

Amend Section 7.3.6 Public Transport in Rural Areas on Page 392

7.3.6 Public Transport in Rural Areas

The availability of public rural transport plays a major role in combatting rural isolation and acts as a catalyst in creating models of partnership, at all levels, where key sectors actively engage in transport provision, to ensure equality of access for all **including people with disabilities, reduced mobility and older people**.

Recommendation No. 135

Insert new text after paragraph 2, Section 7.1 page 381

Cavan County Council is committed to supporting an integrated and accessible public transport. Reference is made in this regard to the National Disability Inclusion Strategy (NDIS) 2017-2022 which includes specific actions assigned to Local Authorities, the United National Convention on the Rights of Persons with Disabilities and to the DMURS Interim Advice Note- COVID 19 Pandemic Response. Local Authorities are a key stakeholder in the 'whole journey approach' to making public transport fully accessible to people with disabilities to all elements that constitute a journey. This ensures a universal design approach to the built environment, including footpaths, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters.

National Transport Authority (NTA)

The NTA opens their submission with a set of guiding principles that a development plan land use policies and objectives should be guided by including:

- Development of land within/contiguous to existing urban areas
- Residential lands to be developed sequentially and be accessible by walking, cycling and public transport
- Propriety to infill/brownfield sites
- Large scale/trip intensive developments to town core
- Town centres to focus on permeability for walking, cycling and public transport modes.
- Maximise number of people walking/cycling/public transport to their neighbourhood or district centre
- New developments to be fully permeable for walking and cycling
- Density and location of development should maximise potential for walking/cycling/public transport

- New residential development to provide for filtered permeability- restricting/discouraging private car trips
- Trip destinations like employment, schools, retail to be developed at locations that maximise walking/cycling/public transport
- Strategic transport function of national roads to be maintained and protected in accordance with national policy
- All non-residential development proposals should be subject to maximum parking standards
- In areas of high intensity of development, an approach that caps car parking on an area wide basis should be applied
- For all major employment developments and all schools, travel plans should be conditioned

Settlement Strategy

The NTA welcomes the Land Use and Transport Development Objectives set out in Chapter 7 and in particular development objective LUR07.

Virginia Masterplan at Burrencarragh is located outside the settlement boundary and there is no specific reference to impacts of the Masterplan on the national road network nor provision of sustainable transport including public transport, walking and cycling. This appears to be at variance with Para 2.11.2 of the plan which seeks to consolidate towns.

Densities of 18-22 units in Cavan Town should be increased, notwithstanding the topographical challenges as densities support the accommodation of future growth in a consolidated manner and supports better connectivity, accessibility to local services and sustainable transport modes.

Local Transport Plans

The NTA recommends that Local Transport Plans should be prepared in tandem with LAP's rather than subsequent and that a timeline for the delivery of each LAP/Local Transport plan should be provided in the Plan. In this regard objectives CNR 02 and KTC05 would need to be amended to commit to the preparation of a local transport plan for Cavan Town, based on the Area Based Transport Assessment approach as set out in the NTA/TII Advice Note.

Provision of Public Transport Services

The NTA welcomes the inclusion of Development Objectives PT01 – PT11 in relation to public transport. The objectives in relation to the promotion of public transport use should include improvement of accessibility to public transport services and associated provision for improved levels of permeability, to maximise walking catchment areas.

The NTA has commenced the preparation of the Connecting Ireland: Rural Mobility Plan which is a major national public transport initiative that will increase connectivity especially for people living outside major cities. It aims to improve mobility in rural areas providing better connections between villages and towns by linking these with an enhanced regional network connecting cities and regional centres

nationwide. The plan will be led by the NTA but delivered in partnership with transport operators and local authorities.

The NTA continues to provide rural transport services through the Local Link Rural Transport Program. The key properties of this programme is addressing rural social exclusion and integration of the rural transport service and other public transport services. It is recommended that the development plan acknowledges the role these rural transport services and initiatives can perform in providing for social and economic connectivity between small villages/rural areas and towns. The NTA welcomes development objectives PT09 and PT11 to support through liaising with the NTA and Local Link Cavan Monaghan the expansion of the service to towns in the County and to explore need for additional public transport services in Shercock, Kingscourt and Bailieborough.

Walking, Cycling and Greenways

The inclusion of Development Objectives WC01-WC06 illustrate the importance placed on sustainable modes of transport within the County. The plan should be reinforced to ensure that people are living within walking and cycling distance of their neighbourhood or local centres, public transport centres and other services at the local level such as schools.

Development Objective WC 01 which seeks to secure the development of direct, comfortable and safe cycle routes and footpaths in the vicinity of schools is welcomed.

The Plan could be further strengthened by the inclusion of objectives which seek to ensure that new development areas are fully permeable for walking and cycling, the principles of filtered permeability are applied and that the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to give competitive advantage to these modes for local trip making.

At a national level, several funding streams have been announced to target improvements in the built environment for walking, cycling and other public realm measures.

One funding stream recently announced is the Safe Routes to Schools (SRTS) programme which aims to make the journey to school by sustainable modes a safe and attractive choice for students and their parents.

Strategic Road Network

The NTA recommends that the development objectives of the plan should be in accordance with the DOECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) and opinions of Transport Infrastructure Ireland.

Parking

The NTA recommends that car parking standards should be expressed as maximum, thereby allowing for appropriate level of parking provision to be identified and provided within the maximum standard.

Universal Design

The NPF recognises that social inclusion can be improved in the transport sector through, among other things, universal design. The accessibility of the built environment, transport infrastructure and transport services for all users, including those with mobility impairments and disabilities, should be a key consideration in the development plan. The NTA welcomes section 7.3.6 that notes that the availability of public transport plays a major role in combatting rural isolation.

Mobility Management

The NTA welcomes the requirement for Mobility Management Plans (MMP01) for significant new development or trip intensive developments.

Development Plan Indicators

It is recommended that a profiling of travel patterns is undertaken in the County, through an interrogation of existing transport data, by mode and by journey purpose, in order to better understand transport demand and associated travel patterns and what influences/determines them. This analysis would provide a better understanding of rural transport issues and function relationship between urban settlements and their associated rural catchments, this profiling can be used to better understand the relationship between current land use patterns and associated travel patterns across the county and between Cavan and neighbouring counties.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The importance of transport in a rural County like Cavan is paramount in the draft Plan. Proactive objectives to support walking and cycling are embedded in the draft Plan and are key considerations in assessments for applications for residential, commercial and employment.

The draft Plan in combination with Masterplans and the previously adopted Town and Village Revitalisation Plans place a strong emphasis on sustainable development in our towns and villages. The draft Plan furthers this with strong objectives for compact and sequential development.

The Draft Plan has indicated that the Masterplan at Burrencarragh is a strategic employment site with particular needs. The development of this Masterplan will be done in conjunction with relevant prescribed bodies and will include a complete assessment on access and traffic. In view of the emerging route for the Virginia Bypass, it is considered that this location could be fully assessable by walking and cycling.

Densities of development have been clarified in the OPR submission. The densities provided in the Core Strategy of the Draft Development Plan did not include anticipated densities in town core and infill or brownfield sites. This has been clarified. The topographical issues in the County are real and densities in accordance with National Standards would result in substandard developments without useable private and public open space. This is a key consideration for the local authority along with the provision of quality urban residential developments.

As per the OPR submission, a commitment has been made in the draft Plan to commence the Local Transport Plan for Cavan Town within one year of adoption of the Plan. This is a key propriety for the local authority.

As per the OPR submission, the car parking standards have been amended to express car parking requirements as maximum.

Development Objective WC 03 seeks to ensure that public transport including walking and cycling is available to all in society, including those with mobility impairments.

Chief Executive Recommendation

Recommendation No. 138

Insert new Walking and Cycling Development Objective WC 07, page 387

WC 07 Ensure that all new relevant developments are fully permeable for walking and cycling, the principles of filtered permeability are applied and that the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods.

Recommendation No. 139

Insert new Text 7.3.8 Active Travel on page 395

7.3.8 Active Travel

Active Travel is travelling with a purpose using your own energy. Active Travel is part of a strategy to support compact development, social equity, economic prosperity and to help make our public spaces more liveable and climate resilient.

Cavan County Council are firmly committed to:

- encouraging the use of walking, cycling and other active travel methods.
- provide a safe and connected network to those who wish to commute to work or school or make other journeys through healthy and sustainable means
- Delivery of dedicated infrastructure schemes such as the Safe Routes to School Programme. The Safe Routes to School Programme seeks to create safe walking and cycling routes within communities, to alleviate congestion at school gates and to increase the number of students who walk, scoot or cycle to school.
- the development of walking and cycling infrastructure in our towns and villages with a comprehensive network of safe, well-lit, and convenient footpaths/cycle lanes/shared surfaces within residential areas with links to schools, urban centres etc

These transformative schemes have the potential to substantially increase the numbers choosing to make active travel part of their daily life and should serve to encourage a shift in the population towards walking, cycling and scooting as transport modes, improving personal health and mental well-being, making our towns and village centres more vibrant and people focused spaces, and significantly addressing our climate action challenge.

Encouraging people to walk or cycle will help CCC to respond to climate change. The Council is actively working to secure the development of a high-quality walking and cycling network across the County to prioritise the safety of pedestrians and cyclists. Suitable routes will retro fitted on all key nodes in the County to enhance pedestrian and cyclists' facilities. Town and village improvement schemes are also being developed to enhance the pedestrian and cyclist environment and maximising permeability and connectivity for pedestrians and cyclists to create direct attractive links to town and village centres.

List of Projects Approved and Funded by the NTA

Project Name	Project Description
River Blackwater footbridge	Construction of a footbridge across the River Blackwater in Virginia to provide the residential area north of the river with access to the town centre south of the river for pedestrians and cyclists.
R198 Arvagh Pedestrian Crossing	Provision of a pedestrian crossing from an existing footpath along the R198 in Arvagh town to a Community Creche
Footpath Package A - Ballyconnell, Butlersbridge, Cavan Town, Ballinagh, Kilnaleck	Project is to improve the safety of pedestrians and cyclists within the towns of Ballyconnell, Butlersbridge, Cavan Town, Ballinagh, Kilnaleck. Works will include the construction of new footpaths and crossing points.
Cavan Town Urban Greenway Phase 2	Appointment of Consultants to carry out route selection, preliminary design, Part 8 planning in 2021 for Phase 2 of Cavan Urban Greenway
Cycle Schemes - Cavan Town	Provision of footpath / cycleway linking Keadue Lane to completed section of Cavan Town Urban Greenway. Appointment of consultants to design new cycle links lanes to town centre on Railway Road.
Footpath Package B - Cavan Town	Project is to improve the safety of pedestrians and cyclists within Cavan Town. Works will include the construction of new footpaths and crossing points.
Footpath Package C - Bailieborough, Kingscourt, Cootehill	Project is to improve the safety of pedestrians and cyclists within the towns of Bailieborough, Kingscourt, Cootehill. Works will include the construction of new footpaths and crossing points.

Cootehill Walking and Cycling Strategy	Preparation of a Walking and Cycling Strategy for Cootehill Town to identify walking and cycling routes to link existing residential areas to town core, Industry, Business Parks, schools and recreational facilities
Cavan Town Land Use and Transportation Study	Complete Transportation and Land Use Study for Cavan Town to identify key infrastructural projects, active travel measures, public transport needs and land use requirements
Safe to Schools Programme - Support Infrastructure	St. Aidans Secondary School, Cootehill & St. Marys N.S. Virginia

Active Travel Development Objective

It is a development objective of Cavan County Council to –

ACT 01 Support active travel within the County and the ongoing engagement with the National Transport Authority in the delivery of improvements to the provision and safety of the walking and cycling infrastructure of the County.

OPW

The OPW is the lead agency for flood risk management in Ireland. They have made the following comments in relation to the draft plan:

- That the land use zoning maps should be overlaid with the flood zone maps.
- That Preliminary Flood Risk Assessments was not a detailed assessment of flood risk but a broad assessment.
- That the National Indicative Fluvial Mapping (NIFM) should be included as a source of information
- That a description of the GSI datasets included in Table 2 Historical Flood Risk Indicators or Table 3 Predictive Flood Risk Indicators of the SFRA should be supplied
- That lands not currently at risk of flooding may be vulnerable in the future due to climate change and an objective to support this should be considered.
- All Flood Risk Assessments should consider climate change as a requirement including lands in Flood Zone C.
- That the zonings in Small towns/villages of town centre/village core and Whitelands allows highly vulnerable, lesser vulnerable and water compatible development. The OPW recommends that a water compatible development type zoning such as open space should be used for lands identified as being at risk of flooding.

- Section 8.6.2 and FRM02 provides strict conditions for development in flood zones but FRM 04 still allows for inappropriate development to be proposed in Flood Zones A and B which is not in keeping with the Guidelines.
- Proposed land use zones within Flood Zones A and B in settlement zoning maps need to demonstrate that the Plan Making Justification Test has been applied in proposed vulnerable development zoning within Flood Zone A and B.
- For sites that are intended to be zoned for development following the application of a Justification Test where only a small portion of the site is at risk of flooding, a policy objective might be attached to such zoning.
- Consideration might be given to specific policy objectives that have full regard to the development of flood relief schemes.
- The OPW requests to have regard to the protection and need for maintenance of these schemes. CCC might also consider including a register of key flood risk infrastructure in the development plan where it would not otherwise be readily identified or protected from interference or removal.
- It would be beneficial if potential future flood extents could also show the increase in the 1% AEP flood event i.e. Flood Zone A, and if the maps could be shown overlaid with the land use zonings to demonstrate any developments that could potentially be affected by climate change.

Specially the submission notes in the following in relation to individual towns:

Town	OPW Recommendation
Ballyjamesduff	Undeveloped Town Centre and General Enterprise and Employment zonings are located on Flood Zone A and B. Highly vulnerable development is not appropriate in Flood Zone A and B and less vulnerable development is not appropriate in Flood Zone A.
Belturbet	Undeveloped General Enterprise and Employment, Proposed Low Density Residential, Town Core and Public and Community zonings are located in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zone A and B and less vulnerable development is not appropriate in Flood Zone A.
Crossdoney	Undeveloped Whitelands zonings are located in Flood Zone A and B. Highly vulnerable development is not appropriate in Flood Zone A

	and B and less vulnerable development is not appropriate in Flood Zone A.
Crosskeys	Undeveloped Whitelands zonings are located in Flood Zone A and B. Highly vulnerable development is not appropriate in Flood Zone A and B and less vulnerable development is not appropriate in Flood Zone A.
Dowra	Undeveloped Whitelands zonings are located in Flood Zone A and B. Highly vulnerable development is not appropriate in Flood Zone A and B and less vulnerable development is not appropriate in Flood Zone A.
Killeshandra	Undeveloped Whitelands zonings are located in Flood Zone A and B. Highly vulnerable development is not appropriate in Flood Zone A and B and less vulnerable development is not appropriate in Flood Zone A.
Kilnaleck	Undeveloped Whitelands zonings are located in Flood Zone A and B. Highly vulnerable development is not appropriate in Flood Zone A and B and less vulnerable development is not appropriate in Flood Zone A.
Redhills	Undeveloped Whitelands zonings are located in Flood Zone A and B. Highly vulnerable development is not appropriate in Flood Zone A and B and less vulnerable development is not appropriate in Flood Zone A.
Shercock	Undeveloped Whitelands zonings are located in Flood Zone A and B. Highly vulnerable development is not appropriate in Flood Zone A and B and less vulnerable development is not appropriate in Flood Zone A.
Swanlinbar	Undeveloped Whitelands zonings are located in Flood Zone A and B. Highly vulnerable development is not appropriate in Flood Zone A and B and less vulnerable development is not appropriate in Flood Zone A.

Chief Executive's Opinion on Issues Raised

This submission is noted and welcomed. In relation to information available on groundwater data, historical data and predictive mapping, Table 2 and 3 of the SFRA Report to include a description of these datasets will be updated.

The OPW welcomes Cavan County Council's commitment to go above the Guidelines by restricting less vulnerable developments located in Flood Zone B due to climate change. Lands currently not at risk of flooding may be vulnerable in the future due to climate change. All FRA's should consider climate change as a requirement, including lands situated in Flood Zone C.

Reference is made to FRM 05: "In Flood Zone C, where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed. The County Plan SFRA datasets and the most up to date CFRAM Programme climate scenario mapping should be consulted by prospective applicants for developments in this regard and will be made available to lower-tier Development Management processes in the Council", which addresses this concern.

With regard to Sequential Approach and Land Use Zonings Small towns and villages only have two zonings types, *Town Centre/Village Core* and *White lands*, these zonings allow highly vulnerable, lesser vulnerable and water compatible development. To ensure no encroachment onto, or loss of the flood plain, the OPW have recommended that a water compatible development type zoning such as *Open Space* would be used for lands identified as being at risk of flooding. With regard to lands identified as Flood Zone A and B within the small towns and villages of the County that are subject to Whiteland zoning approach, it is considered appropriate to add text to the objective of Section 14.10 White Lands to clearly specify that with respect to lands within Flood Zones A and B as per the zoning maps that permissible uses shall be constrained to those water compatible and less vulnerable uses as relevant to the particular Flood Zone.

The submission has raised concerns in relation to the fact that land use zonings classified as Highly Vulnerable are within Flood Zones A and B in the settlement zoning maps. It was considered that Section 8.6, page 446 and Section 14.2 (page 593) would not permit vulnerable uses on Flood Zones A and B, however in the interests of clarity and to alleviate concerns raised in relation to this matter, it is considered that the land use zoning maps for the towns and villages of the county should be overlaid with the flooding maps. Flood Zone A and B have been overlaid for the 9 larger towns within the County. The effected towns from this exercise are Cavan Town, Virginia, Ballyjamesduff, Kingscourt, Belturbet and Mullagh. Lands effected have been either rezoned to Amenity and Open Space or removed from the development boundary due to these flooding constraints. Appendix 2 and 3 shows the towns in question and clearly outlines the sites proposed to be amended as a result .

Section 8.6.2 Land Use Zoning Page 441 of the draft Plan provides strict conditions for development in Flood Zones A and Flood Zones and objectives such as FRM 02 ensures that only appropriate

development is allowed. Concerns are raised that FRM 04 and so it is considered appropriate to re-word this development objective to ensure that the wording is in strict adherence to the Guidelines.

In relation to issues regarding Justification Tests in this submission, it is considered appropriate that a finer granularity to the Justification Tests provided on Table 5 of the SFRA report can be provided along with additional flooding mapping and a clear conclusions will be made for each test. It is also considered appropriate to add additional text to the Flooding Land Use description in order to provide additional clarity.

No issue arises in relation to inclusion in the draft plan of a development objective supporting flood relief schemes.

Progressing climate action is a priority for the County Development Plan which will be done through a Renewable Energy Strategy which incorporates national and regional policy through an approach which includes mitigation and adaptation. This is outlined fully under Chapter 5 “Climate Change” of the Plan. The two components of climate action are critical in order to build resilience and adapt to the changing climate in a planned and structured way.

Climate Mitigation Measures from the Plan encompass sectors including:

- Buildings
- Agriculture, Land Management and Forestry
- Transport
- Energy Production
- Minerals
- Resource Management

Climate Adaptation Measures from the Plan encompass sectors including:

- Buildings
- Agriculture, Land Management and Forestry
- Water Management
- Infrastructure, including flood defences
- Wildlife and biodiversity
- Economy and Tourism
- Human Health, Risk and Insurance

The Council have avoided incompatible zoning in areas at risk of flooding and integrated various provisions into the Plan that will contribute towards climate mitigation and adaptation, including provisions requiring that climate change is taken into account in flood risk management, for example:

- FRM 01 “...Any flood risk assessment should include an assessment of the potential impacts of climate change, such as an increase in the extent or probability of flooding, and any associated measures necessary to address these impacts...”
- FRM 03 “...A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) and available information from the CFRAM Studies shall be consulted with to this effect.”
- FRM 05 “In Flood Zone C, where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed. The County Plan SFRA datasets and the most up to date CFRAM Programme climate scenario mapping should be consulted by prospective applicants for developments in this regard and will be made available to lower-tier Development Management processes in the Council.”
- FRM 12 “Ensure each flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation as set out in the OPW Climate Change Sectoral Adaptation Plan for Flood Risk Management applicable at the time.”

No issues arise in relation to the issue of further guidance in the SFRA on the likely applicability of different SuDS techniques. For managing surface water run-off at key development sites, and also that the SFRA identifies where integrated integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

Chief Executive Recommendation

Recommendation No. 140

Update Table 2 on the SFRA, page 8, to include

Historic groundwater flood map: The historic groundwater flood map is a national-scale flood map presenting the maximum historic observed extent of karst groundwater flooding. The map is primarily based on the winter 2015/2016 flood event, which in most areas represented the largest groundwater flood event on record. The map was produced based on the SAR imagery of the 2015/2016 event as well as any available supplementary evidence. The floods were classified by flood type differentiating between floods dominated by groundwater (GW) and floods with significant contribution of groundwater and surface water (GWSW).

In addition to the historic groundwater flood map, the flood mapping methodology was also adapted to produce a surface water flood map of the 2015/2016 flood event. This flood map encompasses fluvial and pluvial flooding in non-urban areas and has been developed as a separate product.

Recommendation No. 141

Update Table 3 on the SFRA, page 9, to include

Predictive groundwater flood map: The predictive groundwater flood map presents the probabilistic flood extents for locations of recurrent karst groundwater flooding. It consists of a series of stacked polygons at each site representing the flood extent for specific AEP's mapping floods that are expected to occur every 10, 100 and 1000 years (AEP of 0.1, 0.01, and 0.001 respectively). The map is focussed primarily (but not entirely) on flooding at seasonally inundated wetlands known as turloughs. Sites were chosen for inclusion in the predictive map based on existing turlough databases as well as manual interpretation of SAR imagery.

The mapping process tied together the observed and SAR-derived hydrograph data, hydrological modelling, stochastic weather generation and extreme value analysis to generate predictive groundwater flood maps for over 400 qualifying sites. It should be noted that not all turloughs are included in the predictive map as some sites could not be successfully monitored with SAR and/or modelled.

Recommendation No. 142

Overlay land use zonings with Flooding Maps on Smaller towns and villages (Whitelands). Please refer to Appendix 4.

Recommendation No. 143

Insert text to objective in section 14.10.1, page 607

With respect to lands within Flood Zones A and B, permissible Uses shall be constrained to those water compatible and less vulnerable uses as relevant to the particular Flood Zone, (please refer to the accompanying Strategic Flood Risk Assessment and Plan Section 13.7.2).

Recommendation No. 144

Overlay land use zonings with Flooding Maps and amend land use zonings as outlined in Appendix 2 and Appendix 3 and make the following Amendments

Cavan Town

Flood Code as per Map	Existing Zoning as per draft Plan	Proposed Zoning Amendment
F1	Residential Strategic Reserve	Amenity and Open Space
F2	Public and Community	Amenity and Open Space
F3	Residential Strategic Reserve/Proposed Residential	Amenity and Open Space
F4	Retail Warehousing	Amenity and Open Space
F5	Public and Community	Amenity and Open Space
F6	Residential Strategic Reserve/General Enterprise and Employment Strategic Reserve	Amenity and Open Space
F7	General Enterprise and Employment/General Enterprise and Employment Strategic Reserve	Amenity and Open Space
F8	Public and Community	Amenity and Open Space
F9	Residential Strategic Reserve	Amenity and Open Space
F10	Public and Community/General Enterprise and Employment	Amenity and Open Space

Ballyjamesduff

Flood Code as per Map	Existing Zoning as per draft Plan	Proposed Zoning Amendment
F1	General Enterprise and Employment	Amenity and Open Space
F2	General Enterprise and Employment	Amenity and Open Space

Kingscourt

Flood Code as per Map	Existing Zoning as per draft Plan	Proposed Zoning Amendment
F1	Public and Community	Amenity and Open Space

Mullagh

Flood Code as per Map	Existing Zoning as per draft Plan	Proposed Zoning Amendment
F1	Proposed Low Density Residential	Amenity and Open Space

Belturbet

Flood Code as per Map	Existing Zoning as per draft Plan	Proposed Zoning Amendment
F1	Public and Community	Proposed Low Density Residential
F2	Public and Community	Remove from development boundary – unzoned land
F3	Public and Community	Amenity and Open Space
F4	Enterprise and Employment	Amenity and Open Space
F5	Proposed Low Density Residential	Amenity and Open Space

Recommendation No. 145

Amend Flood Risk Management Development Objective, FRM 04, page 443

FRM 04	<p>Where a development/land use is proposed that is inappropriate within the Flood Zone, then the dDevelopment proposals will need to be accompanied by a Development Management Justification Test when required by the Guidelines in addition to the site-specific Flood Risk Assessment. Where only a small proportion of a site is at risk of flooding, the sequential approach shall be applied in site planning, in order to seek to ensure that no encroachment onto or loss of the flood plain occurs and/or that only water compatible development, such as Open Space, would be permitted for the lands which are identified as being at risk of flooding within that site.</p>
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Recommendation No. 146

Add the following text to the end of second paragraph of Section 14.2.1 Land Uses and Flooding on page 593 of the draft Plan

Proposals seeking to change the use of existing buildings from a less vulnerable use to a more vulnerable use to the effects of flooding will not normally be considered acceptable to the Planning Authority whilst some change of use proposals not increasing the vulnerability to the effects of flooding or small scale extensions to such buildings will be considered on their individual merits but are acceptable in principle.

An existing dwelling or building that is not located within an area at risk of flooding but has a large rear garden / curtilage that is located within Flood Zone A or B would not be suitable for a more in-depth residential development proposal which would propose a residential use within a designated constrained land use area.

Recommendation No. 147

Insert a new Flood Risk Development Objective FRM 15 on page 444 of the draft plan.

FRM 15 Co-operate with the Office of Public Works (OPW) in the delivery of Flood Relief Schemes.

Recommendation No. 148

To insert the following text into the SFRA under a new subsection titled “Sustainable Urban Drainage Systems”

As provided for by Foul Drainage and Wastewater Development Objective FDW 06, the Plan requires new developments to “Incorporate the requirement for Sustainable Urban Drainage Systems where appropriate in local authority projects and private development sites”.

SuDS are effective technologies, which aim to reduce flood risk, improve water quality and enhance biodiversity and amenity.

The systems should aim to mimic the natural drainage of the application site to minimise the effect of a development on flooding and pollution of existing waterways. SuDS include devices such as swales, permeable pavements, filter drains, storage ponds, constructed wetlands, soakways and green roofs. The integration of nature based solutions, such as amenity areas, ecological corridors and attenuation

ponds, into public and private development initiatives, is applicable within the provisions of the Plan and should be encouraged.

In some exceptional cases, and at the discretion of the Council, where it is demonstrated that SuDS devices are not feasible, approval may be given to install underground attenuation tanks or enlarged pipes in conjunction with other devices to achieve the required water quality. Such alternative measures will only be considered as a last resort. Proposals for surface water attenuation systems should include maintenance proposals and procedures.

Urban developments, both within developments and within the public realm, should seek to minimise and limit the extent of hard surfacing and paving and require the use of sustainable drainage techniques for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flood risk. Development proposals should be accompanied by a comprehensive SuDS assessment that addresses run-off rate, run-off quality and its impact on the existing habitat and water quality.

For larger sites (i.e. multiple dwellings or commercial units) master planning should ensure that existing flow routes are maintained, through the use of green infrastructure. In addition, where multiple individual proposals are being made SUDS should be integrated where appropriate and relevant.

All proposed development, should consider the impact of surface water flood risks on drainage design e.g. in the form of a section within the flood risk assessment (for sites in Flood Zone A or B) or part of a surface water management plan.

Areas vulnerable to ponding are indicated on the OPW's PFRA Pluvial mapping. Particular attention should be given to development in low-lying areas which may act as natural ponds for collection of run-off. The drainage design should ensure no increase in flood risk to the site, or the downstream catchment. Where possible, and particularly in areas of new development, floor levels should be at an appropriate height above adjacent roads and hard standing areas to reduce the consequences of any localised flooding. Where this is not possible, an alternative design appropriate to the location may be prepared.

Further to the above, proposals for development should consider Greater Dublin Strategic Drainage Study documents in designing SUDS solutions, including the New Development Policy, the Final Strategy Report, the Code of Practice and "Irish SuDS: guidance on applying the GDSDS surface water drainage criteria".

Eirgrid

EirGrid notes and welcomes references and emphasis placed on electricity transmission in the draft plan particularly in Chapter 7.9.

It should be noted that Grid 25 has been superseded by Irelands Grid Development Strategy – Your Grid, Your Tomorrow and is paired with the relevant Transmission Development Plan for that year.

Eirgrid welcomes the clear support for the North South Interconnector in Objective GE07 which will improve security of electricity supply in the area and an important component for meeting our climate change commitments.

Chief Executive’s Opinion on Issues Raised

This submission supports and welcomes the references and emphasis places on electricity transmission in the draft plan and the clear support for the delivery of the North South Interconnector.

Chief Executive Recommendation

Recommendation No. 149

Amend text in Section 7.9. Electricity, page 409

7.9 Electricity

Cavan County Council takes cognisance of the ‘Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure’ 2012 issued by the Department of Communications, Energy and Natural Resources’ which acknowledges the strategic and economic importance of investment in networks and energy infrastructure. **The Regional Spatial and Economic Strategy fully supports the delivery of these regionally important electricity interconnectors projects.** ~~Government endorses the major investment underway in the high voltage electricity system under EirGrid’s Grid 25 Programme.~~ The Planning Authority recognises the need for development and renewal of energy networks, in order to meet both economic and social policy goals

Coillte

Coillte is the largest forest company in Ireland. It has grown the estate to over 440,000 hectares and today provides stewardship over approx. 7% of the total land mass of the country. Coillte has provided the public with a huge range of benefits from recreation, to critical infrastructure (including telecoms and wind energy) to environmental services. Coillte comprises of 4 discrete businesses – Forestry, Land Solutions, Renewable Energy and Medite Smartply (Panels).

Coillte grows sustainably to produce quality wood and wood products. Irelands forest industry will approx. double in size over the next 10 years and Coillte will be at the core of this initiative with an innovative supply chain and a consistent reinvestment in the next generation forests.

Coillte is Ireland's leading provider of outdoor recreational activities with over 3,000km of hiking trails, 12 forest parks and 260 recreational sites.

Coillte Nature, which is dedicated to the restoration, regeneration and rehabilitation of nature across Ireland is seeking to deliver significant impact on the climate and biodiversity crisis through innovation projects of scale across 4 themes.

1. Reforesting by planting new native woodland
2. Restoration of important biodiversity habitats
3. Regeneration of urban forests
4. Rehabilitation of critical ecosystems services

Tourism/Recreation, Community

Coillte is committed to working closely with CCC to deliver on local and wider needs in a manner which aligns with the overall vision for the County.

Forestry

Ireland has a competitive advantage for tree growth, our natural oceanic climate and mild winters meaning certain conifer tree species can reach commercial maturity in just 35 years. This wood is a valuable commodity and used in a variety of applications. Using Irish, locally grown wood and wood based products for construction is a climate efficient and sustainable substitute for conventional heavy construction products, such as concrete, brick and steel.

The regulation of forestry is overseen by the Department of Agriculture, Food and the Marine by the issuing of licences which may also be challenged by an appeal overseen by the Forestry Appeals Committee.

It is requested that consideration is given to inclusion of reference for the regulatory framework established under the Department of Agriculture, Food and Marine while nonetheless continuing to support the forestry industry in the county.

Coillte manages 7,324 hectares of forestry in County Cavan BNS allows members of the public to access the forests for amenity use, according to the principles of Leave No Trace.

Tourism Recreation and Amenity.

Coillte supports the policy to maintain and further enhance walking, and cycling trails in GCW 04, 05 and 09. Coillte also supports public access and use of the forest parks in GCW11. It also supports the policy in TO6 to utilise the country's natural and heritage resources to foster the development of tourism as a viable sector of the economy. It also supports the provision of high quality tourism accommodation particularly in rural areas in TV02 in which Coillte have expertise in delivery e.g. Center Parcs, Ballymahon, Co. Longford and Cabú in Killykeen Forest Park where. It is considered holiday type accommodation can successfully integrate into a forest setting, whilst ensuring the protection of the forest/woodland environment, subject to appropriate design. Coillte welcomes policy support for

'appropriate sustainable tourism related development' within a forest setting (F10) and supports the inclusion of policies in the plan under which forest based tourism accommodation can be facilitated at suitable locations.

Infrastructure and Development

Coillte can provide appropriate locations for delivery of infrastructure and services like water and wastewater infrastructure, telecommunications and transport infrastructure. Coillte is committed to working with CCC and other stakeholders to identify and develop other suitable lands that address local needs and ensure necessary infrastructure services and supports are in place.

Coillte request that CCC consider the provision of planning policies/land use zoning objectives where appropriate to support the provision of infrastructure/development on Coillte lands where suitable to provide for example tourism, commercial, community and residential and other uses which support and enable national, regional and local policy objectives.

Renewable Energy

The Renewable Energy division of Coillte will be transferred to a newly formed joint venture later in the coming months, co-owned on a 50:50 basis by Coillte and ESB. Coillte believes that the planning profession needs to step forward and frame this national CO2 reduction ambition and associated requirement for renewable energy, in the form of a plan-led 'Renewable Energy Strategies'.

County Cavan has a current 118.5MW installed onshore wind and Coillte commend this contribution over the last 20 years and encourage the county to continue this contribution to our targets.

A Regional Approach to Renewable Energy Strategies and On Shore Wind Ambition

Coillte strongly support the development of a regional Renewable Energy Strategy to complement the local authority approach, which would coordinate the identification of sites of scale and ensure inter county consistency in relation to designating remaining renewable energy zones and identifying landscape sensitivities.

As CCC will be aware, there does not appear to be any central guidance on the quantum (MW or GW) of new renewable energy development each local authority needs to make provision for, and a regional approach could provide that context.

Renewable Energy and Economic Growth

Wind energy developments can generate meaningful direct and indirect economic contributions to an area particularly in the construction period and then with further permanent roles required during operations.

In many rural areas, this has become a key annual revenue source for local authorities to fund their annual budgeting needs. Community Benefit Fund supports the development of local recreation amenities and provides additional community project funding. This presents an opportunity to transform communities where projects are located.

Coillte is an active member of Wind Energy Ireland. Every megawatt of wind energy capacity installed gives rise to an investment of approximately €1.25 million. Ongoing investment and economic development benefits during the 30+ year operational lifespan of wind farms which take the forms of rents payable to landowners, financial support for local communities in the form of community benefits and commercial rates payable to local authorities.

Sustainable Timber Products

Coillte requests that CCC promote the use of sustainable timber products in the development plan.

Chief Executive's Opinion on Issues Raised

This submission is considered positive and is welcomed and noted. The submission considers a number of areas relevant to the development plan including:

- Forestry – Chapter 12 Rural
- Tourism – Chapter 9 Tourism
- Timber products - Chapter 12 Rural
- Renewable energy -Chapter 7 Transportation and Infrastructure
- Infrastructure -Chapter 7 Transportation and Infrastructure

It is considered that it is unnecessary to reference the regulatory framework established for forestry development in Ireland and that the draft plan has included objectives for the incidences when forestry development does require planning permission.

Development on Coillte lands will be considered within the development objectives contained within the draft plan.

Chief Executive Recommendation

No change recommended

An Post

An Post operates a number of post offices and delivery services units across the County and throughout the State. An Post operates 2 distinctive business in the County – An Post Mails and Parcels and An Post Retail.

Operational Requirements and Supportive Requirements

County Cavan

An Post own and/or operate a number of postal services within County Cavan including An Post Retail and An Post Mails and Parcel Distribution facilitates in Cavan Town, Cootehill and Belturbet.

The draft LAP for Cavan Town has identified the Abbeylands backlands as a Masterplan area, where they aim to undertake a structures scheme of works to redevelop the area, with the purpose of rejuvenating the town core.

CCC has secure capital funding under URDF to redevelop this key town centre site and the draft plan recognises that the project requires a collaborative approach to adjoining landowners. An Post is open to and welcomes direct engagement with CCC as this project progresses over the coming months. It is imperative that An Post's existing and future operational requirements are considered as part of any redevelopment plans for the Abbeylands Masterplan.

The draft plan identifies Cootehill as a 'Self Sustaining Town' and Belturbet as a 'Medium Town'. An Post highlights the importance of postal services both retail and mails/parcels in relation to the economy, employment and social/community services within these towns.

An Post may consider the potential to redevelop sites which are no longer fit for purpose and may consider the potential to relocate to new sites that are considered better suited to meet the operational requirements of An Post. As such, An Post encourage policy objectives that can assist An Post in ensuring their ability to continue to meet the operational needs of an expanding and growing market.

Flexible Zoning Objectives

It is requested that CCC provide flexibility under their land use zonings and objectives in relation to An Post facilities and operational requirements. Both An Post Retail and An Post Mails and Parcels are a necessity in urban locations and provide an essential service and can and do work within tight urban constraints and amongst a variety of other land uses. Therefore An Post seeks that both An Post Retail and An Post Mails and Parcels operate as permissive or open for consideration land uses across all zoning objectives in the plan.

Supportive Policies

CCC should consider the existing and future requirements of An Post and include appropriate policies to support An Post's ambition to enhance postal facilities in the County. They request the inclusion of supportive policies to facilitate enhanced postal services in the County over the plan period. Policies of this nature 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 within new and existing communities that are appropriate to the size and scale of each settlement.

The above would assist An Post as they invest in the mails and parcels infrastructure in the County over the next decade.

Car Parking

An Post requires the use of c. 3,000 vehicles on a daily basis to transport mail within and between settlements throughout the Country. An Post facilities, may require greater levels of parking spaces including electrical vehicle charging points, as a steady transition is made to the use of environmentally sustainable vehicles. An Post facilities generally require areas of car parking for staff as well as parking storage areas for delivery vehicles. This requirement is specific to An Post and of particular importance given its essential service. CCC should therefore provide flexibility with car parking standards for postal facilities as they may require a greater quantum of spaces going forward as postal trends continue to evolve.

Deliveries and Access

Access is typically required to premises on a 24 hour basis with early morning deliveries and late evening collection of particular importance. An Post seek that CCC recognise this requirement as part of the development plan. This should also be noted in the event there is a future proposal to amend delivery hours in town centres locations. It is important that a sufficient level of vehicular access is maintained and that sufficient loading bay space is provided to accommodate the collection and delivery of mail and accommodate customers.

Chief Executive's Opinion on Issues Raised

The support in this submission for the draft Development Plan in this submission is welcomed and noted.

It is considered that the recommendations in this submission are included in the draft Development Plan under the Social Infrastructure Development Objectives which seek to support the provision of community services and social infrastructure in the County.

In relation to Landuse for An Post services, reference is made to Chapter 14 of the draft development plan which stipulates which uses are permitted and not permitted in the landuses used in the zoning maps of the plan.

Cavan County Council welcomes the continued engagement between An Post and CCC in relation to the continued progression of the Abbeylands Masterplan, which is a key development objective of the draft Development Plan.

Chief Executive Recommendation

Recommendation No. 150

Amend text on Notes on Parking Standards, page 408

Notes on Parking Standards

- **Car Parking Standards are expressed in Maximum Standards**
- Where the parking standards shown in table 7.4 do not cover the type of development proposed, the requirement shall be calculated relative to the most appropriate standards.
- In exceptional circumstances, the Council may at their discretion accept a reduced/**increased** parking requirement, where the applicant has clearly demonstrated that this would not impact on road safety or traffic flow, **and where it is considered to be required for the operations of the business/use concerned and is** in the interests of the proper planning and sustainable development of the area.
- The Planning Authority will specify, in certain developments, the requirement for a number of disabled car parking spaces and a number of parent and child spaces.
- Parking layouts shall make provision for commercial and service vehicles depending on the type attracted to the development and should provide for manoeuvring space to enable vehicles to exit the site in forward gear.
- Minimum perpendicular car-parking space dimensions shall be 5 x 2.5 metres. Minimum parallel car-parking space dimensions shall be 6 x 2.4 metres. Car parking design should comply with the standards set out in the publications listed in section 4.1.12.
- A bicycle stand comprises of a shelter with a minimum of 5 racks per stand.

Recommendation No. 151

Insert new Objective SI 01 in Section 4.9 Social Infrastructure.

SI 01	Work collaboratively with relevant service providers and stakeholders to facilitate the provision of community services and social infrastructure, where appropriate, in order to meet the needs of new and existing communities.
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Gas Networks Ireland (GNI)

GNI would like to draw the Councils attention to 2 initiatives i.e. renewable gas production via anaerobic digestion (AD) and compressed natural gas (CNG) in transport.

Natural Gas (Chapter 7 Transportation and Infrastructure)

GNI welcomes the inclusion of 7.8 Natural Gas particularly GE02, GE05 and GE06. The development of the gas network will support large energy users to reduce emissions by converting from heavy fuel oil to natural gas and will also facilitate the use of renewable gas and CNG within the county.

Renewable Gas

GNI welcomes the Biomass Development Objectives, particularly BD 02 which promotes and prioritises the use of waste streams from agriculture and forestry for renewable energy projects including anaerobic digestion.

Hydrogen

GNI would welcome support from the Council in the development plan for the future of hydrogen. It is likely that hydrogen will have a key role to play in decarbonising different sectors of the economy.

Compressed Natural Gas

GNI would welcome support for the development of CNG Infrastructure in County Cavan as a mechanism for supporting sustainable transport, particularly in the Heavy Goods Vehicles (HGV) sector. GNI asks the Council to consider the inclusion of wording in the Transportation and Infrastructure section of the new plan which support CNG infrastructure.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. Alternative and sustainable energy supplies are key to meeting Climate Change targets. Cavan County Council are fully committed to supporting this in the draft Plan and have committed to commence the preparation of a Renewable Energy Strategy within 6 months of adoption of the plan. The support by Gas Networks Ireland for the development objectives contained in the draft Plan are noted.

Chief Executive Recommendation

Recommendation No. 152

Insert new Section 7.10.6 Hydrogen and new development objective, page 415

7.10.6 Hydrogen

Hydrogen is carbon free flammable gas that can be produced from renewable electricity and utilised for high heat applications, heavy use transport, industry and power generation. It can be stored indefinitely and like other gas technologies can play a significant role in the Net Zero Carbon. Reducing Ireland's total carbon emissions, tackling climate change in addition to ensuring that Ireland has a sustainable and secure energy future are just some of the benefits of this technology. Hydrogen has the potential to offer an alternative that can assist with the decarbonisation of industrial processes where the reduction of carbon emissions is both difficult and urgent. The Hydrogen Strategy published by the EC outlines Europe's ambition for utilisation of this technology. There is also an intention to make substantial investment into this sector as a means of promoting it as a major pillar in a future decarbonised energy environment.

Hydrogen Development Objective

It is a development objective of Cavan County Council to -

HYD 01 Support the use of Hydrogen as a renewable energy resource subject to proper planning considerations.

Recommendation No. 153

Insert new Section 7.10.7 Compressed Natural Gas page 415

7.10.7 Compressed Natural Gas

CNG is natural gas that has been compressed to fit into a vehicle's tank and is particularly suitable for use in commercial vehicles. The development of CNG Infrastructure will enable fuel switching from diesel to CNG for HGVs and buses. CNG is an established technology that is used in many countries around the world. CNG contains virtually no particulate matter (PM) and also has low emission levels of nitrogen oxides (NOx) which is beneficial from an air quality perspective. CNG vehicles can be run on 100% renewable gas. This is a renewable and carbon neutral fuel, produced using Anaerobic Digestion technology from existing waste streams and a variety of sustainable biomass sources, including grass, animal waste, crop residues and food waste. Infrastructure development for CNG is already underway in Ireland, with 14 fast fill CNG stations being installed across the Core TEN-T road network via a project called the Causeway Study 7 that is supported by the European Commission through the CEF Transport Fund and the Commission for Regulation of Utilities (CRU).

Compressed Natural Gas

It is a development objective of Cavan County Council to -

CNG 01 Support the use of gas in transport through the facilitation of CNG refuelling infrastructure subject to proper planning considerations.

ESB

ESB is Irelands foremost energy company and the largest supplier of renewable electricity in Ireland. Their goal is to reduce ESB's carbon emissions 40% by 2030 and move towards becoming carbon - neutral by 2050.

Generation, Transmission and Distribution

It is the ambition that ESB will increase renewables to 50% of generation capacity by 2030, significantly contributing to the national target of 3.5GW of off shore wind, 8.3GW of onshore wind and 1.5GW of solar. To support the transition of the electricity system to a low carbon future ESB is developing assets such as battery storage and flexible gas fired units at their existing generating sites that respond quickly to system demand.

ESB Roll-Out of EV Infrastructure

ESB has developed a network of almost 1,100 electric charge points across the Island of Ireland. With the support of the Governments Climate Action Fund, the ESB is rolling out high power charging hubs across the country.

The ESB has plans to include investment in a green hydrogen production, storage and generation facilities by the end of this decade. This is a clean, zero carbon fuel and will be produced from renewable energy.

ESB Telecoms and Telecommunications Infrastructure

ESB is set to become one of Irelands leading independent telecommunications infrastructure providers with over 400 locations nationwide. ESB Telecoms now provides network solutions for a wide variety of mobile network operators. SIRO (a joint venture between ESB and Vodafone) is bringing 100% fibre-to-the-building to 50 towns and cities across Ireland including areas in County Cavan and it will contribute to accelerate this roll out in 2021.

Planning Policy and Proposed Draft CDP

In the Climate Action Plan (2019) the Minister is committed to raise the amount of electricity generated from renewable sources to 70% by 2030 with no generation from peat and coal. This aligns with the vision of the draft plan expressed at the beginning of Chapter 5 Climate Change.

Electricity Transmission and Distribution

ESB fully supports the reinforcement of NPF and RSES policies that reinforce the ongoing generation, transmission and distribution of electricity.

The ESB welcome Section 7.9 Electricity, Section 7.9.1 North South Interconnector and Objectives GE01-GE08 in the draft plan.

Generation of Renewables

ESB is increasing renewables in our power system from 30% to at least 70% with a broader range of technologies likely to be deployed e.g. offshore wind, solar, biomass etc. ESB welcome EDO 05 to prepare a Renewable Energy Strategy. The development of the Strategy will provide an opportunity to reinforce Policy Objectives in the draft CDP in relation to renewable energy and ensure full alignment with the objectives of the NPF, RSES and national guidelines.

Onshore Wind Energy

The absence of a wind energy strategy means there is no framework that supports wind farm developers and eliminates uncertainty surrounding areas unsuitable for renewable energy development at project inception stage. ESB support a plan led approach to wind energy development through the identification of areas for wind energy development adopted by other local authorities. ESB encourage CCC to develop a wind energy strategy for the county.

ESB co-owns the Mountain Lodge Wind Farm. There is an opportunity to strengthen the plan with the inclusion of a development objective to support the life extension and repowering of existing wind farms. This entails extending the planning lifetime of existing windfarm with no or minimal new development.

Hybrid Renewables

Hybrid renewables consist of two or more renewable energy sources used together to provide increased system efficient as well as greater balance in energy supply, whilst optimising use of existing infrastructure. Reporting with hybrid renewables can grant a new lease of life to existing windfarms and other generation sites. There is a strong argument for giving hybrid renewable plant favourable consideration in suitable locations.

Battery Storage and Hydrogen

Energy storage systems such as batteries, liquid air and synchronous condensers are some of the technologies being explored that will be essential to smoothing out the natural variability that occurs in renewable energy sources and to provide electricity at times of peak demand, ESB are installing Battery Energy Storage Systems at existing generating facilities across Ireland. There is an opportunity for CCC to include a development objective similar to the text below in line with National and Regional policy:

“Facilitate proposals for energy storage systems and infrastructure, which support energy efficiency and reusable energy systems, provided such proposals accord with the principles of proper planning and sustainable development of the area.”

ESB wish to highlight that Green Hydrogen which is produced from renewable energy sources offers potential for large scale seasonal storage of variable renewable energy. There is scope to expand the ambition of the draft plan with the inclusion of specific policies supporting these technologies.

Renewables- Enabling Plant.

It will still be necessary by 2030 to connect additional non-renewable plant to the grid. This may comprise of gas turbines (ie. FlexGen plant) to provide back up power.

Solar

Section 7.10.2 of the draft plan supports the growth in solar photovoltaics and solar thermal use in the County. CCC has significant existing grid network presenting the opportunity to maximise energy generation by solar means. In this regard, and in the absence of national planning guidelines for solar developments ESB welcome the support for development of this new technology in the County. ESB consider that it is appropriate to retain the option to grant permission for a longer period if requested by a developer of this nature. It is considered that solar development are now suitable for a minimum of 30 years operation and that planning permissions could be granted with a lifetime of a maximum of 40 years.

Telecommunications

All ESB Telecoms Mast sites are open for co-location and duplication of infrastructure is reduced as a result. ESB supports the Telecommunications Development Policy ICT 06 that promotes co-location. ESB encourages policies consistent with national guidance to allow for the improved development of telecommunications infrastructure, particularly broadband capability in the area.

Sustainable Transport and Electric Vehicles

Climate Action Plan 2019 has set stretching targets for EV adoption in Ireland to address energy demand. These targets demonstrate that EV's (including plug in hybrid electric vehicles PHEV's) are central to Government targets for zero carbon emissions transportation systems. The establishment of EV infrastructure by the ESB and the associated EV usage aligns with the key principles and benefits of sustainability and National Climate Change Strategy on reduction of emissions.

The EU Energy Performance of Buildings Directive comes into force very soon, the new Directive calls for an increase to 20% for the number of parking spaces which should have provision for electric vehicle charging infrastructure. ESB welcome the standards for EV charger installations outlines in the Roads and Infrastructure Climate Development Objectives RIC01- RIC-4. In addition to requiring all one off housing to install a minimum of 1 no. EV charge points the standards for multiunit residential development and commercial development are in line with requirements of the new Directive.

Other Sustainable Transport

ESB wish to highlight that green renewable hydrogen enables the further electrification of transport, allowing the full decarbonisation of the transport sector, as well as improved air quality as the technology replaces diesel buses, diesel HGV and potentially soe diesel trains across Ireland.

Chief Executive’s Opinion on Issues Raised

The contents of this submission are noted and welcomed.

Development Objective EDO 05 which aims to. “Prepare a Cavan County Renewable Energy Strategy within two years of the adoption of this plan.” This ensures a plan led approach to wind energy development, will examine hybrid approaches and provide policy for new and existing windfarms. This timeframe has been altered to be done within 6 months of adoption of the Plan.

It is considered appropriate to reference the CGS ‘Western Cuilcagh’ in the environmental baseline description in the SEA report. The SEA Environmental Report shall include the potential adverse effect of aggregate potential sterilisation. The SEA Environmental Report will include the GSI’s Geochemistry datasets that may be useful in ‘planning and assessing individual projects with regards to the environmental topics of soil and/or material assets. The SEA Environmental Report shall reference the GRI’s Physiographic mapping in the environmental baseline and to identify that it would ‘be valuable for regional land-use planning, and in studies of the influence of physical landscape on the ecological. Appendix 1 of the SEA Report will include references to Fisheries Act Northern Ireland and the North Atlantic Salmon Conservation Organisation Implementation Plan for 2019-2024.

It is considered appropriate to include support in the draft Plan for energy storage systems and infrastructure.

Cavan County Council will continue to investigate and support new technologies during the lifetime of the County Development Plan in line with the proper planning and sustainable development of the County.

It is acknowledged that the development of some renewable developments can be in excess of 5 years, however it is considered appropriate that this is dealt with under the development management system.

Chief Executive Recommendation

Recommendation No. 154

Insert new Energy Development Objective EDO 06, Page 411

EDO 06 Facilitate proposals for energy storage systems and infrastructure, which support energy efficiency and reusable energy systems, provided such proposals accord with the principles of proper planning and sustainable development of the area.

Department of the Environment, Climate and Communication's – Geological Survey Ireland (GSI)

GSI is the national earth science organisation and a division of the Department of the Environment, Climate and Communications. The following sets out the recommendation contained in this submission

Section 10.9 Geological Heritage – amend Objective GH1 to 'Protect and enhance the County Geological Heritage Audit of Cavan'.

Include the 'Western Cuilcagh' as a geological site in the SEA Report.

Ensure that Marble Arch Caves, UNESCO Global Geopark is referred to as its new name of Cuilcagh Lakelands UNESCO Global Geopark.

The submission notes the 2 recipients of GSI fundings for the creation of an online poetry map linking specific sites around the Geopark, with each having their own poem reflecting the unique Geoheritage and geology of that site and the life size model of a woolly mammoth in Belturbet following mammoth remnants being discovered on Turbot Island and thus showcasing the towns Ice Age past.

Include GSI in objective BTD 12 which seeks to 'engage with agencies and community groups in the area that support and contribute to tourism e.g. Fáilte Ireland, Coillte, Heritage Railway Group, Tidy Towns, Inland Fisheries'.

Include reference to Dimension Stone/Stone Built Ireland project in Section 4.12 Cultural Heritage. This project aims to document building and decorative stone in Ireland to inform government agencies, building owners and conservationists of the sources of suitable replacement stone in restoration work and to develop a greater awareness to the general public.

GSI are happy with the content of the plan on Groundwater, Geohazards, Geothermal Energy.

GSI request in Section 12.12 Quarrying that County Geological Sites are included in Development Objective Q8 – 'Ensure that development for aggregates/mineral extraction, processing and associated processes does not significantly impact on the followinginclude County Geological sites'

GSI request that the Geological Heritage Guidelines for the Extractive Industry are included in Q8 development objective which seeks to 'Ensure that all quarrying activities and projects associated with the extractive industry comply with all relevant Planning and Environmental legislation'.

GSI would welcome the consideration of aggregate potential sterilisation included as part of the draft SE/CDP

GSI's Geochemistry datasets would be of benefit in Chapter 4 'Environmental Baseline' in Section 4.8 'Soil' of the SEA environmental report.

GSI also recommend the use of their physiographic units map data for Section 4.13, 'Landscape' of the draft SEA rereport.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The importance of the County's geological heritage is evident in the draft Plan. The renaming of the Marble Arch Caves UNESCO Global Geopark officially occurred following preparation of the Chief Executives Draft Plan and will be altered throughout the document and appendices. This is not considered to be a material amendment.

Chief Executive Recommendation

Recommendation No. 155

Amend Development Objective for Geological Heritage GH1, page 482

GH1	Protect and enhance the geological heritage of the Cavan Geological Survey County Geological Heritage Audit of Cavan .
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Recommendation No. 156

Amend Belturbet Tourism Development Objectives BT12, page 186

BT12	Engage with agencies and community groups in the area that support and contribute to tourism e.g. Fáilte Ireland, Coillte, Heritage Railway Group, Tidy Towns, Inland Fisheries Ireland, Geological Survey Ireland .
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Recommendation No. 157

Amend Quarrying Development Objectives Q 08, page 532

Q 08	Ensure that development for aggregates/mineral extraction, processing and associated processes does not significantly impact on the following
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- | |
|--|
| <ul style="list-style-type: none">• Existing and proposed Special Area of Conservation and Special Protection Areas• Existing and proposed Natural Heritage Areas.• Areas of importance for the conservation of fauna• Areas of significant archaeological potential• In the vicinity of a recorded monument• Sensitive landscapes• County Geological Sites |
|--|

- Ensure that all quarrying activities and projects associated with the extractive industry comply with all relevant Planning and Environmental Legislation **including the Geological Heritage Guidelines for the Extractive Industry**

**Northern Ireland Environmental Agency- Strategic Environmental Assessment Team (NAERA)-
Department of Agriculture, Environment and Rural Affairs for Northern Ireland Gaeltacht**

NAERA are pleased to note that transboundary considerations are included in the SEA and NIR - Appropriate Assessment reports of the draft plan. Following the decision of the UK to leave the EU The European protected sites in the UK are now referred to as 'National Site Network'.

In relation to the SEA document Inland Fisheries notes section 4.11.7 relating to Renewable Energy Potential and advise that any push to faciality Hydropower should be treated with caution. These have shown significant negative impacts to transboundary habitats and migratory species such as European Eels, Salmonoids and Lamprey that utilise them as migratory corridors to/from their marine/freshwater lifecycle stages, which are crucial for their survival.

In tables 5.1, 7.2, 8.1 and 9.1 of the SEA, Inland Fisheries recommends specific mention within Biodiversity, Flora and Fauna sections in relation to transboundary impacts.

In Appendix 1 of the SEA, NAERA recommends inclusion of Fisheries Act (Northern Ireland) 1966 as amended under International and EU legislation and a mention of the North ATLANTIC Salmon Conservation Organisation (NASCO), Convention for the Conservation of Salmon in the North Atlantic Implementation Plan for the period 2019-2024.

In Appendix II of the SEA, Inland Fisheries notes the designations for the sites listed in Northern Irelands with Atlantic salmon only mentioned for Lough Melvin and recommend that NI priority species and their habitats should be considered in relation to all the sites which are potentially impacted by the plan.

It is noted the in Tables 8.2 & 9.1 and Section 8.7.9 of the SEA the potential impact of all environment topics are included but given the potential transboundary impacts on the water environment in relation to impacts on drinking water protected areas and water bodies used for abstraction of water for drinking, with from surface water sources or ground water sources, these should be included.

Consideration needs to be given to the Regulations covering Private Water Supplies from a national sense i.e. 'The Private Water Supplies Regulations (Northern Ireland) 2017 which are in force in Northern Irelands and the 'European Union (Drinking Water) Regulations 2014 (S.I.122 of 2014) (as amended by European Union (Drinking Water) Regulations 2017 (S.I. 464 of 2017)) which are in force in the Republic of Ireland.

Chief Executive's Opinion on Issues Raised

This submission deals with the impact on the environment in Northern Ireland. It is agreed that there is potential for impact on all environmental topics in relation to transboundary effects, if impacts are not mitigated. Measures have been integrated into the draft Plan that will help to protect and manage the environment and ensure that no significant effects will occur in Northern Ireland.

Chief Executive Recommendation

Recommendation No. 158

Amend GW 03 Groundwater Development Objective, page 433

GW 03 Support the implementation of the relevant recommendations and measures outlined in the relevant River Basin Management Plan 2022-2027, and associated Programme of Measures, or any such plan that may supersede same during the lifetime of the plan. Development proposals shall not have an unacceptable impact on the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands and species, **in County Cavan and in any areas that are hydrologically or hydrogeologically linked, including areas in Northern Ireland.**

The Arts Council

The Arts Council is the Irish Government agency for developing the arts, which operate as an autonomous body under the aegis of the Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media. The Arts Council is guided by its own strategy 'Making Great Art Work, 2016-2025' which sets a vision for Ireland with the Arts. The Arts Council is currently preparing its own 'Spatial Policy' which will forefront the importance of place and spaces where people live, work and come together for cultural participation. The Spatial Policy will highlight the Arts Council's key role as a Prescribed Body in the Irish planning system and set a clear vision for how it endeavours to see the arts and culture more strongly integrate into spatial development frameworks, and landuse planning policy.

Considerations for the draft County Development Plan are:

Arts and culture can play a contributing role to the social and economic development of places by creating vibrant places to live and crating social cohesion through festivals and events, community cultural activity, tourism interest and local identify and association with a particular place.

The Arts Council welcome the provisions for the development of arts and culture in the draft Plan in Chapter 4 Sustainable Communities and Chapter 9 Tourism however, consider, that there would be a gap between the identification and deliver of these strategic intentions in the draft plan relative to current and emerging trends in the importance and function of arts and culture infrastructure, and, a lack of

recognition and synergy between the draft CDP and the spatial priorities and intentions defined by existing Arts plans and strategies for Cavan.

The Arts Council request on recognition and collaboration in the spatial approach between the CDP and the County Arts Office strategies in its role in 'Supporting and Developing the Arts Infrastructure and expressly that function as set out in the publication 'inclusivity and Ambition A Strategy for Cavan Arts 2018-2023.

The CDP should acknowledge the role of the Arts Plans and Strategies and include specific policy objectives which support and facilitate the intentions of those plans/strategies where they relate to spatial development insofar as it can, under land use planning functions.

The Arts Council considers that specific development objectives contained within the final Development Plan should include explicit reference to, and provision for 'arts' and 'culture' as an essential part of social infrastructure and spatial development in new developments, urban renewal, regeneration and urban expansion throughout the County.

Despite development objectives LAC03 and LAC04 in the Draft Plan greater synergy and integration of those objectives at local level is required in the final plan for Section 11.9 (Built and Cultural Heritage), Section 13.3.12 (Urban Design) Section 13.4.8 (Public Open Spaces) Section 4.5 creating Sustainable Neighbourhoods) and in relation to Urban Regeneration.

The Arts Council encourage the CDP to adopt a policy approach for the preservation, enhancement and provision of Arts and Culture which have been/are identified as value in contributing toward physical, social, cultural and economic benefit for the County.

The Arts Council would welcome the inclusion of a specific policy objective that recognises the significant role the Arts and arts infrastructure can have on creating distinctive and vibrant places and seeks to maximise opportunities for suitable arts interventions, including through funding opportunities such as Town and Village Renewal Scheme.

The Arts Council would welcome the inclusion of specific policy objective which seeks to facilitate the provision of Public Art throughout the County, and supports maximising opportunities through the Per Cent for Art Scheme as a means to provide public art interventions, experiences and infrastructure.

Chief Executive's Opinion on Issues Raised

This submission is noted and welcomed. The contribution that Arts and Cultural facilities make to communities in County Cavan is acknowledged and outlined in Section 4.1.7 Libraries Arts and Culture of the Draft Plan. The Plan through its development objectives aims to promote, support and facilitate the growth of the Arts and Cultural Sector as stipulated in Libraries, Arts and Culture Development Objectives on page 300.

Chief Executive Recommendation

No change recommended.

Fáilte Ireland

Fáilte Ireland welcome the identification of Fáilte Irelands Brands ‘Ireland Ancient East’ and ‘Irelands Hidden Heartlands’ in the introduction of the Plan. There should be greater alignment and prioritisation of key areas of focus. The following projects/areas of tourism development that should be strongly supported and highlighted include:

- The Shannon Masterplan and the delivery of the priority projects pertaining to Cavan as set out for the Upper Shannon
- The Beara Breffni Way
- Ancient Destination Development Plan
- Shannon Pot and Cavan Burren Geopark

Fáilte Ireland is in the process of preparing Regional Tourism Plans for each of the 4 Regional Experience Brands.

Fáilte Ireland request the inclusion of the objective supporting the preparation and implementation of Regional Tourism Plans in the CDP, to support the continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these tourism plans.

Accessible Tourism

The council should promote accessible tourism in the country. This ensures that facilities are accessible to people with mobility issues, people with learning disabilities, visual or hearing impairment, young children and elderly people. The CDP would benefit from inclusion of the following policy:

Proposed new policies, to be inserted into Tourism Chapter:

It is an objective of the Council to support the provision of accessible tourism.

Chapter 7 – Transportation and Infrastructure

The provision of accessible parking for visitors to the county should be considered in the development plan. Identifiable access from main access routes, roads, greenways, blueways etc. should be identified.

Proposed new policies, to be inserted into Transportation and Infrastructure Chapter:

It is an objective of the Council to support the provision of centralised parking for bicycles, cars and motorhomes within towns and villages ensuring these are both strategically and sensitively located.

Chapter 9 – Tourism

Visitor numbers in Section 9.1 and 9.3 background should be updated to use updated Tourism Figures.

Proposed amended text:

Fáilte Ireland's figures indicate that in 2019, Cavan welcomed 1% of the 9.7 million overseas tourists who came to Ireland, spending 1% of the €5.2bn overseas tourism expenditure in Ireland, with a further 310,000 domestic visitors to Cavan & Leitrim generation an estimated 53mn in revenue.

The CDP should support the tourism sector to investing digital technology with a particular focus on sectors with low digital presence such as visitor attractions and activities.

Proposed new objective, to be inserted in Section 9.5:

TV 10 Encourage and support investment in digital technology in the tourism sector, with a particular focus on sectors such as visitor attractions and activities with low digital presence and/or integration.

Section 9.7 Lakes and Waterways

Fáilte Ireland would welcome an objective which supports the development of shared facility centres for water based activities in the county to help sustainably manage the increased interest in water sports activities in certain locations as well as improving the overall visitor experience.

Proposed new objective, to be inserted in Section 9.7, Section 10.23 and 10.24:

LW 08 Shared Facilities

To encourage the development of shared facilities centres, at inland water bodies, to facilitate greater access to water for areas such as water-sports and water-based activities and events subject to normal planning and environmental criteria.

Fáilte Ireland Tourism Brands

Fáilte Ireland welcome reference and support to key Fáilte Ireland Tourism initiatives however it is considered that these could be identified more strongly in the Draft Plan.

Destination Development Plan Areas

It is considered that the Development Plan should include an objective to support the preparation of Destination Experience Development Plans (DEDP) and other tourism masterplans both within the county and also those which crosses from the county into neighbouring counties. There is one existing DEDP in the county- Ancient Destination Experience Development Plan.

Proposed new objectives, to be inserted into Tourism Chapter:

The Council will support the preparation of Destination Experience Development Plans (DEDP) and other tourism masterplans both within the county and also those which crosses from the county into neighbouring counties in collaboration with Fáilte Ireland and other tourism stakeholders.

The Council will work with Fáilte Ireland to prepare and implement The Ancient Destination Experience Development Plan (ADEPD) as it extends into parts of the county.

The Beara Breifne Way

The Beara Breifne Way is a significant section of this long-distance walking route and has potential to become a key tourism asset for the County, as such we request a dedicated paragraph and policy objectives in respect of The Beara Breifne Way as follows:

Proposed new text, to be inserted into Tourism Chapter:

The Beara Breifne Way

The Beara Breifne Way is a long-distance walking route based upon the historic 14-day march of O'Sullivan Beara in 1603. The route has historic relics dotted throughout the journey which stand as snapshots in time, reflecting its history. One of the largest community-based projects in Ireland, the Beara Breifne Way has 12 stages, from Cork to Cavan and many points in between. It has seen more than 40,000 people walk its path, with the area's heritage displayed throughout.

Proposed new objective, to be inserted into Tourism Chapter:

As one of the county's key tourism assets the Development Plan is committed to safeguarding the future success and deliverability of The Beara Breifne Way and will promote and identify the need for key facilities and services for visitors such as accommodation, signage, parking, and sustainable transport as identified in the 'Tourism Masterplan for the Beara Breifne Way' prepared by Fáilte Ireland and Outdoor Recreation Ireland.

The Shannon Tourism Masterplan

The Shannon Tourism Masterplan key objective is to revitalise the combined Shannon Navigation and Shannon Erne Waterway as a key destination within Ireland's Hidden Heartlands, identifying world class visitor experiences based on the region's natural and cultural assets. This Masterplan was launched in March 2021.

We note the only reference to this initiative is in LW 06 and we therefore request that the 'The Shannon Tourism Masterplan' is more fully integrated into the Development Plan.

Proposed new text, to be inserted into Tourism Chapter:

The Shannon Tourism Masterplan has been prepared by Waterways Ireland. The key objective of the Masterplan is to revitalise the combined Shannon Navigation and Shannon Erne Waterway as a key destination within Ireland's Hidden Heartlands, identifying world class visitor experiences based on the region's natural and cultural assets. This Masterplan was launched in March 2021.

Proposed new objectives, to be inserted into Tourism Chapter:

Promote, encourage and facilitate the implementation of the Shannon Tourism Masterplan and its objectives in co-operation with Waterways Ireland, Fáilte Ireland and adjoining local authorities. This includes proposals for the increased access to and visibility of the Shannon's scenic attributes and its use for land-based activities such as cycling and walking.

Promote, encourage and facilitate the implementation of the DZ1 Upper Shannon Priority Projects as identified in the Shannon Tourism Masterplan where they relate to County Cavan

Shannon Pot & Cavan Burren Park

Given the recent funding announcement of €4.8 million by Fáilte Ireland (with a further €1.6 million from Cavan County Council), one of only 4 projects selected under the Platforms for Growth Investment Grants Scheme for Immersive Heritage and Cultural Attractions, it is considered that the flagship project at Shannon Pot should be set out as one of the key priorities in the Development Plan and set out specifically in the Tourism Chapter.

Proposed new objective, to be inserted into Tourism Chapter:

In collaboration with Fáilte Ireland, promote, encourage and facilitate ~~and fund~~ the development of a new visitor discovery experience centre ~~and stunning viewing platform~~ at Shannon Pot as a key tourism product under the Fáilte Ireland Platforms for Growth capital investment programme.

Tourism Amenities and Assets Maps

Fáilte Ireland would also like to see tourism policies and objectives clearly set out where possible through the inclusion of maps in the draft Development Plan.

Such a map should illustrate:

- Key **nodes** of tourism activity in the County.
- Existing transport **links** between nodes and identified routes– whether walking, cycling or road based including greenways and blueways.
- **Strategic tourism centres** where key services such as hotels etc. are located;
- **Sensitive environments** where the provision of services must be sensitive and appropriate to the robustness / sensitivity of the receiving environment and in particular its existing tourism significance;
- **Areas/Assets of unrealised tourism potential** where proactive policies will aim to encourage the development of this sector.
- **Branding** – reference and use of Fáilte Ireland Tourism Brand logos applicable to the county i.e. Ireland's Ancient East & Ireland's Hidden Heartlands

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed.

Car and bicycle standards and provisions are included in Chapter 7 of the draft Plan which seeks to acknowledge their importance to urban centres in the County. Motorhomes, camping and glamping are supported in Chapter 9 Tourism Infrastructure of the draft Plan.

Chapter 7 Section 7.12 focuses on the importance of ICT and Broadband in the county. Reference is made to ICT 01 Development Objective which seeks to support the delivery of high capacity ICT infrastructure, broadband connectivity and digital broadcasting.

It is considered that the draft development plan Lakes and Waterways Development Objectives page 465 outline support for the provision of tourism infrastructure throughout the County.

The amended text in development objective T 04 below clearly outlines support for Fáilte Irelands existing and future plans and strategies.

The Bearna Breffni Way is supported through the provision of Specific Policy Objectives in Dowra and Blacklion, refer to VSO 07 Blacklion SO and DSO 05 in Dowra.

It is considered that the draft Plan provides adequate support for the delivery of the Shannon Tourism Masterplan

Chief Executive Recommendation

Recommendation No. 159

Amend text in Tourist Development Objectives T 04 page 459

T 04	Continue to work closely with Fáilte Ireland to maximise the benefit of national and regional initiatives/ plans/strategies for the county, with a particular emphasis on initiatives which will increase the economic benefit from tourism, support local business development and encourage new enterprise opportunities.
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Recommendation No 160

Insert new Tourism Development Objective T 13 on page 461

T 13 It is an objective of the Council to support the provision of accessible tourism.

Recommendation No. 161

Amend Section 9.1- (third paragraph page 455) to include updated Tourism Figures.

~~In 2018, Cavan welcomed 96,090 overseas tourists making a contribution to the local economy of over €52M. Irish residents took 222,000 trips to Cavan and Leitrim spending €29mn (1% of domestic tourist spend) across the two counties. Britain, Northern Ireland and the domestic market are the main sources of tourism business.~~

In 2019, Cavan welcomed 1% of the 9.7 million overseas tourists who came to Ireland, spending 1% of the €5.2bn overseas tourism expenditure in Ireland, with a further 310,000 domestic visitors to Cavan & Leitrim generation an estimated 53mn in revenue. Britain, Northern Ireland and the domestic market are the main sources of tourism business.

Recommendation No. 162

Amend 9.3 (last paragraph page 459) to include updated Tourism Figures.

In 2018, Cavan welcomed 96,090 overseas tourists ¹contribution to the local economy in Cavan of over €52M. Irish residents took 222,000 trips to Cavan and Leitrim spending €29mn (1% of domestic tourist spend) across the two counties.

Fáilte Ireland's figures indicate that in 2019, Cavan welcomed 1% of the 9.7 million overseas tourists who came to Ireland, spending 1% of the €5.2bn overseas tourism expenditure in Ireland, with a further 310,000 domestic visitors to Cavan & Leitrim generation an estimated 53mn in revenue.

Recommendation No. 163

Insert new development objective TV 10, Section 9.5, Tourism Infrastructure and Visitor Services Development Objectives -page 462

TV 10 In collaboration with Fáilte Ireland, promote, encourage and facilitate the development of a new visitor discovery experience centre at Shannon Pot as a key tourism product under the Fáilte Ireland Platforms for Growth capital investment programme

¹ 1% of the 9,609 million who came to Ireland in 2019

Recommendation No. 164

Insert new Section in Chapter 9 Tourism, Section 9.4.1, page 461

9.4.1 Destination Towns

As part of Ireland's Ancient East programme Cavan Town has been designated as a Destination Town. The continued expansion of the tourism sector in Cavan will require additional visitor facilities, additional bed-nights (across all sectors of accommodation) in your destination town. The RSES state that over the next decade, it is estimated Ireland will have to increase its bed-stock by approximately 50%. This plan supports the provision of the required supporting infrastructure, including improvements to the public realm, transport links, accommodation, night-time economy and harnessing our natural and built heritage and developing our cultural infrastructure.

Under the Destination Towns Initiative Cavan has secured €540,518 to enhance public spaces in a manner to engage, improve "sense of place" and enhance visitor experience. The following works will be undertaken in Cavan Town as part of the project:

- Public realm works at Townhall and the junction of Townhall Street and Farnham Street
- Enhancement of the town's heritage town trail
- A review and updating of tourism signage and waymarking throughout the town
- Planting, seating and lighting.

Destination Towns Development Objectives

It is a development objective of Cavan County Council to:

- DT 01 Ensure provision is made for the expansion in accommodation and facilities and necessary supporting infrastructure within Destination Towns, whilst supporting the sustainable development of our natural and built heritage.
- DT 02 Establish potential tourist and amenity attractions of scale in Cavan, in partnership with Fáilte Ireland, and the relevant Local Authorities.
- DT 03 Ensure that "Discovery Points" targeting Ireland's Ancient East are included for Cavan as enablers for increasing bed nights and visitor numbers.

Recommendation No. 165

Insert the following to Section 9.3 Tourism in Cavan, page 459:

Cavan County Council has secured €4.8 million for a new Discovery Centre at the Shannon Pot, alongside enhancements including a new elevated walkway for Cavan Burren Park under Fáilte Ireland's Platforms for Growth Capital Investment Programme. The Shannon Pot project involves the development of a new state of the art Discovery Centre, comprising of a three-part complex containing the main visitor exhibition area, reception area, ticket box, public amenities, a café, and a retail shop.

In addition to a looped trail at the Discovery Centre which will take visitors on a journey around the pot itself. Developments at the Cavan Burren Park will include an upgrade of the existing car park, the visitor centre and its immediate surrounds, a new outdoor amphitheatre meeting area and a new 450 metre elevated walkway.

Recommendation No. 166

Insert the following new Tourism Development Objective T13

T13 Support the development of a new Discovery Centre at the Shannon Pot in collaboration with Fáilte Ireland as a key tourism product under the Fáilte Ireland Platforms for Growth capital investment programme.

Recommendation No. 167

Insert the following new Tourism Development Objective T 14

T14 The Council will support the preparation of Destination Experience Development Plans (DEDP) and other tourism masterplans both within the county and also those which crosses from the county into neighbouring counties in collaboration with Fáilte Ireland and other tourism stakeholders. The Council will work with Fáilte Ireland to prepare and implement The Ancient Destination Experience Development Plan (ADEPD) as it extends into parts of the county.

Recommendation No. 168

Insert new Lakes and Waterway Development Objective LW 08, page 465

LW 08 Support the development of Waterways Ireland 'Shannon Tourism Masterplan' and its objective to revitalise the combined Shannon Navigation and Shannon Erne Waterway as a key destination within Ireland's Hidden Heartlands, identifying visitor experiences based on the region's natural and cultural assets.

Health and Safety Authority

The submission outlines the requirement as per the Planning & Development Regulations that the Health and Safety Authority to be consulted in relation to Development Plans.

It is noted that the approach of the Health and Safety Authority to Land-Use Planning is outlined in “*Policy & Approach of the Health and Safety Authority to COMAH Risk-based Land-Use Planning*”. It is requested that this policy document be consulted as part of this submission.

The submission states that the Health and Safety Authority expects the planning guidelines to contain:

1. An indication of planning policy in relation to major accident hazard sites notified under the regulations, which reflects the intentions of Article 13 of Directive 2012/18/EU.
2. The Consultation distances and generic advice, where applicable,
3. A policy on the siting of major hazard establishments, taking account of Article 13 and the published policy of the Authority in relation to new developments, including developments in the vicinity of such developments.
4. Lakeland Dairy Food Services Limited, Killeshandra, Cavan and Farragh Proteins, Monery, Crossdoney are currently two notified establishments in the area of the Cavan County Development Plan.

The submission also contains a note on the approach of the HSA to the provision of land-use planning advice.

Chief Executive’s Opinion on Issues Raised

Section 7.13 of the draft Development Plan deals adequately with Prevention of Major Accidents and in accordance with the above submission.

Chief Executive Recommendation

No change recommended.

Meath County Council

The submission sets out the provisions of Section 11 of the Planning and Development Act and welcomes the opportunity to engage in the consultation process. Meath County Council acknowledge the positive vision that the Draft Plan sets out for Cavan and the focus on the promotion of sustainable development and on fostering stable economic growth to deliver long term benefits for the citizens of the County over the plan period. The submission notes the inclusion of climate adaption and mitigation as a cross cutting theme of the Draft Plan, the latter is welcomed by Meath County Council as climate and environmental issues are of mutual interest to both counties.

The submission notes the importance of collaboration with adjoining local authorities and states it is the intention of Meath County Council to maintain this important relationship between Cavan and Meath County Councils.

The submission outlines the current status of the Draft Meath County Development Plan 2021-2027, including a link to same.

The submission notes that the Meath County Development Plan, 2013-2019 and the Draft Plan contain a Landscape Character Assessment and lists the areas adjacent to the Cavan County boundary in the LCA areas. The submission states that these designations should be considered in the context of development proposals in Cavan with a cross boundary visual impact.

The submission states that the settlements of Virginia, Mullagh and Kingscourt are of particular interest to Meath considering their proximity to the Meath boundary. The submission indicates that the development strategy set out in the Draft Plan for such settlements is supported by Meath County Council. The submission states that it would be helpful if the adjoining zoning proposed in the Draft Meath County Development Plan, 2021-2027 was included, noting that the Draft Meath County Development Plan zones are all areas outside of settlements as RA Rural Areas.

The submission notes that the National Planning Framework Strategic Outcome of Enhanced Regional Accessibility (NSO 2), is of mutual interest to both counties particularly in respect of the N3 National Primary route which links Dublin and the North West. The submission also welcomes the inclusion of policies to support the Virginia bypass. The submission outlines a material amendment to the Draft Meath County Development Plan 2021-2027 which relates to the Virginia Bypass.

The submission also notes that the Draft Meath County Development Plan also supports increased regional public transport connectivity and seeks to engage with all relevant stakeholders in this regard, noting an improved regional transport service will be of mutual benefit. With regard to same a number of policies are noted including:

PT 11 To work with the NTA to explore the need for additional public transport services in Shercock, Kingscourt and Bailieborough.

MOV OBJ 42 of the Draft Meath County Development Plan contains reference to R162 Navan-Kingscourt Road safety upgrades.

It is also noted that on-going co-operation on winter maintenance arrangements and operational matters on routes along the county boundary is of mutual benefit to both Local Authorities and it is intended that this will continue.

The submission highlights the Draft Plan's strong support for further expansion of greenways/trails. This is too welcomed by Meath County Council as the Lakelands Greenway is a key greenway objective for Meath County Council. The submission conveys the supporting policies included in this regard. It is also noted that the construction of a section of recreational trail and an upgrade of the existing forest

trail, linking Kingscourt to Dun na Rí Forest park and the proposed Boyne Valley to Lakelands County Greenway is an important part of this greenway as Dun na Rí will be a key destination on the route.

The submission notes that sites including the River Boyne/Blackwater SAC, Lough Sheelin SPA are of mutual interest in both counties. The current and draft Meath County Development Plans contain detailed policies and objectives supporting the conservation of these areas and notes that the Draft Plan contains a similar policy basis and that cross county co-operation regarding these sites will continue to be essential.

The submission concludes by expressing gratitude for the opportunity to input into the review process and requests that the above comments are considered and incorporated in the Draft Plan. It is also stated that Meath County Council looks forward to ongoing participation in the plan review and wishes Cavan County Council well as the process continues.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. It is considered that this submission is very positive in relation to the Draft Development Plan and outlines the key areas of common interest between Cavan County Council and Meath County Council. The submission is positive in relation to the development objectives of these common areas which include Virginia Bypass, Lough Sheelin and the River Boyne and Blackwater, Kingscourt Greenway and linkages to Dun a Rí.

The Draft Development Plan also contains a development objective LC8 which states Cavan County Councils commitment to complete a landscape character assessment. It will be a requirement to acknowledge adjoining local authorities landscape designations as part of this process.

The Rural Strategy and policy for the County is contained in Chapter 12 of the draft Plan – Rural.

Chief Executive Recommendation

No changes recommended.

Eastern and Midland Regional Assembly

The Assembly welcomes the publication of the Draft Cavan Plan which enables the coordinated and timely incorporation of Project Irelands 2040. The scope of this submission focuses on issues directly linked to the Eastern and Midland Region.

It welcomes the statement that the plan should be read in the hierarchical context of legislation and plans that exist at International, National and Regional level.

A positive addition to the plan would be inclusion of the statement that the Plan be cognisant to the long term strategic planning and economic framework of the Eastern and Midland Region, having regard to the fact that County Cavan borders the Region and the counties of Meath, Westmeath and Longford.

The Eastern and Midland Regional Assembly welcomes the strategic priority in the draft Plan of addressing economic resilience and connectivity and maintenance of seamless cross-border movement for people, goods and services together with improvement in digital and physical infrastructure.

The Assembly welcomes the inclusion of KT 05 development objective which seeks to work with Meath County Council on the delivery of the Navan-Kingscourt Greenway and the development of Dun a Ri trailhead point.

The Assembly supports the Development Objective VB 01 to work with TII and Meath County Council in the planning and construction of N3 Virginia By Pass.

The Assembly supports GE 07 to support the reinforcement and strengthening of the electricity transmission network.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The submission welcomes the draft plan and its content in relation to economic resilience and connectivity and the maintenance of a seamless cross border movement of people, goods and services. The submission supports the draft Plan and the development objective to work with Meath County Council in the planning and construction of the N-3 Virginia By-Pass and the reinforcement and strengthening of the electricity transmission network.

Chief Executive Recommendation

Recommendation No. 169

New text section in Section 2.1 National Planning Framework, page 29

Moreover, the Framework notes that within the Northern and Western region, most of County Cavan and County Monaghan have a more easterly focus than elsewhere. These counties comprise part of a North-Eastern functional area that also includes County Louth in the Eastern and Midland Regional Assembly area. The key driver for this regional area is the Dublin-Belfast cross-border network, the influence of which, as well as that of the Dublin Metropolitan area, extends into Cavan and Monaghan. **Having regard to this, cognisance is given to the long term strategic planning and economic framework as contained within the Eastern and Midlands Regional Spatial and Economic Strategy.**

Fermanagh and Omagh District Council (FODC)

It is important that CCC has regard to the objectives and policies of the Fermanagh and Omagh District Councils (RODC) draft Plan Strategy as part of the consideration of responses and before the making of the Cavan County Development Plan. Many of the challenges for CCC are similar to those of Fermanagh and Omagh District Council. There are opportunities for co-operation and collaboration in the cross-border area in relation to a number of key areas such as protection of environmental assets, economic development, climate change and sustainable transport. FODC welcomes this approach having regard to the proximity of the medium towns of Belturbet and Ballyconnell and villages of Swanlinbar, Bawnboy and Blacklion to the border.

FODC encourage further collaboration on the development of shared tourism assets such as Cuilcagh Mountain, the Shannon Erne Waterway and Ulster Canal. The level of protection in the draft plan affords to the UNESCO Geopark and natural heritage features along the mutual boundaries is welcome and offers potential for further collaboration on these specific issues.

FODC welcomes objective WE02 which ensures wind energy development proposals have regard to sensitivities of the country's landscape, visual impact on protected views, prospects, scenic routes and local visual impacts, impacts on nature conservation, archaeological areas and historic structures, public rights of way and walking routes. Consideration should also be given to the sensitivities of lands, visual impacts and environmental impacts and impacts on amenities within the FODC area.

FODC notes the intention to carry out a renewable energy strategy and request an opportunity to comment on same.

FODC notes a number of objectives in the Draft Plan Strategy with regard to nature conservation and the objectives to halt the loss of biodiversity and habitats and seek CCC to consult with DAERA in its role with regard to European Sites.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The submission outlines the importance of a close working relationship between the two organisations and Cavan County Council concur with this. Policies and objectives in the draft Plan to continue to work collaboratively and liaise on projects/issues of mutual benefit to Cavan County Council and Fermanagh and Omagh District Council are included in the draft Plan.

Chief Executive Recommendation

No changes recommended.

GENERAL SUBMISSIONS

Irish Green Building Council

The submission gives an overview of the general principles for all plans in the context of the climate emergency. These are outlined as the following: development plans being designed with carbon neutrality as the end goal, all climate measures should be cross cutting, all new residential developments and buildings must be designed to reduce and eliminate car-dependent travel, zero carbon buildings, resource efficiency and circularity, water efficiency first, compliance with the 'do no harm' principle i.e., no action should undermine environmental objectives, think mitigation and adaption, construction waste hierarchy, biodiversity, minimum density guidelines to be followed and encourage third party verification of all principles above and for the council to go beyond minimum standards.

The submission provides a number of toolkit recommendations with suggested actions for measuring carbon across the full life cycle of buildings, net zero carbon buildings, reuse and renovation of existing building stock, planning for climate mitigation and adaption, measuring carbon in the built environment, development management standards, development contributions, performance management indicators for developments plans and new green infrastructure standards.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The principles, actions and toolkit recommendations as suggested in this submission are a useful resource to aid the delivery of Climate Change policies and objectives contained throughout the draft plan and particularly in Chapter 5 Climate Change. Cavan County Council is fully committed to supporting the implementation and achievement of European, National, Regional and Local objectives for climate adaptation and mitigation. The draft plan has also committed to undertaking a Renewable Energy Strategy within 6 months of adoption of the plan.

Chief Executive Recommendation

No Change Recommended.

Gaffney and Cullivan

This submission relates to Section 13.5 which deals with infill, backland, corner sites and extensions to existing domestic dwellings. There are references to the effect that external finishes and designs should be complementary in terms of design and materials. The submission raises concern that this could be interpreted in a way which would prevent contemporary infill and/or extension of good architectural quality where planning permission is required.

There is reference to flat roofed extensions of contemporary design being acceptable. The submission raises concern that this may be interpreted at application stage to limit contemporary design to flat roofs only where other options are available.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. Cavan County Council welcomes the use of contemporary design and finishes to existing dwellings and as per the draft plan consider that the use of contemporary design for extension of existing dwellings is an acceptable form of development and is viewed positively. It is the intention of the draft Plan to support contemporary design and finishes and clarity is recommended on this issue.

Chief Executive Recommendation

Recommendation No. 170

Amend Section 13.5.5 Extensions to Dwellings, page 572

13.5.5 Extensions to Dwellings

Extending existing dwellings to meet changing needs of families is an acceptable form of development which is viewed positively by the Planning Authority. Extensions to dwellings will be assessed in terms of the degree of impact on existing adjacent residential amenity and the design approach adopted.

Extensions to Dwellings Development Objectives

It is a development objective of Cavan County Council to:

EXD 01 Ensure that extensions to residential dwellings accord with the following:

- ⊖ Be subordinate in terms of scale and be complementary in terms of materials and design to the main building
- Complement the local area and not have a negative impact on the visual or residential amenities of neighbouring dwellers of the area in general
- Flat roof extensions in a ~~and~~ contemporary design ~~extensions context~~, will be considered on their individual merits.
- The extension shall not provide for overlooking of the private area of an adjacent residence where no such overlooking previously existed
- New extensions shall not overshadow adjacent dwellings to the degree that there is significant decrease in daylight or sunlight entering the house

Gaffney and Cullivan

This submission relates to Section 10.11 which deals with invasive species. The invasivespeciesireland.com website does not refer to Cypress Leylandii but it is requested that Cavan County Council specifically refers to it in the Plan. It is stated that it becomes high maintenance quickly and either becomes expensive to manage or is allowed to grow indiscriminately. It then becomes

unsightly and can lead to loss of light, loss of space and loss of amenity and is associated with many boundary disputes.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. It is not within the remit of Cavan County Council to make an addition to the Invasive Species Ireland List. However, the concerns noted in the submission regarding the planting of Cypress Leylandii are concurred with. It is the policy in the draft Plan to require new planting to comprise of native species only. Reference in this regard is made to development objectives: IN 2, WTHS 5, F 06, CTH 06, RHD 01, RH08, The Rural House Design Guide and Appendix 23 List of Planting and Tree Species, which lists native trees and shrubs suitable for planting in the County.

Chief Executive Recommendation

No Change Recommended.

Gaffney and Cullivan

This submission relates to the boundary of the ACA that is proposed in the draft Plan for Farnham Street, Cavan Town. This submission queries the omission of the building, previously Jacksons Showroom at the junction of Farnham Street with Ashe Street from the ACA boundary. It is considered that this building has some architectural merit and is constructed with high quality materials. It makes a significant contribution to the streetscape and request that it is considered in the proposed ACA.

Chief Executive's Opinion on Issues Raised

This submission is noted and welcomed. Having considered the submission and reviewing the boundary of this ACA, CCC are not opposed to its inclusion in the ACA.

Chief Executive Recommendation

Recommendation No. 171

Include previous Jacksons Showroom building, Farnham Street Cavan Town into the boundary of the Architectural Conservation Area for Farnham Street.



Irish Architects Declare

This submission relates to the proposal to integrate the 'green factor approach' into planning policy. The submission provides an overview of Irish Architects Declare, what the 'green factor approach' is and where it has been used. The green factor approach is outlined as an ecological planning tool which provides an opportunity to improve planning practices as it provides a means to assess and develop ways to build an ecological, climate-resistant and dense city in which the social values of urban greenery are a priority. The goal is to mitigate the effects of construction by maintaining sufficient levels of green infrastructure while enhancing the quality of the remaining vegetation.

A number of case studies have been outlined including cities such as Berlin, Seattle, Toronto, Malmo, Southampton and London.

The submission also outlines a methodology study on how the Green Factor Approach was developed for the city of Helsinki.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The green approach as advocated in this submission is supported throughout the draft development plan. The contents of the submission in relation to case studies and tools is an excellent resource for the greening of the built environment.

Chief Executive Recommendation

No Change Recommended.

Loughanleigh and Muff Heritage Trust

This submission notes the inclusion of Lough an Leagh as a noted destination for walking and the listings of the Kingscourt Tourism Development Objectives. The wording of resolution item KT09 is endorsed. It is stated that Lough an Leagh is an understated treasure in the East Cavan area and therefore its protection and recognition is welcome.

Chief Executive's Opinion on Issues raised

The contents of this submission are noted and welcomed. The Trust welcomes the protection and recognition afforded to Loughanleigh in the draft Development Plan.

Chief Executive Recommendation

No Change Recommended.

Eugene Hughes

The submission relates to Objective reference KT 09 which refers to the protection of the Lough an Leagh for its scenic and amenity value and the support of scientific studies of the area.

The submission seeks assurances from the Planning Authority that there would be consultations and permission received from relevant landowners before any scientific studies are carried out on their lands.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The commissioning of individual specific studies regarding Lough an Leagh will be completed under the workings of the Heritage Office of Cavan County Council. Full protocol and best practise models will be utilised to conduct any study which will incorporate consultation with all relevant stakeholders including landowners.

Chief Executive's Recommendation

No change recommended.

Cavan Traveller Movement

This submission provides an overview of the Cavan Traveller Movement, the demographic profile of Travellers and the various factors that impact on Traveller's health, well-being and life expectancy. The submission focuses on the issue of Traveller accommodation and references local consultation which has taken place. A clear account of the current issues relating to traveller accommodation in the County is outlined. The submission also provides a number of recommendations as contained in the Traveller Accommodation Plan 2019-2024. The submission also contained the following recommendations for the Development Plan:

- Reference is made to planning guidelines for Development Plans and the Traveller Accommodation Programme (TAP) and it is stated that the latter require the range and type of housing required and the land use aspects of the TAP to be incorporated into the Development Plan. Noting that projects committed to under the TAP should be listed as objectives of the Development Plan with clear timelines.
- Monitoring and reviewing system relating to Traveller accommodation should be included in the Development Plan.
- Identify Travellers as a priority group in the Development Plan and plans to address Traveller Homelessness.
- Carry out Traveller accommodation baseline studies as part of the Housing Need and Demand Assessment.
- Consider the timeline of future development plans and align same with timeline for the TAP.
- Development plan should reference and implement recommendations of the Traveller Accommodation Expert Review, in addition to recommendations made by the Irish Human Rights and Equality Commission and their review of the provision of Traveller specific accommodation by Cavan County Council, published in July 2021.
- Include planned support services for the Traveller Community, work closely with Cavan Traveller Movement to develop an identifiable space in Cavan Town.

Chief Executive's Opinion on Issues Raised

Traveller housing needs as defined in the Traveller Accommodation Plan 2019-2024 were considered as part of the Housing Need Demand Assessment prepared as part of the development plan review process.

Chapter 14 Land Use of the Draft Plan clearly outlines the land use zoning and outlines what is permitted and not permitted in principle for each category. Traveller accommodation has been considered as part of this and therefore it is not appropriate to introduce a new zoning specifically for traveller accommodation.

Section 14.6.1 Objective for Proposed Residential is to: Provide for new residential development in tandem with the provision of the necessary social and physical infrastructure.

Chief Executive's Recommendation

No change recommended.

Galetech Sustainable Living

The submission relates to the provision of lands suitable for residential development within the settlements designated within the 'Village Category 2' classification. Identification of lands within smaller settlements, noted as 'whitelands' is welcomed, however, 'whitelands' of all 'small towns', 'village

category 1' and 'village category 2' settlements should be re-evaluated, and revised, where appropriate to ensure the provision of suitable and available lands for development.

It is stated that residential development proposed outwith the 'whitelands' should not be automatically deemed inappropriate simply for planning policy reasons but should instead be assessed on its proper planning and sustainable development merits and the contribution which it can make to the overall revival of the settlement.

Chief Executive's Opinion on Issues Raised

Chapter 2 Core Strategy sets out the spatial expression to the housing, population, land and employment parameters of the development plan, using evidence based planning. It is considered that the Core Strategy contained in the draft plan is fully inline with requirements as specified in Section 10 (2A) of the Planning and Development Act. The latter section of the act clearly stipulates what a core strategy must contain.

Development on lands located outside of zoned lands (including whitelands) are assessed in line with Chapter 12 Rural.

Chief Executive's Recommendation

No change recommended.

Irish Traveller Movement

The submission provides an overview of the Irish Traveller movement and the accommodation crisis for travellers. The submission notes that the Traveller Accommodation Expert Review, 2019 highlights the need for Development Plans and Traveller Accommodation Programmes (TAP) to be aligned. The submission also contained the following recommendations for the Development Plan:

- Traveller specific accommodation developments completed under the last development plan should be outlined in the Development Plan.
- Reference is made to planning guidelines for Development Plans and the Traveller Accommodation Programme (TAP) and it is stated that the latter require the range and type of housing required and the land use aspects of the TAP to be incorporated into the Development Plan. Noting that projects committed to under the TAP should be listed as objectives of the Development Plan with clear timelines.
- Sites identified and zoning of land for Traveller specific accommodation.
- Consideration for how sites will be identified for the next Traveller Accommodation Programme.
- Monitoring and reviewing system relating to Traveller accommodation should be included in the Development Plan.
- Sites identified for Traveller specific accommodation should be well located, close to key amenities, chosen in consultation with the community and include sufficient green areas and children's play areas.

- Ensure development is completed with consultation at every stage including with children and young people.
- Identify Travellers as a priority group in the Development Plan and plans to address Traveller Homelessness.
- Carry out Traveller accommodation baseline studies as part of the Housing Need and Demand Assessment.
- Consider the timeline of future development plans and align same with timeline for the TAP.
- Development plan should outline Cavan County Council plans for retrofitting Traveller accommodation to improve the sustainability and energy efficiency of traveller accommodation.
- Sites are identified for transient sites within the Development Plan, in consultation with the community.
- Development plan should reference and implement recommendations of the Traveller Accommodation Expert Review, in additions to recommendations made by the Irish Human Rights and Equality Commission and their review of the provision of Traveller-specific accommodation by Cavan County Council, published in July 2021.

Chief Executive's Opinion on Issues Raised

Traveller housing needs as defined in the Traveller Accommodation Plan 2019-2024 were considered as part of the Housing Need Demand Assessment prepared as part of the development plan review process.

Chapter 14 Land Use of the Draft Plan clearly outlines the land use zoning and outlines what is permitted and not permitted in principle for each category. Traveller accommodation has been considered as part of this and therefore it is not appropriate to introduce a new zoning specifically for traveller accommodation.

Section 14.6.1 Objective for Proposed Residential is to: Provide for new residential development in tandem with the provision of the necessary social and physical infrastructure.

Chief Executive's Recommendation

No change recommended.

Wind Energy Ireland

The submission begins by outlining the critical importance of having supportive planning policies for wind and renewable energy developments in the development plan, noting that obtaining planning permission is a critical first stage for any renewable energy project.

The submission notes the Council recognition of the importance of renewable energy development to the County in the draft plan with reference to specific objectives and Section 7.10.

The submission contains a detailed overview of Wind Energy Ireland and wind energy in Ireland, noting the benefits and importance of same.

The submission argues that wind energy is popular and references various opinion poles noting the importance of not only considering the views of those who live near wind farms, but also the wider Irish society when identifying the priorities for a new County Development Plan and Renewable Energy Strategy for County Cavan.

The submission outlines national policy with regard to renewable energy, provides an overview of the economic development opportunity for wind energy development, and encourages ambitious policy in relation to climate action and energy. It is stated that Cavan County Council should identify an adequate quantum of land to accommodate onshore wind energy. The submission notes the specific stipulations required using project examples.

The submission also urges Cavan County Council not to consider grid capacity, wind speed or nature conservation areas as potential constraints or facilitators in the process of identifying areas as being potentially suitable for wind energy developments as part of the Renewable Energy Strategy. The submission notes that in the case of other Council's Renewable Energy Strategy/Wind Energy Strategy, an overly restrictive approach has resulted in a reduction in potential areas for wind farms.

The submission advocates a regional approach to the spatial planning of wind farm developments.

Chief Executive's Opinion on Issues Raised

It is a policy of this plan to support sustainable energy sources and locally based renewable energy alternatives where such development does not have a negative impact on the surrounding environment including landscape, water, biodiversity, natural or built heritage or local amenities. It is policy to encourage renewable development proposals which contribute positively to reducing energy consumption and carbon footprint.

It is the intention of Cavan County Council to commence the preparation a Renewable Energy Strategy within six months of the adoption of this development plan, in order to guide and measure how Cavan County Council can facilitate a low-carbon future in the County by supporting the sustainable development of the renewable energy sector in Cavan.

Reference is made to the following sections and development objectives contained in the Draft Plan which pertain to this subject area: EDO 01, EDO 02, EDO 03, EDO 04, EDO 05, page 411, Section 7.10.1 Wind Energy, page 412 and WE 01, WE 02 and WE 03.

Chief Executive Recommendation

No changes are recommended.

Cootehill Area Development Association

The submission welcomes the increase in commercial land zoning proposals for Cootehill Town including Back Road Town regeneration on Market Street. It is recommended that strong consideration be given to the proposed plans for new cycling and walking infrastructure within the town core and beyond. It is also recommended that the East West Strategic Road Corridor is designed with cycle lanes along side. The submission notes other trails and greenways links would be welcome.

The submission also recommends that community lands on Station Road are included in Sport and Recreation zoning to enable redevelopment of the two tennis courts. The submission also recommends a feasibility study on an Anaerobic Digestion facility which could pump directly back into the existing gas line infrastructure.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The provision of social and physical infrastructure outlined in the submission is supported in the objectives of the draft plan specifically CG 04, CPI 02, CPI 03, CS 05, CS 06 and CRP 03. In relation to the request to zone community lands on Station Roads as Sport and Recreation to enable the redevelopment of 2 tennis courts, it is considered appropriate as this will facilitate the building of sustainable communities.

The draft Plan contains the following objectives which advocate support for technologies like Anaerobic Digestion, CC 22, BD 02 and WM 11.

Chief Executive's Recommendation

Recommendation No. 172

Include lands formally used as tennis courts as per map below outlined in red and marked as 'F' on Cootehill Map in Appendix 3, as Sports and Recreation in Cootehill.



Dymphna Headen, Secretary, Bawnboy Workhouse

This request seeks a section on specific objectives for the village of Bawnboy that include for the preservation of the workhouse in Bawnboy. The workhouse is a protected structure and the committee also seek renewal of their lease of the building and support in the plan for the tourist potential of Bawnboy.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The draft Plan contains objectives relating to Protected Structures in Villages which includes those located in Bawnboy, Section 2.12 Villages, Village Development Objectives VDO 23 specifically relates to same.

Other objectives contained in the draft Plan which support the usage of Protected Structures include VDO24. The latter should be read in addition to Section 11.2 Record of Protected Structures which contains a range of development objectives concerning protected structures.

The renewal of the lease of this building is outside the remit of the County Development Process.

Chief Executive Recommendation

No Change Recommended.

Ciaran O'Sullivan on behalf of Roadstone

Roadstone is Irelands leading supplier of aggregates, construction and road building materials and employs several hundred people throughout the country. It has a number of property assets within the Cavan County Council administrative areas namely:

- Arvagh
- Cootehill
- Knocknagillagh
- Rasudden

The importance of extractive industries is recognised in both National (National Planning Framework) and Regional (Regional Spatial and Economic Strategy) planning policy. Reference is made to 'Essential Aggregates- Providing for Irelands Needs to 2040' ICF publication which details the role of locally supplied aggregates in supporting the demand for new homes, schools and better infrastructure. The submission has noted and referenced population predictions for the county and extracted references to quarrying in the draft development plan.

The submission states that it should be the aim of the County Development Plan to safeguard areas of significant resources from incompatible developments to ensure the continued viability of the extractive industry. The proposed policy objective from Chapter 12 Rural Strategy are of benefit in relation to this, specifically Q 03 and Q 05.

The submission also welcomes in Section 12.2 that quarrying and other extractive industries are important to the local rural economic development of the County in terms of generating employment and providing raw material to the construction industry. It is considered that the Draft County Development Plan could be revised to adequately outline the economic value and significance of the aggregates sector, emphasising the sectors significance in terms of economic development and employment and benefits numerous stakeholders.

The council should have due regard to Roadstones property assets within the county and the added value these bring in terms of local, regional and national economy.

The draft County Development Plan should offer a policy objective with respect to the after use of quarry and extractive sites which could include for biodiversity, agriculture, recreation/amenity, industrial and commercial type uses and in this regard should include for the inclusion a new policy relating to same.

Roadstone are broadly in favour of the policies and objectives regarding aggregates being a finite resource, however recommend that there is potential to strengthen policy provisions in relation to identifying and protecting aggregate reserves in the county. Reference is made in this regard to English and Welsh Guidance and their approach on this matter.

Roadstone recommends that the County Development Plan highlights areas containing proven deposits on an appropriate map in order to protect them from the future development of incompatible land use.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. It is considered that the draft Plan has adequately acknowledged the contribution that quarrying makes to the economic growth of the County and the need for the industry.

It is appropriate that the rehabilitation and after use of quarries in the County are dealt with as part of the planning application process and are subject to proper planning and sustainable development. As such it is appropriate to include rehabilitation proposals as part of the criteria that would be assessed in a planning application for this industry.

The draft Plan notes the importance of the safeguarding of quarrying materials for future use.

Chief Executive Recommendation

Recommendation 173:

Insert the following text in Section 12.12 Quarrying, page 530

Mineral extraction, such as working with stone, sand and gravel, can generate environmental capacity problems for the surrounding areas. As such, applications for mineral extraction must account for issues including noise, dust, vibration, visual intrusion, water pollution, traffic generation **and rehabilitation proposals for the site**. An Environmental Impact Assessment Report (EIAR) will be required as part of a planning application where certain thresholds are exceeded and in other cases

where extraction is likely to have significant effects on the environment as determined by the Planning Authority. The cumulative effects of work in a given area will also be considered when assessing a planning application.

Recommendation No. 174:

Insert new Quarrying Development Objective, page 532

Q 09 To encourage the rehabilitation of disused quarries and extractive sites to possible uses including habitat restoration, agriculture, recreation/amenities, commercial, industrial, and residential or a combination of same, subject to normal planning and environmental considerations'.

Val Martin

The submission states the Cavan County Council's staff require in service training on European environmental law.

The submission notes that Ireland's Wind Guidelines 2006 advise on the processing of planning permission applications for wind turbines. It is also noted that the Belgium equivalent of these guidelines have been declared to be in breach of European law on Strategic Environmental Assessment noting the specific case details.

It is also noted that new Irish government guidelines must comply with the SEA Directive.

The submission states that the complaints from residents living near wind farms means that the set back distances between turbines will have to be increased from the current 500 meters to a longer distance and varied according to the height of the turbine.

It is also noted, that existing wind farms are "in limbo" because CJEU ruled that wind farms built using the old illegal guidelines must have their consent annulled and then must be dismantled, stating they do not have planning permission and are an unauthorised development.

The submission states that this a matter for the Irish government to rectify and until then, no plan by Cavan County Council can be initiated. The submission states that if the latter occurs that Val Martin may take a Judicial Review of that decision.

It is also stated that Cavan County Council seek direction from the Department, noting that this is the law and for any official Irish body to act illegally is a serious matter.

The submission notes that complaints have been made to Cavan County Council about Raragh Wind Farm noise which need to be investigated. Val Martin's land is adjoining this wind farm and notes that the impact of the wind farm is so bad that it is described as "life changing", the submission outlines details of such impacts which are currently being evaluated.

It is further noted that if there is no new guidelines with public consultation, then Cavan County Council must reject wind farms in the plan and consult with Westmeath County Council which did this.

The submission concludes with the statement that the Minister has no right to order any local authority to break the law.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. It is the intention of Cavan County Council to commence the preparation of a Renewable Energy Strategy within six months of the adoption of this development plan, in order to guide and measure how Cavan County Council can facilitate a low-carbon future in the County by supporting the sustainable development of the renewable energy sector in Cavan.

It is a policy of this plan to support sustainable energy sources and locally based renewable energy alternatives where such development does not have a negative impact on the surrounding environment including landscape, water, biodiversity, natural or built heritage or local amenities. It is policy to encourage renewable development proposals which contribute positively to reducing energy consumption and carbon footprint.

Reference to made to WE 01 which requires compliance with the principles and planning guidance set out in with the Wind Energy Guidelines (2006) and Circular PL20-13, and any updates thereof.

Chief Executive Recommendation

No change recommended.

Shay Fitzpatrick

This submission relates to upgrade and upkeep of towns and villages and outlines a number of suggestions that the council should consider, for example the provision of funding and resources to paint and tidy up buildings in towns and village centres. The submission makes specific reference to Bailieborough. It is also suggested that Cavan County Council use an innovative and collaborative approach to the appearance of building thus enhancing the public realm space, in addition to greater enforcement for property owners who do not upkeep their premises. It is queried in the submission if the CPO process could be used for such building for social housing projects.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. It is the policy of Cavan County Council to protect and strengthen the vitality and viability of town centres throughout the County in the following development objectives:

- Town and Village Economic Development Objectives ETV 01- ETV 08

- Public Realm and Design Development Objectives PRD 01
- Bailieborough Regeneration and Placemaking Development Objectives BRP 01 - BRP 07.

Public Realm plays a vital role in defining our towns and villages by projecting a positive image as attractive locations for people to live, work, visit and do business in. With this in mind, Cavan County Council proactively developed Town and Village Revitalisation Plans for 20 Towns and Villages across the County. The Plans showcase how improvements can enhance the town as an attractive place in which to live, work, and visit. They also seek to enhance and improve the long term socio economic, cultural and environmental benefits for residents, businesses, communities and visitors. The outcomes of the Revitalisation Plans are three-fold – to deliver successful strategies across spatial development, economic development and community development. Each town and village in Cavan is unique not only in its form, but its attributes and function. Settlements Plans for each town and village is presented as part of this development plan, such plans provide a framework to guide new development, regeneration and renewal of towns and villages incorporating key elements of the *Town or Village Revitalisation Plans*.

Chief Executive Recommendation

No change recommended.

Killeshandra Tidy Towns

The submission states that Killeshandra tidy towns support the enhancement and guidance on public realm design particularly wirescapes and quotes UD 05 of the Draft Plan.

The submission also states that Killeshandra Tidy Towns support the provision of funding for the planning of the Killeshandra to Crossdoney railway/greenway.

It is noted that support is needed to ensure the Killeshandra railway station and good yard heritage building do not fall into further disrepair.

The submission states that Killeshandra Tidy Towns wish to add Fletchers mill brick chimney and surrounds, the Hamilton Estate, old walls and the old retaining walls of Loughside and approaches to the industrial heritage sites.

The submission references the council owned green landbank in Killeshandra and requests a greenspace biodiversity plan for the area.

It is also noted that bike racks are required when cycleways are developed.

The submission concludes by outlining Killeshandra Tidy Towns' support Cavan County Councils Town and Village Revitalisation Plans.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. With regard to the request for further protection and designation of Killeshandra Railway Station, Fletchers Mill Brick Chimney and Hamilton Estate, it is noted that these are all on the Record of Protected Structures as contained in the draft Development Plan. It is considered that this level of protection and designation is appropriate.

The importance of both physical and social infrastructure is acknowledged and fully supported in the draft plan. Reference is made to Section 13.4.8 Public Open Space Development Objectives (PCOS 04) which seeks to provide for and promote additional public parks, amenities and spaces in towns and villages throughout the county and the preparation of a County Open Space Strategy in this regard.

Chief Executive Recommendation

No change recommended.

T McPhillips

The submission is divided under the following 3 headings:

Protection of Country Lanes and Hedgerows

The submission suggests the need to repeal/amend the current S.I. governing hedge cutting/hedgerow management in particular country lands. Reference is made to the protection of biodiversity and native species and amenity value of country lanes. An account is given regarding the current S.I. approach and the effects of same. The benefits of mature trees and hedgerows are also highlighted. The submission notes observations of modern transport and agricultural vehicles on country lanes and outlines suggestions as to how improvement/restrictions can be used to lessen the impact on the natural and built environment of county lanes.

Management of Inland Waterways

The suggestion states the need for boats, etc using waterways to be registered by local county councils with an official registration number. This is to enable identification and reporting of anyone breaking the law, e.g. illegal fishing.

Planning Approval Considerations

The submission states that all planning approvals should, in the interest of visual amenity, include full screening of tree planting at the time of development. A fee should be retained by the Council and reimbursed when the trees mature. It is also suggested that any removal of screening should be registered as a breach of planning permission.

It is requested that the council rethink the removal of hedgerows for one off rural houses and a specific road-sign developed to identify an entrance.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The draft Development Plan cannot repeal or amend a Statutory Instrument. It is considered that the protection of mature trees and hedgerows are adequately addressed throughout the draft Plan with specific reference made to WTHS 3, WTHS 7, AS 01, NH8 and CTH 06.

Section 12.13.2.7 Boundary Treatment in Rural Areas deals specifically with the appropriate retention of existing boundaries and new and supplementary boundary treatments that can be required for planning applications in rural areas.

The request to introduce a registering of boats system is outside the remit of the County Development Plan process.

In relation to the provision of policy against which planning applications are assessed, it is considered that the appropriate landscaping of new developments throughout the County is clearly outlined in the draft Plan and reference is made to RH08, PRD 05, CP 06 and PCOS 02.

Chief Executive Recommendation

No change recommended.

Cootehill Town Teams

The submission is divided under the following 16 headings:

1. Introduction

The submission begins by noting the elements of the plan that are welcomed by Cootehill Town Team. The latter include; general development objectives, objectives regarding housing, water, wastewater treatment, employment and enterprise.

2. Improved footpaths and provision of cycle lanes and safe crossings

The submission gives an account of work completed and funding secured to date. Reference is made a walkability study prepared identifying issues, in particular footpaths and lack of crossings for those with accessibility issues. The submission highlights the following map based specific objectives; CP102, CT07, CS07, CRP03, RAOS11, CE07, CE12 and CP103 contained in the draft plan and notes that a formal assessment/audit of the levels of traffic through Cootehill and its impact is required.

3. Traffic build up control measures at Bridge Street and Cavan road junction roundabout/controlled lights

The submission suggests that the for sale property at this junction should be purchased and demolished to enhance sight lines for traffic approaching the junction from the Cavan side and facilitate construction of a roundabout/lights. The submission quotes CP103.

4. *Redevelopment of Cootehill Railway Station CV17035, Preservation of and provision of public access to Famine Graveyard, Station Rd., Cootehill, Provision of access to Cohaw Court Cairn*

The submission states that the above mentioned sites are important and overlooked aspects of the heritage of Cootehill. Reference is made to CT05, CT07, CT11, CH09, CH10, CH14, CH15 and BGPW02 map based specific objectives.

5. *Development of Linen Museum CT02, CT07 and Bird Wetland Reserve CT02, CT07, CH02, CH03, CH05.*

The submission notes that the linen industry is very important in the history of Cootehill and the province and should be recognised. It is also noted that the creation of a Bird Wetland Reserve would highlight and protect the biodiversity in the area.

6. *.Zoning of former sportsground on Fairgreen for Community Use*

The submission refers to a town centre site which is outlined on a map accompanying the submission. It is noted that Cootehill Town Team have had discussions with Cavan County Council in relation to community hub plans on this site. It is submitted that this site should be zoned for Public and Community use. Reference is made is CG02, CG04, CS05, CS06, HW10, SC02, SI05 and CF01.

7. *Construction of a Community Hub*

The submission notes the lack of community space available in Cootehill and references working on going with stakeholders to address this problem. It is requested that it is an aim of the strategic plan that a purpose-built community resource is made available. Reference is also made to a community needs analysis survey which is currently being undertaken in Cootehill, noting CT09, SS106.

8. *Provision of Community Theatre*

The submission notes that a suitable performance space for local amateur drama and musical theatre groups is required. Reference is made is LAC0-06, CE03 and the fact that use of Drumlon House space will be soon limited.

9. *Youth Facilities*

The submission notes existing clubs in the towns and notes the lack of recreational space for young people in Cootehill. It is noted that a structured consultation with children and young people will be carried out to identify what they require. Reference is made to CS05, CS06, CF01, CF08, CE03.

10. *Provision of accessible public toilets and changing areas WC*

The submission reiterated the commitment of Cootehill Town Team to making Cootehill “the most accessible town in Ireland”. It is noted that there is extremely limited changing places and WC to cater for people with complex needs. The provision of same would be welcomed. Reference is made is CRP03 and SI05.

11. Provision of public seating

It is noted that public seating is limited and is required. The submission outlines the benefits of this provision and makes reference to CRP03, SI05, SS106.

12. Update of existing playground with multi purpose equipment and provision of sensory garden with dual purpose equipment in green area outside playground currently underutilised.

The submission notes that CTT made previous unsuccessful applications for funding for this provision which is required for accessibility and inclusion. Reference is made is SI05, CF03, CE03 and SS106.

13. Additional electric car charging points

The commitments to sustainability in the draft plan are noted. It also notes that the importance of Cootehill's rural hinterland to the economic life of the town and the paucity of public transport available means that the ownership of electric vehicles should be encouraged.

14. Additional rubbish bins to combat littering and dog fouling

It is noted that this provision would bolster the work carried out by the Tidy Towns.

15. Improved welcome signage on entry to town and removal of overhead wires

The submission references previous funding received for the enhance to the town. It is noted that this welcome signage and the removal of overhead wires would further improve the appearance of the town.

16. Rural Re-Generation and Development Fund

The submission quoted CG05 which aims to “engage with the community and relevant stakeholders to promote and support the regeneration of Cootehill through identification of significant regeneration projects along with associated funding streams including Rural Regeneration Development Fund. The submission also notes support for the implementation of the “Cootehill Revitalisation Plan 2019”.

Chief Executive’s Opinion on Issues Raised

The contents of this submission are noted and welcomed. A number of specific references are made to traffic, pedestrian, heritage and biodiversity improvements that should be made in Cootehill. As a strategic policy document for the development of growth of the County, the development plan would be unable to specify the level of detail outlined in this submission. The development plan however strongly supports improved pedestrian safety in the towns and villages of the County and the preservation, access to and improvement of protected structures, archaeological heritage and the natural heritage of the County.

With regard to the specific reference to zoning of the former sportsground on Fairgreen for Community Use, it is noted that the current use is town core and that this use is acceptable and supports community uses.

The lack of community space, community theatre and youth facilities in Cootehill is noted in this submission. The submission requests that an aim of the development plan that these are made available. The development plan role in this is to ensure that sufficient lands and sites for this type of use are available by the zoning of lands for Public and Community Use. This has been considered and provided for in the draft plan.

The provision of public seating and upgrade of playgrounds is supported in the development objectives of the draft Plan that encourage the social and recreational development of the towns and villages in the County.

Electric Car Charging Points are fully supported in the draft Plan and reference is made to Section 7.3.7 and the development objectives contained in this section which seek to support, encourage and increase the number of EV Charging points in the county.

Reference to additional bins, littering, dog fouling, signage, wires and the Rural Regeneration and Development Fund are noted. The improvement of the appearance of our towns and villages in accordance with the Revitalisation Plans carried out for towns and villages in the County is fully supported in the draft Plan.

Chief Executive Recommendation

No change recommended.

St. Michael's N.S. Parents Association

The submission welcomes the commitment to educational, recreational and community facilities in the plan. Reference is made to CP102 and CS07 and it is highlighted that a large number of pupils attending St. Michael's NS walk or cycle to school along the new line. It is noted that there is no safe crossing on the Station Rd side, closest to the school. It is stated that a safe crossing, warning signs for motorists turning off Station Rd and a safe cycle lane are urgently required in this area.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The provision of footpaths, safe crossings and warning signs are outside the remit of the Development Plan, however the draft plan contains objectives to support improvements to the pedestrian and cycling infrastructure in the town, reference is made to CRP 01, CPI 02 and CRP 03.

Chief Executive Recommendation

No change recommended.

Renewable Energy Systems Limited

The submission gives an overview of this multinational company, past projects completed and future aspirations. The submission reinforces the need for Cavan County Council to adopt a proactive and plan lead approach to renewable energy development in the County. The submission welcomes the suggestion to prepare a Renewable Energy Strategy for the County.

The submission notes that it is only when planning permission is secured can a project apply for a connection to the grid to export energy to the national electricity grid. It is stated that clear and supportive planning policies for renewable energy developments is required to ensure Irelands meets its climate change and decarbonising targets.

RES believes Cavan needs to be more progressive and ambitious regarding renewable energy policies, such policies need to be more supportive of further wind energy development within the County. The submission outlines the strategic importance and economic benefits of wind energy to the County.

The submission also states that Cavan County Council must be confident that its policies and objectives will be able to deliver national targets.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. It is the intention of Cavan County Council to commence the preparation of a Renewable Energy Strategy within six months of the adoption of this development plan, in order to guide and measure how Cavan County Council can facilitate a low-carbon future in the County by supporting the sustainable development of the renewable energy sector in Cavan.

It is a policy of this plan to support sustainable energy sources and locally based renewable energy alternatives where such development does not have a negative impact on the surrounding environment including landscape, water, biodiversity, natural or built heritage or local amenities. It is policy to encourage renewable development proposals which contribute positively to reducing energy consumption and carbon footprint.

Reference to made to WE 01 which Require compliance with the principles and planning guidance set out in with the Wind Energy Guidelines (2006) and Circular PL20-13, and any updates thereof.

Chief Executive Recommendation

No change recommended.

Owen Martin

This submission relates to different themes and is divided under the following sub headings:

1. *Wind Energy Guidelines*

The submission references the Belgian equivalent of Ireland's 2006 wind energy guidelines and states they have been ruled as illegal by the European Court of Justice for failing to comply with the Strategic Environmental Assessment Directive. It is stated that Ireland's current guidelines have also never been assessed under the SEA Directive and no wind farm should be granted in County Cavan until this legal issue is rectified. It is noted that a high court action taken in 2017 resulted in a settlement by the wind farm operator in favour of a family in Cork who had to leave their home because of nuisance from a wind farm. The submission outlines the type of nuisance, stating that this proves that the current setback distance of 500m for a wind farm is completely inadequate.

2. *Protected Structures*

The submission states it is regrettable to see the number of protected structures that have been destroyed or interfered with in County Cavan. It is stated that there should be an attempt to restore such structures. It is also stated that of major importance is the vitrified fort in Shantemon Hill, the only one of its kind in Ireland. It is also noted in Scotland, these rare structures are protected and in good condition.

3. *Housing and Climate Change*

It is stated that if housing is to be sustainable, then a limit should be put on the number of new housing estates in the region. It is also noted that green areas (grassland and woodland) provide a cooling effect during periods of extreme hot weather. It is also stated that the use of concrete should be limited and new housing estates should require adjoining tree habitats.

4. *Youth Cycling Area*

It is stated that there has been an increase in antisocial behaviour in the Cavan Town region, partly due to the lack of a play/cycle area for the youth. It is noted that youths should have an area of their own with a cycling course.

5. *Tractamotors Junction, Cavan Town*

The submission notes that this junction should be laid out to allow road users approaching from Ballinagh position correctly in the middle of the road in order to turn right. This would allow traffic turning left pass more safely also.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The making of Planning Guidelines is a function of the Department and not the Local Authority.

The draft Development Plan has aimed to include development objectives to protect the built and natural heritage of the County as per Chapters 10 and 11 of the Plan. This protection extends to structures like Shantemon Hill which has two National Monuments Sites (a stone row and a ring fort).

It is considered that the Core Strategy contained in Chapter 1 of the Draft Plan, allocates the required number of houses over the plan period in each town or village, thus ensuring the sustainable development of the County. The provision and retention of green open spaces and trees/woodlands is included in the draft Plan.

The need for social and recreational space in the towns and villages of the County is acknowledged in the draft plan and where required additional lands have been zoned as Public and Community, Open Space and Sports and Recreation in order to ensure that suitable lands are designated for the use, should this be required over the plan period.

The draft Plan has committed to the preparation of a Local Transport Plan under development Objective KTC 05 for Cavan Town. It is considered that this document is best placed to deal with transport issues around Cavan Town.

Chief Executive Recommendation

No change recommended.

West Cavan Bog Association (WCBA)

This submission states that WCBA support the inclusion of the following in the Draft Plan:

FRM 08, CC10, LCC 04, LCC 01, WL1, WL 2, WL 3, WL 4, WL 5, WL 6.

The submission requests a peatland strategy for lowland peatlands for County Cavan, in conjunction with other border counties. The submission gives a detailed account of that should be taken into account.

The submission references and includes a link to an EPA report produced in conjunction with the Community Wetland Forum which highlights the possible role of involvement of communities in Co. Cavan Peatlands.

The submission states that the Council has a role with communities overcoming barriers to restoration by facilitating the following:

- The adoption of new ideas on the role of bogs, as GHG sources/sinks, flood mitigation roles and biodiversity hotspots.
- The framing of these new ideas, for the owners, on a new role of their bogs and the restoration for the common good for all, and individual supports to owners.

The submission notes that the peatland and wetland strategy should be integrated with other function of the local authority like road maintenance and wildlife control and hydrologist's reports should be commissioned to consider long term implications of drain work on wetland along roads.

It is also noted that the list of wetland sites must be updated and mapped following the new work proposed in p. 485 of the Draft Plan.

WCBA also recommends the use of local names and all townland names as bogs may cross several townlands.

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. It is considered that the draft development plan has included as per development objective LCC 04 to prepare a peatland strategy for the County. Prior to the preparation of this strategy, CCC will commission a number of studies and surveys to inform site selection and other baseline information as necessary. Consultation is considered essential and will form a key element of the preparation of the Cavan Biodiversity Plan. It is noted that wetland sites will be mapped as part of the Wetland Survey which will be completed within the lifetime of the Development Plan.

Chief Executive Recommendation

No change recommended.

Social Enterprise Republic of Ireland

The submission notes that the Social Enterprise Republic of Ireland is the representative body for Social Enterprises in Ireland. The submission requests the following items to be included as key commitments in the new Cavan County Development Plan:

1. A commitment to facilitate, enable and support the development of a vibrant Social Enterprise sector, as a valuable and important component of the overall Economic Development vision. The submission notes that Social Enterprise is responsible for a significant level of service delivery, employment and facilities across a range of sectors. It states it is an essential pillar in the regeneration for many communities and advocates that the Local Authority should ensure that relevant staff have knowledge of the challenges faced by social enterprises and that social enterprises have access to enterprise support structures and supports.
2. A commitment to work with Social Enterprises to access and develop appropriate fit for purpose land and buildings as spaces to enable development and growth of new services and products. The submission notes that social enterprises require access to facilities to grow and develop their business services and products. It is noted that lacking access to essential services to facilitate self-funded development that social enterprises require Local Authorities to have a greater awareness of their needs and incorporate Social Enterprises into local regeneration

and other plans. Proactive approaches to provide infrastructural and service supports to facilitate Social Enterprises will create synergies, networking and the potential for collaboration.

3. A commitment to include Social Clauses in Public Procurement.

The submission notes that social enterprises require more accessible forms of public procurement in order to participate and benefit from state funded contracts. It is suggested that local authorities can facilitate this in how they structure their public procurement exercises when delivering on the County Development Plan investments, by introducing social clauses making public procurement tenders more accessible for social enterprises.

4. A commitment to identify and disseminate best practice local examples of social enterprises and increase public understanding of their contribution to society and the economy.

The submission highlights the importance of local authorities communicating the social enterprise agenda to ensure coherence and to improve public understanding of social enterprise,

The submission states the Social Enterprise is available to meet with Cavan County Council to advise how better support can be provided.

The submission also contains a note section which includes the following sections:

1. Background to Social Enterprise Republic of Ireland
2. The Social Enterprise Sector in Ireland
3. Recent Development for Social Enterprise in Ireland
4. National Social Enterprise Policy
5. Social Enterprise and Local Authorities

Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. Cavan County Council concur with the comments in relation to the importance of the provision of social enterprise, infrastructure and supports. It is considered that the draft plan has placed adequate emphasis and support in objectives relating to this area. These include STE 02, VDO 11, CE 15, LE 01, LE 03, LE 06, LE 11, ALIE 01, ALIE 03, ETV 07, SISE 01, SISE 04, SISE 07, IS 01, IS 02.

It should be noted procurement is outside the remit of the Development Plan making process.

Chief Executive Recommendation

No change recommended.

Keep Ireland Open

The submission is focused on access to and protection of our heritage, the countryside and the provision of walking and cycle routes for recreational purposes.

The submission contains suggested text, policy and objective changes/additions to the following chapters and subsections:

- Chapter 4 Sustainable Communities with regards to recreation, amenity and open space and burial grounds and places of worship.
- Chapter 7 Transport and Infrastructure with regards to walking, cycling, disused rail lines, greenways, existing trails, wind energy, solar energy, rights of way and information technology and broadband.
- Chapter 9 Tourism with regards to history, heritage and ancient sites, greenways, cycling and walking and tourism climate change context.
- Chapter 10 Natural Heritage with regards to Natura Sites and Natural Heritage Areas, local sites of biodiversity value and non-designated sites, geological heritage, Cuilcagh Lakelands UNESCO Global Geopark, invasive species, wetlands, woodlands, trees, hedgerows and stone walls, landscape categorisation, special landscape policy areas, heritage sites, scenic views and viewing points, scenic routes, forest parks and other parks, major lakes and lake environs, lakeside amenity areas, riverside amenity areas, inland waterways, canals, lakes, national parks, peatlands and special amenity area orders.
- Chapter 11 Architectural Heritage with regards to the record of protected structures, industrial heritage, archaeological heritage and world heritage sites.
- Chapter 12 Rural with regards to rural enterprise and economy, agriculture and quarrying.
- Chapter 13 Development Management

Chief Executive's Opinion on Issues Raised

Format

Following adoption of the Draft Plan and outside of its statutory timeframe, it is intended to further format and design the document.

The Draft Plan has been prepared in accordance with the Planning and Development Act 2000 (as amended). The National Planning Framework and the Regional Spatial and Economic Strategy for the Northern and Western Region.

Sustainable Communities

All comments and suggestions put forward as part of the submission relating to walking/cycling, greenways and public rights of way are acknowledged and welcomed. It is considered that many of the suggestions outlined within the submission are already covered within numerous sections of the draft

plan. Particular reference should be given to the following specific development objectives and sections of the draft plan that relate to the forementioned:

- Town and Village Revitalisation Plans
- Section 7.11, p416 and relating objectives
- Section 9.8 Greenways, Cycling and Walking, p. 465 and accompanying development objectives.
- Section 4.16, p. 296
- Section 7.3.1, p. 386.
- Walking and Cycling Development Objectives, p. 387.
- Section 7.3.2 Greenways, p. 287
- Greenway Development Objectives, p. 391
- Section 9.8 Greenways, Cycling and Walking, p. 465.
- Greenway, Cycling and Walking Development Objectives. p. 466.
- GP 4, p. 483, F 02, F 05, p. 528, SC 01, p. 280, F02, F 05, p. 528 and EDO 02, p. 411, WE 02, p. 412, SED 03, p. 413, HD 03, p. 415, NHDS 1, p. 479NHN 1, p. 481, CS 01, p. 280, LC 4, p. 490, RAOS 11, RAOS 12, p. 298, SI 03, p. 287, CE 05, CE 07, p. 295., RAOS 02, RAOS 11, RAOS 12, p. 298, CC 17, 331, TC 01 and TC 02, p. 471.
- Transportation and Infrastructure Policy on p. 381.
- Chapter 2, Town and Villages Development Objectives.

It should be noted that all walking routes are supported in the draft plan with development objectives supporting their development and upgrade including waymarking and signposting.

It is considered that the following requests as outlined in the submission fall outside the remit of preparing a County Development Plan:

- Appointment of a Cycling Officer to Cavan County Council
- Lobbying Government Department

Disused Railway lines

In relation to comments and suggestion made regarding disused railway lines, please refer to the following development objectives and map based specific objective:

- RVSO 04, RVSO 08, p. 240. G 03, p. 391, GCW 06, p. 467, CTH 04,p. 95. CT 11, p. 148. KH 03, p. 167
- Map based Specific objective no. 3 Belturbet, p. 193. BSO 07, p. 220

Renewable Energy

It is considered appropriate to amend Energy Development Objective 02 to include reference to cycling and public rights of way.

Wind Energy

Please refer to development objective CC24 which outlines the Councils commitment to the preparation of a Renewable Energy Strategy for the County.

Solar Energy

The making representations to the appropriate government department concerning the making of Planning Guidelines for ground mounted solar farms is considered outside the remit of the Development Plan.

Rights of Way

It is considered appropriate to amend Section 7.11 Rights of Way to read Section 7.11 Public Rights of Way.

Information Technology and Broadband

It is considered that the proposed put forward as part of this section of the submission is adequately provided for, please refer to ICT 05 and protection of walking routes.

Tourism

It is considered that local people are included in the following objectives, T 07, HHAS 02, HHAS 03, GCW 03 – 07, GCW 07, GCW 09, GCW 11 and GCW 13, TC 01 and TC 02.

Natural Heritage

It is considered appropriate to add a new natural heritage development objective outlining commitment to work relevant bodies to deliver on strategic actions of the current Cavan County Heritage Action Plan and the Cavan County Action Biodiversity Plan:

Natura Sites, Natural Heritage Areas, Local Sites of Biodiversity Value and Non Designated Sites

It is considered the following objectives adequate provide for suggestions within this part of the submission: T 07, p. 460, HHAS 03, p. 463, LW04, p. 465, GH3, p. 482, WTHS 1, p. 488, CH 14, p. 155 and STC 08, p. 209.

Geological Heritage

It is considered that comments and suggestion made as part of this section of the submission are already covered in the section on to walking/cycling, greenways and public rights of way (as above), where relevant sections and development objectives contained in the Draft Plan are outlined.

Invasive Species

It is considered that comments and suggestions made as part of this section of the submission are already covered in the section on to walking/cycling, greenways and public rights of way (as above), where relevant sections and development objectives contained in the Draft Plan are outlined.

Wetlands

It is considered premature to include a new objective to facilitate public access to wetland area until such time as the County Wetland Survey is completed.

Woodlands, Trees, Hedgerows and Stonewalls

Please refer to Chapter 10: Natural Heritage and the Town and Village Section of Chapter 2 which contain relevant objectives relating to Woodlands, Trees, Hedgerows and Stonewalls.

Landscape Categorisation

Please refer to section 10.16 Landscape Categorisation, in particular LC 8 which outlines Cavan County Council's commitment to prepare a Landscape Character Assessment for the County.

Special Landscape Policy Areas

Reference is made to the fact that non exempted fencing planning application are dealt with in accordance with the designation of the site and in accordance with the Development Management Chapter.

Heritage Sites

It is considered adequate as part of the draft development plan that the County Heritage Sites are mapped as per Appendix 15.

Inland Waterways

It is considered that as per Section 10.24, p. 495 and the accompanying development objectives for inland waters that the suggestion made in 1 -20 of this section of the submission are adequately catered for within the remit of the development plan.

Canals

It is considered that as per Section 10.24 and the accompanying development objectives, in addition to development objectives contained in the Ballyconnell section that adequate provision is provided for within the development plan.

Lakes

It is considered that as per Section 9.7, Section 10.23, Section 10.23.1, Section 13.4.11 and accompanying development objectives, that adequate provision is provided for within the development plan in relation to access and maintenance of amenity value of lakes.

River Shannon

Reference is made to the protection of the River Shannon and Islands, as an inland County the small islands in some of the lakes in the County are catered for within the Draft plan. Furthermore, there is sufficient protection of all rivers in the County as outlined throughout the Draft Plan.

Natural Parks

There are no natural parks within County Cavan and it is outside of the remit of the Development Plan to designate same.

Special Amenity Area Order

There are no special amenity area orders within County Cavan and it is outside of the remit of the Development Plan to designate same.

Chapter 11 Built and Cultural Heritage

Archaeological Heritage

It is considered that Section 7.11, p. 416, T07 p. 460., HHAS 03, p. 463, AH 6, p. 509, CTH 09 and the Natural and Built Heritage Development Objectives for the Towns and Villages provide adequate provision as per suggestions within this section of the submission.

World Heritage Sites

In the event of any site in the County becoming a World Heritage Site, a variation of the plan may be appropriate.

Rural

It is considered Section 12.4 and the development objectives of same on p. 520 adequately address elements outlined as part of this section of the submission.

Agriculture

It is considered Chapter 12 and the development objective of same adequately addresses elements outlined as part of this section of the submission.

Quarrying

It is considered appropriate to include impacts of walkways/public rights of way in applications for aggregate/mineral extraction. It is proposed to amend Q 08 to reflect same and add a new development objective to ensure that all quarrying activities and projects associated with the extractive industry comply with all relevant Planning and Environmental Legislation.

Chief Executive's Recommendation

Recommendation No. 175:

Amend Development Objective BVS0 07

BVS0 07 Support the Cavan Way Walking Trail, Kingfisher Cycling Trail, and the development of the Beara Breifne Way walking route and all other **long distance** walking routes.

Recommendation 176:

Amend Development Objective EDO 02

EDO 02 Require renewable developments to include for assessment the following which will be the criteria that will be taken into account:

- The proper planning and sustainable development of the area
- The environmental and social impacts of the proposed development
- Traffic impacts, including details of haul routes
- Impact of the development on the landscape, having regard to the Landscape Categorisation/ Characterisation or any updated version thereof.
- Impact on protected scenic views
- Impact on walking/cycling routes and public rights of way
- Connection to National Grid (where applicable)
- Mitigation measures where impacts are identified
- Protection of designated areas, - NHAs, SPA's and SAC's, areas of archaeological importance, national monuments, protected structures, ACAs etc.
- Cumulative impact of the proposed development

Recommendation No. 177:

Amend Title of Section 7.11 Public Rights of Way

Recommendation No. 178

Add the following new Natural Heritage Development Objective:

NH9 Working in close partnership with the Heritage Council, National Parks and Wildlife Service, Fisheries Boards, Fáilte Ireland, Office of Public Works, Geological Survey of Ireland to deliver on the strategic actions of the current Cavan County Heritage Action Plan and the Cavan County Action Biodiversity Plan or subsequent plans adopted within the lifetime of the development plan.

Recommendation No. 179:

Amend the Development Objective Q 08:

Q 08 Ensure that development for aggregates/mineral extraction, processing and associated processes does not significantly impact on the following:

- Existing and proposed Special Area of Conservation and Special Protection Areas
- Existing and proposed Natural Heritage Areas.

- Areas of importance for the conservation of fauna
- Areas of significant archaeological potential
- ~~In the vicinity of a Recorded Monuments~~
- Sensitive landscapes
- **Public Rights of Way, Walking/Cycling Routes**
- ~~— Ensure that all quarrying activities and projects associated with the extractive industry comply with all relevant Planning and Environmental Legislation~~

Recommendation No. 180:

Insert new Development Objective:

Q 09 Ensure that all quarrying activities and projects associated with the extractive industry comply with all relevant Planning and Environmental Legislation

ZONING REQUESTS

Cavan Town

012 Vogue Homes

This submission refers to lands in Drumnavannagh, Farnham Road, Cavan Town. The lands in question are currently zoned as 'Existing Residential' in the draft Cavan County Development Plan 2022-2028. The submissions seeks to maintain the current zoning in the draft plan and to include them, as per the draft plan, in the development envelope for Cavan Town.



Chief Executive's Opinion on Issues Raised

The contents of the submission is noted and welcomed.

Chief Executive Recommendation

No Change.

Greenway Estates, Sligo Ltd

This submission relates to lands in Loreto Woods, Cavan Town. Greenway Estates are in the ownership of lands at Loreto Woods and are seeking to deliver a residential scheme during the lifetime of the next plan. The subject lands occupy 2.15ha north west of Cavan Town Centre. The submission sets out how Cavan Town sits on a national scale. In terms of locality the subject sit is in an established housing estate known as Loreto Wood., are readily accessible in terms of a local road with adequate design standards to accommodate additional traffic. Lands are currently zoned as Recreation and Amenity in the existing Development Plan (2014-2020), however was zoned for Phase 4 Residential in the 2008-2014 Development Plan.

The submission sets out the key objectives relating to the growth of Cavan Town as set out in the National Planning Framework and the Regional Spatial and Economic Strategy.

The submission states that the draft plan has failed to set out how the lands within Cavan Town have been prioritised for zonings and the following relevant factors should be considered

- Infrastructure requirements to service lands
- Identification of lands already zoned
- Identification of infill sites
- Setting out a scoring matrix on how lands within the settlement limit are weighted in terms of appropriateness of zoning
- Availability of lands for zoning

It is noted that the zoning of the land needs to be consistent with Appendix 3 of the NPF which requires a written infrastructural assessment of how lands are prioritised for zonings.

It is submitted that the subject lands have been incorrectly identified as Amenity and Recreation and this should be revised on a number of grounds:

- Previous permission on the lands in 2006 for 56 dwellings
- Lands previously zoned as Phase 4
- Lands defined as Tier 1 serviced lands under the NPF
- Lands sequentially appropriate and infill
- Connection to infrastructure
- Draft CDP fails to incorporate an infrastructural assessment or scoring matrix
- Draft CDP fails to recognise constraints to local topography in Cavan Town
- Draft CDP fails to recognise lands which are available or being available for delivery of residential units.

There is a shortage of residential units on the market and this acute shortage has not been captured in the draft CDP. Only 156 scheme houses have been granted in the county since Q1 2017. The draft Core Strategy and Housing Supply Targets should be revised in the draft CDP to take account local demand and further local analysis should be undertake to capture:

- Local market reports deem auctioneers and developers
- Occupancy/vacancy/availability of units in Cavan Town
- Future uplifts required so that housing allocations have increased headroom so that future employment growth in Cavan Town in facilitated.

Site Context

Lands in their entirety are suitable for development and adjacent to existing residential development.

Local Connections

Primary frontage is along Drumlark Road and within walking distance of Cavan town. Public transport is available at Drumgola just over 400 metres from lands. There are good cycle/footpath connections to Cavan Town centre.

Sequential Development

Lands are appropriate given they are:

- Directly accessible from existing road infrastructure
- Lands are serviced
- Lands are available for development and capable of being delivered by the owner
- Lands sequentially appropriate and infill
- Lands immediately south and southwest are already developed for residential

Population change

Historical context in terms of population change is important to note. Cavan County grew by 43.9% between 1996 and 2016. Cavan Town grew from 7757 in 1996 to 13,787 in 2016. The Housing Needs Demand Assessment confines its assessment to historical growth rates from 2011 onwards which is distorted having due to the recession from 2011 to 2016.

Housing Market

The Housing Market has experienced significant growth in recent years in Cavan which it is considered represents the natural growth of Cavan's population. Scheme Housing Units however for the county remains extremely low particularly for apartment provision. Increase house price is noted and deemed to be 256.6% since 2014 to 2021 and this is reflective of the existing demand to live in the county. The county is also more affordable than Dundalk, Drogheda and/or Dublin. The low rates of construction of scheme houses needs to be addressed by zoning lands.

Planning History

Previous applications 02/874 and 06/257 referenced in the submission. These permissions, notwithstanding that fact that the lands are zoned as Amenity demonstrate that residential development is acceptable in principle on the lands.

Concept Design and Delivery

A proposal on the lands in question would set out to achieve:

- A scheme that creates a sense of place
- A scheme which adopts the principles of sustainable urbanism with a variety of house types
- A high-quality public realm

- Appropriate density and scale
- Consist with existing built character.

Recommended Zoning and Objectives

The submission recommends that the lands in question are zoned for 'Residential Phase 1' for the reasons set out above.



Chief Executive's Opinion on Issues Raised

This submission refers to two portions of land located within the existing Loreto Woods Housing Development. Parcel 1 is an infill site within the existing estate and the other parcel is a larger site located adjoining the northern portion of the estate, to the rear of St. Christopher's Hospice. Levels are extremely difficult in the small infill site with a steep fall from road level with retaining walls of substantial height to the east and west of site. Concerns arise here regarding residential amenities. Historical development along this side of the road, has resulted in high retaining walls between the rear properties of the dwelling houses. Having regard to the steep drop in levels and the difficult topography at this site, it is not deemed appropriate to consider this site for inclusion as Proposed Residential.

It is considered that the requested extension of this estate in the larger parcel would be predominately car bound development having regard to its distance of the site to the town centre and is not considered to be sustainable in terms of its walking distance to town core and adjoining amenities and services. The addition of these lands would result in housing and population growth that would be considered unsustainable over the lifetime of this plan and it is therefore recommended that the lands not be zoned for residential purposes.

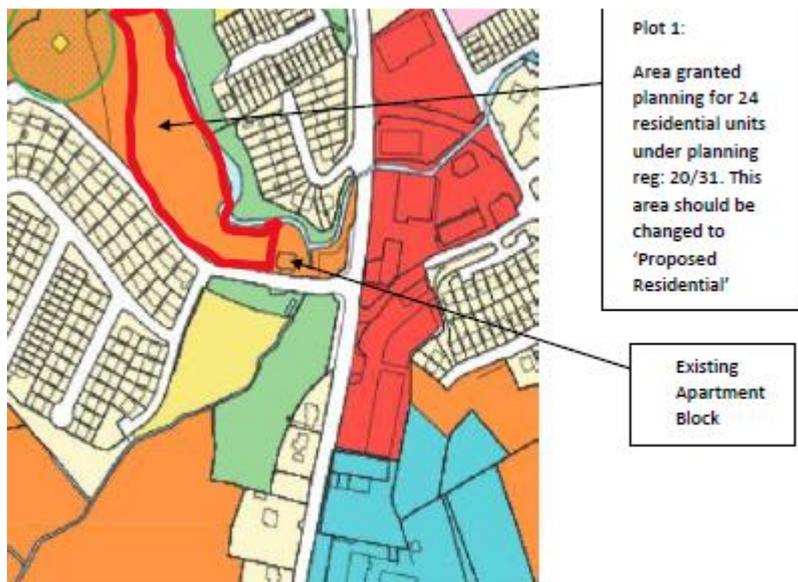
Chief Executive Recommendation

No change recommended.

Collette Bogue

Refers to lands within the confines of Ashbrooke Housing Estate in Cavan Town. Lands have been included as Strategic Reserve which should be zoned for Residential for the following reasons there is an existing apartment block in the area planning permission was granted for 24 residential units under 20/31 on 22/10/2020 20/31 will expire on 21/10/2025 and due to constraints of developing in terms of connection agreements with Irish Water and ESB Networks the development will not be completed within 5 years and there will be no opportunity for an extension of time for the development in the event that the lands are zoned as Strategic Reserve. No lending institution will provide finance under the current time limit of 5 years. The site is an infill site and fully serviced with foul sewer and watermain.

With regard to the same housing estate the submission welcomes that rearrangement of lands located in Plot 2 of the submission. There is a portion beside Plot 2 that should be considered for Residential as it exists beside an extensive green area to accommodate existing and future development. This area was previously designated for Residential and is an infill site and fully serviced with foul sewer and watermain.





Chief Executive's Opinion on Issues Raised

Planning permission has been granted for 24 dwellings as outlined on the above map. It is therefore considered appropriate to rezone these lands from Residential Strategic Reserve to Proposed Residential in accordance with Section 4.4.3 of the Draft Development Plan Guidelines for Planning Authorities, August 2021. This infill site is considered appropriate for residential development due to its close proximity to Moynehall Neighbourhood Centre and its infill nature.

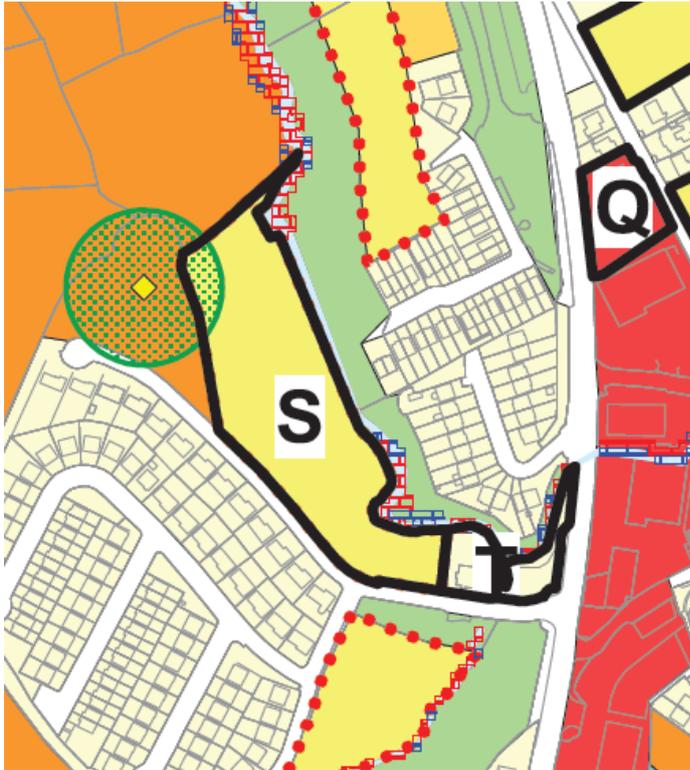
This submission has also requested consideration of an area currently zoned as Amenity and Open Space to be zoned Proposed Residential. It is considered that Amenity and Open Space is an appropriate zoning and no change is recommended.

Chief Executive Recommendation No. 181

Change zoning from Residential Strategic Reserve to Proposed Residential as per 'S' on Cavan Town Map in Appendix 2.

Chief Executive Recommendation No. 182

Change existing apartment block from Residential Strategic Reserve to Existing Residential as per 'T' on Cavan Town Map in Appendix 2.



St. Patrick's Trust

Summary

This submission requests that land parcels (4.79ha) as identified on accompanied maps be zoned for residential development in the new Cavan County Development Plan 2022-2028. The submission includes the following arguments for this inclusion:

- The property is within the boundary of the N3 by-pass, the outer limit set for the zoning of lands in the new plan.
- The lands are on the outer edge of existing built up areas and are contiguous to existing housing developments
- An existing site entrance to the property is in place which meets the required standards for Housing Development.
- Existing development services including roads, footpaths, public lighting, foul sewerage drainage, surface water drainage and water supply are all convenient to and within easy reach of the proposed lands.
- A wide range of amenities and facilities are on the doorstep of these lands, including national and third level education facilities, sporting and recreational facilities, healthcare facilities and public open spaces.
- The land is physically suitable for residential development in terms of topography and would not be impacted upon by future climate change events, like flooding.

- The development of these lands would have no negative impact on local sites of architectural or heritage significance.



Plot 1



Plot 2

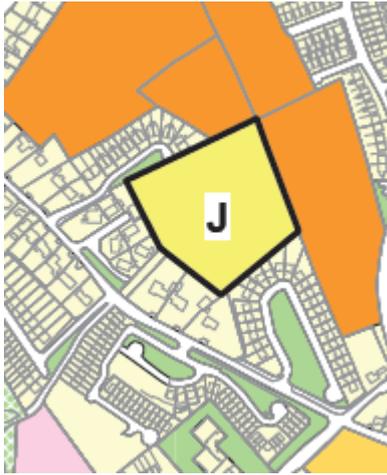
Chief Executive's Opinion on Issues Raised

It is considered appropriate to rezone lands as outlined in the above map Plot 1 to Proposed Residential due to their proximity to the town core and Drumalee Neighbourhood Centre. The Draft Plan promotes consolidation of existing settlements and more compact forms of growth which this site facilitates. Plot 1 is considered to be an infill development within the existing footprint of the urban settlement of Cavan Town and therefore the inclusion of Plot 1 as Proposed Residential is considered appropriate for the 2022-2018 development plan period. This is in accordance with Section 4.4.3 of the Draft Development Plan Guidelines for Planning Authorities, August 2021

Plot 2 is considered premature pending the development of Plot 1.

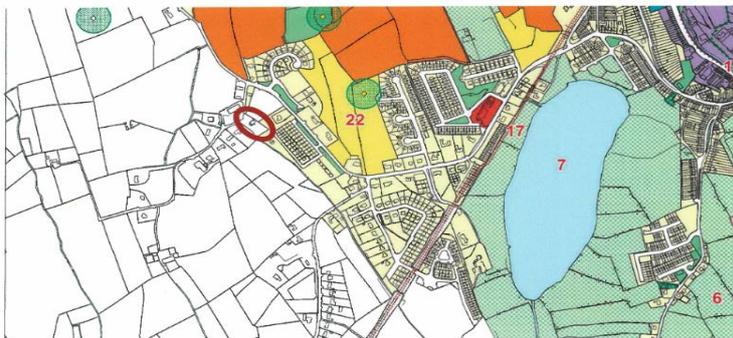
Chief Executive Recommendation No. 183

Rezone the subject land as outlined as 'J' in the attached Cavan Town map in Appendix 2 from Residential Strategic Reserve to Proposed Residential.



Brian and Muriel Allen

This submission makes reference to the fact that Brian and Muriel Allen’s dwelling house is no longer zoned in the Draft Development Plan. It is noted that it is zoned in the current development plan and it is requested that it remain that way. It is noted that the house is connected to the public watermain and the sewerage system and appears to be the only existing dwelling in Swellan Lower that is proposed not to be zoned. A map showing the location of the dwelling house forms part of the submission.



Chief Executive’s Opinion on Issues Raised

The Draft Plan acknowledged that the extent of lands to the west of the town were deemed to be excessive regarding the amount of land zoned as future residential purposes (Phase 3 and Phase 4, CDP 2014-2020). As a result there has been a reduction in allocation of this type of land in the Draft Plan. Many one off dwellings have subsequently been removed from Existing Residential Zoning to better convey the Draft Plans policy for compact growth.

Chief Executive Recommendation

No change recommended.

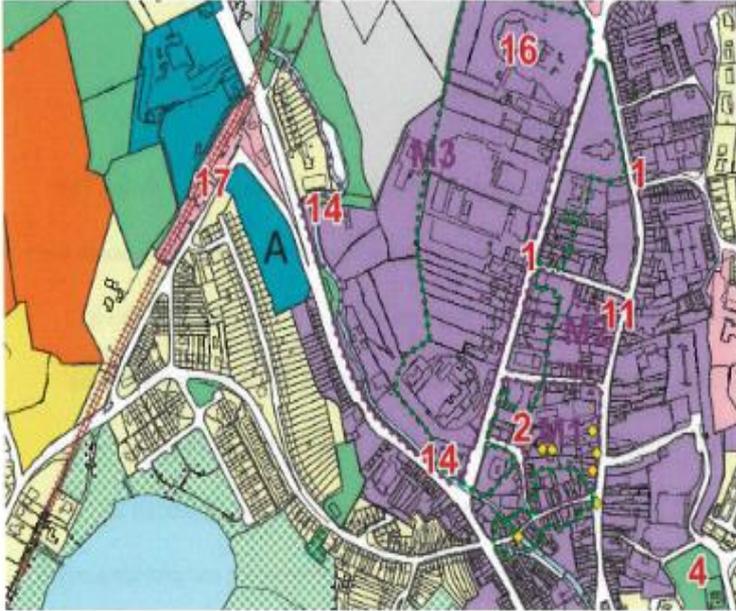
Peader Fay, Latt Properties Ltd

This submission is made by Gaffney and Cullivan Architects on behalf of Peader Fay, Latt Properties Ltd. The submission relates to lands currently zoned as “General Enterprise and Employment” stating this zoning is not appropriate noting that the only other similar zoning nearby relates to the existing meat plant, outlining that one of the uses not allowed for is Abattoir which indicates that an application for a meat factory would not be consistent with the intentions of the current plan. The submission contains a map clearly identifying the lands in question. The submission also contains section 14.15 of the Draft Plan.

It is submitted that this site, so near to the urban centre, should have a Town Centre zoning designation, stating that this would be consistent with adjoining properties. It is noted that the line of buildings immediately to the south were constructed as houses 30 years ago and have gradually changed to offices, clinics and other service based uses, which is consistent with town core zoning designation and allows for the versatile adaption of building stock. The submission notes that the proposed zoning is overly restrictive and could disincentivise the development of this plot. Reference is made to the changing work practices, working from home and hybrid models of employment will become more the norm and it is stated that this plot should be able to adapt and provide a mix of residential/lifestyle units/home offices/shared “hot desks” office space which town core zoning would facilitate. It is further noted that detailed design, mix and density can be evaluated and controlled at formal application stage so that there is no risk to blanket housing for example. The submission contains an extract of section 14.3 of the Draft Plan.

The submission states that if the planning authority is not willing to support a change to Town Core Zoning then it is submitted that Mixed Use would be a reasonable alternative that should be considered for the same reasons as set out above. The submission contains an extract of section 14.9 of the Draft Plan.

The submission concludes by stating that the zoning of General Enterprise and Employment unnecessarily restricts development at this site. It is noted that a site at this location needs to offer flexibility to a potential developer of it is to represent a worthwhile risk. It is stated that the application for Town Core or Mixed Use still offers the majority of uses allowed under General Enterprise and Employment and can achieve a similar outcome to that envisaged by the Local Authority. The importance of the final zoning offering enough latitude for a positive development to take place with the planning process allowing for fine tuning of the development, to achieve the balance required by the developer and the local authority.



Chief Executive's Opinion on Issues Raised

A key objective of the Draft Plan is to promote regeneration and facilitate compact growth of the Town Core. It is considered that the extent of Town Core zoning is appropriate in the Draft Plan. Having regard to the distance of this site to town core, it is not considered appropriate to expand this zoning to the site as marked A above. In addition, considering the topography of the site and the adjoining land uses it is considered that the zoning as per the Draft Plan of General Enterprise and Employment is appropriate at this location.

It is also considered that the zoning of this site as Mixed Use is not appropriate at this location, for reasons referred to above.

Chief Executive Recommendation

No change recommended.

Onyx Homes Ltd

This submission by JD O'Hagan Consulting Engineers is on behalf of Onyx Homes Ltd. The submission relates to land north east of Cavan Town centre, 3.12ha in size and zoned partly "Proposed Low Density Residential" and partly "Residential Strategic Reserve" in the Daft Plan. The submission requests to zone these lands as "Proposed Residential" within the 2022-2028 Cavan County Development Plan. Maps clearly outlining the subject lands form part of the submission.

The submission notes that Onyx Homes Ltd. intend to deliver residential development on these lands during the lifetime of the next Cavan Development Plan. It is stated that a preliminary planning meeting has been arranged for Sept. 2021 with the planning and roads departments, in addition to concept

designs for all of the land with a planning application to be submitted later this year. Reference is made to an examination of the National Planning Framework and the Regional Spatial, the Economic Strategy for the Northern and Western Regional and the current Cavan County Development Plan which demonstrates that the all of the subject lands are suitable for a normal density residential development.

Subject Lands

This section of the submission gives a full description of the lands:

- Located north east of Cavan town centre
- 3.12ha in size
- Located in a multiple density residential type area
- Existing road and service infrastructure bounding the lands in situ

Site Location

This section of the submission gives an account of the site location and includes a context drawing map:

- Close to all amenities (walkable communities)
- Walking distance of schools, third level college, the town centre, leisure centre, public transport infrastructure, health care surgeries and retail units
- Bounded by 4 roads
- Foul drainage provision in place
- Adjacent to multi density residential developments
- Currently zoned residential

Section 2 of the submission relates to Zoning

Current Zoning

The submission notes the current zoning is Residential and previously zoned as Phase 3 Residential.

Proposed Zoning

The submission notes this land is zoned partly “Low Density Residential” and partly “Residential Strategic Reserve” and that the division between zonings conflicts with the natural topography of the site. The said lands are indicated on accompanying map of the Cavan Town Draft Local Area Plan map.

Zoning Context

This section of the submission reiterates the core locational attributes of the site. It also notes that the CDP Core Strategy identifies the requirement for additional housing units and that these lands provide a suitable location for a residential scheme; helping to create a walkable community.

Infrastructure

The submission states that the full development of the land may allow for the upgrading of Junction 1 and/or Junction 2 and/or Road C which will form part of pre planning discussions. It is stated that development of these lands will improve infrastructure and create a safer environment for pedestrians. It is also stated that it may provide improved access to development land owned by Cavan County Council abutting the site.

Density

The submission outlines density figures for developments in close proximity to the site and suggests that for the reasons as outlined above that it is an inefficient use of land to categorise as “Low-density”. It is further stated that this would be contrary to the guidance of Sustainable Residential Development in Urban Areas and the Urban Design Manual. It is proposed a density of 25-30 units per hectare for the subject lands.

Design Parameters for Subject lands

This section gives an overview of the design parameters proposed for these lands including;

- Open space provision
- Density
- House Types
- Design concepts
- Landscaping
- Pedestrian/cycle links
- Road/junction upgrades
- Services

Recommended Zoning

This section of the submission reiterates the desired zoning designation and details pre planning/planning applications plans.

The submission concludes by noting the following:

- That the revised zoning will improve the supply of residential units and create an opportunity to update infrastructure in the vicinity and improve road safety and align in terms of land use with the wider planning objectives to develop such serviced lands
- The CDP Core Strategy identifies the requirement for additional housing units which these lands will provide a sustainable location for a residential scheme; creating a walkable community.



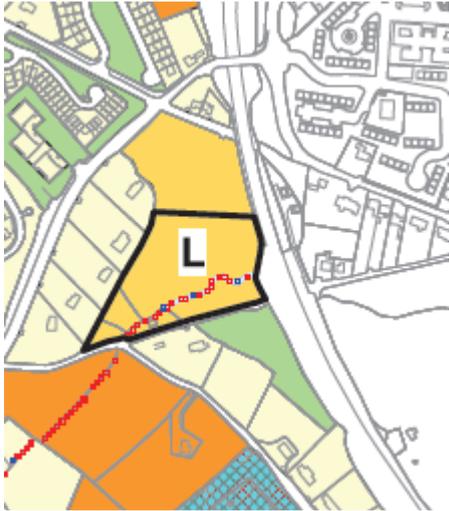
Chief Executive's Opinion on Issues Raised

This submission seeks to have the entire site zoned as Proposed Residential. The Draft Plan currently zones a portion of this lands as Proposed Low Density Residential Development and the remainder as Residential Strategic Reserve. The site is located in close proximity to Cavan Town Centre and Drumalee Neighbourhood Centre. Services in the vicinity also include necessary and appropriate social infrastructure. Having regard to the existing character in the area, it is considered that Low Density Residential Development which delivers in the region of 8 units per hectare is appropriate at this location. It is recommended that the site as outlined above is zoned in its entirety as Proposed Low Density Residential Development in accordance with Section 4.4.3 of the Draft Development Plan Guidelines for Planning Authorities, August 2021.

Chief Executive Recommendation

Recommendation No. 184

Rezone the proposed remainder of the site currently zoned Residential Strategic Reserve as Proposed Low Density Residential Development as per 'L' on attached Cavan Town map in Appendix 2.



John Prior

This submission was made by Hanley Taite Design Partnership Architects and Design Consultants on behalf of John Prior and requests subject lands at Swellan Lower, Cavan be zoned as Public and Community. The submission is divided under the following headings:

Introduction

It is noted the site is located at Swellan Lower, Cavan and is 4.5 ha and currently unzoned. The subject lands are proposed to be zoned as “sport and recreation” in the draft plan and the submission seeks to have the lands zoning altered to “public and community”

Proposed Site Information

This section of the submission outlines the following regarding site specifics:

- Located to the rear of Lower Swellan Ed
- Accessed via a private lane
- Current use (agriculture)
- Walking distance from town core with a public footpath
- Close proximity to all existing services and amenities and within the town speed limit
- One off dwellings, the old disused railway line, and terraced housing developments are located to the west and north, agricultural lands to the south and Swellan Lough to the east.
- Mix of residential house types in the vicinity with the applicants family home (ITB Guest Farmhouse) located adjacent to the lands.

Planning History

This section gives an overview of planning history of the site:

- Ref. no. 01/247 – development of 42 residential units – refused

- Ref. no. 984 – outline permission for 24 residential units – granted by Cavan Co. Co, appealed to the An Bord Pleanala and refused by An Bord Pleanala.

Zoning Proposal & Justification

It is noted that the site is bounded by Swellan Lough. Specific Objective 7 and 17 relate to the site. The submission notes Specific Objective 7 relates to the increased usage of Swellan Lough and specific objective 17 relates to promoting and supporting the expansion of the development of a greenway in Cavan Town. The submission notes support for these objectives and outlines and states the proposed zoning of “Sport and Recreation” will leave the site very restrictive in terms of aiding the development of these objectives.

The submission notes the vision of Section 14.12 Community and expresses the opinion that the permitted uses under “Community” will help to enhance the possible development of the specific objectives of Swellan Lough by allowing the return of Glenlara House back to a guest house/residential institution/retirement home/tourism recreational complex by further extending it into the proposed zoned area fronting the lake with individual car units for the aged/vulnerable of the community. Therefore providing a more socially inclusive space whilst providing security for any proposed lakeshore walk/amenity space/greenway in the area.

The submission outlines a previous planning permission on adjacent lands closer to the town allowing for future pedestrian/cycle linkages back to the main road that potentially serve as a looped walk from the site access further out the Swellan Lower road, failing the full development of a fully looped lakeshore walk and thus providing a much needed amenity facility for the area.

It is also stated that the proposed change of zoning to “Public and Community” will not effect the potential of the lakeshore walks or the development of the greenway as such uses can be covered under “Community”. Support of same is again noted.

The submission contains image 1 and image 2 which depict the proposed zoning map as per Draft Cavan Development Plan 2022-2028 and image 3 which depicts the proposed zoning map as per Draft Cavan Development Plan 2022-2028 with the suggested zoning of Low Density Residential outlined.

The submission concludes by requesting that Cavan County Council consider zoning the subject lands “Public and Community” instead of “proposed sport and recreation” in the Cavan County Development Plan 2022-2028. Support is again noted for the proposed recreational use of the lakeshore frontage and the opinion is given that the proposed zoning is restrictive. It is stated that by changing the proposed use to “Public and Community” will offer a greater opportunity for the opening up and development of these lands, in addition to the provision of an amenity space for all the community to enjoy.



Chief Executive's Opinion on Issues Raised

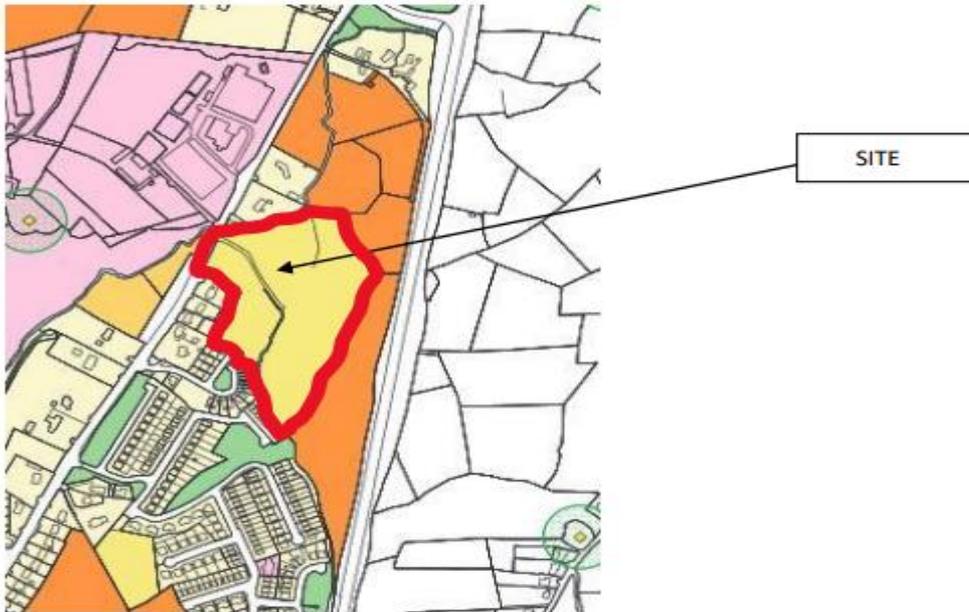
The potential for increased usage of Swellan Lough is a key objective of the Draft Plan, Development Objectives 7 and 17 specifically relates to same. As such the lands surrounding the Lough has been zoned as Sport and Recreation in the Draft Plan. Development Objective PCOS 04 provides for and promotes additional public parks, amenities and spaces throughout the County and undertakes to prepare a County Open Space Strategy for the County in this regard. It is therefore considered premature pending the preparation of this strategy to amend the zoning on these lands from Sport and Recreation.

Chief Executive Recommendation

No change recommended.

Colm Murphy

This submission was made by Wynne Gormley Gilsenan Architects and Surveyors Ltd on behalf of Colm Murphy and relates to subject lands at Billis, Cootehill Rd., Cavan. The submission notes the zoning of land in the Draft Plan as "Proposed Residential" is supported and welcomed and appropriate going forward. Figure 1.0 shows an extract of the Draft Cavan Town Environs 2022-2028 Map with the subject site at Billis, Cootehill Rd, Cavan clearly outlined.



**Fig 1.0 Extract of Draft Cavan Town Environs 2022-2028 Map
Billis, Cootehill Road, Cavan**

Chief Executive's Opinion on Issues Raised

The comments contained in this submission are noted. The zoning of Proposed Residential on the subject lands is considered appropriate and has been welcomed in this submission.

Chief Executive Recommendation

No change recommended.

Brendan Cosgrove

This submission was made by Michael Fitzpatrick Architects on behalf of Brendan Cosgrove. The submission relates to subject lands at Drumlark, Cavan and requests these lands to be zoned as "Proposed Residential Strategic Reserve", "Proposed Mixed Use Residential", "Proposed Low Density Residential Development" and "Proposed Residential", under the forthcoming Cavan County Development Plan 2022-2028.

The submission is divided under the following headings:

Introduction

The submission notes Brendan Cosgrove is the owner of the subject lands and is seeking to deliver a residential scheme on the subject lands. It is noted the appropriateness of the lands for zoning as residential have been assessed in the context of the National Planning Framework, the RSES and the Cavan County Development Plan which demonstrates the lands suitability for residential

development. The submission notes that given the existing residential context and the lands being in close proximity to existing infrastructure, it is submitted that such lands will provide an ideal location for residential development.

It is submitted that the zoning of the subject lands marked B on attached map as “Proposed Mixed Use Residential” closer to the proposed development site entrance and existing public road and footpath/cycle lane infrastructure, would be consistent with the 5-10 year overall proposed masterplan for the site, and appropriate in terms of land use with the planning objectives to develop such serviced lands. And by zoning the “Subject Lands – C as “Proposed Low Density Residential” would align with the masterplan design intent to have detached dwellings on larger sites fronting the public road would form and appropriate low density frontage to the site and entrance as viewed from the public road, the design and massing of these dwellings would be carefully considered, and also appropriate in planning terms of land use with the wider planning objectives to develop such serviced lands.

Proposed Land Zoning V Recommended Zoning of Subject Lands – Cavan County Development Plan 2022-2028

Figure A conveys the proposed land zoning as per draft Cavan County Development Plan 2022-2028.

Proposed zoning (as per draft Cavan CDP 2022-2028)

Observations as per the current Cavan CDP 2014-2020: The subject lands are currently designated as per the current Cavan CDP 2014-2020 as:

- Subject Lands A – Proposed Mixed Use Residential
- Subject Land B – Proposed Residential Strategic Reserve
- Subject Land C – Proposed Low Density Residential
- Subject Land D – Proposed Residential Strategic Reserve

The submission quotes the CDP objectives for lands reserved as “Mixed Use Residential”.

It is noted the subject lands are proposed to be located within the settlement limit of Cavan Town.

It is considered appropriate that the subject lands should be zoned as stated above.

It is requested to amend the proposed zoning as above and as recommended on Figure B.

Proposed Land Zoning as per Draft Cavan County Development Plan 2022-2028

Zoning Context

It is highlighted that the surrounding land uses in the immediate vicinity are compatible with the proposed residential scheme:

- The subject lands are adjacent to the established residential area.

- The development of a residential scheme is consistent with the residential profile of the locality and the wider environs of north Cavan Town.
- The lands will provide a sustainable location for a residential scheme proximity to the town centre amenities and local transport hubs achieving a balance in terms of residential units close to local services and centres of employment.
- The lands are appropriate for residential development given the lands to the east of the site have been already developed for residential with and infrastructure and services in place.
- The lands will provide a sustainable location for a residential scheme.
- Excellent infrastructure is in place, to the east of the site there are both footpaths and street lighting located nearby on the public road.

It is submitted that zoning the subject land B as “Proposed Mixed Use Residential” closer to the proposed development site entrance and existing public road, street lighting and footpath infrastructure, and would be consistent and appropriate in land use terms with the wider planning objectives to develop such services lands.

Proposed Land Zoning as per draft Cavan County Development Plan 2022-2028

Details of the overall long-term draft site layout proposals are outlined as part of this section of the submission.

Land Identification for possible future School/Educational Facility

Figures E & F identify the existing educational and school facilities nearby the proposed development. The benefits of same are also outlined.

Summary and Conclusion

The submission requests that the subject land A as identified at Drumlark., Cavan be included within the “Residential Strategic Reserve” zoning (currently Mixed Use Residential) of Cavan Town in the 2022-2028 Cavan County Development Plan. It is also requested that the Planning Authority designate the subject lands as suitable for zoning “Proposed Residential” going forward.

It is noted that in terms of the approach set out in the NPF and the RSES for land zonings that the subject lands are appropriate for residential zoning and the submission outlines specifics of same.

The following is submitted:

- Subject Lands A be revised from Proposed Mixed Use Residential to Proposed Residential Strategic Reserve, under the forthcoming Cavan County Development Plan 2022-2028
- Subject Lands B be revised from Proposed Residential Strategic Reserve to Proposed Mixed Use Residential, under the forthcoming Cavan County Development Plan 2022-2028
- Subject Lands C be revised from Proposed Residential Strategic Reserve to Proposed Low Density Residential, under the forthcoming Cavan County Development Plan 2022-2028

- Subject Lands D be revised from Proposed Residential Strategic Reserve to Proposed Residential.

It is submitted that the zoning of the subject lands B as “Proposed Mixed Use Residential” is closed to the proposed development site entrance and existing public road and footpath/cycle lane infrastructure would be appropriate planning in terms of land use with the wider planning objectives to develop such serviced sites.

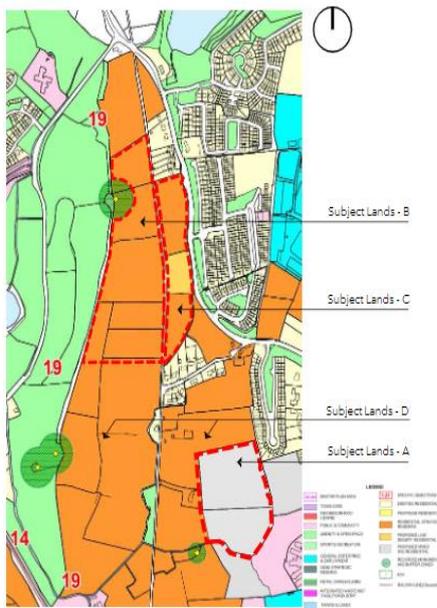


Figure A - Proposed Land Zoning as per draft Cavan County Development Plan 2022-2028

21 Recommended Zoning as per draft Cavan County Development Plan 2022-2028

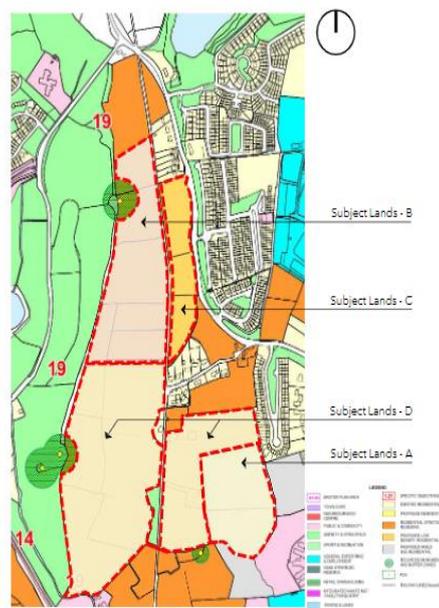


Figure B - Recommended Zoning under forthcoming Cavan County Development Plan 2022-2028

22 Recommended Zoning

Chief Executive’s Opinion on Issues Raised

In summary it is requested that:

- Subject Lands A be revised from Proposed Mixed Use to Proposed Residential Strategic Reserve
- Subject Lands B be revised from Proposed Residential Strategic Reserve to Proposed Mixed Use
- Subject Lands C be revised from Proposed Residential Strategic Reserve to Proposed Low Density Residential
- Subject Lands D be revised from Proposed Residential Strategic Reserve to Proposed Residential

In relation to Lands marked A as above, the development of this mixed use zoning is reliant on the development of the lands adjoining and to the east of this site. The submission indicates by virtue of its request that development will not occur on these lands during the plan period. It is therefore considered appropriate to amend the zoning on this site from Mixed Use to Residential Strategic Reserve.

In relation to Lands marked B and C as above, such lands are currently zoned as Residential Strategic Reserve with a small portion of Low Density Residential Development . These lands occupy excellent walking and cycling facilities to the town centre, are in close proximity to the Cullies Neighbourhood Centre in addition to other social infrastructure. The need for low density development as a means of alternative house type provision is well documented in the Draft Plan. The front portion of this land marked C is considered suitable for this type of development. Higher density residential development to the rear of this site is also considered appropriate. It is recommended that the front section of this site (to the east) is zoned as Low Density Residential Development and a portion of the lands to the rear are zoned as Proposed Residential Development.

In relation to Lands marked D as above, considering the infrastructure issues and road access restrictions it is not considered appropriate to amend the zoning from Residential Strategic Reserve to Proposed Residential Development. Development of this land is premature pending the overall development and provision of infrastructure in the area at large. It is accepted that the overall development of these lands will commence from north to south.

Chief Executive Recommendation

In accordance with Section 4.4.3of the Draft Development Plan Guidelines for Planning Authorities, August 2021-

Recommendation No. 185

It is recommended to amend lands zoned as Residential Strategic Reserve to Low Density Residential Development as marked 'C' on Cavan Town attached map.

Recommendation No. 186

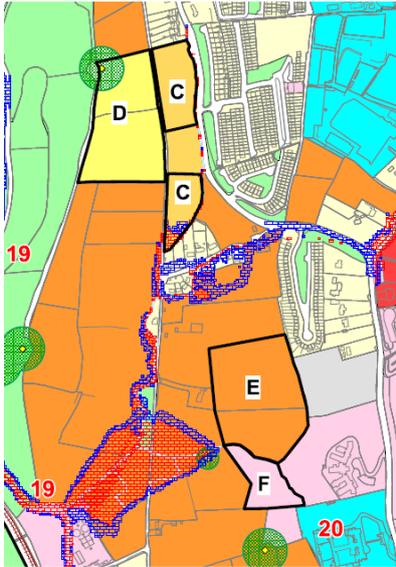
It is recommended to amend Residential Strategic Reserve to Proposed Residential as marked 'D' on attached map.

Recommendation No. 187

It is recommended to amend lands zoned as Mixed Use to Residential Strategic Reserve as marked 'E' on attached map.

Recommendation No. 188

To amend lands to the rear of College View Nursing Home to Public and Community (from Mixed Use in the draft Plan) to provide for an appropriate land use consistent with the nursing home use. This amendment is indicated as 'F' on the attached Cavan Town Map, please see Appendix 2.



Terry Hyland

This submission was made by Terry Hyland. The submission relates to subject lands at Kilnavarragh Rd., Cavan and requests these lands to be zoned as “Proposed Residential” under the forthcoming Cavan County Development Plan 2022-2028.

The submission is divided under the following headings:

Introduction and Background

The submission notes Terry Hyland is the owner of the subject lands and is seeking to deliver a residential scheme on the subject lands. It is noted the appropriateness of the lands for zoning as residential have been assessed in the context of the National Planning Framework, the RSES and the Cavan County Development Plan which demonstrates the lands suitability for residential development. The submission notes that given the existing residential context and the lands being in close proximity to existing infrastructure, it is submitted that such lands will provide an ideal location for residential development.

It is submitted that the zoning of the subject lands as “Proposed Residential” would align in terms of land use with the wider planning objectives to develop serviced lands. And would also align with the masterplan design intent to have carefully designed detached dwellings on larger sites to from an appropriate low density frontage development. It is noted that that latter would also be appropriate in terms of land use with the wider planning objectives to develop serviced lands.

Proposed Land Zoning V Recommended Zoning of Subject Lands – Cavan County Development Plan 2022-2028

Figure A conveys the proposed land zoning as per draft Cavan County Development Plan 2022-2028 of “Sport and Recreation”.

- The subject lands are currently designated as per the current Cavan CDP 2014-2020 as “Sport and Recreation”.
- The submission quotes the CDP objectives for lands reserved as “Proposed Residential”.
- It is noted the subject lands are proposed to be located within the settlement limit of Cavan Town.
- It is considered appropriate that the subject lands should be zoned as “Proposed Residential”.
- It is requested to amend the proposed zoning to “Proposed Residential” as recommended on Figure B.

Requested Zoning

- That the subject lands be zoned as “Proposed Residential”, under the forthcoming Cavan County Development Plan 2022-2028.
- Include the subject lands within the proposed residential zoning of Cavan Town in the 2022-2028 Cavan County Development Plan
- Designate the subject lands as suitable for zoning.

Proposed Land Zoning as per Draft Cavan County Development Plan 2022-2028

Zoning Context

It is highlighted that the surrounding land uses in the immediate vicinity are compatible with the proposed residential scheme:

- The subject lands are adjacent to the established residential area.
- The development of a residential scheme is consistent with the residential profile of the locality and the wider environs of South-West Cavan Town.
- The lands will provide a sustainable location for a residential scheme proximity to the town centre amenities and local transport hubs achieving a balance in terms of residential units close to local services and centres of employment.
- The lands are appropriate for residential development given the lands to the south of the site have been already developed for residential with and infrastructure and services in place.
- The lands will provide a sustainable location for a residential scheme.
- Established infrastructure is in place, to the south-east of the site there are both footpaths and street lighting located nearby on the public road.

It is submitted that zoning the subject land as “Proposed Residential” would provide sustainable development directly adjacent the existing public road, street lighting and footpath infrastructure, and would be consistent and appropriate in land use terms with the wider planning objectives to develop such services lands.

Proposed Land Zoning as per draft Cavan County Development Plan 2022-2028

This section details the overall draft site layout proposal.

Summary and Conclusion

The submission requests that the subject land as identified at Kilnavarragh Rd., Cavan be included within the “Proposed Residential” zoning of Cavan Town in the 2022-2028 Cavan County Development Plan. It is noted that in terms of the approach set out in the NPF and the RSES for land zonings that the subject lands are appropriate for residential zoning, with specific references to same.

It is submitted that the zoning of the subject lands as “Proposed Residential” aligns in terms of land use with the wider planning objectives to develop such serviced lands. In addition the design and massing of these dwellings would be carefully considered, and also appropriate planning in terms of land use with the wider planning objectives to develop such serviced sites.

2.0 Proposed Land Zoning V Recommended Zoning of Subject Lands - Cavan Cavan County Development Plan 2022-2028

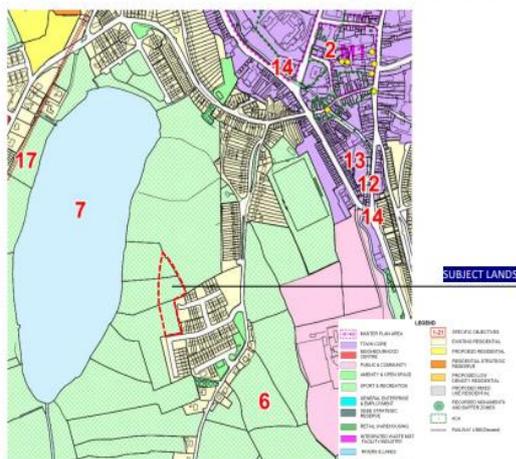


Figure A - Proposed Land Zoning as per draft Cavan Cavan County Development Plan 2022-2028

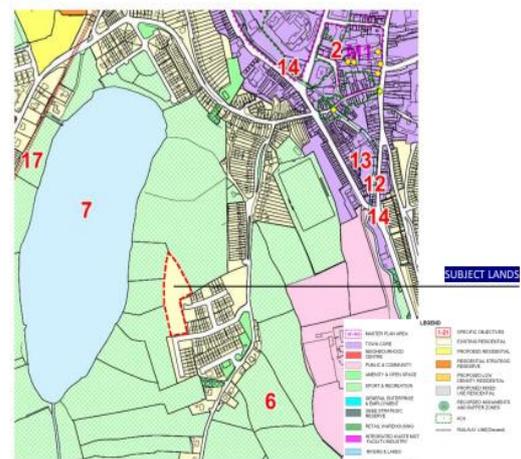


Figure B - Recommended Zoning under forthcoming Cavan County Development Plan 2022-2028

Chief Executive’s Opinion on Issues Raised

The potential for increased usage of Swellan Lough is a key objective of the Draft Plan, Development Objective 7 specifically relates to same. As such the lands surrounding the Lough has been zoned as Sport and Recreation in the Draft Plan. Development Objective PCOS 04 provides for and promotes additional public parks, amenities and spaces throughout the County and the draft plan undertakes to prepare a County Open Space Strategy in this regard. It is therefore considered premature pending the preparation of this strategy to amend the zoning on these lands from Sport and Recreation.

Chief Executive Recommendation

No change recommended.

Bernard Farrell

This submission was made by Michael Fitzpatrick on behalf of Bernard Farrell. The submission relates to subject lands at Maple Drive, Cavan and requests these lands to be zoned as “Proposed Residential” under the forthcoming Cavan County Development Plan 2022-2028.

The submission is divided under the following headings:

Introduction and Background

The submission notes Bernard Farrell is the owner of the subject lands and is seeking to deliver a residential scheme on the subject lands. It is noted the appropriateness of the lands for zoning as residential have been assessed in the context of the National Planning Framework, the RSES and the Cavan County Development Plan which demonstrates the lands suitability for residential development.

It is noted that the subject lands have been previously zoned and had received planning permission (a continuation of the existing residential layout), the foundations and electricity supply cabinets, footpaths, etc are in place for these previously granted units.

The submission notes that given the existing residential context and the lands being in close proximity to existing infrastructure, it is submitted that such lands will provide an ideal location for residential development.

It is submitted that the zoning of the subject lands as “Proposed Residential” would align in terms of land use with the wider planning objectives to develop serviced lands. And would also align with the masterplan design intent to have carefully designed detached dwellings on larger sites to from an appropriate low density frontage development. It is noted that that latter would also be appropriate in terms of land use with the wider planning objectives to develop serviced lands.

Proposed Land Zoning V Recommended Zoning of Subject Lands – Cavan County Development Plan 2022-2028

Figure A conveys the proposed land zoning as per draft Cavan County Development Plan 2022-2028 of “Amenity and Open Space”.

The subject lands are currently designated as per the current Cavan CDP 2014-2020 as “Amenity and Open Space”.

The submission quotes the CDP objectives for lands reserved as “Proposed Residential”.

It is noted the subject lands are proposed to be located within the settlement limit of Cavan Town.

It is considered appropriate that the subject lands should be zoned as “Proposed Residential”.

It is noted that the subject lands have been previously zoned and had received planning permission (a continuation of the existing residential layout), the foundations and electricity supply cabinets, footpaths, etc are in place for these previously granted units.

It is requested to amend the proposed zoning to “Proposed Residential” as recommended on Figure B.

Recommended Zoning

The following is requested:

- that the subject lands be zoned as “Proposed Residential”, under the forthcoming Cavan County Development Plan 2022-2028.
- Include the subject lands within the proposed residential zoning of Cavan Town in the 2022-2028 Cavan County Development Plan
- Designate the subject lands as suitable for zoning.

Figure G shows a photograph of the existing conditions.

Proposed Land Zoning as per draft Cavan County Development Plan 2022-2028

This section details the overall long-term draft site layout proposal

Summary and Conclusion

The submission requests that the subject land as identified adjacent to No. 20, Maple Drive, Cavan be included within the “Proposed Residential” zoning of Cavan Town in the 2022-2028 Cavan County Development Plan.

It is noted that in terms of the approach set out in the NPF and RSES for land zonings that the subject lands are appropriate for residential zoning, noting specifics of same.

It is submitted that the zoning of the subject lands as “Proposed Residential” aligns in terms of land use with the wider planning objectives to develop such serviced lands. In addition the design and massing of these dwellings would be carefully considered, and also appropriate planning in terms of land use with the wider planning objectives to develop such serviced sites.

2.0 Proposed Land Zoning V Recommended Zoning of Subject Lands - Cavan Cavan County Development Plan 2022-2028



Figure A - Proposed Land Zoning as per draft Cavan County Development Plan 2022-2028



Figure B - Recommended Zoning under forthcoming Cavan County Development Plan 2022-2028

Chief Executive’s Opinion on Issues Raised

The proposed site is contained within an established high density residential area. The provision of open space is a key priority in the Draft Plan. Residential development is suitable for part of this infill site, in conjunction with the delivery of useable open space on the remainder of the site.

Chief Executive Recommendation

Recommendation No. 189

It is recommended to rezone part of the site from Open Space and Amenity to Proposed Residential as marked ‘A’ on the Cavan Town Map.



Danny Barr and Shane Nc Cormick

This submission was made by Michael Fitzpatrick on behalf of Danny Barr and Shane Mc Cormick. The submission relates to subject lands at Kilnavarragh Rd., Cavan and requests these lands to be zoned as “Proposed Residential” under the forthcoming Cavan County Development Plan 2022-2028.

The submission is divided under the following headings:

Introduction and Background

The submission notes Danny Barr and Shane McCormick are the owners of the subject lands and is seeking to deliver a residential scheme on the subject lands. It is noted the appropriateness of the lands for zoning as residential have been assessed in the context of the National Planning Framework, the RSES and the Cavan County Development Plan which demonstrates the lands suitability for residential development.

The submission notes that given the existing residential context and the lands being in close proximity to existing infrastructure, it is submitted that such lands will provide an ideal location for residential development.

It is submitted that the zoning of the subject lands as “Proposed Residential” would align in terms of land use with the wider planning objectives to develop serviced lands. And would also align with the masterplan design intent to have carefully designed detached dwellings on larger sites to form an appropriate low density frontage development. It is noted that that latter would also be appropriate in terms of land use with the wider planning objectives to develop serviced lands.

Proposed Land Zoning V Recommended Zoning of Subject Lands – Cavan County Development Plan 2022-2028

Figure A conveys the proposed land zoning as per draft Cavan County Development Plan 2022-2028 of “Amenity and Open Space”.

The subject lands are currently designated as per the current Cavan CDP 2014-2020 as “Sport and Recreation”.

The submission quotes the CDP objectives for lands reserved as “Proposed Residential”.

It is noted the subject lands are proposed to be located within the settlement limit of Cavan Town.

It is considered appropriate that the subject lands should be zoned as “Proposed Residential”.

It is requested to amend the proposed zoning to “Proposed Residential” as recommended on Figure B.

Recommended Zoning

The following is requested:

- That the subject lands be zoned as “Proposed Residential”, under the forthcoming Cavan County Development Plan 2022-2028.
- Include the subject lands within the proposed residential zoning of Cavan Town in the 2022-2028 Cavan County Development Plan
- Designate the subject lands as suitable for zoning.

Proposed Land Zoning as per draft Cavan County Development Plan 2022-2028

Zoning Context

It is highlighted that the surrounding land uses in the immediate vicinity are compatible with the proposed residential scheme:

- The subject lands are adjacent to the established residential area located in the environs of Cavan Town development limits.
- The development of a residential scheme is consistent with the residential profile of the locality and the wider environs of north Cavan Town.

- The lands will provide a sustainable location for a residential scheme proximity to the town centre amenities and local transport hubs achieving a balance in terms of residential units close to local services and centres of employment.
- The lands are appropriate for residential development given the lands to the south of the site have been already developed for residential use and infrastructure and services in place.
- The lands will provide a sustainable location for a residential scheme.
- Established infrastructure is in place, to the south-east of the site there are both footpaths and street lighting located nearby on the public road.

It is submitted that zoning the subject land as “Proposed Residential” would provide sustainable development directly adjacent the existing public road, street lighting and footpath infrastructure, and would be consistent and appropriate in land use terms with the wider planning objectives to develop such services lands.

Proposed Land Zoning as per draft Cavan County Development Plan 2022-2028

Subject Lands in relation to overall long-term draft site layout proposal

- The subject lands (5.9ha) will be developed in one phase
- Considered approach will ensure the completion of all necessary works (car parking/open spaces/site works, etc) prior to the occupancy of units.
- Open space provision will be 15% of the site area at a minimum
- Key design parameters include:
 - C. 34 units
 - variety of detached/semi-detached units
 - utilise connections to existing road and utility infrastructure
 - open space and entrance to form part of a wider green infrastructure network. Associated access and landscaping works and buffer planting to ensure privacy and protection of adjoining residential lands

Figure C conveys the proposed Site Masterplan/Concept Layout indicating subject lands.

Figure G is a photograph of the existing conditions of the subject lands.

Summary and Conclusion

The submission requests that the subject land as identified at Kilnavarragh, Cavan be included within the “Proposed Residential” zoning of Cavan Town in the 2022-2028 Cavan County Development Plan.

It is noted that in terms of the approach set out in the NPF for land zonings that the subject lands are appropriate for residential zoning for the following reasons:

- Objectives 3a, 3c, 4, 5, 6, 7, 11, 13, 18a and 35 and section 4.5 of the NPF are compiled with.

- Of relevance is appendix 3 of the NPF which sets out a tiered approach to zoning of lands: (I) serviced lands should be identified (II) Serviceable lands should be identified
- Given the serviced nature of the lands they are to be regarded as “Tier 1” and prioritised under the NPF approach to land zonings.

At a regional policy context level, the subject lands are appropriate for residential zoning for the following reasons:

- The proposed zoning is consistent with the objectives of the RSES 2020-2032
- Will improve the supply of residential units for Cavan Town in a sustainable manner, being located in a sequentially appropriate location suited for residential development.

It is submitted that the zoning of the subject lands as “Proposed Residential” aligns in terms of land use with the wider planning objectives to develop such serviced lands. In addition the design and massing of these dwellings would be carefully considered, and also facilitate appropriate planning in terms of land use with the wider planning objectives to develop such serviced sites.

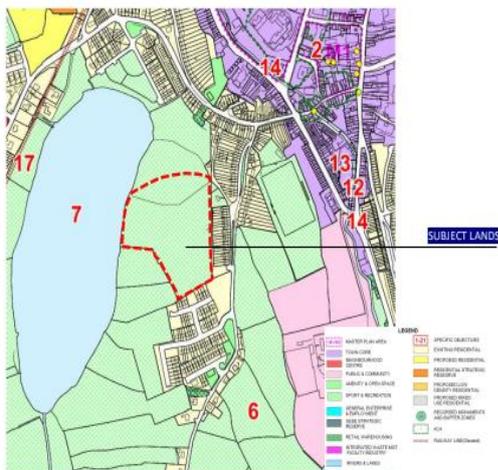


Figure A - Proposed Land Zoning as per draft Cavan Cavan County Development Plan 2022-2028

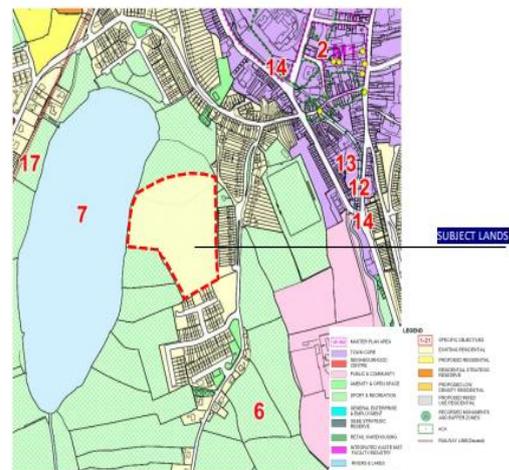


Figure B - Recommended Zoning under forthcoming Cavan County Development Plan 2022-2028

Chief Executive’s Opinion on Issues Raised

The potential for increased usage of Swellan Lough is a key objective of the Draft Plan, Development Objective 7 specifically relates to same. As such the lands surrounding the Lough has been zoned as Sport and Recreation in the Draft Plan. Development Objective PCOS 04 provides for and promotes additional public parks, amenities and spaces throughout the County and undertakes to prepare a County Open Space Strategy in this regard. It is therefore considered premature pending the preparation of this strategy to amend the zoning on these lands from Sport and Recreation.

Chief Executive Recommendation

No change recommended.

Bernard Farrell

This submission was made by Michael Fitzpatrick on behalf of Bernard Farrell. The submission relates to subject lands at Keadue Lane Cavan and requests these lands to be zoned as “Proposed Residential” under the forthcoming Cavan County Development Plan 2022-2028.

The submission is divided under the following headings:

Introduction and Background

The submission notes Bernard Farrell is the owner of the subject lands and is seeking to deliver a residential scheme on the subject lands. It is noted the appropriateness of the lands for zoning as residential have been assessed in the context of the National Planning Framework, the RSES and the Cavan County Development Plan which demonstrates the lands suitability for residential development.

The submission notes that given the existing residential context and the lands being in close proximity to existing infrastructure, it is submitted that such lands will provide an ideal location for residential development.

It is submitted that the zoning of the subject lands as “Proposed Residential” would align in terms of land use with the wider planning objectives to develop serviced lands. And would also align with the masterplan design intent to have carefully designed detached dwellings on larger sites to form an appropriate low density frontage development. It is noted that that latter would also be appropriate in terms of land use with the wider planning objectives to develop serviced lands.

Figure A conveys the proposed land zoning as per draft Cavan County Development Plan 2022-2028 of “Amenity and Open Space”.

The subject lands are currently designated as per the current Cavan CDP 2014-2020 as “Residential Strategic Reserve”.

The submission quotes the CDP objectives for lands reserved as “Proposed Residential”.

It is noted the subject lands are proposed to be located within the settlement limit of Cavan Town.

It is considered appropriate that the subject lands should be zoned as “Proposed Residential”.

It is requested to amend the proposed zoning to “Proposed Residential” as recommended on Figure B.

Recommended Zoning

The following is requested:

- That the subject lands be zoned as “Proposed Residential”, under the forthcoming Cavan County Development Plan 2022-2028.
- Include the subject lands within the proposed residential zoning of Cavan Town in the 2022-2028 Cavan County Development Plan
- Designate the subject lands as suitable for zoning.

Proposed Land Zoning as per draft Cavan County Development Plan 2022-2028

Zoning Context

It is highlighted that the surrounding land uses in the immediate vicinity are compatible with the proposed residential scheme:

- The subject lands are adjacent to the established residential area located in the environs of Cavan Town development limits.
- The development of a residential scheme is consistent with the residential profile of the locality and the wider environs of north Cavan Town.
- The lands will provide a sustainable location for a residential scheme proximity to the town centre amenities and local transport hubs achieving a balance in terms of residential units close to local services and centres of employment.
- The lands are appropriate for residential development given the lands to the north of the site have been already developed for residential use and infrastructure and services in place.
- The lands will provide a sustainable location for a residential scheme.
- Established infrastructure is in place, to the south-east of the site there are both footpaths and street lighting located nearby on the public road.

It is submitted that zoning the subject land as “Proposed Residential” would provide sustainable development directly adjacent the existing public road, street lighting and footpath infrastructure, and would be consistent and appropriate in land use terms with the wider planning objectives to develop such services lands.

Proposed Land Zoning as per draft Cavan County Development Plan 2022-2028

This section provides details of the overall long-term draft site layout proposal.

Summary and Conclusion

The submission requests that the subject land as identified at Keadue Lane, Cavan be included within the “Proposed Residential” zoning of Cavan Town in the 2022-2028 Cavan County Development Plan.

It is noted that in terms of the approach set out in the NPF and RSES for land zonings that the subject lands are appropriate for residential zoning, noting specifics of same.

It is submitted that the zoning of the subject lands as “Proposed Residential” aligns in terms of land use with the wider planning objectives to develop such serviced lands. In addition the design and massing

of these dwellings would be carefully considered, and also facilitate appropriate planning in terms of land use with the wider planning objectives to develop such serviced sites.

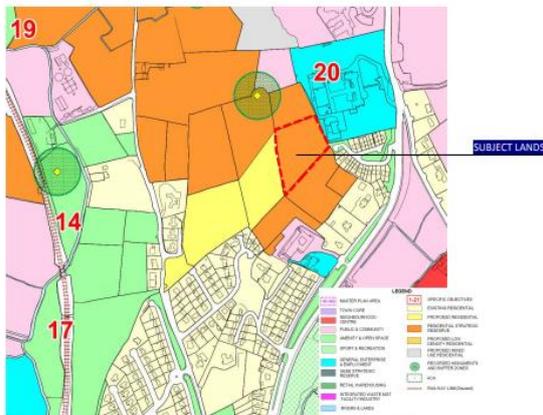


Figure A - Proposed Land Zoning as per draft Cavan Cavan County Development Plan 2022-2028

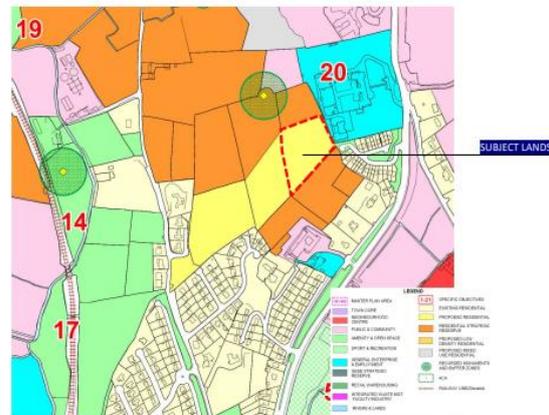


Figure B - Recommended Zoning under forthcoming Cavan County Development Plan 2022-2028

Chief Executive’s Opinion on Issues Raised

The Draft Plan has zoned lands west of this proposed site as Proposed Residential. This is considered sufficient to facilitate the development of these lands in a phased and sustainable manner during this development plan period 2022-2028. It is considered premature to include the lands as identified above as Proposed Residential in this plan period.

Chief Executive Recommendation

No change recommended.

Paul Boyle

The submission relates to lands at Creighan, Cavan Town which are within the ownership of Paul Boyle. The subject lands measure approximately 0.158 hectares and are located approximately 500 metres from the town centre. It is submitted that the subject lands would represent a suitable location for residential development. The submission outlines the planning rationale for the subject lands to be zoned as proposed residential. An overview of national, regional and local policy context is provided.

It is submitted that the subject lands are appropriate for residential zoning as envisaged by the NPF:

- As under the tiered approach set out in the NPF these lands are Tier 1 (serviced) and should therefore be prioritised under the development plan process
- Objectives 3a, 3c, 4, 5, 6, 7, 11, 13, 35 and NSO 10 of the NPF are complied with;
- The lands are in close proximity to the town centre and a number of significant employment centres.

- The development would see significant regeneration of a sequentially appropriate site along the R212 road.

Sequential Development

It is submitted that the site is appropriate in terms of sequential development given:

- The site is directly accessible from the existing road infrastructure.
- The site is serviced.
- The site is available for development.
- The site is sequentially appropriate in that it is close to the town core.
- Lands immediately east and south west are already developed for residential use. With these lands already having a previous planning permission for residential development makes this an appropriate proposal.

Planning History

Permission has been granted previously for residential development on the subject site; 10 no. townhouses under application ref. 03/991627 and 28 no. apartments under application ref. 06/991829.

Concept Design and Delivery

A proposal on the lands in question would set out to achieve

- A scheme that creates a sense of place
- A scheme which adopts the principles of sustainable urbanism with a variety of house types
- A high-quality public realm
- Appropriate density and scale
- Sustainable location within walking distance of the town core

Recommended Zoning and Objectives

The submission recommends that the lands in question are included within the settlement boundary of Cavan Town and zoned for 'Proposed Residential' for the reasons set out above.



Chief Executive’s Opinion on Issues Raised

Having regard to the confined nature of the site with the river as its natural boundary to the rear and the Strategic Flood Risk Assessment carried out for Cavan Town which indicates the subject site to be located in Flood Zone A and B. It is considered the zoning of Sport and Recreation as per the Draft Plan is appropriate.

Chief Executive Recommendation

No Change recommended.

Paul Boyle

The submission relates to lands at Drumalee (Loughtee Upper) and Cullilee Tds, Cavan Town, which is within the ownership of Paul Boyle. The lands measure approximately 3.618ha and are located to the north east of Cavan Town Centre. The site is located along the main R188 road. The lands are currently zoned as ‘Phase 2 Residential’ within the existing Cavan County Development Plan 2014-2020. The submission requests that the Planning Authority designates the subject lands as suitable for ‘proposed residential’ with a key site requirement to provide for serviced sites going forward and that the Planning Authority incorporates locational policies and zoning objectives under the lands use zoning matrix within the CDP to enable higher residential densities. The submission outlines the planning rationale for the subject lands to be zoned as proposed residential. An overview of national, regional and local policy context is provided.

It is submitted that the subject lands are appropriate for residential zoning as envisaged by the NPF:

- As under the tiered approach set out in the NPF these lands are Tier 1 (serviced) and should therefore be prioritised under the development plan process
- Objectives 3a, 3c, 5, 6, 7, 11, 13, 35 and NSO 10 of the NPF are complied with;

- The lands are in close proximity to the town centre and a number of significant employment centres.
- The development would see significant regeneration of a sequentially appropriate site on the R118 road.

It is submitted that the proposed low density zoning provision is not consistent with National Policy objectives under the Section 28 Guidelines 'Sustainable Residential Development in Urban Areas' wherein Section 5.11 states the density of residential development should be in the general range of 35-50 dwellings per hectare; further section 5.11 of the guidelines also states that net densities of less than 30 dwellings per hectares is generally discouraged in the interest of land efficiency, particularly on sites in excess of 0.5 hectares. The submission also refers to circular NRUP 2021 as per appendix B which requires densities of 30-35 units per hectare to be achieved on such lands.

It is submitted that there is an excessive amount of land proposed to be zoned for Public and Community which is calculated as 106 hectares which excludes town centre lands which is noted as a further 42 hectares.

It is also submitted that there is a disproportionate reduction in proposed residential lands under the draft zonings to 30.07ha proposed, a reduction of 65ha currently as per the 2014-2020 zonings for Cavan Town. It is submitted that this is not good land-use planning or a sustainable use of zoned lands. For public and community facilities to be supported they require a growth in residential units/an increase in population at the local level to be established first so that a 'balanced growth equilibrium' is achieved. Whilst it is noted that the Core Strategy restrictions is forcing such de-zoning of residential lands it is considered that this is not a pragmatic way forward as the landowners who are in a position to deliver residential schemes are not being facilitated under the draft CDP zonings for Cavan Town.

It is submitted that it is simply not good planning to unsustainably dezone residential lands (such as these) in urban areas and at the same time seek to achieve NPF objectives 3a, 3c, 4, 5, 6, 11, 13, and 35 (for increased urban development rates) and also restrict rural housing policy under NPF objective 19.

Sequential Development

It is submitted that the site is appropriate in terms of sequential development:

- The lands have been identified as appropriate for residential zoning under the current Cavan Town Plan 2014-2020.
- The lands are directly accessible from the existing road infrastructure.
- The lands are serviced.
- The lands are available for development.
- The lands are sequentially appropriate in that they are close to the town core.
- Lands immediately south and east are already developed for residential use.
- The extant permission 17/419 is also highlighted.

Planning History

Planning permission has previously been granted for 50 residential units on the subject site (application ref. 02/1525) and more recently for 4 no. dwellings on a portion of the subject site (application ref. 17/419). It is stated that the OPW flood maps displays that the site is not at risk from flooding.

Concept Design and Delivery

A proposal on the lands in question would set out to achieve

- Density of 30-35 units per hectare.
- Open space and play area facilities.
- Variety of unit types.
- Provide connections to road and utility infrastructure.
- Planting and landscape buffers throughout.
- Residential units within walking distance of the town centre.
- Single entrance to DMURS standards
- A high-quality public realm.

Recommended Zoning and Objectives

The submission recommends that the portion of lands that are proposed to be zoned for 'low density residential' and the remaining lands proposed to be zoned for 'public and community' are zoned for 'Proposed Residential' for the reasons set out above. Furthermore, it is recommended that the Planning Authority incorporates locational policies and zoning objectives under the lands use zoning matrix within the CDP to enable higher residential densities. Circular NRUP 02/2021 is referenced.



Chief Executive's Opinion on Issues Raised

The provision of Education facilities and services is a key objective of the Draft Plan. The Department of Education have indicated that the anticipated additional requirement at post primary level could be met by expansion of the existing facilities in the Cavan Town Area. Having regard to this submission and the interests of proper planning and sustainable development it is considered appropriate that additional zoned land is provided in the vicinity of post primary level schools in Cavan Town.

Chief Executive Recommendation

No change recommended.

Pemfitz Holdings

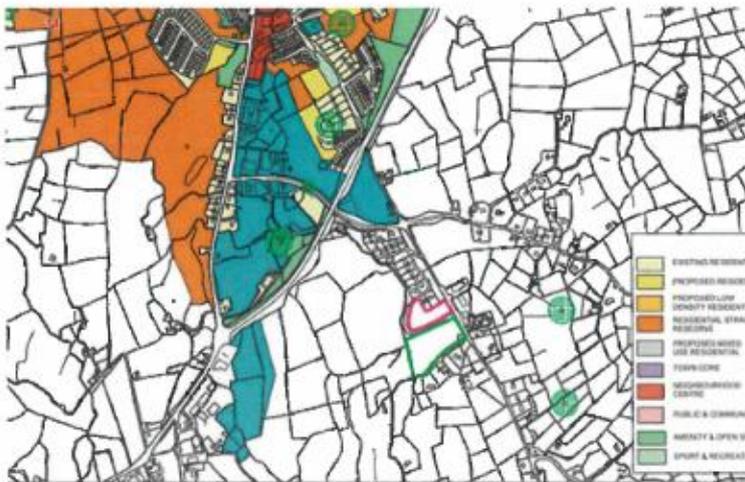
The submission relates to a development envelope known as Roscolgan. This site began development approximately 20 years ago which has resulted in 13 houses being completed and the remaining houses being ceased after the financial crash. It is stated that planning consent for the remaining incomplete houses has lapsed although the foundations of all the houses have been constructed.

It is submitted that as planning consent is no longer in place, the absence of zoning on this land will prevent the previously approved planning permission from being reinstated and therefore is in error. The submission sets out reasons for this development to be permitted to be completed:

- The development was previously granted and approximately 50% of the scheme has been completed to date.
- The critical infrastructure required for all of the development, namely the roads, paths, public lighting, underground services including sewage pumping station have all been constructed and services are readily available to complete the 10 houses not yet constructed.

- The houses being provided in this scheme are detached family homes sitting on their own sites and can be seen as a direct alternative to one-off rural housing in the countryside which are being discouraged for environmental reasons at national and regional level.
- The issue of ghost estates and incomplete estates has plagued the country for a decade and the absence of an appropriate zoning to facilitate the completion of this development will most likely condemn the existing completed houses to living in an unfinished estate for the lifetime of this Plan.
- The completion of these 10 houses represents a finite, proportional and manageable development that will provide serviced dwellings where demand clearly exists and in a location where services have been established and capital investment costs have already been incurred.

It is submitted that these lands are provided with the appropriate zoning to facilitate the completion of the development or that a spot objective be provided in the Plan that permits consideration being given for planning permission to complete housing developments which stalled at the time of the economic crash.



Extract from Draft Plan. The lands are not zoned nor within the Development Envelope. The 10 houses are within the pink line. The green line contains the balance of lands within this holding which would be available for amenity space as part of the consent to complete the development.

Chief Executive's Opinion on Issues Raised

The site in question is located on the Ballyjamesduff Road out of Cavan Town and over 3km to the town centre. This site is not in keeping with the principles of sustainable development, compact growth and sequential development of Cavan Town. It is considered that there is sufficient lands zoned in this

settlement, to cater for the population and housing provision during this plan period. With this in mind, it is not considered appropriate to include these lands as Proposed Residential.

Chief Executive Recommendation

No change recommended.

Tesco Ireland Limited

This submission relates to lands to the east of Main Street at Cock Hill, Cavan Town. Planning permission has been granted to Tesco under application ref. 11/1992 (ABP Ref. PL48.240097) to relocate its current store in Cavan Town to this site.

The submission provides a background to Tesco Ireland which is one of the primary convenience retailers in Ireland with over 150 no. stores in cities and towns nationwide. Tesco currently operates 2 no. stores in County Cavan and given the projected population growth for the County it is considered that there may be scope to provide additional stores at appropriate locations to serve the County's increasing population and to improve and expand existing retail facilities.

It is stated that in accordance with the objectives of the NPF as well as the RSES, the Draft Development Plan sets out that it is likely that much of the growth of the County will be experienced in the Key Town (more than 30%) of Cavan in which a minimum increase of 4,366 persons is expected, resulting in the town having a total population of 15,280 by 2040. The submission states that it is important that the new County Development Plan accommodates this growth by not only providing supportive policies and objectives to provide for residential and employment lands, but also the supporting infrastructure and services such as education, commercial, retail and specifically new retail convenience retail floorspace at suitable locations across its administrative area.

The submission welcomes the publication of the Draft Cavan County Retail Strategy 2021-2028, which includes an assessment of the current retail provision in the county. It is noted that the draft strategy notes that there is a requirement for at least an additional 2,925sqm of convenience retail floorspace between 2021 and 2028. In addition, the projected retail floorspace does not account for the existing vacant floorspace in the County, which is estimated to be 13,877sqm. It is requested that the Local Authority makes it clear on the tables provided that these figures are best estimates and that future convenience retail proposals in the County will be assessed on their merits with the primary considerations being their location, potential local impact and whether they accord with relevant planning policy such as the site's zoning.

It is submitted that under application ref. 11/1992 (ABP Ref. PL48.240097) Tesco can relocate its current store in Cavan Town and provide a new modern store at Cock Hill, Cavan Town. It is noted that

the majority of the site is proposed to be zoned under 'Town Core', however, the north-west portion of the site (i.e. former waterworks) is proposed to be zoned 'Public and Community' in which the objective is to 'provide for and protect civic, religious, community, education, health care and social infrastructure'. Retail shops – major and off-licence uses are not permitted under this zoning objective which is a concern. The former waterworks has been demolished and the Eastern Access Road has been completed. Therefore, it is submitted that any 'public and community' zoning should only cover the school and its attendant grounds and where former public infrastructure facilities no longer exist, i.e. the waterworks, the zoning should be changed to reflect planned future uses, i.e. town centre use.

The submission also outlines the requirements of modern retailing and a table is provided outlining the reasoning for each requirement. The submission also outlines the changing nature of retail, i.e. to click and collect and grocery home shopping.

It is submitted that the Cavan County Development Plan 2022-2028 provides for the following:

- Provides flexible land use zoning objectives that will allow sites to be brought forward in the County's towns and settlements for convenience retail development over the lifetime of the Plan,
- Includes policies and objectives that can spur investment in the convenience retail sector and provides for adequate convenience floorspace to be allocated in settlements across the County that have been identified in the Plan.
- Acknowledges the requirements of modern retailers including appropriate floorplates, car parking and servicing access, where possible, and the Cavan County Development Plan and associated Retail Strategy should include reference to these requirements,
- Supports and accommodates the growth of 'Click and Collect' retail services and Grocery Home Shopping.



Chief Executive's Opinion on issues raised

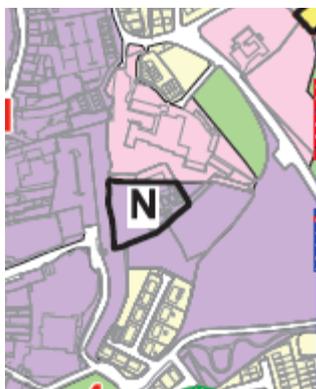
The contents of this submission are noted and welcomed.

The existing planning permission on this site is acknowledged and the acknowledgement of same in the zoning map is considered appropriate.

Chief Executive Recommendation

Recommendation No. 190

It is recommended that the portion of the lands as marked 'N' on the Cavan Town Map in Appendix 2 is amended from Public and Community land use zoning to Town Core.



Lisdaran Partnership

The submission relates to lands at Lisdaran, Cavan Town which are in the ownership of Lisdaran Partnership. The subject lands measure approximately 24 hectares and currently there is permission on the lands for a fully serviced nursing home. Currently plans are also progressing to deliver ancillary schemes on the lands for a specialist health care facility, crèche, staff facilities along with residential development. An overview of national, regional and local policy context is provided.

The subject lands are divided into a number of zones to provide a range of land uses. This includes public and community in zone 1, residential in zone 2, low density and serviced sites in zone 3 and amenity and open space in zone 4.

It is submitted that zone 1 is appropriate for nursing homes, health care facilities, a crèche, staff facilities and retirement housing as envisaged by the NPF:

- as under the tiered approach set out in the NPF these lands are Tier 1 (serviced) and Tier 2 (serviceable) and should therefore be prioritised under the development plan process.
- The lands are sequentially appropriate.

- Direct connection can be made to the existing infrastructure along the site frontage.
- Objectives 3a, 3c, 4, 5, 6, 7, 11, 13, 18a, 18b, 35 and NSO 1, 4, 7, 8 and 10 of the NPF are complied with.
- Objective 30 of the NPF with regards to development which meets the needs and opportunities of an ageing population is complied with.
- The development would see significant development of a serviced site which is sequentially appropriate.

With regards to zone 2 use (residential), it is submitted that the CDP fails to set out how lands within Cavan Town have been prioritised for zonings as it appears it has been solely on the basis of sequential appropriateness rather than all relevant factors which includes an assessment of infrastructure requirements to service lands, failing to identify which lands are already serviced, failing to identify which lands are sequentially/proximate to major employers such as Cavan General Hospital, appropriateness for zoning and how strategic land parcels can deliver sustainable communities with a balance of service provision and active neighbourhoods, availability of lands for development and the capacity of owners to deliver developments and how restricted rural housing policies going forward under NPF objective 19 and future revised rural housing policies will require an uplift in urban housing allocations and zoning.

It is submitted that the subject lands have been incorrectly identified under the draft CDP as 'Strategic Residential Reserve' and therefore the zonings should be revised for the following reasons:

- Previous planning permission on the site.
- Currently zoned for phase 2 development and within the settlement boundary.
- Lands are next to Cavan General Hospital.
- The subject lands can provide a sustainable community with a balance of service provision and active neighbourhoods.
- No infrastructural assessment or scoring matrix for the draft CDP zonings.
- The zonings do not recognise topographical constraints in Cavan Town.
- The zonings do not recognise which lands are available or capable of delivery of residential units onto the market.
- The Housing Need Demand Assessment is incorrectly confining its assessment to historical growth rates from 2011 onwards which are noted as distorted due to the recession.

Sequential Development

It is submitted that the lands are appropriate in terms of sequential development given:

- The lands are directly accessible from the existing road infrastructure;
- The lands are serviced;
- The lands are available for development;

- The lands are sequentially appropriately given the location directly adjacent to Cavan General Hospital, which is a major employer and hub for the region.
- Lands immediately north, west and south west are already development for residential use.

Planning History

It is highlighted that the subject lands have been granted permission for 197 dwellings and a crèche as part of application ref. 08/618, and more recently for a 160 bed nursing home as part of application ref. 19/236.

Concept Design and delivery

A proposal on the lands in question would set out to achieve

- A scheme that creates a sense of place.
- A scheme which adopts the principles of sustainable urbanism with a variety of house types.
- A high-quality public realm.
- Appropriate density and scale.
- Mix of land uses, service provision and active neighbourhoods.

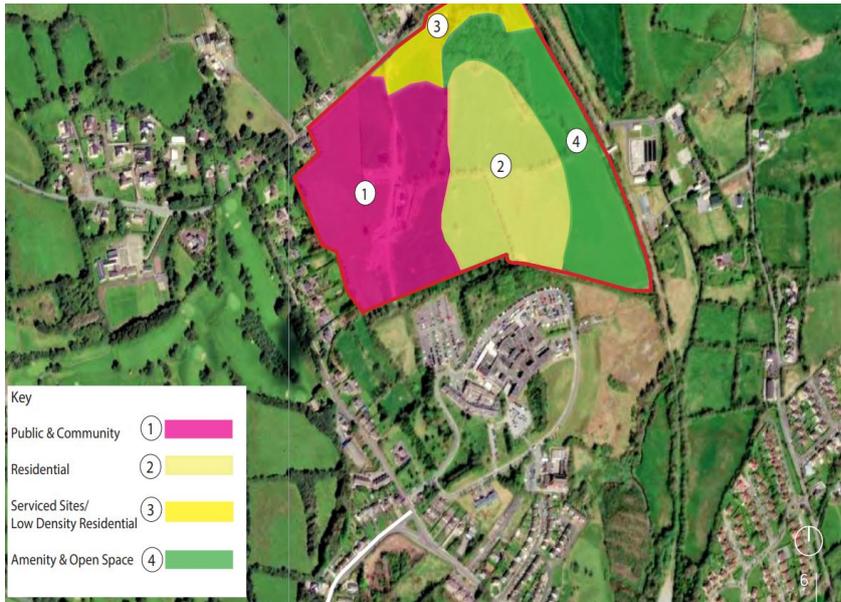
Rationale for nursing home and healthcare facility

It is submitted that at national and local level there is a well-established ageing population which are placing an ever increasing and growing demand on the provision of important community infrastructure such as nursing homes and healthcare facilities. In the context of sectoral analysis carried out by the Department of Health and most recently by CBRE (provided in Appendix of submission) it is evident there is an ever-increasing need for nursing homes and healthcare provision to cater for an ageing population. It is submitted that the subject lands represent an ideal opportunity to provide for a planned nursing home/healthcare centre to cater for anticipated demand.

Recommended Zoning and Objectives

The submission recommends that the lands in question are zoned for the following land uses:

- Zone 1 to be designated as 'Public and Community' with zoning objectives to provide for nursing homes, health care facilities, retirement housing and ancillary uses.
- Zone 2 to be designated as 'Proposed Residential'.
- Zone 3 to be designated as 'Low Density and Serviced Sites'.
- Zone 4 to be designated as 'Proposed Amenity and Open Space' along with zoning objectives under the land use zoning matrix to enable provision for access and infrastructure works to be accommodated.



Chief Executive's Opinion on Issues Raised

The submission requests the following:

- Zone 1 to be designated as 'Public and Community'
- Zone 2 to be designated as 'Proposed Residential'
- Zone 3 to be designated as 'Low Density and Serviced Sites'.
- Zone 4 to be designated as 'Proposed Amenity and Open Space'

In relation to Zone 1 Public and Community, it is considered that the Draft Plan has acknowledged the existing permission on site for a nursing home and the need for expansion of facilities associated with Cavan General Hospital and thus lands identified within Zone 1 are designated with the zoning of Public and Community.

In relation to Zone 2, the submission has requested a portion of the land holding to be zoned as Proposed Residential. It is noted that the topography of the site is difficult and therefore considers that land to the south are zoned as Proposed Residential only. This would facilitate the planned development of the site in its entirety. The existing National Monument located on this portion of the site shall have an underlying zoning of Open Space and Amenity.

In relation to Zone 3 identified on the above map, it is acknowledged that Low Density Residential is in keeping with the character of the surround area and the requested small extension of this land use is considered acceptable.

In relation to Zone 4 Proposed Amenity and Open Space. The submission has indicated an increased land use zoning for Amenity and Open Space which runs along the existing greenway. The proposed land use is considered acceptable.

Chief Executive Recommendation

Recommendation No. 191

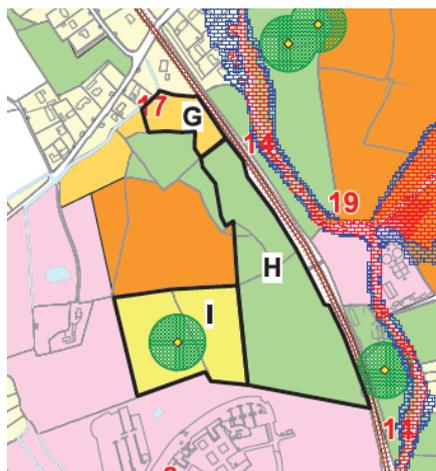
Amend existing residential strategic reserve to Proposed Low Density Residential as marked 'G' on attached Cavan Town map in Appendix 2.

Recommendation No. 192

Amend existing Residential Strategic Reserve to Amenity and Open Space as marked 'H' on attached Cavan Town map in Appendix 2.

Recommendation No. 193

Amend existing Residential Strategic Reserve to Proposed Residential as marked 'I' on attached Cavan Town map and designate the existing national monument as Amenity and Open Space in Appendix 2.



Recommended Zonings

Lidl (Ireland) GmbH

This submission relates to lands at Ballinagh Road which are in control of Lidl (Ireland) GmbH. The existing Lidl store falls within the proposed 'Neighbourhood Centre' designation which is welcomed. The purpose of the submission is to seek a re-zoning designation of the lands to the north of the exiting store from 'Existing Residential' to 'Neighbourhood Centre'.

The submission sets out the national and local planning context to support the submission. It is stated that the proposed zoning amendment will deliver a plan-led redevelopment of the area associated with the existing retailing function and in a more sustainable manner in accordance with policy objectives

outlined in the National Planning Framework 2040, the current Cavan Development Plan 2014-2020 and the Draft Cavan County Development Plan 2022-2028.

The submission states that due to the land being in control of Lidl (Ireland) GmbH and being immediately adjacent to the existing Neighbourhood Centre zoning designation, it represents a logical form and pattern of development to support the sustainable and logical growth of the existing Lidl store. In addition, to provide more amenity and bicycle parking where the site presents in close proximity to residential areas and where a neighbourhood 'basket' or 'top up' shop or walking pattern of retailing significantly and currently occurs.

Recommended Zoning and Objectives

It is therefore contended that the identified lands should be rezoned as Neighbourhood Centre as the parcel of land will provide proper planning and sustainable development of the existing Lidl store to the surrounding community at Ballinagh Road in Cavan Town and will minimise journey times and travel distances. It is stated that the lands are currently vacant and underutilised.



Chief Executive's Opinion on Issues Raised

The draft plan recognises the important role that Neighbourhood Centres play in the provision of essential retail and social infrastructure. The subject site is considered appropriate to be rezoned as Neighbourhood Centre to allow plan led redevelopment of the area. This site would provide for the sustainable and logical expansion of this zoning.

Chief Executive Recommendation

Recommendation No. 194

It is recommended to rezone the subject site from Existing Residential to Neighbourhood Centre as per 'Q' on Cavan Map in Appendix 2.



Harton Family

This submission relates to lands at Creighan which are under the ownership of the Harton family.

It is submitted that the land has previously been granted planning permission for residential development under application ref. 99/917 (outline permission for 133 units). It is stated that the developments never proceeded due to the economic downturn but the lands remain available for residential development. It is stated that the technical merits of the schemes previously granted have not changed nor diminished and are every bit as suitable for residential development now as at the time planning permission was granted. Furthermore, it is submitted that the site could be considered as an infill site between other established residential developments. It is further stated that there are established facilities and amenities in the immediate area which would support sustainable living in this location.

Recommended Zoning and Objectives

The zoning as currently proposed is for public and community use and it is submitted that consideration is given to zoning part of these lands as residential. In the absence of a change in the proposed zoning to residential, the submission states that they would support the proposed 'public and community' zone.



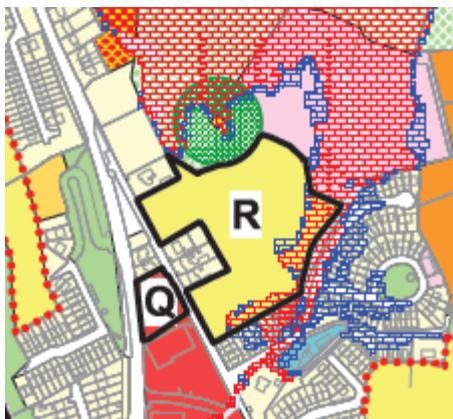
Chief Executive's Opinion on Issues Raised

The proximity of this site to Moynehall Neighbourhood Centre and Cavan Town Centre is noted. Subject to elimination of lands on Flood Zone A and B it is considered that Proposed Residential is a suitable land use zoning designation at this location.

Chief Executive Recommendation

Recommendation No. 195

It is recommended to amend zoning from Public and Community to Proposed Residential on the remaining areas not subject to Flood Zone A and B, as marked 'R' on attached Cavan Town map in Appendix 2.



Enda Young and Irene Young

The submission relates to lands at Kinnypottle, Cavan Town which are within the ownership of Enda Young and Irene Young. The subject site is proposed to be zoned 'Amenity and Open Space' and it is submitted that the area should be zoned residential for the following reasons:

- The site is currently zoned as 'phase 1 residential' under the current development plan.
- The subject site is fenced off and secured with a palisade fence.
- The subject site is serviced with site services along the public road.
- Access to the site is off the old Cavan/Cootehill Road and eliminates any impact on traffic movements.
- The site is within walking distance to Cavan Town and is located in close proximity to all town amenities.
- While the subject site is an elevated site, the site is very workable and lends itself for a number of high quality, one off style, detached split level houses.
- There will be more of a demand for housing going forward.



Chief Executive’s Opinion on Issues Raised

This piece of land is topographically difficult with lands rising steeply from Cavan/Cootehill Road to the housing estate to the south east. The type of residential development in the vicinity of the site is established low density dwelling located close to the public road with rear gardens rising. The site subject to this submission is similar in nature. Pedestrian access from the existing estate from the Cootehill Rd notwithstanding the difficult levels would be desirable at this location. It is considered that a specific objective to support same at this location is appropriate.

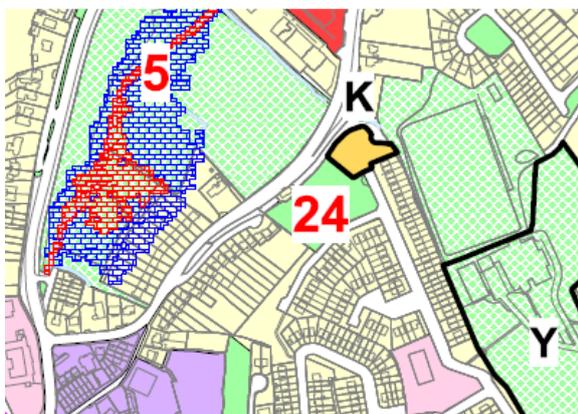
Chief Executive Recommendation

Recommendation No. 196

Amend lands marked as ‘K’ on attached Cavan Town map in Appendix 2 from lands zoned Amenity and Open Space to Proposed Low Density Residential Development.

Recommendation No. 197

Insert Map Based Specific Objective 24 “Promote public pedestrian link through this site to the public road on remaining open space lands’.



Darren Sherry

This submission relates to lands at Aghnaskerry, Cavan which are under the ownership of Darren Sherry. Plans are currently being progressed for the delivery of a residential scheme on the subject lands on the basis of clear policy support within the Cavan County Development Plan 2014-2020, which designates the lands as being 'Phase 1' residential development. It is submitted that the Draft Plan has been chosen without any clear planning justification or sustainable development rationale to revise the zoning to 'Amenity and Open Space'.

The submission provides a description of the subject lands and the national, regional and local policy context. It is submitted that the purposes of this submission is to demonstrate that the subject lands:

- Represent a strategic location for future residential development within the urban fabric of Cavan Town;
- Represent a substantial opportunity to meet the obligations of the Core Strategy;
- Are strategically located to take advantage of existing public services thus limiting the requirement for significant further public expenditure;
- Are suitably located to ensure the implementation of key policies contained within the Draft Plan including the creation of sustainable communities, sequential development, adherence to climate change policies, implementation of compact growth policies, and the implementation of smart travel/sustainable transport policies.

The submission states that there is a number of deficiencies in the land-use zoning approach adopted by the Planning Authority and include:

- The absence of a detailed evaluation of existing 'undeveloped' lands;
- The absence of an identification of infill lands which adjoin or are adjacent to existing residential developments;
- The provision of a rating/weighting matrix to identify those sites which are most suitable for development;
- The availability of the land for development

It is requested that the Planning Authority overturns its decision to revise the land-use zoning of the subject lands and revert the zoning to 'proposed residential' for the following reasons:

- The lands are, in the current Plan, zoned as 'Phase 1' residential. No planning policy basis, proper planning rationale or sustainable development justification has been offered in the Draft Plan for the decision to alter the land use zoning vis-à-vis the current Plan;
- The lands are, by NPF standards, assessed to be 'Tier 1: Serviced Zoned Lands' and merit a designation for residential development;
- The subject lands accord with the policy objectives of sequential development and compact growth;

- Development of the subject lands can avail of existing services including roads, footpaths, public lighting, telecommunications and wastewater infrastructure thus avoiding the requirement for the delivery of additional public investment in service provision;
- The draft Plan zonings fail to integrate an infrastructural assessment or rating/ranking matrix; and
- The draft Plan zonings fail to identify lands which are available for the delivery of residential units onto the market.

It is stated that the subject lands are strategically important in the overall sequential development of Cavan Town and the appropriate development of these lands should be prioritised over those at a further remove from the Town Centre. The proximity of the site to the urban centre, retail developments, educational facilities, recreational facilities, transport hubs and employment centres will assist in the delivery of the Planning Authority's objectives on sustainable transport and in particular the proposed development of the subject lands will likely foster an increased uptake in walking and cycling.

It is submitted that Darren Sherry is actively engaged in the delivery of amenity facilities at Killymooney Lough (application ref. 20/276) which is stated will further reinforce the suitability of the subject lands for residential development. It is stated that the delivery of residential on the lands will not result in any adverse effect on the permitted, or any future, recreational plans for Killymooney Lough. The submission is also supportive of the objective to identify a potential link to the existing greenway and it can co-exist with the delivery of residential units on the subject lands.

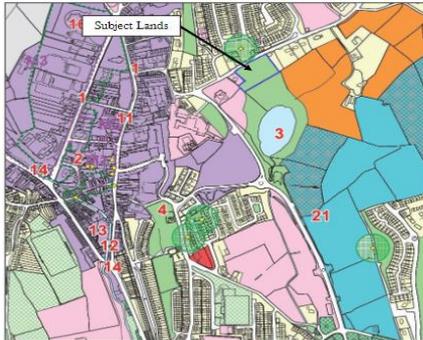


Figure 4: Zoning under the Draft Plan

Chief Executive's Opinion on Issues Raised

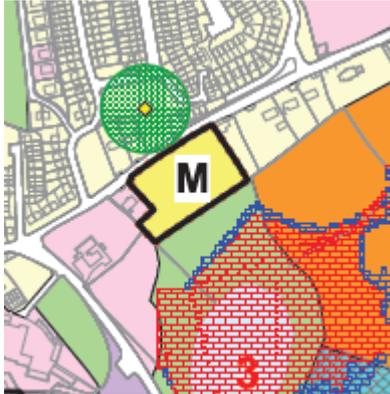
Having regard to this sites location on the periphery of the Town Core and close to public amenities and social infrastructure it is considered that the proposed site would contribute to the compact growth and consolidation of Cavan Town if zoned as Proposed Residential. Reference is also made to Recommendation No. 2 of the submission from the Office of the Planning Regulator seeking the removal of the Amenity and Open Space zoning in the absence of robust justification.

Chief Executive Recommendation

Recommendation No. 198

Amend Amenity and Open Space to Proposed Residential as marked 'M' on the attached Cavan Town map in

Appendix 2.



Campbell and Slevin Ireland Ltd

The submission relates to lands at Bramble Lane and Killynebber, Cavan, which are currently proposed to be zoned 'Enterprise and Employment. It is submitted that the area outlined as 'Plot 1' should be zoned residential for the following reasons:

- It is considered that the proposed 'Enterprise and Employment' designation for the subject lands is inappropriate going forward for enterprise and employment as under the draft proposal there is ample lands being considered for this zoning and the site lends it better for 'proposed residential'.
- Campbell and Slevin is an established developer and is looking to further continue building houses in Cavan Town, compared to other areas that are designated proposed residential which in most cases the landowners are not developers and any planning on these lands would be merely speculative.
- The subject site is serviced with site services.
- The site has previous planning permission for 16 no. dwellings (Ref. 00/494).
- Access to the subject site would be off the existing Bramble Lane Service Road and old Dublin Road beside Advance Pitstop.
- Campbell and Slevin state that they are experiencing a strong demand for houses and is currently completing houses within the Bramble Lane development and there will be strong future demand for new housing in this area.

- It is stated that there will be more of a demand for housing and not General Enterprise and Employment and overall, under the draft County Development Plan 2022-2028 there is more lands zoned for enterprise and employment than proposed residential.

Furthermore, it is submitted that the area outlined as 'Plot 2' for existing residential is appropriate with the area currently serviced and houses previously commenced on site are at floor level.

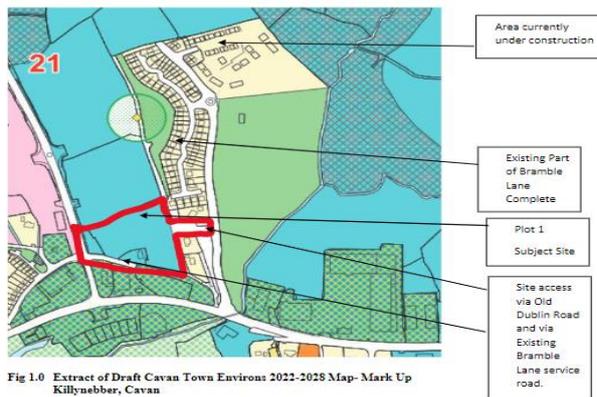


Fig 1.0 Extract of Draft Cavan Town Environs 2022-2028 Map- Mark Up
Killynebbber, Cavan

Chief Executive's Opinion on Issues Raised

The provision of adequate Enterprise and Employment lands is a fundamental element required to ensure the sustainable economic development of Cavan Town. This area and the surrounding land is considered to be a strategic area for employment within Cavan Town. The proximity of the site to the Town Core, existing infrastructure (new link road) facilitates a very sustainable location for employment, reducing the impact and need for car borne development. In addition to the latter and having regard to the adjoining land use zonings, which includes Enterprise and Employment and the level of existing enterprises in this area, it is considered that the zoning of Enterprise and Employment as proposed in the Draft Plan is appropriate.

Chief Executive Recommendation

No change recommended.

Oxygen Environmental ULC (Cavan Waste Disposal)

The submission relates to lands next to Cavan Waste Disposal waste transfer facility at Killygarry Industrial Estate, off the N3 on the eastern edge of Cavan Town. The existing facility operates under an EPA licence.

The submission provides a background to Oxygen Environmental ULC, its strategic goals and related waste management policy and legislation such as the EU Waste Framework Directive, the Connacht-

Ulster Region Waste Management Plan 2015-2021, A Waste Action Plan for a Circular Economy – Ireland’s National Waste Policy 2020-2025, NPF, NDP 2018-2027 and the Northern and Western Regional Assembly Regional Spatial and Economic Strategy 2020-2032.

Recommended Zoning and Objectives

It is submitted that lands to the west, northwest and southwest of the existing Oxygen/CWD facility are not proposed to benefit from any land use zoning which greatly constrains the ability of Oxygen/CWD to deliver the enhanced services needed to enable Cavan move further towards the circular economy. It is submitted that lands to the north of the existing facility be zoned General Enterprise and Employment. It is noted that these lands fall within Flood Zone A of the Draft Strategic Flood Risk Assessment associated with the Draft Plan. It is stated that a waste management facility would constitute a less vulnerable development and any concerns regarding flooding may be fully and more correctly addressed through appropriate design at the planning control stage. It is further stated that lands within Flood Zones A and B are zoned for both General Enterprise and Employment and Strategic Reserve in the Draft Plan.

It is submitted that a zoning of the subject lands is consistent with national and regional policy supporting a more sustainable approach to waste management, supports the growth of Cavan Town as a designated key town, accords with Objectives CTE08 and CTE10 in regard to economic and employment growth and objectives WM04, WM05, WM06 and WM07 pertaining to waste management.

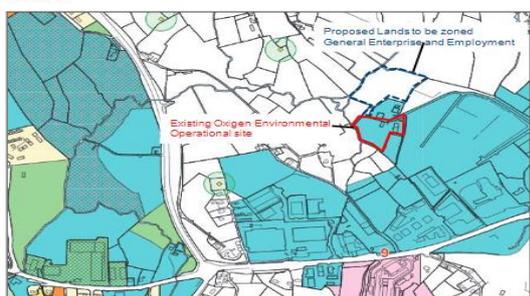


Figure 4: Extract of Land-Use Zoning Map including General Enterprise and Employment (teal) and General Enterprise and Employment Strategic Reserve (teal with black hatching)

Chief Executive’s Opinion on Issues Raised

The bulk of the site is within Flood Zone A/B and as such any proposed zoning requested in this submission is considered inappropriate.

Chief Executive Recommendation

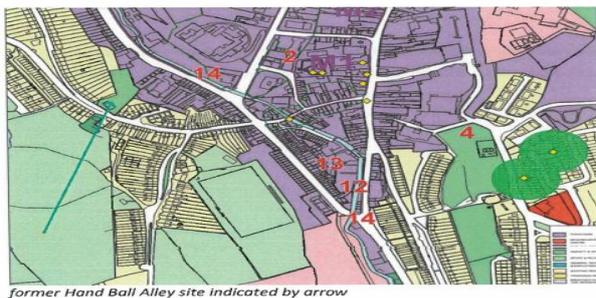
No change recommended.

Peadar and Paul Fay

The submission relates to lands at the former hand ball alley in Cavan Town at the top of the Barrack Hill which was purchased by Peadar and Paul Fay many years ago. It is stated that they are an established house builder in and around Cavan Town and county in which they have a reputation for delivering affordable starter and other homes. It is submitted that it is intended to develop the former handball alley in the future to provide a supply of new homes in Cavan Town Centre. The Draft Plan illustrates these lands as 'Amenity and Open Space'. It is submitted that this zoning is unreasonable for lands in private ownership in an urban centre where residential development is always in demand. Furthermore, there are substantial lands zoned for Sport and Recreation in the vicinity that are ideal for recreation and amenity in close proximity to natural features such as Swellan Lake.

Recommended Zoning and Objectives

It is submitted that the ball alley site could accommodate a modest development of 1 and 2 bedroom units in an established town centre location. There is demand for such dwellings and especially at sites such as this where sustainability is possible by use of public transport and walking/cycling to shops, school etc. The site could also incorporate a link between the Barrack Hill and Railway Road to enhance and improve connectivity in the town.



former Hand Ball Alley site indicated by arrow

Chief Executive's Opinion on Issues Raised

The subject site is located in a well established high density residential area. The amount of public amenity and open space in the vicinity of the site is limited and the presence of the ball alley although not in current use is still regarded as an amenity asset to the area. The site itself occupies very difficult levels and increasing the traffic levels in this area is not desirable.

The existing zoning of Amenity and Open Space on the subject lands in the Draft Plan is considered appropriate and removal of same would be premature pending the preparation of the Open Space Strategy for the County.

Chief Executive Recommendation

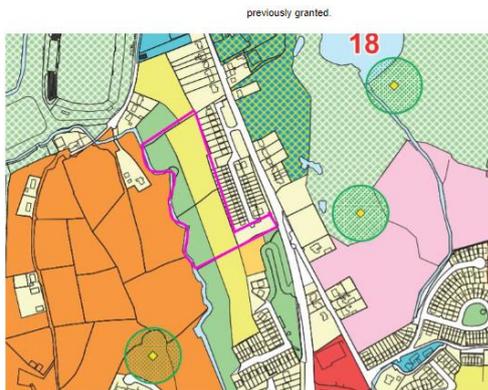
No change recommended.

Latt Properties Ltd

The submission relates to lands at Creighan, located off the N55 Cavan to Ballinagh Road. The lands are within the ownership of Latt Properties Ltd and the site has had planning permission for 26 dwellings under application ref. 07/2418 (ABP ref. PL02.231171) which expired recently.

Recommended Zoning and Objectives

It is submitted that the proposed zoning of the site between residential and amenity is accurate in terms of delivering the number of housing units previously granted and therefore, the zoning as proposed is supported.



Chief Executive's Opinion on issues raised

The contents of this submission are noted and welcomed. The draft Plan supports the contents of this submission.

Chief Executive Recommendation

No Change Recommended.

Virginia

Mr. Richard Corrigan

Summary

This submission was made by Hanley Taite Design Partnership Architects and Design Consultants on behalf of Richard Corrigan.

The submission outlines developments and improvements made to Virginia Park Lodge since bought in 2013. The benefits that such improvements have made to the property, area, town and county as also outlined, in addition to plans for future works.

The submission states that the proposed zoning objectives in the Draft County Development Plan 2022-2028 may potentially restrict and inhibit the further development of the resort. The submission also notes satisfaction that the written objectives are appropriate.

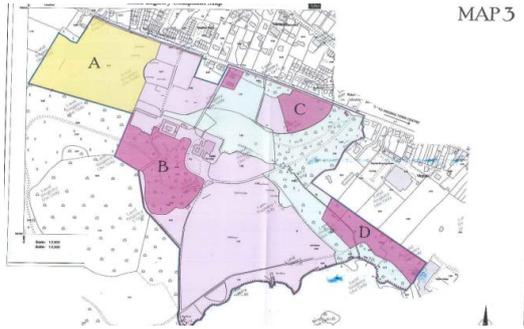
It is noted that the current zoning map sets out an extensive area of land zoned as “proposed residential” to the north west and an area of “Commercial” zoned land to the north which added value to the property that facilitates investment. It is stated that the Draft 2022-2028 zoning map portrays a very significant reduction in the residential zoning, abolishment of the commercial zoning and a creation of a tourism zoning on most of the lands. This submission states this will result in a reduction in the value and the land and restrict ability to obtain investment for continued development. It is further noted that to zone Plot A as outlined on attached Map 3 as residential would safeguard the ability to continue the development of the resort and would have no negative impact on Virginia Park Lodge or surrounding landscape.

It is also noted that the Draft 2022-2028 Zoning Map sets out an area to the west of the main building and south of the courtyard and stable buildings as being amenity and open space. This area adjoins Deerpark Forest, is parkland with some grass and trees, not forested. It is considered that any future expansion of the resort would have least impact on the architectural, natural heritage and landscape should it be of exceptionally high quality design and located in this area. Plot B on the accompanying map on Map 3.

The submission states that the area of land zoned commercial on the 2014-2020 zoning map overlooks the gardens to the south and west and is visually prominent with undulating topography. It is further noted that it is accepted that the zoning as set out in the Draft 2022-2028 zoning map, however it is considered that given its proximity to the Gate Lodge and gardens it is favourably disposed to this area as “tourism” (as indicated as plot C on Map 3).

The submission gives an overview of the forestry area which extends from the south eastern corner of the golf club towards Virginia College and Lakeshore Amenity Area as a forest of poor quality and backs on to Lidl and the Shopping Centre car park. It is also noted this area is regularly littered and used for antisocial behaviour. Sensitively designed tourist related activity on this plot would compliment the report and provide for passive surveillance. The submission advocated this area to be zoned as tourism as shown as Plot D on Map 3.

In summary the submission requests that consideration for the above zoning changes be considered and that appropriate material amendments be implemented in advance of Stage 3 in the development plan process. The importance of Virginia Park Lodge to Virginia and the region is reiterated and the benefits of same outlined again.



Chief Executive's Opinion on Issues Raised

The submission requests the following:

Plot A Amend from proposed Tourism to Proposed Residential

Plot B Amend from Amenity and Open Space to Expansion of Hotel Facilities

Plot C Amend from Proposed Residential to Tourism

Plot D Amend from Amenity and Open Space to Tourism

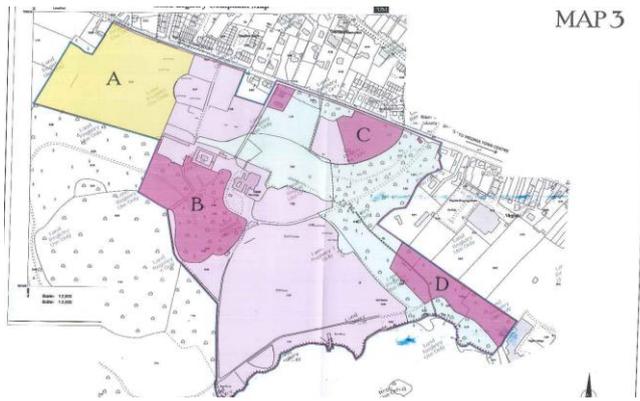
Having regard to the underlying protection of Plots B and D as Natural Heritage Areas, which is a national protection area. It is not considered appropriate to zone these lands for Tourism use. It is considered the proposed alteration from proposed residential to tourism is appropriate and within the curtilage of the existing tourist facility. It is considered that a portion of Plot A is appropriate for residential development, having regard to the existing established residential area and the proximity to Virginia Town Core.

It is not considered appropriate to place a landuse zoning on an area which is already designated as a Natural Heritage Areas having regard to the possible impact on same. The Draft Plan promotes and protects Natural Heritage Areas throughout the County. In relation to Plot D and Plot B is not considered appropriate to amend the proposed amenity and open space zoning to Tourism.

Chief Executive Recommendation

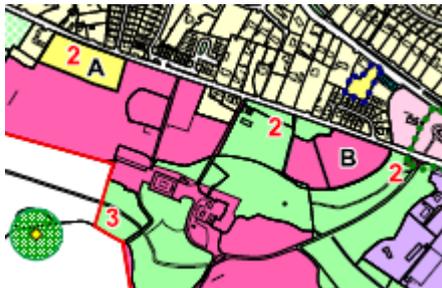
Recommendation No. 199

Amend Plot C below from Proposed Residential to Tourism and as referenced as "B" in Virginia map in Appendix 3



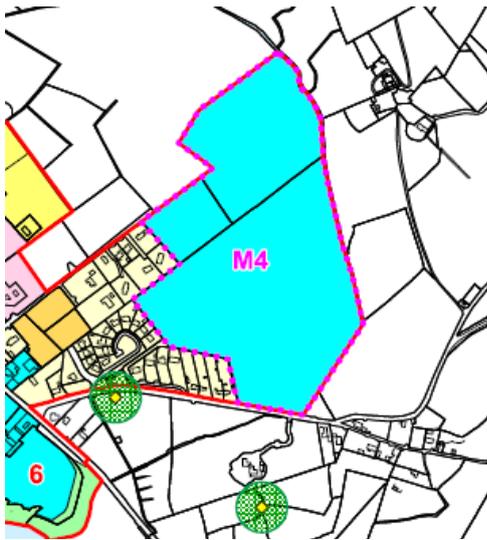
Recommendation No. 200

Amend Tourism in the draft Plan to Proposed Residential as marked 'A' in the Virginia Map in Appendix 3.



Ronan O'Reilly

This submission relates to land proposed to be zoned M4 "General Enterprise and Employment" in Virginia and is made by the landowner. The submission commends this proposed zoning at this location and considers the location of the lands very suitable for this type of development. Confirmation is given of the commitment to work with Cavan County Council over the lifetime of the new CDP 2022-2028 to carry out development on the subject land. The landowner's support is stated for the proposed use of the lands.



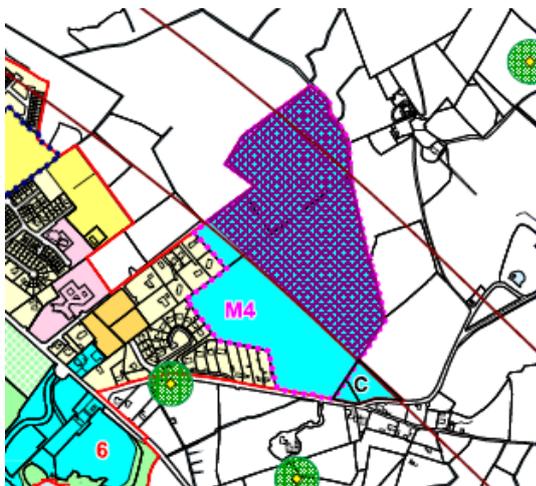
Chief Executive's Opinion on Issues Raised

The contents of this submission are noted.

It is noted that the overlay of the Emerging Route for the Virginia Bypass will reduce the allocation of General Enterprise and Employment on this site as per Appendix 5 Please refer to OPR and TII submissions in this regard.

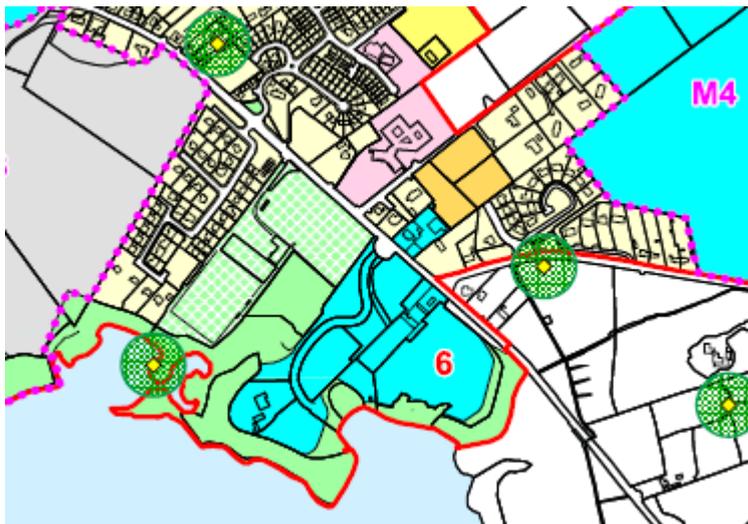
Chief Executive Recommendation

Reduce the quantity of zoned land at this location as shown in Virginia Map in Appendix 5 as dealt with in recommendation under Transport Infrastructure Ireland and Office and Planning Regulator Submissions.



Peter Cullen

This submission relates to land zoned for “General Enterprise and Employment” with a specific objective for the provision of “office, research and development and high technology/high technology manufacturing type employment in a high quality built and landscaped environment, in Virginia and is made by the land owner. This submission compliments Cavan County Council for this zoning noting the suitability of these serviced land. The submission states the landowners support for this proposed use on such lands.



Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The draft Plan supports the contents of this submission.

Chief Executive Recommendation

No change recommended.

Karl O'Dowd

Summary

This submission was made by Hanley Taite Design Partnership Architects and Design Consultants on behalf of Karl O'Dowd and requests subject lands at Cranadillon, Virginia be zoned as Proposed Residential. The submission is divided under the following headings:

Introduction

It is noted the site is located at Cranadillon, Virginia and is 1.20 ha and currently unzoned. The submission seeks to have the land included within the Virginia development boundary of the 2022-2028 Cavan County Development Plan.

Proposed Site Information

This section of the submission outlines the following information about the site:

- Located adjacent to existing residential development
- Link road connecting the Virginia/Cavan Rd and the Virginia/Ballyjamesduff Rd forms the boundary to the west, lands to the north are covered with vegetation and a wooded area and to the east there is a mixture of agricultural and residential development
- Located 100m from town core with a public footpath
- All local amenities and services are easily accessible and within walking distance
- Access is via existing service road to Swiftbrook Glen
- The town boundary aligns with the southern boundary of the site.

Planning History

This section gives an overview of planning history of the site:

- Ref. no. 04/2215 – permission granted to construct 4 dwellings and all ancillary works as granted under planning permission ref.no.00/1787
- Ref. no. 16/480 – permission to construct 9 dwellings – application withdrawn

It is noted that there are other permissions approved for existing adjacent residential development in close proximity to the site which have not been included in this submission.

Zoning Proposal & Justification

It is stated that giving the location of the site on the outskirts of Virginia Town, its proximity to local amenities, services and infrastructure it is proposed that Cavan County Council should consider extending the town boundary to include this site. The submission contains image 1 which depicts the proposed zoning map as per Draft Cavan Development Plan 2022-2028 and image 2 which depicts the proposed zoning map as per Draft Cavan Development Plan 2022-2028 with the suggested zoning of Proposed Residential outlined.

The submission states there is high demand for all types of residential properties in Virginia and the upgrading of the Virginia sewerage treatment system will result in the commencement of numerous residential developments in Virginia. The submission notes the attributes of the Swiftbrook Glen development and states the land owners commitment to deliver a similar high quality development within the lifespan of the Cavan County Development Plan 2022-2028.

Strategy and Vision, Virginia General Development Objectives

The submission highlights the following development objectives: VG 03 and VG 05 of the Draft Cavan County Development Plan 2022-2028.

Sustainable Communities, Virginia Sustainable Communities Development Objectives:

The submission highlights the following development objectives: VSC 01 and VSC 02 of the Draft Cavan County Development Plan 2022-2028.

Summary

The submission concludes by noting the site was included within the development boundary of Virginia under a previous development plan. It is requested that Cavan County Council consider zoning the subject lands proposed residential in the Cavan County Development Plan 2022-2028.



Chief Executive's Opinion on Issues Raised

The quantity of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Proposed Residential.

Chief Executive Recommendation

No change recommended.

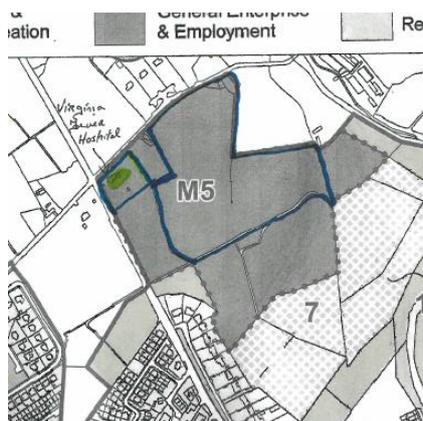
Paddy and Brendan O'Reilly

Summary

This submission relates to part of the lands proposed to be zoned as General Enterprise and Employment as indicated as M5 on the Virginia Land Use Map as indicated on an accompanying map. It is requested that the said lands remain in agriculture use.

The submission also notes that it is intended on applying for planning permission to restore the Virginia Fever Hospital and for 2 residential buildings east of the existing building that was previously granted planning permission.

The submission notes that the lands outside the blue lines are not in the submitter's ownership.



Chief Executive's Opinion

The lands referred to as M5 in the submission relate to an area of land identified in the draft Plan for General Enterprise and Employment use to the northwest of Virginia town. The lands subject of this submission relates to a portion of the overall General Enterprise and Employment lands at this location.

There is an identified need for additional enterprise and economic lands in Virginia. The National Planning Framework and the Regional Spatial and Economic Strategy (RSES) highlight the opportunity to further enhance the economic performance of Virginia, by capitalising on its strategic location and the associated national and international connectivity that this provides. The draft Plan contains development objectives to promote the sustainable economic development of Virginia through the promotion of identified economic growth areas, which provide economic opportunities locally and reduce the volume of commuting. It is a core aim of the draft plan to make provision for sustainable live-work patterns to strengthen and improve local employment, services and sustainable transport options to enable towns to become more self-sufficient during this plan period. The economic aims for Virginia are outlined in the draft Development Plan as:

1. Attract large scale operators
2. Reduce the loss of economic activity and businesses to other locations
3. Reduce the level of commuting
4. Retain employment in Virginia
5. Create sustainable and attractive family and work-life balance for the residents of Virginia and its environs.

The M5 lands are considered important to achieve this economic development in Virginia.

The economic approach undertaken in the draft Plan for Virginia includes the identification of appropriate employment lands in Virginia. The draft Plan identifies 3 areas of land suitable for both local indigenous and strategic economic opportunities in Virginia- namely M4, M5 and M6.

- M4- Lands east of Virginia (Mullagh Road) with the potential to support and enhance the existing business community in the area and create a more defined economic hub in the town.
- M5 – Lands located in the northern fringes of Virginia adjoining the N3 would serve to improve the economic activity of the town with its proximity to the town centre. Such lands support accessibility to services and infrastructure.
- M6- A strategic employment site in accordance with the NPF and the RSES which note that there are opportunities to further enhance the economic performance of Virginia by capitalising on its strategic location and the associated national and international connectivity that this provides. The lands in question are considered appropriate for large scale employment generating uses of a strategic importance with a notable land requirement. RSES recognises the existing 'food cluster of AW Ennis and Glanbia' and its potential. These lands will help to achieve growth at this area.

It is considered that the lands zoned as M5 in the draft Development Plan are fundamental to the economic vision of Virginia as outlined above. The mechanism for the delivery of lands at M5 is clearly set out in the Draft Development Plan with the requirements of the Masterplan stipulated within.

The Virginia Emerging Preferred By-Pass Corridor has been selected since publication of the draft Development Plan. It is the aim of the draft plan to recognise the importance of the role of national road infrastructure and to protect same. Arising from submissions from the Office of the Planning Regulator and Transport Infrastructure Ireland, it is considered appropriate to remove employment generating lands within the by-pass corridor. Therefore, General Enterprise and Employment lands at M4 have been greatly reduced in size. This reduction in the overall quantity of zoned Enterprise and Employment lands in Virginia reinforces the need to protect remaining lands proposed to be zoned General Enterprise and Employment, such as M5.

M5 in its entirety is considered appropriate to facilitate sustainable economic development at this location, considering the attributes and scale of the site. By removing the portion of the M5 lands as requested would have a negative impact on the delivery of the remaining lands zoned for General Enterprise and Employment at this location, contrary to the proper planning and sustainable development of Virginia.

In Summary, it is not considered appropriate to alter the zoning of these lands from General Enterprise and Employment, as provided for in the Draft Plan.

With regard to the lands marked as Virginia Fever Hospital, which is a Proposed Protected Structure, the submission refers to the restoration of this building in addition to 2 number residential buildings. The development of a small residential scheme at this location would compromise the objective of these lands to provide for General Enterprise and Employment landuse. Furthermore, to deliver this element of the submission, would require for the lands in question to be zoned as Proposed Residential. This zoning would not only compromise the General Enterprise and Employment Zoning at this location, but is also not considered an appropriate zoning at this location as compact growth and the delivery of sustainable residential communities is a core component of the draft plan. This site is not in keeping with the principles of proper planning and sustainable development, compact growth and sequential development of Virginia, in addition to lacking required physical infrastructure and linkages to the town core.

The quantity of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period.

Chief Executive Recommendation

No Change Recommended.

Kingscourt

Destrina Ltd

The submission is sub divided under the following headings:

Introduction

This submission was made by Downey Planning Consultants on behalf of Destrina Ltd and relates to c. 3.89 ha of lands at Dún Na Carraige, Dunaree Lane, Kingscourt. Such land are zoned residential under the current County Development Plan. The submission notes that under the Draft Cavan County Development Plan 2022-2028, c. 0.6 ha of these lands have been proposed to be dezoned and are therefore outside of the current Development Plan boundary. The submission seeks to have all the lands zoned as “proposed residential”, in keeping with the current development plan.

Planning Legislation

This section of the submission gives an account of the relevant sections of the Planning and Development Act, 2000 (as amended) which relate to the making of a development plan.

Site Location and Description

This section of the submission gives a full overview of the site location its size of 3.89 ha, its address, adjoining residential developments and access details. It is also noted that this is a brownfield site.

The submission states that the subject site forms part of a larger site that received permission under Reg. Ref. 06/536 for 109 residential units, to date 38 units have been built, permission has now lapsed. It is also note that an application to process the remaining of the site is currently under progress. Figure 1 contained in the submission conveys an aerial view of lands outlined in red. Figure 2 conveys a site location map outlined in red.

Planning History

The submission gives an overview of the planning history pertaining to the subject lands:

- Reg. Ref. 05/584 – 112 units and all ancillary works – refused
- Reg. Ref. 06/536 – 109 units and all ancillary works – granted

The submission also notes that Downey Planning engaged in pre-planning consultation with the Planning Authority in Spring 2020 and August 2021 regarding the preparation of a residential development on the subject lands.

Planning Context

The submission includes an account of the planning context of the subject lands from a national, regional and local perspective. Specific elements of Project Ireland 2020: National Planning Framework form part of the submission including NPO 12 and NPO 35.

Reference is made to Rebuilding Ireland, An action Plan for Housing and Homelessness (2016) and it is noted that the return of the existing zoning for the subject lands to provide residential development, on lands that are contiguous to existing residential schemes will help the Government to achieve the objectives of the Housing Action Plan. This, it is submitted that the proposal is consistent with national policy in this regard.

Regional Planning Context

The submission states and quotes RPO 4.1 and RPO 4.2 which sets out the rationale and basis for preparing these strategies. The submission reiterates the request to have the subject lands returned to a “Proposed Residential” zoning and notes previous development on the site and Section 247 pre-planning discussions. It is noted that the lands can be serviced and that Irish Water have advised that the upgrade of the existing wastewater treatment plant in Kingscourt forms part of their Capital Works Programme and will further increase the capacity of the plant. It is noted that a final planning application will be submitted to the Planning Authority within 2 months.

The submission notes that the lands are contiguous to the existing built-up area of Kingscourt and will form phase 3 of an existing housing development. The lands can connect to all the necessary services and utilities.

Local Planning Context

The submission notes that the subject lands are zoned “Proposed Residential” under the Cavan County Development Plan 2014-2020 and quotes this zoning objective. It is further noted that Kingscourt is identified as a “Large Town – Tier 2” settlement within the settlement hierarchy of the Cavan County Development Plan 2014-2020. Figure 3 outlines the subject site in red on the existing zoning map from the CDP 2014-2020.

The submission notes that under the Draft Development Plan the majority of the lands have been zoned to “Proposed Low Density Residential” and 0.6 ha of the subject lands are completely removed from the development boundary of Kingscourt. Figure 4 conveys the land use zoning in the Draft Development Plan 2022-2028 with subject site outlined in red.

The submission includes the following Kingscourt development objectives: KG 04, KG 05, KSC 01, KSC 02 and KSC 08 and it is noted that many of these objectives are contradictory to each other and to the general residential zoning that pertains to the subject site. Reference is also made to Map Based Specific Objective 7 which seeks to “Provide pedestrian and cycle linkages to connect adjoining residential areas”.

Justification and Grounds of Submission

This section reiterates the request contained in the submission to have the lands identified as “Proposed Low Density Residential” zoned back to “Proposed Residential” and to have the 0.6ha of lands included in the Kingscourt Development Plan boundary and zoned as “Proposed Residential”.

Serviceability of the lands

It is noted that the basis of the Council's proposal to rezone this land to "Low Density Residential" and to remove some of the lands from the Development boundary is unclear. It is also stated that the subject lands are currently considered Tier 1 development lands under the NPF, given that they are zoned and serviced. In this regard, they are appropriate for a residential development which would potentially complete the estate and provide great connectivity and linkages between Dunaree Lane and Rocks Road.

Failure of Previous Core Strategies to Deliver Required Housing

The submission references the recent economic downturns between 2008-2015 and the impact it has had on housing output resulting in housing figures set out in the Core Strategy of the Cavan County Development Plan 2014-2020 not being met. It is also noted that there is a significant pent-up demand for housing in the Kingscourt area, including a large number of people on the Council's housing list. The submission confirms that the current supply of housing is not meeting the demand.

The submission emphasises that it is critical that sufficient lands are zoned for residential development use under the current and draft county development plan, noting that for various reasons lands have not been developed during this plan period, with the exception of one zoned site. The commitment to develop these lands is again outlined as part of the section of the submission, whereby reference is made to previous and future developments.

Conflicting Objectives in the Draft Development Plan and Non-Compliance with Section 28 Ministerial Guidelines

The submission states that there are conflicting objectives within the Draft Development Plan as it relates to Kingscourt and the subject lands. Objectives KG 04, KG 05, KSC 01 and KSC 02 seek to provide sustainable communities and identify sufficient land for housing purposes which conflicts with KSC 08 which looks to "support the provision of serviced sites on lands zoned for low density residential development".

The submission states that the idea of providing serviced sites at a low-density rate on urban and serviced lands within 800 metres of the centre of a town represents an inefficient use of such lands going against the ethos of national and regional planning policy.

The submission notes that Kingscourt would be classified as a Small Town under the Sustainable Residential Guidelines (2009), the latter states that a graduated approach to the application of densities should be as follows:

- Centrally located sites: 30-40+ dwellings per ha
- Edge of centre sites: 20-35 dwellings per ha
- Edge of small town/village: 15-20 dwellings per ha

It is also stated that this approach was also confirmed in the Government Circular Letter NRUP 02/2021. It is also noted that the Planning Authority are required to ensure that the Development Plan is consistent with the national and regional planning policy and relevant Section 28 Ministerial Guidelines,

therefore it is submitted that the zoning of the subject lands must be returned to “Proposed Residential” in order for this to be consistent.

It is also submitted that providing for an appropriate scale and massing of development is not necessarily linked to quantitative basis, such as density. It is stated that in this regard a high quality scheme can successfully provide a mix of house types, sites and design to facilitate a sustainable community, which is consistent with draft objective KSC 02 without having to be a low-density layout.

Evaluation of Alternative Sites

The submission contains an evaluation of other zoned sites in Kingscourt on the suitability of the subject site in comparison to others. Figure 5 conveys land use zoning in the Draft Development Plan with sites numbered. Table 1 indicates site evaluation information. The submission concludes that with the exception of 1 other site, that the other sites have not and are not likely to be deliver housing during the lifetime of the current or next development plan.

The submission notes that it is evident from the evaluation table, that it is appropriate for the “proposed residential zoning” to be given to the subject lands for the following reasons:

- Proximity to the town centre (900metres)
- Accessibility via public road/existing development
- Owned by an active developer

Integration with the Surrounding Areas

The submission notes that the subject lands are located immediately north of Dun na Carraige and west of Thorndale Close, and therefore a housing development would be able to integrate fully with the existing estate and provide connections between Dunacree Land and Rocks Road. It is also noted that in accordance with proposed local objective 7, there is also the potential to link the development of these lands into the existing estate to the east.

Environmental Considerations

The submission notes that the subject lands are not located within or adjoining any designated Natura 2000 sites and have no known hydrological connection to such sites and are not located within a Flood Zone A or Flood Zone B.

Conclusion

The submission concludes by outlining the proposed zoning on the subject lands as per the Draft County Development Plan and seeks to have all their lands zoned as “Proposed Residential”, in keeping with the current Development Plan.

It is noted that the submission identifies that the rezoning of the lands to residential use is in accordance with national, regional and local planning policy. Furthermore, the rezoning of the subject lands is justified on the following grounds:

- The land owner is an experienced developer and builder who has completed phases 1 and 2 of the development, which are being taken in charge by CCC. They have engaged in Section 247 pre-planning consultation and intention to lodge application within the next 8 weeks.
- The lands are readily connected to the sewer network and present an ideal location to provide permeability between the Rocks road and Dunaree Lane as well as adjoining residential areas.
- If the .06 ha of lands be dezoned and the remainder of the lands be designated as “Proposed Low Density Residential”, then it could prevent much needed family homes being delivered in the area, including those for social and/or affordable housing.
- The delivery of these homes will help sustain essential retail services and retail/commercial outlets in the area.
- The zoning of the entire subject lands as “Proposed Residential” is in accordance with the policies and objectives of the Development Plan and national and regional planning.
- The proposed “Low density residential” zoning on this site would not be consistent with national planning policy and specifically the 2009 Residential Guidelines.

It is also submitted that the associated development costs to progress these lands means that it would not be viable to only develop a low density scheme and as such the lands would in reality remain undeveloped in such a scenario.



Chief Executive’s Opinion on Issues Raised

The submission seeks to have the above outlined subject lands currently proposed to be zoned Proposed Low Density Residential Development to Proposed Residential Development. The purpose of affording this zoning of Proposed Low Density Residential in a settlement is to ensure the sustainable growth of the area with a desirable mix of house type and size. It is also used as an alternative for rural one off dwellings to provide self build and serviced plots, in an urban setting, close to town core amenities and facilities. It is appropriate that this mechanism is used to facilitate this type of

development in Kingscourt. It is noted that lands adjoining the subject site have catered for higher density residential development and as much the proposed zoning of Low-density Residential Development is appropriate. The zoning designation permits in the region of 8 units per hectare.

Chief Executive Recommendation

No change recommended.

Cyprian Briody

This submission requests the zoning of c.3 acres of land in Kingscourt as outlined on accompanying map be zoned. The submission states that the land was previously zoned and notes that this land is a prime position in the town, beside Supervalu and a 3 minute walk to the doctor/medical centre. It is also noted that there is a new secondary school in the town and over 100 people on the housing waiting list and that there is a strong need for more houses to be built in the town.



Chief Executive's Opinion on Issues Raised

The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Proposed Residential.

Chief Executive Recommendation

No change recommended.

Niall Smith

Summary

This submission requests that lands as identified on accompanied maps be zoned as General Enterprise and Employment development in the new Cavan County Development Plan 2022-2028. The lands consists of approximately 1.5 ha and are located at the Bailieborough Rd., Dunaree, Kingscourt. The submission notes the land are not currently zoned or within the development plan boundary. This detailed submission contains the following:

Introduction

The submission outlines details that the submission is make in accordance with Section 9, 10, 11 and 12 of the Planning and Development Act 2000 (as amended).

Planning Legislation

The submission contains an overview of Section 9 of the Planning and Development Act, 2000 and notes this submission is in accordance with Section 12 (2) (b) of the Planning and Development Act, 2000 (as amended).

Site Location and Description

The submission gives an account of the site location and description of same including an aerial photo. It is noted that the lands are c. 1.5 ha and located on the Bailieborough Rd., Dunaree, Kingscourt on the edge of the existing Kingscourt development plan boundary. The lands comprise agricultural lands that are accessed via an entrance on the Bailieborough Rd. Such lands are located less that 1 km from Kingscourt town centre, with the surrounding built environment characterised by a community hall, residential development, industrial shed and residence to the west and agricultural developments with a mix of building types.

Planning History

The submission contains a planning history of the site and the surrounding area:

Reg. Ref. 05/840: Planning permission granted for the demolition of Dunaree House and outbuildings and construction of 160 houses and 8 apartments and all ancillary works.

Reg. Ref. 07/1136: Planning permission granted to include revisions of previously approved planning permission 05/840.

Planning Context

The submission sets out the planning context to the subject lands including reference to the National Planning Framework, the Eastern and Midlands Regional Spatial and Economic Strategy and the Draft Cavan County Development Plan 2022-2028.

Justification and Grounds of Rezoning Submission

The submission makes reference to the Draft Plan where it is stated “*There is therefore opportunities in Kingscourt to zone additional lands for General Enterprise and Employment purposes to support an expansion of economic development in the town*”. The submission also states that most of the sites zoned as “*General Enterprise and Employment*” are already existing enterprises and employment businesses, noting there is a need for additional and new “*General Enterprise and Employment*” zoned sites in Kingscourt to service the need of the existing large industries in Kingscourt and the surrounding hinterland. It is further stated that there are a number of smaller and medium sized service and enterprise businesses who cannot get sites in Kingscourt. They require similar edge of town sites to service their needs like warehousing. Logistics, business/enterprise and employment units and sites to accommodate such businesses.

The submission states this site is suitable for such use and the proposed rezoning of the subject lands would be consistent with national, regional and local planning policy.

Serviceability of the lands

The submission notes that these lands were previously serviced as part of the uncomplete residential development; there is a large stormwater attenuation tank located on the site; there is an adjoining foul pumping station; the site is serviced with main water and the site has direct access onto the R 169, Bailieborough Rd. and is within the 50kmp speed limit. The submission contains a sketch site layout plan of the proposed site indicating access to the public road, existing services, adjoining uses, building outline and landscaping.

Integration with the Kingscourt Local Area Plan

The submission highlights the surrounding land uses in the immediate vicinity and submits that zoning the subject lands as “*General Enterprise and Employment*” would be consistent and appropriate in land use terms with the surrounding land uses, and consistent with national, regional and local policy objectives. It is proposed to include high levels of landscaping to any adjoining community and residential amenities and boundaries. The design of the site and development would be a high architectural quality and similar to high quality design of Niall Smith Architects has prepared on the Dublin and Carrickmacross Rd for Kingscourt, noting this will act as a strong entrance/exit to the town, resulting in a thriving town centre and core.

The submission concludes by reiterating the main reasons why this site is suitable to be zoned as *General Enterprise and Employment* and requested that Cavan County Council amend the Draft Cavan

County Development Plan 2022-2028 by including these lands within the Kingscourt Town development boundary and zoning land to “*General Enterprise and Employment*”.



Chief Executive’s Opinion on Issues Raised

It is considered premature to zone the subject lands as General Enterprise and Employment taking into account the location of the land and the adjoining land uses. The Draft Plan has made provision for an adequate quantum of General Enterprise and Employment zoned land in Kingscourt.

Chief Executive Recommendation

No change recommended.

COOTEHILL

Coyle Civil and Structural on behalf of Patrick Mc Eaneyey

Patrick Mc Eaneyey is the owner of 14.73 ha of lands at Glebe, Cootehill and the submission seeks to have the said lands included in the development envelope of Cootehill. The submission seeks to have the lands for Mixed Use with a portion proposed for Residential and a portion for Enterprise and Employment. The submission states that the lands offer a unique opportunity for the sequential development of Cootehill and is serviced by existing infrastructure with direct access onto the regional road network.

The submission details several previous applications on the subject site. The sites are serviced by existing infrastructure and readily available in their current condition.

The submission sets out how the inclusion of the said lands is in compliance with the National Planning Framework and the Regional Spatial and Economic Strategy. The submission also included justification

for the inclusion of the land under the existing Cavan County Development Plan 2014-2020 settlement hierarchy, Core Strategy and development policies and objectives.

Whilst the submission has made no reference to the draft Development Plan that is on display, it has submitted the following –

- 1 million additional people in Ireland by 2040 and the Northern and Western Region projected to accommodate an additional 180,000 persons.
- Principle of the National Planning Framework is to allow for choice in housing location, tenure and accommodation
- Accommodate homes at locations that can support sustainable development and at an appropriate scale

The submission requests that Portion 1 (1.63ha) is appropriate for Residential due to its available services, accessibility and existing infrastructure. The submission acknowledges that other lands may be relative close proximity to the town centre of Cootehill, but due to the lack of infrastructure it may not be developable during the new plan period. The sequential test should examine each site in detail and not just location.

Parcel 2 which the submission has deemed suitable for Industry, Enterprise and Employment. This land has been justified on the basis of the objectives set out in the current Cavan County Development Plan 2014-2020 and these have been quoted in the submission.

The submission notes that the lands in question were previously zoned. The submission sets out the justification of the zoning of the land by including development objectives of the National Planning Framework and Regional Spatial and Economic Strategy.



Chief Executive's Opinion on Issues Raised

This submission seeks the addition for 2 land parcels, Parcel 1 as outlined in yellow above to be zoned as Residential Development and Parcel 2 to be zoned as Enterprise and Employment. In relation to Parcel 1 is located to the rear of existing residential dwellings and adjoins the Primary School.

Parcel 2 as outlined in blue above seeks to have the land zoned as Employment and Enterprise.

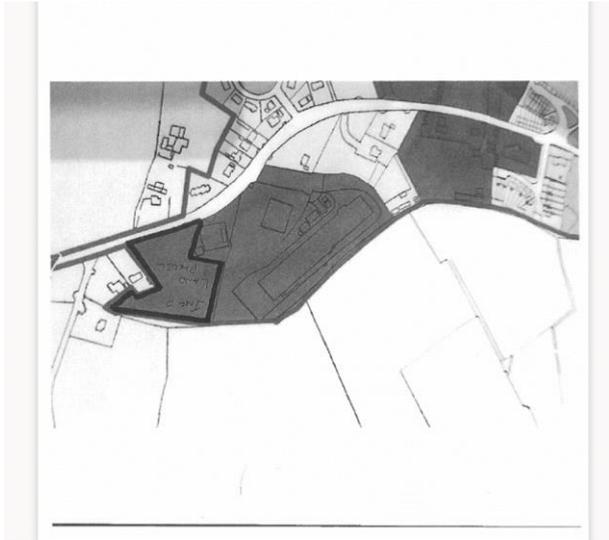
The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Proposed Residential.

Chief Executive Recommendation

No Change recommended.

Jean Mc Phillips

This submission requested that lands at Errigal Cootehill as outlined on accompanied map be rezoned as residential. The subject lands are currently zoned General Enterprise and Employment in the Draft Cavan County Development Plan 2022-2028. It is noted that the landowner has a daughter with local needs who may require this land to build a family home.



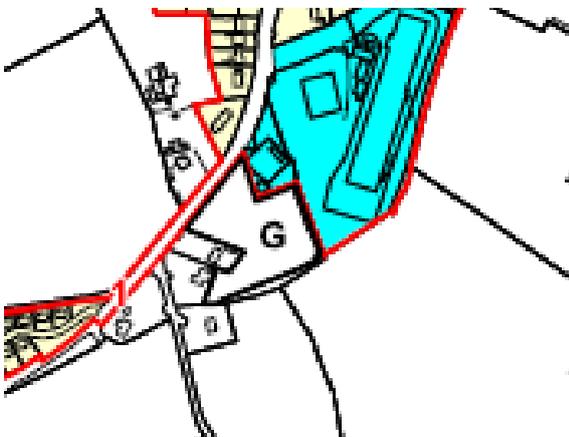
Chief Executive's Opinion on Issues Raised

The comments of the submission are noted. This land was included to facilitate an expansion if required for existing adjoining land uses. The applicant has indicated an intention for a different use for the lands in question, therefore it is considered acceptable to remove the zoning of Enterprise and Employment on the subject lands.

Chief Executive Recommendation

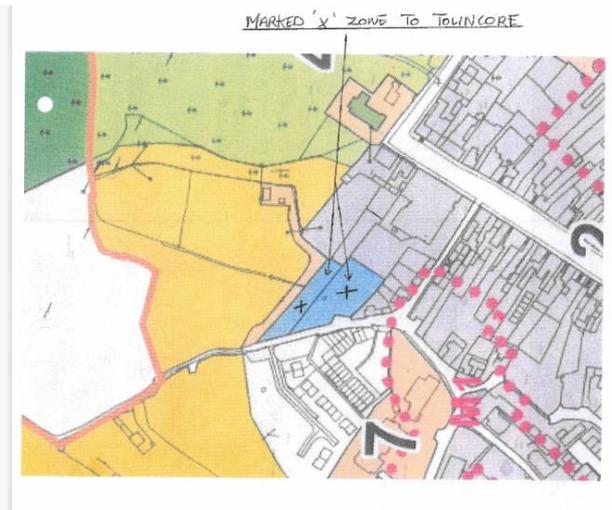
Recommendation No. 201

Remove lands in question from the development boundary of Cootehill that were zoned in the draft Plan as General Enterprise and Employment as marked 'G' on Cootehill Map in Appendix 3.

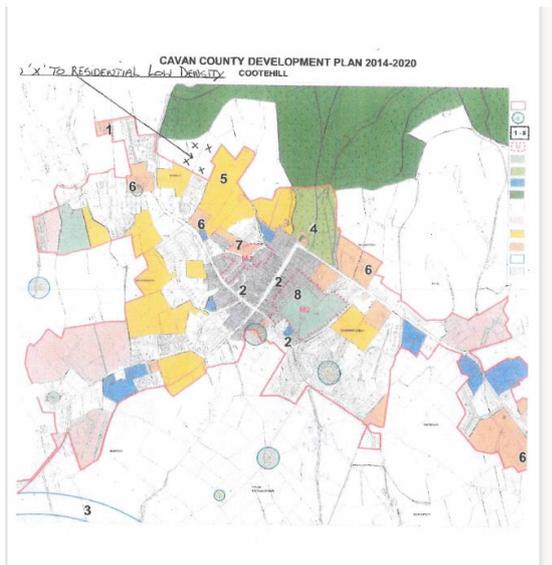


Jimmie Brady

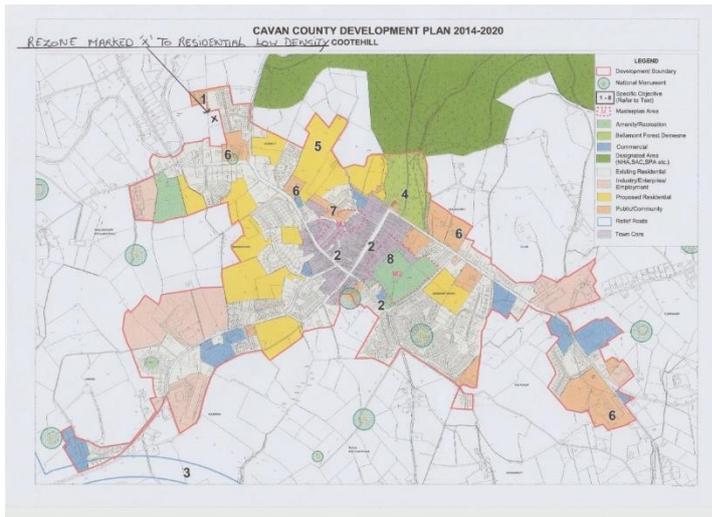
The submission request 3 different zoning requests as indicated on below maps. It is requested to amend lands currently zoned as General Enterprise and Employment to Town Core on Map 1. It is also requested for lands in townland of Munnilly to be included as Low Density Residential on Map 2. The submission also seeks to have lands in the townland of Magheranure zoned as Low Density Residential in Map 3.



Map 1



Map 2



Map 3

Chief Executive’s Opinion on Issues Raised

As indicated on Map1 above, the submission seeks to amend lands currently zoned as General Enterprise and Employment in the Draft Plan to Town Core. It is considered appropriate to afford this change in zoning as requested taking into account that the subject site already adjoins the Town Core.

In relation to both requests for zoning of subject lands as shown on the Map 2 and 3 above as Proposed Low Density Residential Development, it is noted that the amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Proposed Residential.

Chief Executive Recommendation

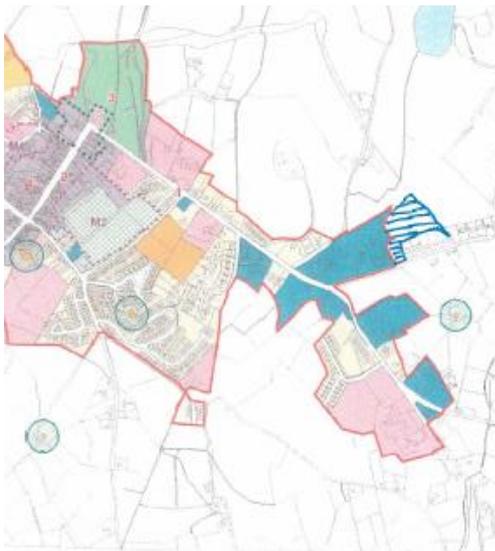
Recommendation No. 202

Amend zoning from General Enterprise and Employment to Town Core as indicated ‘C’ on Cootehill Map in Appendix 3.



Mark Hilliard

This submission relates to an existing garage/vehicle test centre in Killycramp, Cootehill. Over the coming years they wish to expand operations which will have a positive impact on employment for the town of Cootehill. They are seeking that the field to the back of their premises is designated as General Enterprise and Employment in the new County Development Plan.



Chief Executive's Opinion on Issues Raised

The submission requests that the lands outlined in above map are zoned as General Enterprise and Employment to facilitate the expansion of the adjoining General Enterprise and Employment lands. Appreciating the existing and established nature of the adjoining uses, the available necessary infrastructure, the location of the subject lands, it is considered appropriate for the sustainable development of the settlement that the site be zoned for General Enterprise and Employment. It is the objective of the Council to zone lands within the envelope of existing settlements as defined in the settlement hierarchy which seek to promote the consolidation of existing settlements and provide more

compact forms of urban growth. The provision for sustainable live-work patterns to strengthen this approach and to improve local employment, services and sustainable transport options to enable towns and villages to become more self-sustaining during this Plan period.

Chief Executive Recommendation

Recommendation No. 203

Extend zoning of General Enterprise and Employment to site 'E' on Cootehill Map in Appendix 3.



Ballyjamesduff

K Callaghan and P Smith

This submission was made by Michael Fitzpatrick on behalf of K Callaghan and P Smith. The submission relates to subject lands at Oldcastle Rd in Ballyjamesduff and requests these lands to be zoned as “Proposed Residential” under the forthcoming Cavan County Development Plan 2022-2028.

The submission is divided under the following headings:

Introduction and Background

The submission notes K Callaghan and P Smith are the owners of the subject lands and is seeking to deliver a residential scheme on the subject lands. It is noted the appropriateness of the lands for zoning as residential have been assessed in the context of the National Planning Framework, the RSES and the Cavan County Development Plan, which demonstrates the lands suitability for residential development. The submission notes that given the existing residential context and the lands being in close proximity to existing infrastructure, it is submitted that such lands will provide an ideal location for residential development.

It is submitted that the zoning of the subject lands as “Proposed Residential” would align in terms of land use with the wider planning objectives to develop serviced sites. And would also align with the masterplan design intent to have carefully designed detached dwellings on larger sites to from an

appropriate low density frontage development. It is noted that the latter would also be appropriate in terms of land use with the wider planning objectives to develop serviced lands.

Proposed Land Zoning V Recommended Zoning of Subject Lands – Cavan County Development Plan 2022-2028

Figure A conveys the proposed land zoning as per draft Cavan County Development Plan 2022-2028 of “Sport and Recreation”.

Proposed zoning (as per draft Cavan CDP 2022-2028)

Observations as per the current Cavan CDP 2014-2020: The subject lands are currently designated as per the current Cavan CDP 2014-2020 as “Sport and Recreation”.

It is noted that the subject lands are proposed to be located within the settlement limit of Ballyjamesduff Town.

It is noted that the subject lands should be zoned as “Proposed Residential” and notes that the proposed open space north of the proposed development is intended to be used as open recreation space, as an extension of the adjacent sport and recreation space.

It is requested to amend the proposed zoning to “Proposed Residential” as recommended on Figure B.

Recommended Zoning

The following is requested:

- That the subject lands be zoned as “Proposed Residential”, under the forthcoming Cavan County Development Plan 2022-2028.
- Include the subject lands within the proposed residential zoning of Ballyjamesduff Town in the 2022-2028 Cavan County Development Plan
- Designate the subject lands as suitable for zoning.

Proposed Land Zoning as per Draft Cavan County Development Plan 2022-2028

Zoning Context

It is highlighted that the surrounding land uses in the immediate vicinity are compatible with the proposed residential scheme:

- The subject lands are adjacent to the established residential area.
- The development of a residential scheme is consistent with the residential profile of the locality and the wider environs of Ballyjamesduff Town.
- The lands will provide a sustainable location for a residential scheme proximity to the town centre amenities and local transport hubs achieving a balance in terms of residential units close to local services and centres of employment.

- The lands are appropriate for residential development given the lands to the south east of the site have been already developed for residential use which makes this a viable residential site located within the current settlement boundary.
- The lands will provide a sustainable location for a residential scheme.
- Established infrastructure is in place, to the south east of the site there are both footpaths and street lighting located nearby on the public road.

It is submitted that zoning the subject land as “Proposed Residential” would provide sustainable development directly adjacent the existing public road, street lighting and footpath infrastructure, and would be consistent and appropriate in land use terms with the wider planning objectives to develop such services lands.

Proposed Land Zoning as per draft Cavan County Development Plan 2022-2028

This section of the submission outlines the overall long-term draft site layout proposal

Summary and Conclusion

The submission requests that the subject land as identified at Oldcastle Rd., Ballyjamesduff be included within the “Proposed Residential” zoning of Ballyjamesduff Town in the 2022-2028 Cavan County Development Plan.

It is noted that in terms of the approach set out in the NPF and RSES for land zonings that the subject lands are appropriate for residential/whitelands zoning noting specifics of same.

It is submitted that the zoning of the subject lands as “Proposed Residential” aligns in terms of land use with the wider planning objectives to develop such serviced lands. In addition the design and massing of these dwellings would be carefully considered, and also appropriate planning in terms of land use with the wider planning objectives to develop such serviced sites.



Chief Executive’s Opinion on Issues Raised

This submission seeks to have the lands as outlined above zoned as Proposed Residential. Social and recreational infrastructure are key to the sustainable development of any town or village. The GAA and soccer pitches in Ballyjamesduff are located in close proximity to each other and the zoning of the subject lands as Sport and Recreation allows for the combined expansion of this use on these lands. It is considered that the zoning of Sport and Recreation as per the Draft Plan is appropriate.

Chief Executive Recommendation

No change recommended.

Bailieborough

Colm Murphy

This submission was made by Wynne Gormley Gilsenan Architects and Surveyors Ltd on behalf of Colm Murphy and relates to Beckscourt, Bailieborough. The submission notes the zoning of land in the Draft Plan as “Proposed Residential” is supported and welcomed and appropriate going forward.



Fig 2.0 Extract of Draft Bailieborough Town 2022-2028 Map- Beckscourt , Bailieborough

Chief Executive’s Opinion on Issues Raised

This submission supports the zoning in the draft Plan.

Chief Executive Recommendation

No Change recommended.

Sean O’Callaghan, Gerry Sheridan and Martin Delaney

This submission was made by Hanley Taite Design Partnership Architects and Design Consultants on behalf of Sean O’Callaghan, Gerry Sheridan and Martin Delaney and requests subject lands at Rakeevan, Bailieborough be zoned as Proposed Residential. The submission is divided under the following headings:

Introduction

It is noted the site is located at Rakeevan, Bailieborough and is 2.03 ha and currently unzoned. The submission seeks to have the land included within the Bailieborough development boundary of the 2022-2028 Cavan County Development Plan.

Proposed Site Information

This section of the submission outlines the following information about the site:

- Site address
- Located adjacent to existing residential development
- Previously stripped for development and now is considered a “brownfield” site
- Lands to the north occupy a small number of individual residences, to the east there is an existing residential development, to the south there are brownfield lands and agricultural fields and to the west there are agricultural lands and private residences
- Located 500m from town core with a public footpath
- Close to all local amenities and service and within the speed limit
- Access via the public road

Planning History

This section gives an overview of planning history of the site:

- Ref. no. 04/2613 – permission granted to construct 60 dwellings and all ancillary works. The permission was not acted upon.

Zoning Proposal & Justification

It is stated that giving the location of the site on the outskirts of Bailieborough Town, its proximity to local amenities, services and infrastructure it is proposed that Cavan County Council should consider extending the town boundary to include this site. It is noted that development has previously occurred further out from the town centre than this subject site. It is also stated, it is considered appropriate to permit development on the remaining infill brownfield lands in between the town core and the existing residential development. The submission contains image 1 which depicts the proposed zoning map as per Draft Cavan Development Plan 2022-2028 and image 2 which depicts the proposed zoning map as per Draft Cavan Development Plan 2022-2028 with the suggested zoning of Proposed Residential outlined.

The submission states there has been planning permission previously granted on this site and that the current landowner have a proposed design concept at advanced stage and are in a position to advance works once statutory approvals are in place. It is reiterated that the site was zoned under a previous development plan. The submission seeks the site to be included within the new the Cavan County Development Plan 2022-2028 zoned as “proposed residential” and commits to having the mix of residential development fully completed within the lifespan of the plan. It is considered that the development proposal complies with Draft County Development Plan 2022-2028 objectives:

Strategy and Vision, Bailieborough General Development Objectives

The submission highlights the following development objectives: BG 04 and BG 05 of the Draft Cavan County Development Plan 2022-2028.

Bailieborough Sustainable Communities Development Objectives:

The submission highlights the following development objectives: BSC 01, BSC 02 and BSC 03 of the Draft Cavan County Development Plan 2022-2028.

The submission concludes by noting the site was included within the development boundary under a previous development plan and is now a “Brownfield Site”. It is requested that Cavan County Council consider zoning the subject lands proposed residential in the Cavan County Development Plan 2022-2028.



Image 2.
Suggested zoning – Proposed Residential, site outlined in red shaded yellow.

Chief Executive’s Opinion on Issues Raised

This submission seeks addition lands to be zoned as Proposed Residential as per the above map. The site adjoins lands that have commenced construction for the provision of dwelling houses. The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Proposed Residential.

Chief Executive Recommendation

No change recommended.

Padraic and Roy Brennan

This submission relates to lands at Corkish, Bailieborough within the ownership of Padraic and Roy Brennan. The lands measure approximately 4.2ha and are located to the north east of Bailieborough Town Centre. The site is located along the eastern boundary of the local road L-75661. The submission requests that the Planning Authority includes the subject lands within the settlement envelope of Bailieborough and within the 'Proposed Residential' or 'nursing home/healthcare' zoning. The submission also requests that an objective is included that the Planning Authority incorporates locational policies and zoning objectives under the lands use zoning matrix within the CDP to enable provision for nursing homes/healthcare facilities to be accommodated on the subject lands.

It is submitted that the subject lands are appropriate for residential zoning and as a nursing home/healthcare facility as envisaged by the NPF and RSES.

Sequential Development

It is submitted that the site is appropriate in terms of sequential development given:

- The site is directly accessible from the existing road infrastructure.
- The site is serviced.
- The site is available for development.
- The site is sequentially the next parcel of lands available for development along the L75661.
- The site is sequentially appropriate in that it is closer to the town core than many existing residential developments in the area.
- Lands immediately south, west, north and south-east are already developed for residential use. With these lands being further removed from the town centre the development of the subject lands is therefore appropriate as 'infill development'.

Planning History

It is highlighted that the subject lands have been deemed acceptable for residential under the previous 2008-2014 CDP. Permission has also been granted for 62 residential units under application refs. 07/865 and 08/624 on the subject lands.

Concept Design and Delivery

A proposal on the lands in question would set out to achieve:

- A scheme that creates a sense of place.

- A scheme which adopts the principles of sustainable urbanism with a variety of house types.
- A scheme which incorporates a nursing home/healthcare facility alongside the residential development in order to create a balanced cohesive development which serves families, the older demographic and those in need of healthcare.
- A high-quality public realm.
- Appropriate density and scale.

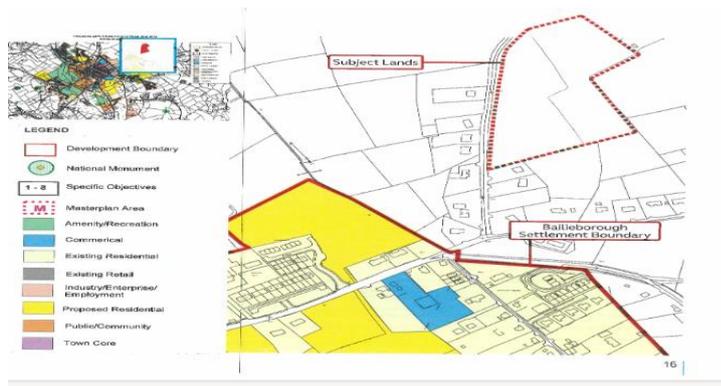
Rationale for nursing home and healthcare facility

It is submitted that Bailieborough and the wider Cavan area consist of a well-established ageing population which are placing an ever increasing and growing demand on the provision of important community infrastructure such as nursing homes and healthcare facilities. In the context of sectoral analysis carried out by the Department of Health and most recently by CBRE (provided in Appendix of submission) it is evident there is an ever-increasing need for nursing homes and healthcare provision to cater for an ageing population. It is submitted that the subject lands represent an ideal opportunity to provide for a planned nursing home/healthcare centre to cater for anticipated demand. A detailed rationale for a nursing home/healthcare facility is outlined within section 4 of the submission. The provision of this facility will be a sustainable local-based centre, and address the leakage of such services being provided in either rural locations or in other counties which residents of Bailieborough have to rely on for healthcare and nursing home provision.

In terms of serviced sites, it is submitted that in order to provide more sustainable housing options than one-off rural housing there is now a recognised planning need for serviced sites to be provided in Bailieborough. The subject site will meet the objectives set out under NPO objectives 18a and 18b of the NPF, meet requirements of section 6.3 of the Sustainable Residential Development Guidelines and also comply with the high-level approach encouraged by the OPR. It is stated that plans are currently being prepared for development of the subject lands.

Recommended Zoning and Objectives

The submission recommends that the lands in question are included within the settlement boundary of Bailieborough and zoned for 'Proposed Residential' for the reasons set out above. Furthermore, it is recommended that an objective is included that the Planning Authority incorporates locational policies and zoning objectives under the lands use zoning matrix within the CDP to enable provision for nursing homes/healthcare facilities to be accommodated on the subject lands.



Chief Executive's Opinion on Issues Raised

The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Proposed Residential.

Chief Executive Recommendation

No change recommended.

Donal Clarke

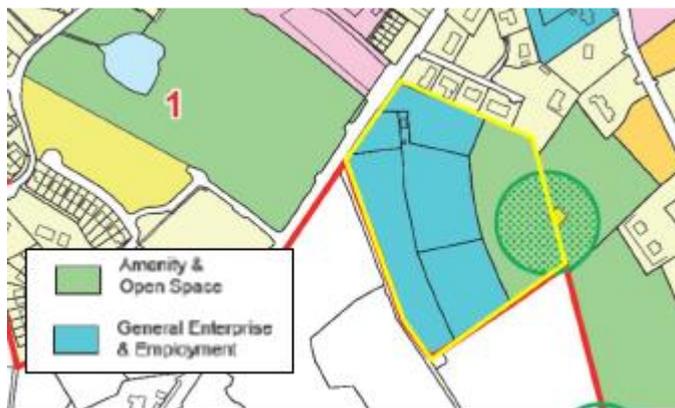
This submission relates to lands on the Virginia Road, Tanderagee, Bailieborough which are under the ownership of Donal Clarke. It is submitted that the 'General Enterprise and Employment' zoning of the subject lands with portion of the land zoned 'Amenity and Open Space' as a buffer is supported.

It is submitted that the subject lands can be utilised accordingly to support the planned growth of the town:

- As to support Bailieborough as a self-sustaining growth town;
- As to provide a level of jobs and services to reverse trends for out-commuting;

- To specifically provide suitable locations for new, growing/expanding and/or relocated businesses from more isolated rural locations; and
- As part of the objectives to provide a better-connected community.

It is stated that the subject lands provide a resource to promote the positive benefits, in the interests of climate change, active transportation and sustainable development to enable the designation of Bailieborough as a self-sustaining growth town within the settlement hierarchy of the Draft Cavan County Development Plan 2022-2028. The importance of the employment ratio for the settlement is a key issue and where Bailieborough is a current net exporter of its population to other locations for work, the objective must be to make the jobs:resident worker ratio 1:1 or potentially improve further to strive as an 'importer' of workers from the rural environs as to present a more sustainable town where car commuting is minimised, remote working opportunities can be explored in the town and a business hub. It is stated that the proposed zoning will give an opportunity to provide suitable locations for new, growing/expanding and/or relocated businesses from more isolated rural locations as to promote more sustainable growth and supporting the rural economy



Chief Executive's Opinion on Issues Raised

The contents of this submission are noted and welcomed. The draft Plan supports the contents of this submission.

Chief Executive Recommendation

No Change Recommended.

Francis Haughey

This submission is made by Gaffney and Cullivan Architects on behalf of Francis Haughey and relates to 2 parcels of land in Bailieborough which are clearly outlined on the attached maps. Both parcels of land are not zoned or included in the Bailieborough boundary. The submission outlines the history of

the lands noting that the lands were purchased in 2006/07 with planning. 32 houses were completed before the financial crash. Extension granted on the permission which has now lapsed. It is requested that these lands be re-considered for the following reasons:

Plot A:

- Previously granted permission with the majority of the scheme completed.
- Critical infrastructure required for the development have been constructed and services are available to complete the remaining houses.
- Proposals to revise previous granted proposals and amend to facilitate 2 detached family homes sitting on their own sites as a direct alternative to one of rural houses in the countryside.
- This proposal will help the image of ghost estates and objective BSC 03 which seeks to utilise infill and brownfield sites.

The submission includes an image showing the access point to Plot A which lies between existing established dwellings describing it as a unmanageable piece of ground; not overlooked nor passively supervised.

The submission requests that these lands are either provided with that appropriate zoning to facilitate the completion of the development or that a spot objective be provided that permits consideration being given for planning permission to complete housing developments which were stalled at the time of the economic crash.

The submission contains the following Bailieborough Sustainable Communities Development Objectives: BSC 01, BSC 02, BSC 03, BSC 04, BSC 05 and BSC 06.

Plot B:

- Previously granted permission with approximately 50% of the scheme completed.
- Critical infrastructure required for the development have been constructed and services are available to complete the remaining houses.
- Proposals to revise previous granted proposals and allow for the development of bungalows for independent living/ assisted living which a density of 20 as opposed to 32 previously.

The submission notes that the demand for downsize houses is clear and an objective of the development plan.

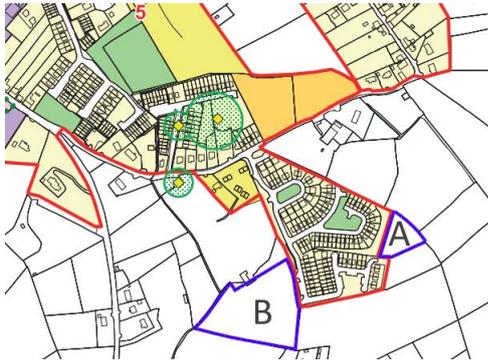
The submission contains images of the section of ground which was previously granted planning permission noting that the grounds have been prepared for development and remains unsightly and unsafe pending consent to complete the area.

The submission concludes by stating that the exclusion of these plots from the development envelop of Bailieborough is a mistake. It is also stated that this could have the effect of discouraging developers in the future, fearful that zoned lands they have purchased with planning permission, can be returned to agriculture value at huge financial loss. It is further stated that such lands have little if any agricultural

use, due to boundaries, topography and grounds which have already taken place. It is stated that without zoning such lands will lie as useless brownfield eyesores.

The submission states that where land had previous planning permission, is serviced and available for development; it should be facilitated by the Plan. Where the opportunity exists to complete partially developed lands, which can benefit and enhance the amenity of the existing, established residents, this should be accommodated in the Plan.

It is further noted that the adjustment of the development boundary and zoning of these lands for residential use can only be seen as an appropriate measure that will benefit the community, the local authority, the environment and the developer.



Chief Executive's Opinion on Issues Raised

The contents of the submission are noted. It is considered that further extension of residential at this site is not in keeping with the principles of sustainable development, compact growth and sequential development.

The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Proposed Residential.

Chief Executive Recommendation

No change recommended.

Patrick Maguire

This submission was prepared by ATC Building Surveying & Engineering Consultancy on behalf of Patrick Maguire and requests that lands at Beckscourt, Bailieborough be considered for zoning of “Proposed Residential” in the new Cavan County Development Plan 2022-2028.

The submission contains Fig. 1, Fig. 2, Fig. 3 and Fig. 4 which clearly conveys the subject lands which are currently not zoned under the proposed Draft Development Plan 2022-2028. Fig 2. Highlights the area that should be considered for zoning of “Proposed Residential” for the following reasons:

- The lands are located to the rear of an existing residential area and lands to the south is zoned “Proposed Residential” under the Draft Plan. The submission includes a aerial image depicting same.
- The subject lands were previously zoned “Strategic Residential Reserve” in the 2008-2014 CDP and not zoned under the 2014-2020 CDP.
- Provision of an improved arrangement of residential development in Bailieborough in terms of buildability and location.
- Access to these lands is not an issue as shown in Figure 3.



Chief Executive’s Opinion on Issues Raised

The contents of the submission are noted. It is considered that this site is not in keeping with the principles of sustainable development, compact growth and sequential development.

The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy.

Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Proposed Residential.

Chief Executive Recommendation

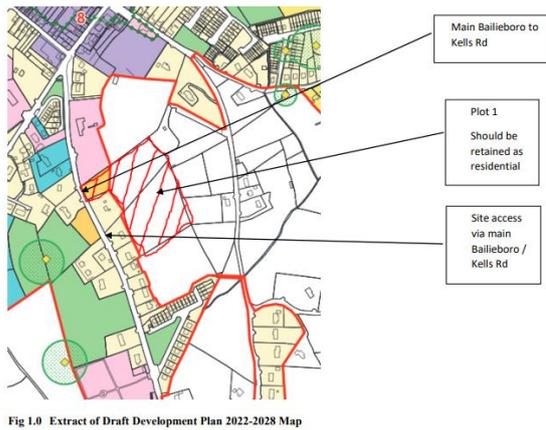
No change recommended.

Danny Drysdale

The submission made by Wynne, Gormley and Gilsenan is made on behalf of Danny Drysdale, the owner of lands located at Tanderagee, Kells Rd., Bailieborough as clearly outlined on accompanying map. The submission requests that these lands should be zoned residential for the following reasons:

1. The subject site is proposed to be dezoned as “whitelands” and should be retained as “residential”.
2. Currently zoned as residential.
3. Previous planning for 35 units with preparation ongoing to apply for a revised housing development.
4. Site is serviced with site services along the public road.
5. Site access is off the old Bailieborough/Kells road and eliminates any impact on traffic movements.
6. Site is walking distance to Bailieborough town and is close to all town amenities.
7. Site although on an elevated site, it is very workable and lends itself for houses granted under 06 678
8. There will be more of a demand for houses going forward

It is noted that under Section 29 development plan guidelines states that development plans should be strategic and a catalyst for positive change and progress and anticipate future needs. Therefore the subject lands should be considered for “Proposed Residential” given its location and walking distance to the centre of the town and also that it is currently zoned for residential in the current development plan.



Chief Executive’s Opinion on Issues Raised

This application seeks to have the lands as outlined above zoned as Proposed Residential. It is noted that such lands contain very difficult levels. The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Proposed Residential.

Chief Executive Recommendation

No change recommended.

Belturbet

Peggy Gray

This submission was prepared by Shane Corby on behalf of Peggy Gray. The submission relates to 2.9ha of land located south of Belturbet Town Centre, adjoining the border of the development envelop. It is requested that these lands be zoned as “Proposed Residential” to facilitate medium density residential development. The submission includes a map and photos of the site. Access options are outlined in the submission. It is noted that services are readily available to facilitate this development.

It is further noted that the site has a favourable topography and overlooks Dawson Lough which would provide a good amenity for residential end users.

The submission outlines local policy contained in the draft plan relating to Belturbet, in addition to Draft Plan zoning maps.

The submission gives an account of the population growth allocation for the county and Belturbet. It notes that this calculation does not consider future residential development in the locality for the following reasons:

1. The majority of the land in Belturbet zoned proposed residential has had this zoning for 3 development plans and has not yet been developed. It is noted that even if one of these sites is not delivered over the lifetime of this development plan then this will result in a lack of available zoned land to accommodate population increase. It is stated that the subject lands are not currently utilised for alternative use and therefore could accommodate a development scheme in the short term.
2. There is a severe shortage of housing in Belturbet, with only one housing scheme (10 units) delivered since 2008. It is also noted that both the rental and second hand housing markets are severely under-supplied.
3. There is a large portion of the forecast population growth to be catered for in the town centre (28% of the total population growth). There are examples of infill residential schemes in the locality which have been subject to a significant number of objections due to undue overlooking and loss of privacy to existing residential.
4. The draft development plan contains a specific local objective to protect and encourage the enhancement of walking trails in the town including Turbet Island Looped Walk and the Old Railway Line Walk. It is noted that any development on the subject lands could incorporate an upgrade of the railway line walk.

The submission contains an extract of the Draft Development Plan of Table 1: Core Strategy Table.



Chief Executive's Opinion on issues raised

The contents of the submission are noted. It is considered that this site is not in keeping with the principles of sustainable development, compact growth and sequential development.

The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Proposed Residential.

Chief Executive Recommendation

No change recommended.

Ballyconnell

Malachy McDwyer

This submission relates to lands at Derryginney, Ballyconnell within the ownership of Malachy McDwyer. The lands measure approximately 0.915ha and are partly located within the settlement limit of Ballyconnell. The site is partly occupied with an existing dwelling and associated outbuildings. The submission requests that the Planning Authority includes the subject lands within the settlement envelope of Ballyconnell and within the 'Proposed Residential' zoning. The submission also requests that an objective is included that supports social housing developments outside defined settlements where a clear demonstrable need can be proven and where the lands are contiguous to the settlement limit and can be adequately serviced.

The submission outlines the planning rationale for the subject lands to be zoned as proposed residential. An overview of national, regional and local policy context is provided. It is submitted that the site has extensive road frontage with the N87 and is within the 50kph zone. It is stated that the lands are included in the settlement boundary in the 2016 CSO SAPMAP and were previously included in the 2008 settlement boundary for Ballyconnell. It is stated that OPW flood maps displays that the site is free from flood risk.

It is submitted that the subject lands are appropriate for residential zoning as envisaged by the NPF:

- as under the tiered approach set out in the NPF these lands are Tier 1 (serviced) and should therefore be prioritised under the development plan process
- Objectives 3a, 3c, 4, 5, 6, 7, 11, 13, 35 and NSO 10 of the NPF are complied with;
- The lands are in close proximity to the town centre and a number of significant employment centres.

It is submitted that the subject lands have been incorrectly identified under the draft CDP being excluded from the settlement boundary and therefore should be revised on a number of grounds:

- The CSO SAPMAP identifies the lands as being within the built up area of the town;
- The lands are within the 50kph speed limit for the town;
- The 50kph speed limit is established to correlate with the built up area of settlements under sections 5-8 of the Road Traffic Act 2004.

It is submitted that the socio-economic profile of the town provides a clear opportunity for the draft CDP to harness this established economic base and provide a strong basis for further residential schemes and job-to-housing ratios to address the ongoing unsustainable commuter patterns where people have to commute to the town and its associated employment base.

It is submitted that the draft Core Strategy and housing supply targets need revised in the draft CDP going forward to take account of the local demand and further local analysis should be undertaken for Ballyconnell which better captures:

- On the ground local market reports from auctioneers and developers of residential schemes;
- Occupancy/vacancy/availability of units in Ballyconnell;
- Future uplifts required so that housing allocations have increased headroom so that existing and future employment growth in Ballyconnell is better facilitated with a housing-to-jobs ratio to encourage multi-national investment.

Sequential Development

It is submitted that the lands are appropriate in terms of sequential development given:

- The lands are directly accessible from the existing road infrastructure;
- The lands are serviced;
- The lands are brownfield; such lands to be prioritised for development purposes given the sustainable re-use of such lands;
- The lands are available for development;
- The lands are sequentially appropriately in that it is close to the town core;

- With the lands already having previous permission for a residential scheme this demonstrates the lands are appropriate, Tier 1 should be prioritised for development purposes.

Planning History

It is highlighted that the subject lands have been granted permission for 12 residential units as part of application ref. 08/169.

Concept Design and delivery

A proposal on the lands in question would set out to achieve

- A scheme that creates a sense of place.
- A scheme which adopts the principles of sustainable development on brownfield lands with a variety of house types.
- A high-quality public realm.
- Appropriate density and scale
- Sustainable location within walking distance of the town core.

Recommended Zoning and Objectives

The submission recommends that the lands in question are zoned for ‘Proposed Residential’ for the reasons set out above. The submission also requests that an objective is included that supports social housing developments outside defined settlements where a clear demonstrable need can be proven and where the lands are contiguous to the settlement limit and can be adequately serviced.



Chief Executive’s Opinion on Issues Raised

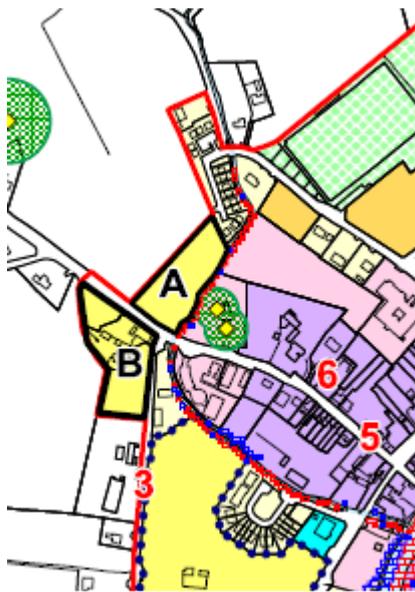
The contents of the submission is noted. The submission seeks to have the lands as outlined above zoned as Proposed Residential. Having regard to Chief Executive Erratum no. 5 and compliance with the Core Strategy and the Housing Needs Demand Assessment there is a requirement to zone additional lands for Proposed Residential in Ballyconnell. It is considered that the subject lands are

appropriate for residential development as they are located in close proximity to the Town Core and all adjoining amenities, services and facilities.

Chief Executive Recommendation

Recommendation No. 204

Extend the Ballyconnell development boundary to include lands as outlined as 'B' as proposed residential in the Ballyconnell Map in Appendix 3.



Mullagh

Patrick Carolan

Summary

This submission was made by Hanley Taite Design Partnership Architects and Design Consultants on behalf of Patrick Carolan and requests subject lands at Moynalty Rd., Mullagh be zoned as Low Density Residential. The submission is divided under the following headings:

Introduction

It is noted the site is located at Rosehill, Mullagh and is 4.26 ha and currently unzoned. The submission seeks to have the land included within the Mullagh development boundary of the 2022-2028 Cavan County Development Plan.

Proposed Site Information

This section of the submission outlines the following:

- development address
- access road (Mullagh/Moynalty Rd)
- Current use (agriculture)
- Located 500m from town core with a public footpath
- Close proximity to sports complex
- Town sewerage treatment plant adjacent to the site
- 50km per hour speed limit
- Road alignment provides unobstructed lines of vision
- Dwelling types and land use types adjoining the lands

Planning History

This section gives an overview of planning history of the site:

- Ref. no. 07/1233 – permission granted to construct 44 dwellings, 1 mixed use block and all ancillary works.

Zoning Proposal & Justification

It is stated that giving the location of the site on the outskirts of Mullagh Village, its proximity to local amenities, services and infrastructure it is proposed that Cavan County Council should consider extending the town boundary to include this site. The submission contains image 1 which depicts the proposed zoning map as per Draft Cavan Development Plan 2022-2028 and image 2 which depicts the proposed zoning map as per Draft Cavan Development Plan 2022-2028 with the suggested zoning of Low Density Residential outlined.

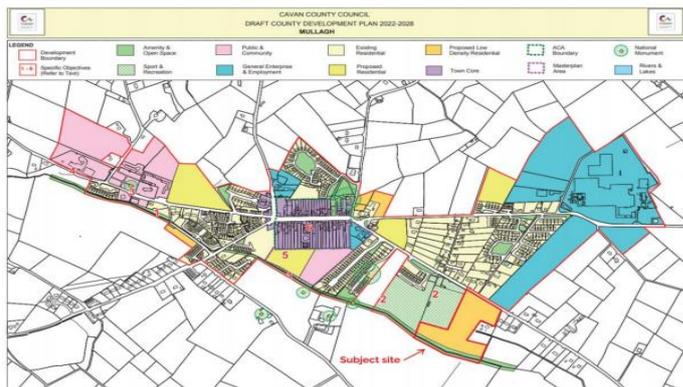
The submission states that the locally resident landowner is aware that there is a shortage of suitable family home in Mullagh Village, this is why low density residential zoning is proposed with an emphasis on single storey dwellings, allowing for a mix of house types with larger gardens and great separation between properties, which permit the development to blend in harmony with the existing one-off residences in the vicinity. It is noted that the owner is confident of delivering a development of this nature within the lifetime of this plan.

The submission states Section 2.10.3 Strategy and Vision, Mullagh General Development Objectives, as per MG03 of the Draft Cavan County Development Plan 2022-2028 and Section 2.10.7 Sustainable Communities, Mullagh Sustainable Community Development Objectives MC01 and MC02.

It is also stated that if the development were to occur on this site it would connect to all existing local services with appropriate separation distances maintained between the development, the sewerage treatment unit, the river and the existing residences.

Summary

The submission concludes by noting the site was included within the development boundary of Mullagh under a previous development plan. The demand for housing in Mullagh has increased in recent years and currently there are few houses for sale or rent. The latter combined with planning restriction for one off houses has resulted in increased pressure, on housing in general, in the area. The submission states that it is for these reasons in addition to the rationale set out that it is requested that Cavan County Council consider zoning the subject lands low density residential in the Cavan County Development Plan 2022-2028.



Chief Executive's Opinion on Issues Raised

This application seeks to have the lands as outlined above zoned as Proposed Low Density Residential. The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

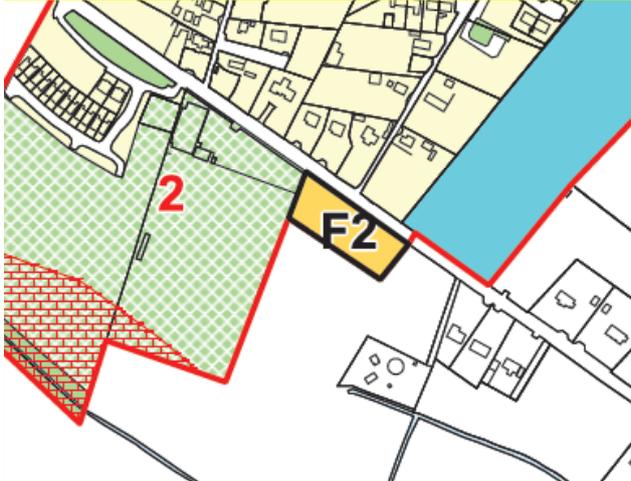
It has been noted arising from the overlaying of flooding maps that a proposed low density residential site in the west of the town of Mullagh has been removed and therefore having regard to same a portion of this site can be included as Proposed Low Density Residential as per Appendix 3.

Having regard to the requirement to comply with the Core Strategy, the remainder of the lands pertaining to this submission shall remain outside the development envelope of Mullagh and cannot be considered for inclusion.

Chief Executive Recommendation

Recommendation No. 205

Include a portion of the lands as Proposed Low Density Residential as per Mullagh Land Use Map in Appendix 3.



Liam Ormiston

Summary

This submission was made by Hanley Taite Design Partnership Architects and Design Consultants on behalf of Liam Ormiston and requests subject lands at Mullagh be zoned as Proposed Residential. The submission is divided under the following headings:

Introduction

It is noted the site is located at Mullagh, adjacent to the existing development “Fair Green Park”, is 4.3ha in size and is currently not proposed to be zoned in the draft plan. The submission seeks to have the land included within the Mullagh development boundary of the 2022-2028 Cavan County Development Plan and zoned as “proposed residential”.

Proposed Site Information

This section of the submission outlines the following:

- development address
- Access roads include (Lislin/Moynalty Rd)
- Current use (agriculture)
- Located 150m from town core with a public footpath

- Close proximity to all existing services and amenities in the village and is within the town speed limits.
- Land use types adjoining the lands include: one off dwellings and agricultural lands to the north, east and west and to the south an existing residential development and Mullagh Village.
- All required service infrastructure is in situ.

Planning History

This section gives an overview of planning history of the site:

- Ref. no. 07/400– permission granted to construct 92 units, 1 creche and all associated site works – not acted upon.

Zoning Proposal & Justification

The submission states that given the location of the subject site adjacent to Mullagh Village, its proximity to local amenities, services and infrastructure, it is proposed that Cavan County Council consider extending the town boundary to include the site within the development boundary in the new 2022-2028 County Development Plan.

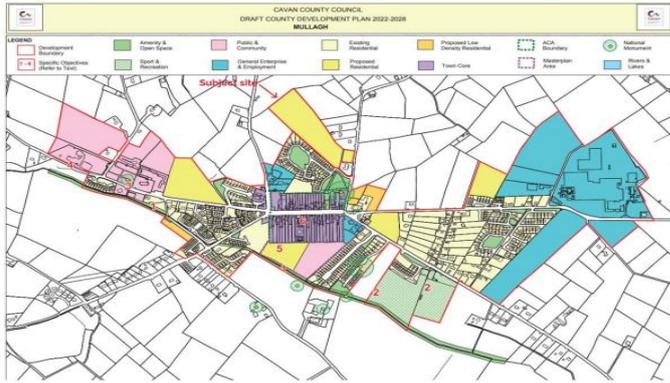
The submission contains image 1 which depicts the proposed zoning map as per Draft Cavan Development Plan 2022-2028 and image 2 which depicts the proposed zoning map as per Draft Cavan Development Plan 2022-2028 with the suggested zoning of Proposed Residential outlined.

The submission notes that the landowner previously obtained planning permission on these lands, the permission was not acted upon due to the collapse of the construction sector. Considerable funds have been invested in the site and site services have been provided for at the entrance to the site. It is advised that if the site is zoned it is foreseen to be developed within the lifespan of the new 2022-2028 County Development Plan. It is noted that a mix of residential units will be proposed. The proximity of the site to the town centre is considered to be advantageous for such a development.

The submission states Section 2.10.3 Strategy and Vision, Mullagh General Development Objectives, as per MG03 of the Draft Cavan County Development Plan 2022-2028 and Section 2.10.7 Sustainable Communities, Mullagh Sustainable Community Development Objectives MC01 and MC02.

Summary

The submission concluded by noting the site was included within the development boundary of Mullagh under a previous development plan. It is stated that the economic recovery has seen a demand for housing increase in Mullagh and it is requesting that Cavan County Council consider zoning the subject lands as “Proposed Residential” in the new 2022-2028 County Development Plan.



Chief Executive’s Opinion on Issues Raised

The contents of the submission are noted. It is considered that this site is not in keeping with the principles of sustainable development, compact growth and sequential development.

This application seeks to have the lands as outlined above zoned as Proposed Residential. The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Proposed Residential.

Chief Executive Recommendation

No change recommended.

Paul Taite

This submission was made by Hanley Taite Design Partnership Architects and Design Consultants on behalf of Paul Taite and requests subject lands at Moynalty Rd., Rosehill, Mullagh be zoned as Low Density Residential. The submission is divided under the following headings:

It is noted the site is located at Moynalty Rd., Rosehill, Mullagh and is 3.15ha in area and currently unzoned. The submission seeks to have the land included within the Mullagh development boundary of the 2022-2028 Cavan County Development Plan.

Proposed Site Information

This section of the submission outlines the following:

- Development address
- Access road (Mullagh/Moynalty Rd)
- Current use (agriculture)
- Located c.750m from town core with a public footpath covering 500m
- Close proximity to sports complex
- Town sewerage treatment plant adjacent to the site
- 60km per hour speed limit is close to site boundary
- Road alignment provides unobstructed lines of vision
- Dwelling types and land use types adjoining the lands
- River traversing the site

Planning History

This section gives an overview of planning history of the site:

- PL 05/1077 – 4 no. dwelling houses – refused
- PL 06/283 – 1 no. dwelling house – refused
- Ref. No. 18/49 – 55 bedroom nursing home, community centre, boiler/utility shed and all ancillary site works – not yet acted upon

Zoning Proposal & Justification

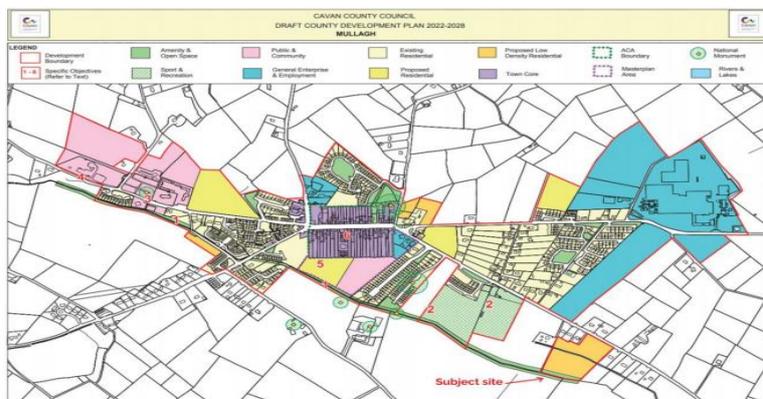
It is stated that giving the location of the site on the outskirts of Mullagh Village, its proximity to local amenities, services and infrastructure it is proposed that Cavan County Council should consider extending the town boundary to include this site and zone it as “low density residential” with an emphasis on single storey bungalow type dwellings. The submission contains image 1 which depicts the proposed zoning map as per Draft Cavan Development Plan 2022-2028 and image 2 which depicts the proposed zoning map as per Draft Cavan Development Plan 2022-2028 with the suggested zoning of Low Density Residential outlined.

The submission states that the locally resident landowner is aware that there is a shortage of suitable family homes in Mullagh Village, this is why low density residential zoning is proposed with an emphasis on single storey dwellings, allowing for a mix of house types with larger gardens and great separation between properties which permit the development to blend in harmony with the existing one-off residences in the vicinity. It is noted that the owner is confident of delivering a development of this nature within the lifetime of this plan.

The submission states Section 2.10.3 Strategy and Vision, Mullagh General Development Objectives, as per MG03 of the Draft Cavan County Development Plan 2022-2028 and Section 2.10.7 Sustainable Communities, Mullagh Sustainable Community Development Objectives MC01 and MC02.

It is also stated that the if development were to occur on this site it would connect to all existing local services with appropriate separation distances maintained between the development, the sewerage treatment unit, the river and the existing residences.

The submission concludes by noting the site was included within the development boundary of Mullagh under a previous development plan. The demand for housing in Mullagh has increased in recent years and currently there are few houses for sale or rent. The latter combined with planning restrictions for one off houses has resulted in increased pressure, on housing in general, in the area. The submission states that it is for these reasons in addition to the rationale set out that it is requested that Cavan County Council consider zoning the subject lands low density residential in the Cavan County Development Plan 2022-2028.



Chief Executive's Opinion on Issues Raised

The contents of the submission are noted. It is considered that this site is not in keeping with the principles of sustainable development, compact growth and sequential development. This application seeks to have the lands as outlined above zoned as Proposed Low Density Residential. The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Proposed Low Density Residential.

Chief Executive Recommendation

No change recommended.

Maureen O'Connell

This submission was made by Hanley Taite Design Partnership Architects and Design Consultants on behalf of Maureen O'Connell and requests subject lands at Virginia Rd., Mullagh which are currently zoned as "Public and Community" be zoned as Proposed Residential. The submission is divided under the following headings:

It is noted the site is located at the Virginia Rd., Mullagh and is 1.22ha and currently zoned as "Public and Community". The submission seeks to have the land zoned as "Proposed Residential" and included within the Mullagh development boundary of the 2022-2028 Cavan County Development Plan.

Proposed Site Information

This section of the submission outlines the following:

- Development address
- Access road (Virginia Rd)
- Current use (agriculture)
- Located c.150m from town core with a public footpath
- Close proximity to all existing services and amenities in the village and within the town speed limit
- Road alignment provides unobstructed lines of vision
- Land use types adjoining the lands include residential to the east, public and community to the south, agricultural lands to the east and north and one-off residences.
- River traversing the site

Planning History

This section gives an overview of planning history of the site, noting that part of the subject site is zoned residential with a live permission:

- Ref. No. 18/247 – 50 no. dwelling houses– not yet acted upon

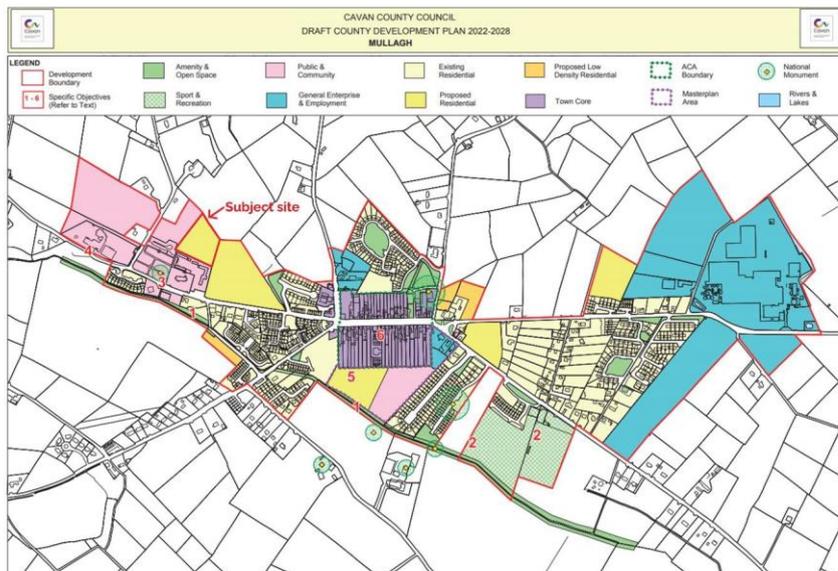
Zoning Proposal & Justification

It is stated that the subject site has been zoned "public and community" for a number of years to provide space for the national school to extend. Taking into account this school is now closed and the building is used by community groups there is no longer a specific need for this type of zoning at this location. It is also noted that it is intended to develop the overall field in which the site is located. It is stated that the field will be fully serviced when developed and allowances have been made in the design of the

adjoining development for access and provision of services. It is proposed that Cavan County Council should consider altering the proposed zoning from “public and Community” to “proposed residential” in the new 2022-2028 County Development Plan. The submission contains image 1 which depicts the proposed zoning map as per Draft Cavan Development Plan 2022-2028. Image 2 which depicts the proposed zoning map as per Draft Cavan Development Plan 2022-2028 with the suggested zoning of Proposed Residential outlined and Image 3 depicts the suggested site layout of the subject site as indicated under planning application ref. no. 18/247.

The submission states Section 2.10.3 Strategy and Vision, Mullagh General Development Objectives, as per MG03 of the Draft Cavan County Development Plan 2022-2028 and Section 2.10.7 Sustainable Communities, Mullagh Sustainable Community Development Objectives MC01 and MC02.

The submission requests that Cavan County Council consider zoning the subject lands “proposed residential” in the Cavan County Development Plan 2022-2028 instead of “public and community” as proposed in the draft plan.



Chief Executive’s Opinion on Issues Raised

The contents of the submission are noted. It is considered that this site is not in keeping with the principles of sustainable development, compact growth and sequential development.

This application seeks to have the lands as outlined above zoned as Proposed Residential. The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of

lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Proposed Residential.

Chief Executive Recommendation

No change recommended.

Patrick Carolan

This submission was made by Hanley Taite Design Partnership Architects and Design Consultants on behalf of Patrick Carolan and requests subject lands at Rosehill, Mullagh be zoned as Low Density Residential. The submission is divided under the following headings:

It is noted the site is located at Rosehill, Mullagh and is 1.5ha in size and is currently proposed to be zoned as “Proposed Residential” in the draft plan. The submission seeks to have the land included within the Mullagh development boundary of the 2022-2028 Cavan County Development Plan and have the zoning altered to “proposed low density residential development”.

Proposed Site Information

This section of the submission outlines the following:

- development address
- Access roads include (Mullagh/Moynalty Rd)
- Current use (agriculture)
- Located 50m from town core with a public footpath
- Close proximity to all existing services and amenities in the village and is within the town speed limits.
- Road alignment provides unobstructed lines of vision
- Land use types adjoining the lands include: one off dwelling to the east, agricultural lands to the north, Mullagh Village to the west and existing residential developments to the south.

Planning History

This section gives an overview of planning history of the site:

- Ref. no. 04/1053 – permission granted to construct 1 dwelling house – not acted upon.

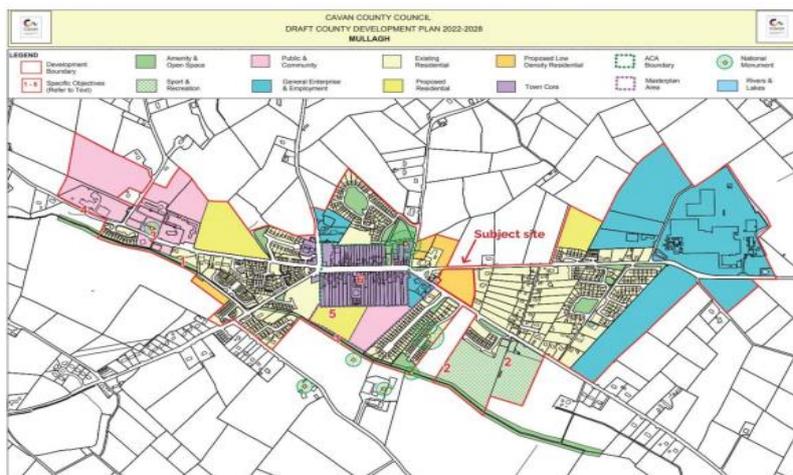
Zoning Proposal & Justification

The submission notes the strong view point that the site occupies at the eastern extremity of the village and expresses the opinion that a lower density development would be better suited than a high density development, thus allowing the creation of a high quality development at this key location. The submission requests that Cavan County Council consider altering the proposed zoning from “Proposed Residential” to “Proposed Low Density Residential Development” in the new 2022-2028 County Development Plan.

The submission contains image 1 which depicts the proposed zoning map as per Draft Cavan Development Plan 2022-2028 and image 2 which depicts the proposed zoning map as per Draft Cavan Development Plan 2022-2028 with the suggested zoning of Low Density Residential outlined.

The submission states Section 2.10.3 Strategy and Vision, Mullagh General Development Objectives, as per MG03 of the Draft Cavan County Development Plan 2022-2028 and Section 2.10.7 Sustainable Communities, Mullagh Sustainable Community Development Objectives MC01 and MC02.

The submission concluded by requesting that Cavan County Council consider altering the proposed zoning from “Proposed Residential” to “Proposed Low Density Residential Development” in the new 2022-2028 County Development Plan.



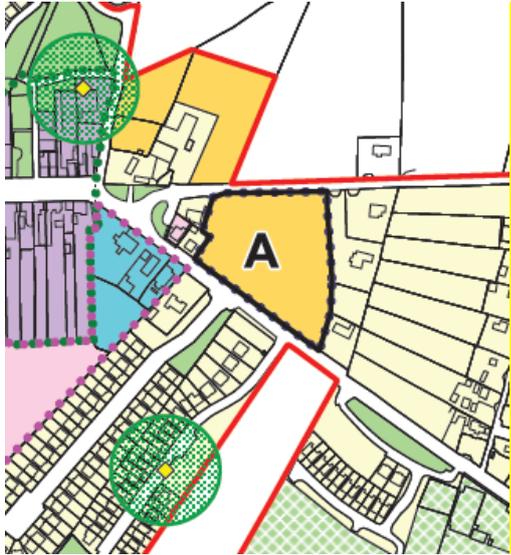
Chief Executive’s Opinion on Issues Raised

The submission seeks to have the above outlined subject lands currently proposed to be zoned Proposed Residential Development to Proposed Low Density Residential Development. The purpose of affording this zoning of Proposed Low Density Residential in a settlement is to ensure the sustainable growth of the area with a desirable mix of house type and size. It is also used as an alternative for rural one off dwellings to provide self build plots, in an urban setting, close to town core amenities and facilities. It is appropriate that this mechanism is used to facilitate this type of development in Mullagh. It is noted that lands adjoining the subject site have catered for higher density residential development and as much the proposed zoning of Low Density Residential Development is appropriate. The zoning designation permits in the region of 8 units per hectare.

Chief Executive Recommendation

Recommendation No. 206

Amend the subject lands from Proposed Residential to Proposed Low Density Residential Development as marked A on Mullagh Map in Appendix 3.



Kilnaleck

Crosserlough Construction

This submission was made by Michael Fitzpatrick on behalf of Crosserlough Construction. The submission relates to subject lands at Church Road, Kilnaleck and requests these lands to be zoned as “White Lands” under the forthcoming Cavan County Development Plan 2022-2028.

The submission is divided under the following headings:

Introduction and Background

The submission notes Crosserlough Construction is the owner of the subject lands at Church Rd., Kilnaleck and is seeking to deliver a residential scheme on the subject lands. It is noted the appropriateness of the lands for zoning as residential have been assessed in the context of the National Planning Framework, the RSES and the Cavan County Development Plan which demonstrates the lands suitability for residential development. The submission notes that given that the lands being in close proximity to existing infrastructure, it is submitted that such lands will provide an ideal location for residential development.

It is submitted that the zoning of the subject lands as “White Lands” would align in terms of land use with the wider planning objectives to develop serviced sites. And would also align with the masterplan

design intent to have carefully designed detached dwellings on larger sites to form an appropriate low density development. It is noted that that latter would also be appropriate in terms of land use with the wider planning objectives to develop serviced lands.

Proposed Land Zoning V Recommended Zoning of Subject Lands – Cavan County Development Plan 2022-2028

Figure A conveys the proposed land zoning as per draft Cavan County Development Plan 2022-2028 and outlines the subject lands and an alternative area of zoned lands unsuitable for development.

Proposed zoning (as per draft Cavan CDP 2022-2028)

The subject lands are currently designated as per the current Cavan CDP 2014-2020 as “un-zoned” and outside of the development boundary.

Under the CDP objectives for lands reserved as “Whitelands” are to: Throughout the county, significant opportunity exists to develop the economic base of many small towns thus allowing the settlements to become more self-sustaining. In order to increase the economic profile of small towns and villages.....

It is noted that the subject lands are proposed to be located within the settlement limit of Kilnaleck village.

It is noted that the subject lands should be zoned as “Whitelands”. It is requested to amend the proposed zoning as recommended on Figure B.

Recommended Zoning

The following is requested:

- That the subject lands be zoned as “Whitelands”, under the forthcoming Cavan County Development Plan 2022-2028.
- Include the subject lands within the white lands zoning of Kilnaleck Village in the 2022-2028 Cavan County Development Plan
- Designate the subject lands as suitable for zoning.

Proposed Land Zoning as per Draft Cavan County Development Plan 2022-2028

It is highlighted that the surrounding land uses in the immediate vicinity are compatible with the proposed residential scheme:

- The subject lands are adjacent to an established residential area.
- The development of a residential scheme is consistent with the residential profile of the locality and the wider environs of north-west Kilnaleck Village.
- The lands will provide a sustainable location for a residential scheme proximity to the town centre amenities and local transport hubs achieving a balance in terms of residential units close to local services and centres of employment.

- The lands are appropriate for residential development given the lands south west of the site have been already developed for residential use which makes this a viable residential site located within the current settlement boundary.
- The lands will provide a sustainable location for a residential scheme.
- Establish infrastructure is in place, to the south east of the site there are both footpaths and street lighting located nearby on the public road.

It is submitted that zoning the subject land as “Whitelands” would provide sustainable development directly adjacent the existing public road, street lighting and footpath infrastructure, and would be consistent and appropriate in land use terms with the wider planning objectives to develop such serviced lands.

Proposed Land Zoning as per draft Cavan County Development Plan 2022-2028

This section of the submission contains an overall long term draft site layout proposal.

Summary and Conclusion

- The submission requests that the subject land as identified at Church Rd., Kilnaleck be included within the “Whitelands” zoning of Kilnaleck in the 2022-2028 Cavan County Development Plan.
- It is noted that in terms of the approach set out in the NPF for land zonings that the subject lands are appropriate for residential/whitelands zoning for the following reasons:
 - Objectives 3a, 3c, 4, 5, 6, 7, 11, 13, 18a and 35 and section 4.5 of the NPF are compiled with.
 - Of relevance is appendix 3 of the NPF which sets out a tiered approach to zoning of lands: (I) serviced lands should be identified (II) Serviceable lands should be identified
 - Given the serviced nature of the lands they are to be regarded as “Tier 1” and prioritised under the NPF approach to land zonings.
- At a regional policy context level, the subject lands are appropriate for residential zoning for the following reasons:
 - The proposed zoning is consistent with the objectives of the RSES 2020-2032
 - Will improve the supply of residential units for Kilnaleck in a sustainable manner, being located in a sequentially appropriate location suited for residential development.

It is submitted that the zoning of the subject lands as “Whitelands” aligns in terms of land use with the wider planning objectives to develop such serviced lands and would also align the masterplan design approach for carefully designed detached dwellings on larger sites to form an appropriate density and also appropriate planning in terms of land use with the wider planning objectives to develop such serviced sites.



Chief Executive's Opinion on Issues Raised

The submission seeks to have the lands identified on the above map to be zoned as Whitelands.

This application seeks to have the lands as outlined above zoned as Whitelands. It is noted that such lands contain very difficult levels. The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Whitelands.

Chief Executive Recommendation

No change recommended.

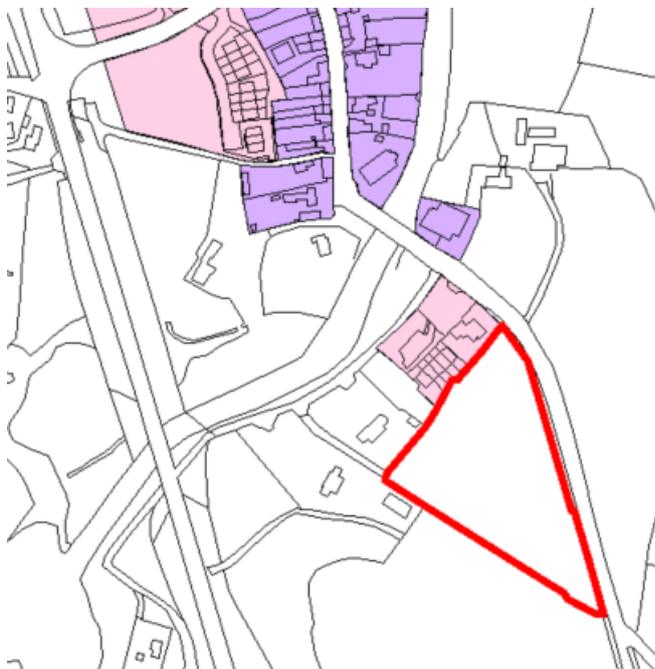
Butlersbridge

Sharon Mundy

This submission requests to re zone land in Butlersbridge from agricultural to development land. The submission notes the subject land had previously received planning permission for development (07/557), however due to the economic downturn the development was postponed. An extension of planning was subsequently refused due to a change of land use zoning to Amenity and Recreation.

It is noted that the owner struggled to understand why this change of zoning occurred and requests a review to have it changed back to its earlier zoning as development land.

It is noted that land is within the village of Butlersbridge and within the speed limit of the village. Reference is made to the shortage of housing across the County, in particular in Butlersbridge and it is stated it is prudent to consider this request as this land is in a prime location within short walking distance of local amenities. Attached to the submission is a site plan map.



Chief Executive's Opinion in Issues Raised

This application seeks to have the lands as outlined above zoned as Whitelands. The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and

location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Whitelands.

Chief Executive Recommendation

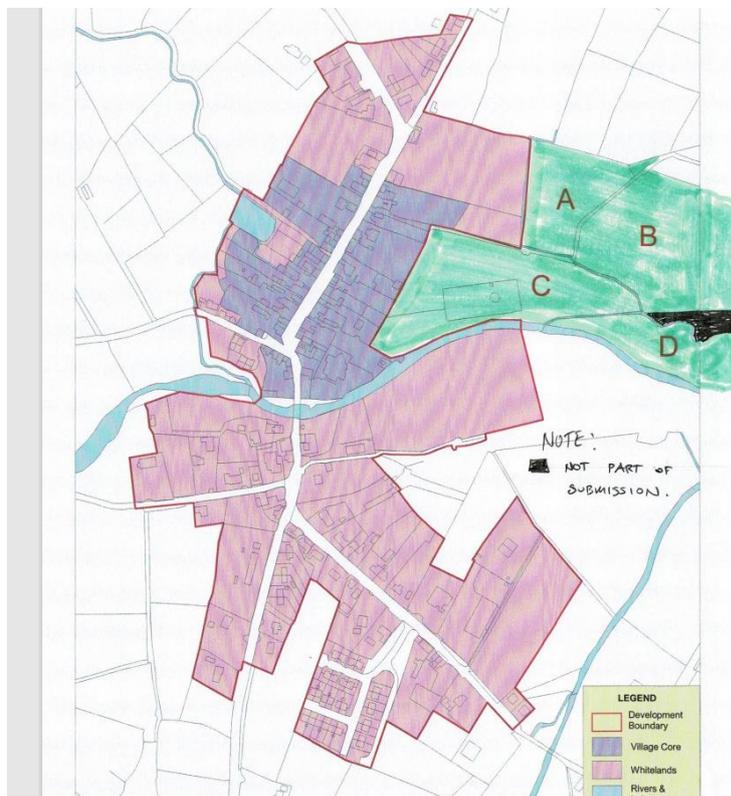
No change recommended.

Swanlinbar

Alteen

This submission requests that land parcels as identified as ABCD on accompanied maps be zoned as “Whitelands”. The submission notes that such lands are not zoned in the Draft Swanlinbar Land Use Zoning Map and makes reference to section 28 development plan guidelines which state:

- Development plans should be strategic
- Development plans should be a catalyst for positive change and progress
- Development plans should anticipate future needs on an objective basis
- Socio-Economic Development is to be promoted.



Chief Executive's Opinion on issues raised

The submission seeks to have the lands identified on the above map to be zoned as Whitelands. The Strategic Flood Risk Assessment indicates the most of AC and D lands are within Flood Zone A/B

This application seeks to have the lands as outlined above zoned as Whitelands. The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Whitelands.

Chief Executive Recommendation

No change recommended.

Crosskeys

Caroline Mc Mahon

This submission was made by Michael Fitzpatrick on behalf of Caroline Mc Mahon. The submission relates to subject lands in Crosskeys and requests these lands to be zoned as "White Lands" under the forthcoming Cavan County Development Plan 2022-2028.

The submission is divided under the following headings:

Introduction and Background

The submission notes Caroline McMahan is the owner of the subject lands and is seeking to deliver a residential scheme on the subject lands. It is noted the appropriateness of the lands for zoning as residential have been assessed in the context of the National Planning Framework, the RSES and the Cavan County Development Plan which demonstrates the lands suitability for residential development. The submission notes that given the existing residential context and the lands being in close proximity to existing infrastructure, it is submitted that such lands will provide an ideal location for residential development.

It is submitted that the zoning of the subject lands as “White Lands” would align in terms of land use with the wider planning objectives to develop serviced sites. And would also align with the masterplan design intent to have carefully designed detached dwellings on larger sites to form an appropriate low density development. It is noted that the latter would also be appropriate in terms of land use with the wider planning objectives to develop serviced lands.

Proposed Land Zoning V Recommended Zoning of Subject Lands – Cavan County Development Plan 2022-2028

Figure A conveys the proposed land zoning as per draft Cavan County Development Plan 2022-2028 and outlines the subject lands and an alternative area of zoned lands unsuitably for development.

Proposed zoning (as per draft Cavan CDP 2022-2028)

The subject lands are currently designated as per the current Cavan CDP 2014-2020 outside of the development boundary. Under the CDP objectives for lands reserved as “Whitelands” are to: Throughout the county, significant opportunity exists to develop the economic base of many small towns thus allowing the settlements to become more self-sustaining. In order to increase the economic profile of small towns and villages, sufficient lands have been zoned within the whitelands boundary to accommodate an appropriate range of uses.

It is noted that the subject lands are proposed to be located on the settlement limit of Crosskeys village.

It is noted that the subject lands should be zoned as “Whitelands”.

It is noted the restrictions with the portion of zoned lands as indicated on Figure A, is that the lands are located in an area subject to flooding. It is also noted there was a flood risk assessment report compiled for a previously withdrawn application on such lands.

It is requested to amend the proposed zoning as recommended on Figure B, noting this land is more elevated and not as low lying and therefore not susceptible to flooding.

Recommended Zoning

The following is requested:

- That the subject lands be zoned as “Whitelands”, under the forthcoming Cavan County Development Plan 2022-2028.
- Include the subject lands within the “Whitelands” zoning of Crosskeys Village in the 2022-2028 Cavan County Development Plan
- Designate the subject lands as suitable for zoning.

Proposed Land Zoning as per Draft Cavan County Development Plan 2022-2028

It is highlighted that the surrounding land uses in the immediate vicinity are compatible with the proposed residential scheme:

- the subject lands are adjacent to the established residential area
- the development of a low density residential scheme is consistent with the residential profile of the locality and the village
- the lands will provide a sustainable location for a residential scheme proximity to the town centre amenities and local transport hubs achieving a balance in terms of low density residential units close to local services and centres of employment.
- The lands are appropriate for residential development given the lands to the north of the site have been already developed for residential use which makes this a viable residential site located within the current settlement boundary.
- The lands will provide a sustainable location for a residential scheme.
- Establish infrastructure is in place, to the east of the site there are both footpaths and street lighting located nearby on the public road.

It is submitted that zoning the subject land as “Whitelands” would provide sustainable development directly adjacent the existing public road, street lighting and footpath infrastructure, and would be consistent and appropriate in land use terms with the wider planning objectives to develop such serviced lands.

Proposed Land Zoning as per draft Cavan County Development Plan 2022-2028

This section outlines the overall long-term draft site layout proposal.

Summary and Conclusion

- land as identified in Crosskeys be included within the “Whitelands” zoning of Crosskeys in the 2022-2028 Cavan County Development Plan.
- It is noted that in terms of the approach set out in the NPF for land zonings that the subject lands are appropriate for residential/whitelands zoning for the following reasons:
 - Objectives 3a, 3c, 4, 5, 6, 7, 11, 13, 18a and 35 and section 4.5 of the NPF are complied with.
 - Of relevance is appendix 3 of the NPF which sets out a tiered approach to zoning of lands: (I) serviced lands should be identified (II) Serviceable lands should be identified
 - Given the serviced nature of the lands they are to be regarded as “Tier 1” and prioritised under the NPF approach to land zonings.
 - At a regional policy context level, the subject lands are appropriate for residential zoning for the following reasons:
 - The proposed zoning is consistent with the objectives of the RSES 2020-2032
 - Will improve the supply of residential units for Crosskeys in a sustainable manner, being located in a sequentially appropriate location suited for residential development.

It is submitted that the zoning of the subject lands as “Whitelands” aligns in terms of land use with the wider planning objectives to develop such serviced lands and would also align the masterplan design approach for detached dwellings on larger sites to form an appropriate density and also appropriate planning in terms of land use with the wider planning objectives to develop such serviced sites.



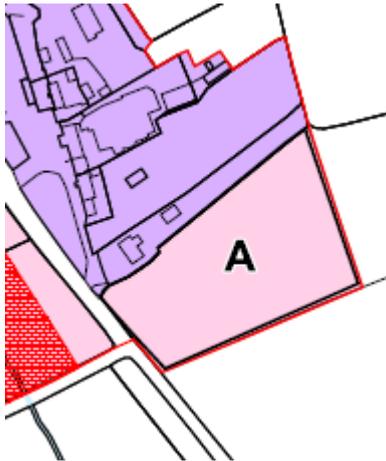
Chief Executive’s Opinion on Issues Raised

The submission requests lands as outlined in the above map to be included within the development boundary of Crosskeys and zoned as Whitelands. The subject lands adjoin the Village Core and a small development on same would benefit from immediate proximity to village amenities, services and facilities. It is considered appropriate to include the subject lands within the development plan boundary and zoned Whitelands.

Chief Executive Recommendation

Recommendation No. 207

Include a portion of the subject lands within the development plan boundary of Crosskeys and zone as Whitelands as marked A in Crosskeys Map in Appendix 4



Michael Sheils

This submission was made by Michael Fitzpatrick on behalf of Michael Sheils. The submission relates to subject lands in Crosskeys and requests these lands to be zoned as “White Lands” under the forthcoming Cavan County Development Plan 2022-2028.

Introduction and Background

The submission notes Michael Sheils is the owner of the subject lands and is seeking to deliver a residential scheme on the subject lands. It is noted the appropriateness of the lands for zoning as residential have been assessed in the context of the National Planning Framework, the RSES and the Cavan County Development Plan which demonstrates the lands suitability for residential development. The submission notes that given the existing residential context and the lands being in close proximity to existing infrastructure, it is submitted that such lands will provide an ideal location for residential development.

It is submitted that the zoning of the subject lands as “White Lands” would align in terms of land use with the wider planning objectives to develop serviced sites. And would also align with the masterplan design intent to have carefully designed detached dwellings on larger sites to form an appropriate low density development. It is noted that that latter would also be appropriate in terms of land use with the wider planning objectives to develop serviced lands.

Proposed Land Zoning V Recommended Zoning of Subject Lands – Cavan County Development Plan 2022-2028

Figure A conveys the proposed land zoning as per draft Cavan County Development Plan 2022-2028 and outlines the subject lands and an alternative area of zoned lands unsuitably for development.

Proposed zoning (as per draft Cavan CDP 2022-2028)

Observations as per the current Cavan CDP 2014-2020:

The subject lands are currently designated as per the current Cavan CDP 2014-2020 outside of the development boundary. It is noted that the subject lands are proposed to be located on the settlement limit of Crosskeys village.

- It is noted that the subject lands should be zoned as “Whitelands”.
- It is noted the restrictions with the portion of zoned lands as indicated on Figure A, is that the lands are located in an area subject to flooding. It is also noted there was a flood risk assessment report compiled for a previously withdrawn application on such lands.
- It is requested to amend the proposed zoning as recommended on Figure B, noting this land is more elevated and not as low lying and therefore not susceptible to flooding.

Recommended Zoning

The following is requested:

- that the subject lands be zoned as “Whitelands”, under the forthcoming Cavan County Development Plan 2022-2028.
- Include the subject lands within the while lands zoning of Crosskeys Village in the 2022-2028 Cavan County Development Plan
- Designate the subject lands as suitable for zoning.

Proposed Land Zoning as per Draft Cavan County Development Plan 2022-2028

Zoning Context

- It is highlighted that the surrounding land uses in the immediate vicinity are compatible with the proposed residential scheme:
- The subject lands are adjacent to the established residential area.
- The development of a low density residential scheme is consistent with the residential profile of the locality and the village.
- The lands will provide a sustainable location for a residential scheme proximity to the town centre amenities and local transport hubs achieving a balance in terms of low density residential units close to local services and centres of employment.
- The lands are appropriate for residential development given the lands to the north of the site have been already developed for residential use which makes this a viable residential site located within the current settlement boundary.
- The lands will provide a sustainable location for a residential scheme.
- Establish infrastructure is in place, to the east of the site there are both footpaths and street lighting located nearby on the public road.

It is submitted that zoning the subject land as “Whitelands” would provide sustainable development directly adjacent the existing public road, street lighting and footpath infrastructure, and would be

consistent and appropriate in land use terms with the wider planning objectives to develop such serviced lands.

Proposed Land Zoning as per draft Cavan County Development Plan 2022-2028

Subject Lands in relation to overall long-term draft site layout proposal is included as part of this section of the submission.

Summary and Conclusion

The submission requests that the subject land as identified in Crosskeys be included within the “Whitelands” zoning of Crosskeys in the 2022-2028 Cavan County Development Plan.

- It is noted that in terms of the approach set out in the NPF for land zonings that the subject lands are appropriate for residential/whitelands zoning for the following reasons:
- Objectives 3a, 3c, 4, 5, 6, 7, 11, 13, 18a and 35 and section 4.5 of the NPF are compiled with.
- Of relevance is appendix 3 of the NPF which sets out a tiered approach to zoning of lands: (I) serviced lands should be identified (II) Serviceable lands should be identified
- Given the serviced nature of the lands they are to be regarded as “Tier 1” and prioritised under the NPF approach to land zonings.
- At a regional policy context level, the subject lands are appropriate for residential zoning for the following reasons:
- The proposed zoning is consistent with the objectives of the RSES 2020-2032
- Will improve the supply of residential units for Crosskeys in a sustainable manner, being located in a sequentially appropriate location suited for residential development.

It is submitted that the zoning of the subject lands as “Whitelands” aligns in terms of land use with the wider planning objectives to develop such serviced lands and would also align the masterplan design approach for carefully designed detached dwellings on larger sites to form an appropriate density and also appropriate planning in terms of land use with the wider planning objectives to develop such serviced sites.



Chief Executive's Opinion on Issues Raised

The submission seeks to have the lands identified on the above map to be zoned as Whitelands. The Strategic Flood Risk Assessment indicates there is a significant amount of the sites are within Flood Zone A/B.

This application seeks to have the lands as outlined above zoned as Whitelands. The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Whitelands.

Chief Executive Recommendation

No change recommended.

Dowra

Noel O'Rourke

This submission requested that subject lands located north of Dowra village, as outlined on accompanying map, be zoned for the development of either residential or commercial development. It is stated that is a good opportunity as the land is flat, serviced, has its own access road, can be easily screened and already has a commercial building on it.

The submission describes Dowra as a thriving business community. It is noted Dowra is included as a Tier 6 village with limited retail and other services which is stated as untrue as Dowra offers the same services as some larger villages.

It is also noted there is a limited number of free houses in the village available for residential use.

The submission gives an overview of parcels of lands that have been included in the Draft CDP 2022-2028 Dowra Landuse map and notes each limitation.

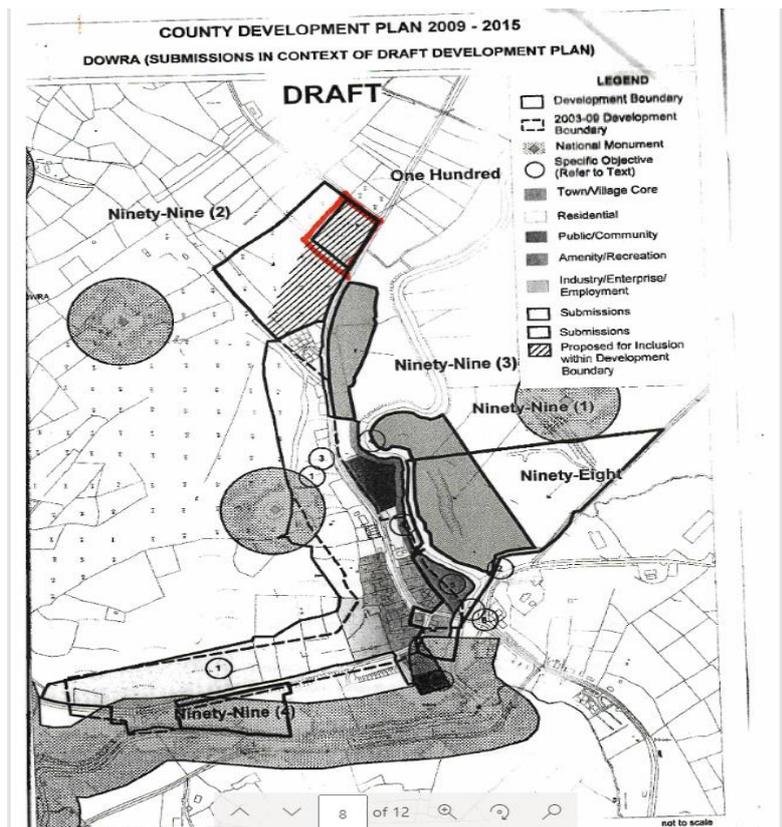
The submission states that Dowra has been overlooked in the last couple of development plans and reference is made to Blacklion and it is stated that Blacklion has been allowed to have linear development away from its core.

The submission reference the expansion of the Cuilcagh Lakelands UNESCO Global Geopark and questions if the Council has allowed for infrastructure/accommodation/services/amenities to facilitate this expansion. It is stated that due to Dowra's proximity to the Geopark and the fact it is the first village on the River Shannon, then it should be considered for development.

It is noted that many people are looking to work from home and move to rural areas, because there are difficulties associated with getting planning in the countryside, should serviced sites near villages not be utilities for the provision of low density homes.

The submission concludes by stating that if something radical is not done then the Dowra village will continue to deteriorate. It is noted again that Dowra is the first village on the River Shannon and should not be allow to fade away.

The submission includes submissions and responses from previous submissions by the local community to previous County Development Plan reviews where recommendations were made for areas to be included for development but were not. The latter includes: Dowra Marts Ltd., Mr. Seamus Mc Govern (Dowra Development Association), Ms. Ella O'Rourke and Mr. Jim Nolan (Killinagh Community Council).



Chief Executive's Opinion on Issues Raised

This application seeks to have the lands as outlined above zoned as Whitelands. The amount of land zoned for residential development as part of the Draft Plan is underpinned by the Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for the Plan period, whilst maintaining consistency with National and Regional Policy. Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. It is considered that there is sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is a core principle and objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. Therefore, it is not considered appropriate to zone the subject lands as Whitelands.

The proposal to re-designate existing, predominantly un-zoned lands to the northern periphery of Dowra village, and already divided from the existing and established Village Core by a band of unzoned land is considered inappropriate and would run counter to the principle of compact growth, and see a disjointed Village Core and increased sprawl into the countryside. This site does not provide for the sequential development when considering the existing and more alternative suitable sites within the village envelope.

Chief Executive Recommendation

No change recommended.

PROTECTED STRUCTURES

Thirty four submissions were received in relation to notices issued regarding the addition/ deletion of protected structures. These are outlined in table below

Rec	Name	Structure Address	NIAH Number	Submission summary	Chief Executive Opinion and Recommendation
1	Nora Clarke	Copponagh	40403410	<ul style="list-style-type: none"> • Requests that the property is not added to RPS. • The house is in very poor condition with roof/chimney and walls unstable. A lot of vegetation and trees have taken over the building. 	<p>The building is in poor condition but retains its original form and some original features. The house is an example of the local vernacular architecture.</p> <p>It is recommended that this house remains on the RPS.</p>
2	Noel O'Rourke	Manor House, Corrad, Dowra	40400507	<ul style="list-style-type: none"> • No major issues with inclusion on RPS, however, issue that no official notification was received. • This will have a big impact on house insurance and questions whether there will be any assistance for increased insurance costs. 	<p>Manor House, Corrad is a good example of a late-nineteenth century parsonage. Many original features were kept during recent works to the house. The owners are to be commended for the sensitive conservation of this former manse.</p> <p>It is recommended that this house remains on the RPS.</p>
3	George Ferguson	Derrycark	40401108	<ul style="list-style-type: none"> • Objects to the building being added to the RPS. 	<p>According to information provided by the owner of the property, this modest house has been</p>

				<ul style="list-style-type: none"> • Building has been unused since 2009 and in 2011 there was a fire in the house which has made the entire structure unsafe. • Building needs to be demolished due to its current deteriorated condition and proximity to a busy narrow road. 	<p>unoccupied since 2009 and was damaged by fire in 2011. The house is overgrown by vegetation and the roof is in very poor condition.</p> <p><u>Recommendation No. 208</u></p> <p>It is recommended that this house is removed from the proposed RPS.</p>
4	Pat Donagh	End of terrace two storey house, Main Street, Kingscourt	40310001	<ul style="list-style-type: none"> • Objects to the building being on RPS. • Appraisal of the building is outdated, dating back to 2012. • Since then, the building has undergone some extensive refurbishments and will continue to do so over the coming year. • Building has no historical building to the town, however the Store building joined to the building is an important component of the industrial heritage of the town, therefore have no objection to the addition of this building on the RPS. 	<p>This is a prominently sited corner building on Main Street, Kingscourt. The building retains its original form and original features. Combined with the stone store building at the rear, this building is an important element of the architectural heritage of Kingscourt and contributes to the historic character of the town. Its loss and loss of original features would have a negative impact on the historic character of Main Street, Kingscourt.</p> <p>It is recommended that this building remains on the RPS.</p>

5	Freddie and Mavis Magee	Prospect Hhouse, Knoeckateery, Cloverhill.	40401523	<ul style="list-style-type: none"> • Opposes the building being entered onto the RPS. • The building has not been used for some time and was already derelict prior to its purchase in the 1970s. Building is in a state of disrepair. • Questions how access was granted to inspect the building. • Building is not currently insured and have no plans to insure a derelict building. • No clear access to the building. 	<p>Although this building is in a derelict condition, it is a substantial late-eighteenth century/early-nineteenth century house, prominently located on an elevation site overlooking Cloverhill. The building retains its original form and some original features and contributes to the architectural heritage of the local area and County Cavan.</p> <p>It is recommended that this building remains on the RPS.</p>
6	Alan Brown	Money, Miltown	40401414 40401415	<ul style="list-style-type: none"> • Seeks that the building is not added to the RPS. • The outbuildings are in poor structural condition with plaster falling off, windows are a mix of aluminium and timber and roofs are sheeted in galvanise. It is submitted that there are no features of architectural importance. • The original cottage is in poor condition and in need of immediate repair to prevent further 	<p>The house (40401415) retains its original form and complements the row of single-storey houses on the road leading to the local national school. Should this building be lost, it would have a negative impact on this historic character of this row of buildings.</p> <p>It is recommended that 40401415, a single storey house built c.1850, remains on the RPS.</p>

				<p>deterioration. The roof is not original and is slatted with asbestos.</p> <ul style="list-style-type: none"> It is the intention to retain all current structures on site 	<p>The outbuilding (40401414) is a modern insert and does not contribute to the character of the area.</p> <p><u>Recommendation No. 209</u></p> <p>It is recommended that 40401414, a two-storey outbuilding, is removed from the proposed RPS.</p>
7	Joanne Callaghan	Moydristan House	40403713	<ul style="list-style-type: none"> Objects to the proposed addition of the property on the RPS. House has been extended, altered and modified over the last 40 years. Original single bay two storey front porch and entrance has been removed, two storey extension was added to the rear, house has been gutted and totally refurbished from the top down, all exterior features apart from the exterior stone wall are gone, roof has been replaced with modern roof tiles, guttering and windows have been replaced with modern uPVC, doors, shuttering, floors and all woodwork have been completely replaced, internal walls have changed the original 	<p>Moydristan House is an important element of Cavan's architectural Heritage. The house retains its original form and some good original features. Moydristan House is nestled amongst a collection of mature trees and its landscape setting is part of its significance.</p> <p>It is recommended that this building remains on the RPS.</p>

				configuration and ceilings, wiring, heating and plumbing have all been replaced and upgraded. Original driveway changed and reconfigured and some sheds have been removed.	
8	Donnie Kiernan	Fortland, Mounnugent	40403807	<ul style="list-style-type: none"> • Objects to inclusion of property on RPS. • It is a dangerous building and needs to be demolished, building is uninhabitable. 	<p>This is the former gate lodge and entrance gates to Fortland House. The main house was demolished and this roadside gate lodge is a reminder of the former house and demesne. The gate lodge and entrance gates are associated structures and both make a contribution the architectural heritage of County Cavan.</p> <p>It is recommended that this building remains on the RPS.</p>
9	Michael G Cooney	Corraneary, Stradone	40402606	<ul style="list-style-type: none"> • Opposes the building being included in RPS • Purchased property in 2019 with no notification of it being included in RPS. • No plans to alter its character and appearance. 	<p>This former mill complex includes a mill building and millers house. The buildings, mill ponds and mill races and their setting are important surviving elements of the County Cavan's industrial heritage and an example of a building type that was once commonly found throughout the county.</p> <p>It is recommended that this building remains on the RPS.</p>

10	Mark Carolan	Greighagibney, Cavan	40402712	<ul style="list-style-type: none"> • Opposes the proposed addition of the detached two storey house with former retail outlet onto the RPS. • The entire structure of the building is no longer deemed safe due to unorthodox construction, deficient structural materials used and significant water damage. • Any interventions required to resolve the issues would not be feasible given the structures current state of repair. • Visual Structural Inspection has been undertaken for the property. 	<p>This former house with shop is prominently located on the roadside. Dating to the early-twentieth century, the building is of local significance and there are no architectural features of importance.</p> <p><u>Recommendation No. 210</u> It is recommended that this building is removed from the RPS.</p>
11	Peter Donohoe	Omard, Kilnaleck	40403706	<ul style="list-style-type: none"> • Requests that the property is removed from RPS. • Dwelling is in very poor condition both structurally and architecturally. • Chimneys are currently structurally unsafe, windows are gone beyond 	<p>This substantial farm house displays characteristics typical of houses dating to the nineteenth century including a symmetrical design and use of materials and features such as sash windows, hipped slate roof, banded brick chimneystacks and quoins. The house and</p>

				<p>repair, fascia and soffit are not original and were modified in last 20 years and majority of downpipes and gutters have been removed or gone past repair.</p>	<p>associated built features contribute to the architectural heritage of County Cavan.</p> <p>It is recommended that this building remains on the RPS.</p>
12	Mary Farrelly	End of terrace two storey house, Milltown	40401411	<ul style="list-style-type: none"> • Requests the property not to be added to RPS • The building is of poor structural condition with plaster falling off. • Windows are not original windows and have been replaced with uPVC. • The roof is not original and is slatted with asbestos. 	<p>The building has lost some original features since it was surveyed by the NIAH. In particular the loss of the timber sash windows has negatively impacted on the historic character of the structure. The semi-detached house, and its pair, are located opposite the R.C church in the village of Milltown and are important features in the streetscape. However this building is of local importance.</p> <p><u>Recommendation No. 211</u></p> <p>It is recommended that this building is removed from the RPS.</p>
13	Orla Brady and Ciaran Fitzpatrick	Laureldale House, Lough Gowna	40403006	<ul style="list-style-type: none"> • No objection to the property being included in the RPS in principle, however, note that they obtained formal approval to carry out alterations and extend the property 	<p>The building is currently undergoing a programme of refurbishment and extension, which has resulted in the loss of most original features. The works to date have had a negative impact on the historical character of the house.</p>

				<p>as part of application ref. 18/136 prior to inclusion on same.</p> <ul style="list-style-type: none"> • Substantial works have been carried out to the property to date— extensions have been constructed and roofed and original house has been stripped out and re-roofed. • Survey in 2017 found the property in very poor condition with numerous structural stability issues. No features of architectural significance were noted. 	<p><u>Recommendation No. 212</u></p> <p>It is recommended that this building is removed from the proposed RPS.</p>
14	Melissa and Enda Gill	The Old Manse, Derrylurgan, Ballyjamesduff	40403209	<ul style="list-style-type: none"> • Appeals against the decision to include this property onto the RPS. • The property is substantially different to its original state and as such is not of cultural or heritage significance. • Approximately 50% of the main house is composed of a modern extension. No original coving, cornicing or decorative ceiling 	<p>This former Presbyterian manse retains some original features and is a reminder of the Presbyterian heritage of the area. This building makes a positive contribution to the architectural heritage of Ballyjamesduff and the county.</p> <p>It is recommended that this building remains on the RPS.</p>

				plasterwork is present. The fireplace in the sitting room is not original.	
15	Patrick Sheridan	Former Cabra Castle Gate Lodge	40403505	<ul style="list-style-type: none"> • Requests that the property is not added to the RPS. • Property has been unoccupied for a long number of years and is uninhabitable, considerable refurbishment would be required. • No relationship between the property and Cabra Castle and the building is isolated from same. • Due to energy efficiency works it is questioned how much of the original structure would remain in any refurbishment. 	<p>The building is a former gate lodge to Cabra Castle and as such is part of collection of demesne related structures. This collection of related structures are an important part of Cavan's architectural heritage.</p> <p>It is recommended that this building remains on the RPS.</p>
18	Peter Mc Hugh	Swanlinbar	40400707 40400708	<p>This submission relates to the proposed addition of NIAH No. 40400707 and NIAH No. 40400708 onto the Record of Protected Structures. The submission states that both properties are no longer in use and not in good repair and earmarked for demolition. Details of future proposals following demolition is also contained in the</p>	<p>This building (40400707) has undergone many changes since its construction and has lost many original features.</p> <p><u>Recommendation No. 213</u> 40400707 – It is recommended that this building is removed from the proposed RPS.</p>

				<p>submission. The submission also advises that both properties are not of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social, or technical point of view and states that if it not necessary or appropriate to include the property on the protected structures register.</p>	<p>This building is part of a larger terrace and retains some interesting features including the decorative door surround with unusual overdoor light and timber sash windows.</p> <p>40400708 – It is recommended that this building remains on the RPS.</p>
19	Michelle Murphy	Swanlinbar	40400715	<p>This submission relates to the proposed addition of NIAH No. 40400707 to the Record of Protected Structures and notes an objective to same for the following reasons:</p> <ul style="list-style-type: none"> - Not a historical or cultural structure - No cultural structures on the land to preserve - Currently in an inhabitable condition without windows. <p>Valued at €15,000</p>	<p>This building is part of a terrace in the centre of Swanlinbar. The terrace as a whole contributes to the historic character of the village. However this single building is of local importance and does not warrant inclusion on the RPS.</p> <p><u>Recommendation No. 214</u></p> <p>It is recommended that this building is removed from the proposed RPS.</p>
20	Rodney Wilton	Kiffagh, Cavan	40403207	<p>This submission relates to the proposed addition of Kiffagh House onto the Record of Protected Structures and notes this property has fallen into a serious state of repair and had partially collapsed many years ago.</p>	<p><u>Recommendation No. 215</u></p> <p>It is recommended that this building is removed from the proposed RPS.</p>

21	Mrs Quinn	Main Street, Ballinagh	40306008	<p>This submission relates to the proposed addition of Mrs Quinn's home on to the Record of Protected Structures. The submission states that the owner has no objection to this inclusion. The submission contains details and photographs of several outbuildings to the rear of the property which have been in a bad state of disrepair and dereliction for over three decades. The submission outlines that these structures are in such a state of disrepair that it is beyond the financial and physical capabilities or reasonable expectation of Mrs Quinn, 90 to repair, replace, or otherwise mend beyond ensuring they do not pose any dangers to guests on her property. In summary the submission welcomes the addition of the house to the RPS but objects to the inclusion of any of the derelict ancillary structures to the rear of the property which are notes as not being of any special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social or technical point of view.</p>	<p>The house retains many original features and makes a positive contribution to the streetscape of Main Street, Ballinagh.</p> <p>It is recommended that this building remains on the RPS.</p>

22	Shane Hughes	Main Street, Kingscourt	40310018	<p>This submission relates to the proposed addition onto the Record of Protected Structures noting an objection to same. The submission states that the inclusion of this property is without merit given the relatively recent and significant modifications made. It is noted that the upstairs of the property is vacant/derelict and has had no stairs for many years. It is also stated that including the property on the RPS will inhibit future efforts to return the upper floors for use as much needed residential accommodation.</p>	<p>The building makes a positive contribution to the historic character of Main street, Kingscourt, an Architectural Conservation Area. However the building has undergone significant changes over the years resulting a loss of original features.</p> <p><u>Recommendation No. 216</u></p> <p>It is recommended that this building is removed from the RPS.</p>
23	Gregory Grene	Derryarmush, Belturbet	40401107	<p>This submission relates to the proposed addition of Derrycark onto the Record of Protected Structures and notes this property is not historically significant to warrant this kind of designation. The submission notes that the current structure was completed in the 1930s consisting of relatively common features for a two storey rural home, the only distinctive features, such as the ivy, are a feature of the way the house is maintained. It is noted this is a functioning family home and consequently putting it on a protected list will present an unnecessary burden.</p>	<p>This modest farm house was constructed in the 1930s. The building has undergone many changes over the years which has resulted in the loss of original features.</p> <p><u>Recommendation No. 217</u></p> <p>It is recommended that this building is removed from the proposed RPS.</p>

24	Martina and Niall Mc Cauley			<p>This submission is made by O'Reilly Solicitors on behalf of their clients Martina and Niall Mc Cauley. The submission relates to the proposed addition of a property at Kilconny, Belturbet onto the Record of Protected Structures and notes a strong objection to this inclusion for the following reasons:</p> <ol style="list-style-type: none"> 1. At no stage were they consulted by Cavan County Council in relation to the designation of their property as a protected structure. 2. This is a family home and its designation will cause real problems for matters such as repair, maintenance and insuring the property. <p>The submission queries why this property was not designated as a protected structure years ago noting that extension/addition to the property was suitable for designation as a protected structure certainly after the</p>	<p>This house was formerly associated with the neighbouring church at Staghall, Kilconny and together the house and church are an important element of the architectural heritage.</p> <p>It is recommended that this building remains on the RPS.</p>

				<p>addition/extension the property could not be properly called a protected structure or qualify as such.</p> <p>The submission requested that confirmation is given that the property will be withdrawn from the proposed draft County Plan as a designated structure.</p>	
25	Fiona Conaty and Sean Hicks	Parochial House, Clondragan, Cavan	40402108	<p>The original structure was built circa. 1800 and revised and rebuilt many times before falling into dereliction in the 1980's when it was used to shelter cattle until 2006 when construction began. Under planning reference number 05/867, the following works were carried out</p> <ul style="list-style-type: none"> • New foundations • New 2 storey exterior walls • New roof and new flat roof to support extension • Demolishment of rear annex • Stripping back to stone of the interior walls, exterior walls and floors. • Breaking through interior walls 	<p>This former parochial house had fallen into dereliction before undergoing extensive restoration by the current owners. Whilst the front façade remains, the remainder of the building was completely rebuilt and extended.</p> <p><u>Recommendation No. 218</u></p> <p>It is recommended that this building is removed from the proposed RPS.</p>

				<ul style="list-style-type: none"> • Replacement of roofs, doors and other timbers • Windows were removed and replaced with double glazed, double sliding sash timber windows <p>They believe that the addition of this structure was made on the misunderstanding that the original building was intact but the house is essential a new build. The interior is a modern open plan layout and none of the original fabric of the building remains.</p> <p>The appraisal has included items that were added in the period between 2006- like timber brackets, door and narrow sidelight and segmental headed fanlight, sills and walls are new. Also the entrance to the porch was moved from left side of porch to the front in 2006. The raised render architrave is new works.</p> <p>This property does not merit inclusion in the record of protected structures.</p>	
26	Erne Palais	Former Palais Cinema, Holborn	4030710	<p>This building was extensively damaged by fire in recent years in accordance with the Architectural Heritage Protection Guidelines</p>	<p>The former cinema building is in a state of dereliction following a fire in the building a number of years ago. Whilst the front façade makes an</p>

		Hill/Deanery Street, Belturbet	<p>should be deleted from the record. This submission includes an Architectural Heritage Impact Assessment for a development which is for partial demolition and conversion of existing structure into 2 apartments and construction of 3 townhouses with retention of front façade. This impact assessment report notes the description of the buildings and in its appraisal notes that the building is located at a strategic corner of Holborn Hill and Deanery Street and is the former Palais Cinema in a prominent site in the urban landscape. The appraisal notes the 'delightful curved gable front' which was typical of cinemas of its time and makes an eye catching contrast to the predominately rectilinear facades found elsewhere in the town.....a reminder of a time when the cinema played an important social role in local communities..' This Assessment considers the impact of the development on the existing structure and concludes that overall, the architectural integrity of the protected structure will not be materially affected by the works and would be</p>	<p>interesting contribution to the streetscape, no features of architectural significance survive in the building.</p> <p>The redevelopment of this property has been permitted as per planning reference number: 20/602.</p> <p><u>Recommendation No. 219</u></p> <p>It is recommended that this building is removed from the proposed RPS.</p>
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				improved with the addition of this valuable asset.	
27	Douglas Smyth		40402814	States that the structure in question has been burnt in a fire and beyond repair on 5 th December 2019.	<u>Recommendation No. 220</u> It is recommended that this building is removed from the RPS.
28	Turloch and Philomena Dolan	Deramfield, Milltown	40401916	They do not wish their property, Lakeview House, Deramfield to be added to the Record of Protected Structures. In 2013, they gutted and refurbished the total building from the roof downwards leaving no original features. They have replaced the windows, doors, floors, internal walls and ceilings. All heating, plumbing and wiring has been replaced. All roof slates trusses and felt has been replaced as the old ones were unfit for purpose.	This house has undergone extensive restoration resulting in the loss of most original features. Whilst the front façade remains, the remainder of the building was completely rebuilt and extended. <u>Recommendation No. 221</u> It is recommended that this building is removed from the proposed RPS.
29	Joseph Lavery			Refers to old St Michaels BNS, Cootehill and notice to include on the Record of Protected Structures. During the years that the building was used as a warehouse/office, it was	St. Michaels BNS is a building of local historical and social significance and does not warrant inclusion on the RPS.

				maintained in excellent condition. The building is now suffering from Dry Rot and is considered unsafe and creates a massive financial burden for a citizen. Owner invites Cavan County Council to remedy the dry rot problem and then place the building on the Record of Protected Structures.	<u>Recommendation No. 222</u> It is recommended that this building is removed from the proposed RPS.
30	Joseph Shorten on behalf of Ann and Patrick Mc Kiernan			Having regard to works permitted under 16/528 which was approved on 21 st July 2017 request to be removed from RPS.	<u>Recommendation No. 223</u> It is recommended that this building is removed from the proposed RPS having regard to works permitted under planning permission.
31	Eva Fidgeon	The Manse, Glasleck, Shercock	40402803	The submission outlines its appreciation for the need to conserve and keep old buildings in good repair and condition and this building has played an important role in the history of the local Presbyterian tradition in the area. They feel it is unnecessary to include this building in the record of protected structures. Thus far, they have maintained the character of the original build and maintaining sash windows, original doors and floors internally, slates, chimney stacks, gutters and spouting. They have also maintained the	This former manse is associated with the nearby Presbyterian church. Together they are an important element of the architectural heritage of the area. Loss of this building or damage to its original features, materials or form would negatively impact the architectural heritage value of the structure. It is recommended this building remains on the RPS.

				entrance in the original appearance. They feel as they are good caretakers of their home that there is no requirement to add to the Record of Protected Structures.	
32	Martha Mc Avety	Scrabby, (Tullyhaw By), Corlough		In storms 2/3 years ago the gable end of the house fell in.	<u>Recommendation No. 224</u> It is recommended that this building is removed from the proposed RPS.
33	Niall Smith Architect	Lisnaclea, Knappagh ED, Cootehill	40402303	This would place an unfair financial burden on owners of property and restricts the options open to the owner for the property. Questions why the property is on the proposed RPS as building is a typical vernacular farmhouse built over 100 years ago. The property is lived on and well maintained and is not of a character or special interest that warrants it to be placed on RPS.	This building remains in very original condition and is a good example of an early-twentieth century rural house. The surviving original features contribute greatly to its historic character and make it a valuable element to the architectural heritage of County Cavan. It is recommended that this building remains on the RPS.

34	CJ and Marion Fay	Cabragh, (E.D. Tullyvin East)	40401738 40401740	<p>They acknowledge and appreciate the concern to preserve Cabragh House, the extended outbuildings, perimeter railways and grounds for future generations.</p> <p>Their concern is the financial implications is registered as an RPS.</p>	<p>This building, together with the outbuildings, entrance gates and landscape setting remains in very original and is an important element of the architectural heritage of Cootehill and County Cavan.</p> <p>It is recommended that this building remains on the RPS.</p>
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Chief Executive Errata

Chief Executive Erratum

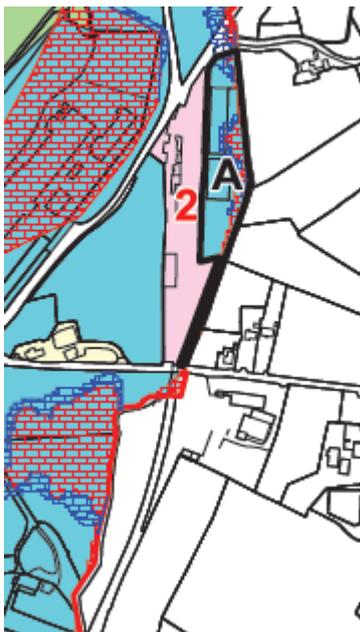
Amendment No. 225

Update enrolment figures for schools for towns and Villages. The current figures in the draft Plan are for 2019/2020 enrolment figures and updated figures to be inserted.

Chief Executive Erratum

Amendment No. 226

Kingscourt - Amend Kingscourt Zoning Map –mapping error Railway/Paramount Doors. Amended zoning as per the draft plan from Public and Community to Enterprise and Employment in recognition of existing use on site as marked 'A' on Kingscourt Map in Appendix 3.

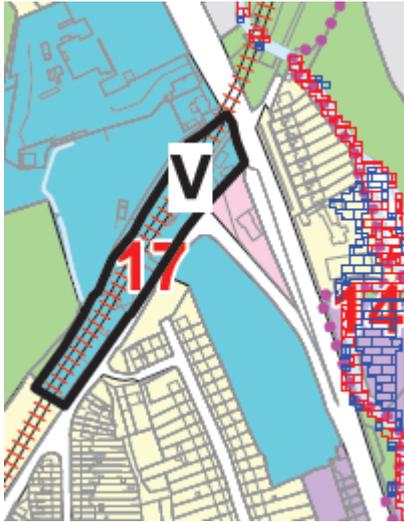


Chief Executive Erratum

Amendment No. 227

Cavan Town – Site as Public and Community (Old Celt Office)

To amend a Mapping error and change Public and Community zoning in the draft plan to Enterprise and Employment to recognise the current office use at this site (marked as V in the Cavan Town Amendments Map in Appendix 2).



Chief Executive Erratum

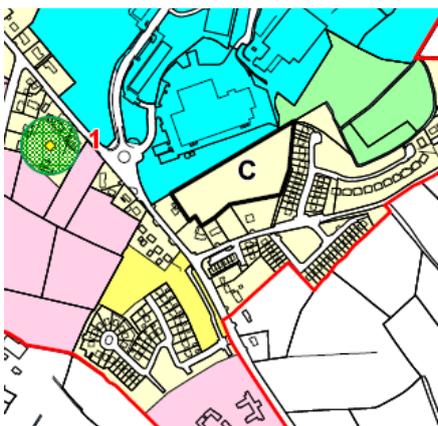
Amendment No 228

Amend Figure 6.2 page 347 of the draft Plan to amend the 30 minute drivetime from Ballyconnell.

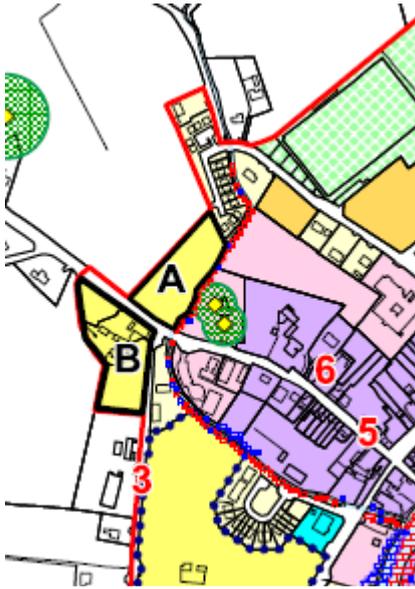
Chief Executive Erratum

Amendment No 229

Ballyconnell –Site as indicated below is zoned as Proposed Residential in the draft Plan. These lands currently have a near completed housing estate and as such should be amended from Proposed Residential to Existing Residential as indicated 'C' on the Ballyconnell Map in Appendix 3.



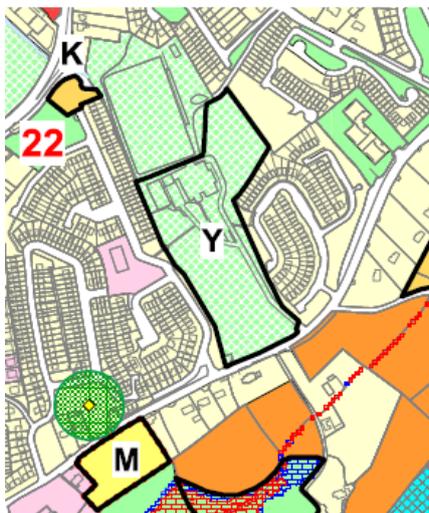
In order to fully comply with the Core Strategy in Ballyconnell, additional lands as Marked A and B on attached Ballyconnell Map in Appendix 3 have been included Proposed Residential.



Chief Executive Erratum

Amendment No 230

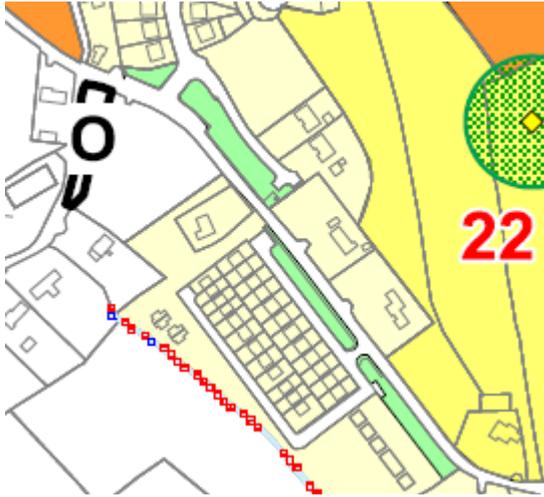
Amend lands zoned as Public and Community in the front of the Cavan Sports Complex, Cavan town to Sport and Recreation to acknowledge existing use, as marked “Y” on attached Cavan Town map in Appendix 2.



Chief Executive Erratum

Amendment No. 231

Remove Existing Residential Zoning identified as “O” in Cavan Town Map as per the Appendix 2.



Chief Executive Erratum

Amendment No. 232

Reference is made to protected structure NIAH number 40403305 at Billis Grange, Drumallaght. It is recommended that this building not be added to the RPS. As a former manse associated with the nearby Church of Ireland church, Billis Grange is of local historical and social significance. However, the building was in a poor condition before extensive restoration works to the building. The building has lost a significant amount of original fabric and changes have been made to its front elevation and interior floor plan.

