



27th July, 2021

Forward Planning Section,
Planning Department,
Johnston Centre,
Farnham Street,
Cavan,
H12 C9K1.

RE: Draft Cavan County Development Plan, incorporating a Local Area Plan for Cavan Town 2022 – 2028

A Chara,

I refer to your notification on 2nd June, 2021 confirming that the Draft Cavan County Development Plan, incorporating a Local Area Plan for Cavan Town 2022 – 2028 has been prepared and inviting submissions / observations. The Northern and Western Regional Assembly wish to thank you for notifying it of this.

The Regional Assembly is required under S27B of the Planning and Development Act 2000, as amended, to offer its opinion on whether or not the draft and its core strategy, in particular, is consistent with the RSES.

The Regional Assembly is required to make recommendations to the Cavan County Council on any amendments necessary to ensure the Draft Plan is consistent with the RSES and to issue its report and recommendations and observations.

The Members of the Northern and Western Regional Assembly considered the Report and Recommendations and Observations at its monthly meeting on 16th July 2021. The submission will follow the chapters sequentially as set out in the Draft Plan and offers commentary on consistency on an ongoing basis, with Recommendations and Observations being provided thereafter.

Summarising the Content of the Draft Cavan County Development Plan:

Given the extent of Content associated with the Draft Cavan County Development Plan as outlined in brief above, it is considered appropriate to present an overview of each chapter of the Plan to Members.

The vast scope of the Draft Plan (Written Statement alone runs to 14 Chapters, and 620 pages in length), and the associated documents is a challenge for the average member of the public to distil the extensive amount of information and material available. Members will be aware, from consideration of other plans, that this is not unusual and is necessary to meet the legislative requirements.



However, the content itself is generally straightforward and the Core Strategy is clearly outlined, with the ambition to continue to grow Cavan's population and to expand Cavan's Key Urban Centre's during the lifetime of this Plan, in particular the towns of Cavan and Virginia.

The format of the written statement is typical of current County Development Plans, however the Written Statement is very text orientated in its visual presentation and could benefit from additional graphics / maps, which may assist in highlighting/giving a greater degree of clarity around some of the aims within the Plan.

It is also notable that throughout the Draft Plan, the consistent and multiple quoting of entire sections of text from other Policy documents within the Planning hierarchy (e.g. NPF – Ireland 2040 and the RSES) adds considerable and perhaps extraneous length to the Plan and it may be of benefit to review this aspect to bring brevity to the overall document.

The introduction is followed by the chapter on the Core Strategy. The next three chapters deal with urban and rural areas in terms of the settlement Strategy (Towns Hierarchy) as well as the Housing Policy for County Cavan.

Thereafter chapters include Economic Development, Transportation & Infrastructure, a dedicated Chapter on Climate Action, as well as Heritage, Tourism, Rural issues and finally Development Management standards, inclusive of Rural Housing Design Guidance for prospective applicants.

This examination of the Draft Cavan County Development Plan will concentrate on each individual chapter and offer commentary on the similarities and differences (if any) between the policy objectives and the RPOs in the RSES.

There is a consistent approach in the draft in the introduction to each chapter and how it links the draft with national and regional policies and it goes on to develop these to county level. These contextual pieces are lengthy and it may be of benefit to review this aspect to examine if it could be more succinct and thus bring brevity to the overall document, without losing the important context.

Draft Cavan County Development Plan 2022 – 2028

Chapter 1 – Core Strategy:

Part V of the Planning Act requires Planning Authorities to produce Core Strategies, and Planning policy which is consistent with National and Regional guidance, this includes matters relating both to high level policy, as well as population projections / apportioning.

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The Core Strategy at its outset makes clear the NPF ambition to develop and expand the Urban Centre's of the Northern & Western Region is something which must be effected at county level.

There is a slight re-ordering of the settlement hierarchy for County Cavan, (from previous Plan iterations) insofar as Cavan Town remains the key settlement - as designated with the RSES - and thereafter Virginia is identified as a Tier 2 Settlement on its own, labelled as a Self-Sustaining Growth Town, with towns of similar size and population (i.e. Bailieborough, Ballyjamesduff, Kingscourt, and Cootehill) falling into Tier 3, as Self Sustaining Towns).

The Council's rationale for the elevation of Virginia is based on several key elements, one of which is the identification of Virginia (together with Carrickmacross) as a place of regional potential, and the settlement has had a growth rate beyond other similar sized towns within County Cavan. Therefore, it is considered that the re-ordering of the Settlement hierarchy to reflect recent trends is reasonable and is consistent with the principles set out within Chapter 3 of the RSES. However, it should be noted that the RSES identifies Virginia as a 'Place of Strategic Potential' and in order to support this important regional designation there is a need to improve alignment between the Development Plan and the RSES through the use of the same terminology. This replication of language from Regional, to County to Local Area Plan will lend itself to coherence and consistency of messaging across the Planning hierarchy and reinforce the importance given in the RSES to Virginia.

County Cavan: There are 6 population Scenario's outlined within the Core Strategy for County Cavan within the lifetime of this Plan (2022 – 2028), the approach preferred for County Cavan is described as 'Current and Stable, Covid adjusted'. This approach envisages stable growth in line with current forecasts to 2028. Crucially, this approach forecasts a population for County Cavan which is 88,409 by 2028, this projection exceeds that set out in the NPF Implementation RoadMap (high scenario), which outlines 85,500 by 2026, and 88,000 by 2031. Thus, in seeking to fully align with the NPF Implementation Roadmap, the Core Strategy goes on to adopt a county population of 85,900 in 2028 and Table 8 of the draft CDP provides an overview of this scenario for each settlement.

Cavan Town: The Council have outlined a growth rate for Cavan Town at approximately 15%, with the population envisaged to rise from 10,914 (2016) to 12,500 (2028). The RSES ambition for Cavan Town is that it will achieve a 30% increase in population to 2040, therefore the figures apportioned to Cavan Town are consistent with the RSES. It should also be noted that Cavan Town has a high ratio of Jobs to Resident Workers (1.388), as per the Appendices of the NPF, and this should underpin its continued growth, which has been consistently upward over a number of Census periods.

Virginia: The population growth rate forecast for Virginia is approximately 31% to 2028 (862 people). It is acknowledged that the expansion in population, services, and employment in Virginia is a strategic priority for Cavan County Council. The Town in 2016 had a low ratio of Jobs to Resident Workers (0.600), and it is an ambition within this Plan to focus on potential employment lands, with 3 no. sites in Virginia identified for development (Masterplans). It should be noted that notwithstanding the expansion planned for Virginia the Waste Water Treatment Capacity for the Town has capacity issues and significant upgrade works will have to be undertaken by Irish Water to cater for the additional population ambition up to 2028. The RSES noted that an issue to be addressed for Virginia was the level of commuting out of the county, through the provision of employment and support services. It would benefit the plan to highlight how this is to be achieved for the existing population and to clarify how employment and services are to be provided for the future planned quantum of population envisaged over the plan period. Such clarification should also take cognisance of infrastructure capacity, including wastewater.

Chapter 2 – Settlement Strategy:

The settlement hierarchy is, according to the plan, dictated by an assets based approach, with services, role and function of towns, their connectivity as well as size / population being assessed in grading towns from Tier 1 (Key Town) to Tier 6 (Villages or circa 200 – 300).

In terms of Rural Areas and the definition thereof with regard to Rural Housing, the county is classified across 3 typologies:

- (i) Stronger Rural Area: Much of the Centre Belt, and South of the County.
- (ii) Weaker Rural Area: The entire NW of the County, including the hinterlands of Blacklion, Bawnboy and Swanlinbar.
- (iii) Area's Under Strong Urban Influence: Area of 7km radius of Cavan Town, and area in South Cavan, surrounding Virginia, and Ballyjamesduff.

This division is largely consistent with the goals of the RSES (Chapter 3) and it is also worth noting it is broadly consistent with the approach adopted in County Monaghan, where there are areas under strong urban influence defined around some of the larger Urban Centres in the County.

Cavan County currently holds a Rural – Urban population ratio of 70% - 30%, (Census 2016), and this is identical to the ratio in the 2011 Census.



This Draft Plan, in line with the NPF, seeks to achieve a Step Change to this balance, and will target approximately 65% of the expansion in population into the urban settlements, namely Cavan Town (17%), Virginia (9%) and 40% into Self Sustaining & Medium Sized Towns (e.g. Belturbet & Ballyconnell etc).

Approximately 20% of the remaining population headspace is allocated to Rural Area's. For the smaller settlement nodes/smaller villages there is a clear commitment under Policy CSD 08 to achieve 30% Compact Growth being consistent with the NPF, and the RSES (RPO 3.2).

Cavan Town – LAP: Sec. 2.2. of the Draft Plan relates to the LAP for Cavan Town. The Key Future Priorities for Cavan Town, as outlined in the Draft Plan, aligns very well with the Key Future Priorities which were set out in Sec. 3.9 of the RSES, and these aims extend across Housing, Employment, Transport, Tourism, Education and Digital Transformation.

Housing: The Plan targets almost 700 housing units, at a density of 18 -22 units per hectare. This is a density which is well below the current Residential Density advocated by Sustainable Residential Development in Urban Areas (2009) Guidelines. However, it is acknowledged that Circular Letter: NRUP 02/2021 clarifies that suburban or high density urban approaches are not applied uniformly and that development responds appropriately to the character, scale and setting of the town or village. Instead, it advocates a graduated and responsive, tailored approach to the assessment of residential densities in Peripheral and/or Less Accessible Urban Locations. It would be helpful if the plan provided greater justification for the density advocated in Objective RD 01.

There appears to be a significant quantum of lands along the outer fringes of the Cavan Town LAP which are identified as Strategic Residential Reserve and the extent of these lands and the ultimate feasibility of these sites from a construction and servicing point of view may merit review and clarification-

The specifics as to how residential expansion / housing Growth is to be achieved, either sequentially, and or via compact growth would merit further clarification by way of additional narrative and through the use of visuals – such as a schematic map so as to assist in the interpretation of the growth of Cavan Town in an overall sense.

Community and Sports Facilities – The advancement of a Regional Sports Centre and Community Hub are outlined. This is consistent with the RSES key future priorities.

Employment Land: The IDA Park on the Dublin Road is nearing capacity, and it is identified that additional Enterprise / Employment lands will be required in Cavan Town. This is consistent with the RSES.



Transport / LTP: RPO6.27 of the RSES supports the collaborative preparation of LTP for Cavan Town that will inform the local area plan for the town. The Draft Plan Objective KTC 05 and CNR 02 support the preparation of a LTP over the lifetime of the plan but this is missing an opportunity to deliver a suitable framework for appropriate investment in the sustainable development of Cavan Town. Accordingly, the plan should commit to a specific timeline for the preparation of an LTP in the short term – within two years of the adoption of the plan would be achievable.

Urban Regeneration: There are 3 proposed Masterplan Sites for Cavan Town earmarked within the LAP. They are as follows: (1) Abbeylands, (2) Farnham Street / Main Street (3) NW of Farnham St. Significant URDF funding (€14m plus) has already been secured for the Abbeylands Project and this will have a transformative impact upon Cavan Town Centre. However, in relation to the latter 2 Masterplan areas, there is no outline of a timeframe within which the Masterplan(s) are to be completed. The Assembly would suggest such timelines should be outlined within this element of the Plan.

There are numerous Public Realm projects which are outlined within the LAP, and these projects and the message associated with them could again benefit from an accompanying map alongside the text, as well as via an Appendix.

Virginia (Self Sustaining Growth Town):

As already outlined, Virginia is earmarked within the RSES as a place of regional potential. Cavan County Council has recently carried out an economic study on Virginia's potential, based on a number of factors, including its proximity to the GDA, the Dublin – Belfast economic corridor, as well as the need to retain more jobs within the Virginia sub region and reduce the commute of a large cohort of its workers to the GDA on a daily basis. The lack of appropriately zoned economic lands is identified within Sec. 2.3.3 as a serious constraint to achieving this goal.

The Map of Virginia within the Appendices associated with the Core Document of the Plan does not contain any reference to the proposed N-3 by-pass and should if possible be amended to include for Route options in this regard, this would serve to better inform the public, and other bodies alike in discerning whether the land zonings therein are appropriate.

Moreover, in relation to the 3 identified sites / lands which are intended for enterprise / employment, and subject to Masterplans, detailed analysis and commentary has been provided within the text around what extent of specific detail and areas of focus the Masterplans will provide, and what time period will see these Masterplans be completed. Sec. 3.2.11 of the Draft Plan does state that no Planning Permission for any development on any of the 3 sites in question will be granted until the Masterplan relating to the lands has been completed would infer that the need for an early assessment of these lands is a pressing matter for Cavan County Council.



Small Towns: In relation to Sustainable Communities – Small Towns (Sec. 2.11) there are policies which align with the ambition that Local Authorities provide alternatives to the one off rural house, which include a programme of serviced sites in smaller Towns and Villages, (RPO 3.7 refers). **The RSES RPO 3.7 envisages the council taking the lead in such projects and it is** not entirely clear that this commitment is being given at STC 09 and additional clarification would be welcomed.

Chapter 3 – Housing: At the outset, it should be acknowledged that the Housing Need Demand Assessment (HNDA) set out within Chapter 3 correlates with the overall projections for County Cavan and its settlements outlined within the Core Strategy of Chapter 1.

The HNDA takes into account the overall need for Housing within the County, the different Housing type needs, based on various circumstances of the population, including household income, household size etc.

Sec. 3.4. of the Draft Plan details The Housing Supply Target Methodology for Planning Authorities, as per Sec. 28 of the Planning Act. Beyond this there are a variety of government publications on Housing, including the National Vacant House Reuse Strategy, Rebuilding Ireland, The Social Housing Strategy, referenced and summarised.

Sec.3.6 of the Housing Strategy sets out the Future Housing Requirements for Cavan, and it is outlined that Cavan County Council qualifies for an adjustment to converge with the baseline because the NPF 50:50 Scenario demand is lower than the Baseline and the plan period goes beyond the year of convergence. (The ESRI Baseline demand for the County 2017 – 2026 is 4,500 houses).

There are a number of Housing Strategy Objectives at the Conclusion of Chapter 3, (14no. in all) and they are all broadly consistent with the aims of the RSES and give effect to the Housing Strategy across several areas, including Traveller Accommodation, and Co-operating with Voluntary Housing bodies, supporting independent living etc.

There are a number of Climate Change Policy Objectives contained at the conclusion of Chapter 3, and many are cross cutting, including the already referenced commitment to Compact Growth in Towns / Villages, retro fitting existing households etc.

The Housing Strategy, is considered to be generally consistent with the RSES.

Chapter 4 – Sustainable Communities: A central aim of the Draft Cavan CDP is to create sustainable communities across the Environmental, Social, and Economic spheres. It is clearly stated from an economic viewpoint, The Cavan LECP will be reviewed later in 2021 and it is required to be consistent with the RSES and the many RPO's therein relating to Regional Skills, advancing educational offer in the regions, inclusive of Cavan / Monaghan.



From a Housing perspective, the goals set out in Chapter 4 ‘cross cut’ with much of the Core Strategy, and Settlement Hierarchy for Cavan, with the aim to permit additional housing within Towns and Villages, close to existing services, reducing the need to travel long distances to avail of key services, and enhancing sustainability through other measures, including public realm improvements. All of these elements are consistent with the RSES, and the RPO’s within Chapter 7 (Quality of Life – Inclusive Region) and RPO 9.1. There is extensive detail on Social Infrastructure Networks including Cavan LCDC, and the work they undertake.

Chapter 5 – Climate Change: Cavan as a Local Authority adopted its Climate Change Adaptation Strategy in 2019 (2019 - 2025). The RSES outlines that with each passing year, it is becoming vital that the Region must prepare for locally based energy production insofar as it is possible and connections to the National Grid to follow from same, where appropriate. This includes several RPO’s in relation to the Bio-Economy and potential Renewable Energy sites of scale. (Refers - RPOs 4.16, 4.20 and 4.27).

The introduction of a Decarbonizing Zone within County Cavan has not yet been advanced. This is required to be done by each Local Authority under the Climate Action Plan (currently being revised), Action 165 (to be done by April 2021). The Draft Plan does not elaborate on whether a Decarbonizing Zone within the County has been identified, or a timeline for the process to commence / be completed. Its inclusion in this iteration of the CDP would be advantageous or a commitment to progressing same within a specified timeline.

Within Sec. 5.6. of the Draft Plan, there are a series of Policy Objectives on Climate Adaptation and Climate Change Development Objectives. There is a reference to potentially varying the Cavan CDP if necessary, should Climate Action guidance render this necessary. There is also an objective (CC 10) in relation to the re-wetting / rehabilitation of bogs / wetlands, but this is general and lacks specific details, either locational or otherwise.

Sec.5.7. outlines a number of measures to Monitor and Review Climate Action progress, and these include many of the fundamentals of the RSES (20% Rural Brownfield, Compact Growth 30% etc.) and this is generally consistent with Regional Policy.

Chapter 6 – Economic

The vision for Economic Growth is outlined at the outset of Chapter 6, and it can be summarised as pursuing growth across County Cavan extending to all Sectors, positioning Cavan as a place for business to invest, and enrich the standards of living of all the Counties Citizens.

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Beyond the background provided in relation to a suite of Economic Strategies and Plans, such as the Regional Enterprise Plans, this Chapter outlines Cavan as a strategically positioned location for business to set up and expand. The levels of Employment within the County have almost recovered to 2008 levels', with 18,200 at work in the County (Business Demography of Cavan, 2018). Proportionately, some of what are considered to be more traditional sectors of employment (Agriculture, Fishing, Manufacturing) are higher in the County than Nationally. Manufacturing employment in Cavan lies at 17%, whereas nationally it is at 10.5%.

The County has a significant Labour catchment, (Sec.6.8) which is estimated at 1million people within a 60min drive of the County. This type of broader approach to Economic (and spatial) Planning is consistent with the Planning for Sub Regions, which is a central tenet of the RSES.

Additionally, the core elements of Cavan's Future economic Strategy are consistent with the themes' outlined within the RSES, in particular Chapter 4: with pillars to include:

- The availability of appropriately located and serviced land. This is already elaborated upon in respect of Cavan Town and Virginia earlier in this report.
- Place making for Enterprise - some measures are being successfully put in place by Cavan County Council, with successful projects in train in Cavan Town, Virginia and Kingscourt (URDF & RRDF funding secured).
- Supporting Towns, including revitalisation via funding mechanisms and to encourage the re-use of vacant units within Town and Village Centre's.

The Assembly would broadly welcome these elements as they are representative of the RSES, and the RPOs within Growth Ambition 1 of the RSES (Economy and Employment).

Sections 6.15, 6.16 and 6.17 are effectively a repeat of what had been outlined previously in the Draft Plan under Sustainable Communities and perhaps cross referencing or rewording may assist in making the plan more succinct.

The emerging trend of Home Working is articulated in Sec.6.20. However, it is notable that this Section of the Plan, whilst containing supporting Policy Objectives, does not contain any firm commitments-to unleash the potential across the County, which is a Key ambition within 'Ireland's Rural Future'. This section of the plan may present an opportunity to consider more ambitious Policy interventions, which include measures which can be quantified in this area over the coming years, and through the lifetime of the Plan, including promotion of Cavan as part of a 'Smart Region' – see Sec 6.6 of RSES.



Chapter 7 – Transportation & Infrastructure: Chapter 7 covers transport in a multi modal manner. Smart Travel, Public Transport, Sustainable Transport options - such as Greenways - are all covered in some detail. This is at a headline level broadly consistent with the RSES, in particular RSES Chapter 6 (Connectivity) and 8 (Infrastructure).

A general observation would be that Chapter 7 is somewhat unwieldy and may benefit from being separated into two parts – Transport Infrastructure / Connectivity as one Part and the remaining Infrastructure as a second Part.

Local Transport Plans – As has already been referenced within commentary on the Cavan LAP, there is no firm commitment to provide a new LTP for Cavan Town. Sec.7.2.13 notes that Transport Studies for Bailieborough, Cootehill and Kingscourt date back to 2009. It would be timely to consider an update to these plans and to also consider preparation of a LTP for Virginia, given its status within the Core Strategy.

The County Council outline within this Chapter its strategy in relation to Trails and Greenways. There is ongoing work in respect of a number of Greenways, including the Kingscourt – Navan (Boyne Valley) Route. The manner in which these projects are to be sequenced could benefit from additional clarity, with a dedicated greenways map, which could include ambitions to link routes which are currently in the pipeline through the medium to long term. (Sec.7.3.2).

Sec.7.3.6 outlines that a Park & Ride strategy (Based along the N3 corridor) is under review for the county, but does not set a time-frame for its completion / implementation.

Sec.7.4.1 outlines the National Primary & Secondary Route improvement projects in County Cavan, and these are consistent with the projects identified within the RSES, The N3 by-pass of Virginia, alongside a number of realignment projects along the N3 are detailed. As referenced previously (Chapter 2), there is no mapping associated with the N3 Scheme (Virginia Bypass), it would be beneficial if the Council included Route options - in this regard the Assembly understand that a preferred Route option is scheduled to be published by Q.4 of 2021.

The Cavan to Dundalk Strategic Route improvement Scheme is referenced at Sec.7.4.2, which forms part of the East – West Road (Dundalk to Sligo) which is a specific Route identified in the RSES, (Refers, RPO 6.10).

Chapter 7 in its later elements deals with Energy Supply, and there is express support within the Draft Plan for the build-out of the North South Interconnector, which is consistent with the goals of the RSES, where the Interconnector is identified as a Major Regional Project within Sec. 8.2.



In relation to Renewable Energy, Sec. 7.10 outlines that Cavan County Council are to prepare a Renewable Energy Strategy within 2 years of the Plan being adopted. This is likely to involve a date somewhere in the latter part of 2024 - this may result in a vacuum in the interim period. This is potentially problematic insofar as there is effectively no Wind Energy policy for the County beyond what is contained within Sec. 7.10.1, which outlines that the Policy will be guided by the WEG (Wind Energy Guidelines of 2006) and any amendments thereto. This approach would not be consistent with the abovementioned Guidelines and may prove problematic in the County's ability to meet future obligations in the area of Climate Change and contributing as necessary to the Renewable Energy targets for the Country. Moreover, there is no reference made to the Interim WEG's.

Sec. 7.10.4. relates to Biomass, however the relevant Policy objectives do not give a full effect to RPO's 4.27, 4.28, and 4.29 of the RSES, This should be reviewed to achieve consistency with the RSES support for the Bio Refining Hubs across the Region.

Finally, in relation to Sec.7.11, the Rights of Way within the County should be illustrated by Map alongside the Text, with more specific mapping if necessary attached in Appendices.

Chapter 8 – Environment, Water & Drainage: Chapter 8 outlines the Role of Irish Water and details the River Basin Management Plans (RBMPs) for County Cavan together with the Local Authorities Water Programme (LAWPRO). The objectives within the Plan Policy to continue to meet the ambitions of the programmes, and to monitor ongoing progress is reflective of the ambitions of the RSES, and RPO's 8.18, and 8.20.

The Wastewater Treatment Networks for Towns and Villages across Cavan are detailed, with Virginia and Ballyjamesduff being the next settlements for upgrade at 'Gate 2', (Sec.8.4.3).

Flood Risk Management is also detailed at 8.6.2 and 8.6.3, and has already been outlined, this Draft Plan is accompanied by a Strategic Flood Risk Assessment for the county.

Sec. 8.7. deals with Waste Management for County Cavan, and the Objectives outlined therein area consistent with those contained at Sec.8.4 of the RSES.

Chapter 9 – Tourism: The Vision for Tourism within the Plan is to ensure County Cavan is a quality place to visit and stay, with a wide range of attractions. There is extensive detail provided in relation to Lakes and Waterways, History and Heritage, Tourism Infrastructure, Cycling and Walking.



However, there is no reference to the RPOs relating to Cavan within the RSES, including RPOs 4.6 – 4.10, which include a clear identification of Cavan as a Destination Town within IAE, and a hierarchy of Towns, and Attractions, as is set out in other County Development Plans in the Region—may be an approach worthy of additional consideration. Additionally, whilst multiple attractions across County Cavan are listed, there isn't any sense of hierarchy, nor mention of the recent Funding (RRDF / Failte Ireland) which was secured in relation to the Shannon Pot.

Chapter 10 – Natural Heritage: Natural Heritage within County Cavan is to be protected and advanced in accordance with the vision set out in the Draft Plan. The Policies associated with the protection of Natural Heritage, including the County's European sites, are consistent with the RSES (Refers: Growth Ambition 2 of the RSES, Sec. 5.1 – 5.5).

Particular focus is afforded to the Cuilcagh Lakelands UNESCO Global GeoPark, this key asset is the subject of focus in Sec. 9.3. of the RSES.

It has been acknowledged elsewhere in the Plan that the County Council has not undertaken a Landscape Character Assessment. A clear time based Objective is necessary to ensure this is completed, taking into consideration the provisions of RSES RPO 5.2.

Chapter 11 – Built & Cultural Heritage: It is Cavan County Council's ambition to Conserve and Enhance the built and cultural Heritage within the County. In addition to its extensive Record of Protected Structures, there are 14 ACA's (Architectural Conservation Area's) within County Cavan, the extent of these ACA's in many smaller Towns and Villages is to be commended.

The Archaeological Heritage Objectives, including those concerning the UNESCO Geopark, and other key assets such as Lough Oghter Castle is consistent with the RSES, Sec.5.7.

Chapter 12 – Rural: Cavan remains a predominantly Rural County, with 70% of its population residing outside Main Towns. This Chapter outlines the ongoing critical role of Rural Communities in areas such as Agricultural activity and production, as well as embracing an evolving Rural Ireland, which includes the provision of Broadband to all householders. In general the Council encourage enterprises to be located within Towns, and Villages, although there is a flexibility outlined within the Policy Objectives of this Chapter which state medium to large scale enterprises may be permitted in Rural areas, should it be demonstrated the location is appropriate, or more appropriate than a small village settlement. This Policy approach does not inherently conflict with the goals and objectives of the RSES.

Chapter 13 – Development Management: This Chapter outlines the Development Management Standards across the entire spectrum of the Planning Service, and the Regional Assembly commend Cavan County Council for the extensive scope of work associated with same. The Assembly fully support the approach to flexible application of requirements to provide Car Parking Spaces given the emphasis on Compact Growth.



Chapter 14 – Land-Use: Chapter 14 provides explanations / elaborations on Land Use Zonings within the Plan. As per the comments relating to Chapter 13, the Assembly commend Cavan County Council on the detail and clarity provided therein.

RECOMMENDATIONS:

1. The issue of serviced sites as outlined in 2.10.7 of the Draft lacks a clear direction in the methodology of identification and supply of such sites. The RSES RPO 3.7 envisages the council taking the lead in such projects and this should be clarified and the terms of RPO 3.7 included in the Plan.
2. Consideration should be given to improve alignment between this plan and the RSES through the use of terminology that describes Virginia as a ‘Place of Regional Significance’ (Chapter 1).
3. Include a commitment to a specific timeline for the preparation of a LTP (for Cavan Town LAP) in the short term – within two years of the adoption of the plan would be appropriate (Chapter 2).
4. That Sec. 7.10.4. be reviewed to give full effect to the reflect RPOs on Biomass (RPOs 4.27, 4.28 and 4.29 refers).
5. That a Landscape Character Assessment for County Cavan be carried out and incorporated into Chapter 10 of the Plan and utilised to inform other Areas of Planning Policy, including Wind Energy. In the alternative a clear timeframe and commitment to completing an LCA should be inbuilt into the objectives of Chapter 10.

OBSERVATIONS

1. Consideration should be given to exploring opportunities to reduce the burden of text, particularly where it quotes from other policy statements (including the RSES). The inclusion of links to documents and graphic design may assist in this regard.
2. That the Cavan Local Area Plan sets out a clear justification for the Zoning of Enterprise & Employments Lands which are distinctly remote from the existing built-up envelope of Cavan Town at the following Locations: (i) East of Cavan Town adjacent to N-3, and (ii) South of Cavan Town adjacent to the N-55.
3. That the Cavan Local Area Plan sets out a greater clarity in terms of the sequencing of Residential Growth, and how the 30% brownfield / compact growth ambitions are to be realised. This could potentially be done through clearly identified neighbourhood growth targets / ambitions.
4. In respect of Virginia, the plan should clarify how it is proposed to address the need identified in the RSES to provide employment opportunities and support services to those residents that commute out of the county and for the quantum of population growth envisaged. Such clarification should also take cognisance of infrastructure capacity, including wastewater (Chapter 1).

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5. Provide greater justification for the density advocated in Objective RD 01 (Chapter 2).
6. The plan would benefit from further review that clarifies and/or justifies the quantum of lands proposed to be zoned 'Strategic Residential Reserve' (Chapter 2).
7. That the Plan clarify the methodology (and timeframe's) through which Masterplans are to be carried out in relation to Key Sites, particularly those identified for Enterprise and Employment use. The Council should through the Plan confirm that such Masterplans are not the responsibility of Developers/ applicants, as the preparation of Masterplans outside of the Plan making process has the potential to inhibit the input of the Public and other consultees in the holistic evaluation of the relevant matters (Chapter 2).
8. Consideration should be given to inclusion of N-3 bypass route options for Virginia if available, within the context of land zonings and other development objectives as appropriate (Chapter 2 and 7.41).
9. The plan would benefit from inclusion of timelines for preparation of Masterplans for the enterprise/employment lands (Chapter 2).
10. That STC 09 and associated narrative be reviewed to clarify that Cavan County Council will be taking the lead in such projects as envisaged within RSES RPO 3.7.
11. That consideration be given to inclusion of decarbonisation zone(s) as an objective of the plan with details – should same be available (Chapter 5).
12. Consider inclusion of clear commitments and deliverables in the provision of Remote Working Spaces across County Cavan (see also the NWRA – Regional Co-Working Analysis at <https://www.nwra.ie/publications/>).
13. Consider commitment to preparation of LTPs for Cootehill, Kingscourt, Virginia & Bailieborough, including timeframe.
14. That Policy LUR-04 (and any associated narrative) be reviewed within the context that this would best fall within the remit of the NTA, who take the lead on the formulation of future Transport Plans.
15. That Chapter 7 be reconfigured, to clearly and distinctly divorce the Transport related Infrastructure, such as Roads, Greenways etc. from other Infrastructure Provision such as Electricity distribution, Wind energy and suchlike.
16. Consider modifications at Chapter 7.3.2 to include a clear Project table for Greenways, together with estimated delivery dates on projects. The modification could include a clear Map of existing, pipeline, and proposed Greenways, with the potential identification of Linkages between projects, where they arise for Medium – Long term ambitions.
17. The reference to the North – South Interconnector within the RSES is contained within Sec. 8.2. The Draft Plan at 7.9.1. should be amended to correctly reflect the same.



18. That the Plan contains a more layered Policy approach to Wind Energy (Sec.7.10.1) which is informed by an analysis of the Landscape Character Typologies for County Cavan, as well as other factors such as Environmental Sensitivity.
19. Consideration should be given to inclusion of a Map showing the Rights of Way within County Cavan, alongside the text as set out in Sec. 7.11.
20. Sec. 9 on Tourism would benefit from including Failte Ireland's themed propositions.
21. That the Chapter in Relation to Tourism sets a clear Hierarchy of Tourism service towns for the county, as well as potentially examining a tiered stratum of Visitor Attractions within the county.

CONCLUSIONS:

The Regional Assembly is generally satisfied that the Cavan Draft County Development Plan is consistent with the RSES, however, some alterations, as referenced above are required for this to be achieved.

The Assembly would have some concern as to the extent of absent Policy instruments which do not form part of this Draft Plan, including instances where timelines are not specified, nor clear commitments charted for either conducting this work, or its completion.

If you have any queries in relation to the above, do not hesitate to contact the Assembly's Planning Team.

Is mise le meas,

David Minton,
Director