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Via email: bjennings@cavancoco.ie

30 March 2022

**RE: Proposed Material Alterations to the Draft Cavan County Development Plan
(incorporating a LAP for Cavan Town) 2022 – 2028.**

A chara,

I refer to your correspondence received on 5 March 2022, inviting the Northern and Western Regional Assembly to make a submission on the above-mentioned proposed Material Alterations (MAs) to the Draft Cavan County Development Plan 2022-2028.

The Assembly has engaged with all stages of the Development Plan-making process and commend the council on processing and considering the large number of submissions received on the Draft County Development Plan.

Format of the Submission

The Assembly note there are over 218 proposed MAs in Volumes 1 to 4 of the draft Development Plan. The submission will concentrate on issues that have regional significance in terms of consistency or otherwise with the RSES. It will comment on selected MAs in this regard. Many of the amendments are relatively minor, involving additional narrative and references that are generally supported by the Assembly, and they do not need to be examined individually at this stage.

The Assembly at its meeting on 25th March 2022 considered the proposed MAs and resolved to make this submission, which incorporates its report on the proposed MAs and

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recommendations and observations.

The following report consists of an initial section that provides a brief reminder of the 'Recommendations' and 'Observations' made by the NWRA and delivers a commentary on the outcome of the consideration given by Cavan County Council. Where a Material Alteration (MA) has arisen it will identify this fact and confirm if it is considered that the proposed Material Alteration is consistent with the RSES. Thereafter, an account shall be given of other selected proposed Material Alterations of regional significance and whether they are consistent with the RSES, dealing with the proposed MAs within the Core Strategy and then within individual Chapters of the Draft Plan.

Recommendations Made By The NWRA To The Draft Cavan CDP

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.

Outcome: MA 49 commits to Cavan County Council identifying and prioritising a programme for Serviced sites, within 1 year of the adoption of the Plan, 'in appropriate smaller towns'. Further detail on the settlements to be included have not been identified at this juncture. Furthermore, **MA 51** provides for a similar provision in respect of 'appropriate villages'. Both are consistent with the RSES.

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).

Outcome: The terminology proposed within the narrative of **MA 7** (scene setting text) now reflects the terminology used in the RSES, but Virginia remains labelled as 'Self Sustaining Growth Town' elsewhere and this is a missed opportunity to reflect it's a place of regional strategic potential. Accordingly, it is appropriate to welcome this MA, and to recommend that the terminology should also be incorporated into the Settlement Hierarchy terminology to give it full effect.

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).

Outcome: Change is proposed through **MA18** to undertake a Local Transport Plan

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(LPT) for Cavan Town within 1 year of Adoption of Dev. Plan. **MA16** also relates to the LTP for Cavan Town, wherein it proposes to amend the wording of Objective CNR 02. It is considered that the proposed wording of Objective CNR 02 needs to be further amended to reflect the intention to prepare a LTP. Although the LTP is to be delivered at a later juncture than envisaged, it is consistent with the RSES.

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).

Outcome: MA 91 addresses the above and introduces 3 new Objectives which reflect the RPO's of the RSES on Biomass. This is consistent with the RSES.

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.

Outcome: MA 130 states Cavan will undertake to commence Landscape Character Assessment (LCA) within 6 months of the adoption of the County Plan, to augment that set out in Appendix 14. Additionally, **MA 83** includes a reduction in the timeframe to prepare a Renewable Energy Strategy for Cavan, from 2 years to 6months (from time of Plan adoption). An LCA can be a particularly lengthy process and may take a number of years to complete. It is less than desirable that County Cavan will be without an LCA for a further period. However, the commitment to undertake an LCA is consistent with Regional Policy Objectives and both **MA 130 & MA83** should be supported.

Observations Made By The NWRA on the Draft Cavan CDP

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.

Outcome: There does not appear to be a reduction to the original extent of text. This matter, however, does not impact Regional Policy Objectives.

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 builtup 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.

Outcome: No justification is included within the proposed MAs in relation to this matter and thus no further comment can be made at this stage of the process.

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.

Outcome: MA 15 introduces new text, and Objectives in respect of Settlement Consolidation Sites. It commits to maintain a log of permissions in relation to Compact Growth developments which include residential and enterprise / employment schemes within the settlements of the County. **MA11** introduces amendments to population allocation across settlements, most notably for Cavan Town, while **MA12** provides new text and policy measures in respect of Residential Density (now inserted at 2.15). These new measures are set out in a Table, which clearly outlines the County Development Plan approach on residential density. These MAs are consistent with the RSES, including the provisions regarding delivery of Compact Growth and RPO 3.1. The Assembly would suggest Cavan County Council, in addition to maintaining a record on Compact / Town Centre Growth (MA 15) should also maintain a record on Residential Completions within its Settlement Hierarchy, as this is a key statistical component to enable the Local Authority to chart progress in respect of achieving compact growth across its main towns.

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).

Outcome: MA 99 includes reference to the WWTP upgrade for Virginia currently at Gate 2 Stage – this upgrade will account for a system with a Population Equivalent capacity of 6,000. Otherwise, there does not appear to be any proposed elaboration on the need for support services in Virginia (inclusive of additional employment opportunities) within the proposed Material Alterations and therefore no further opportunity arises to make a further submission on same. However, the additional detail in respect of WWTP upgrades proposed under **MA 99** is welcome and consistent with the RSES.



5. Provide greater justification for the density advocated in Objective RD 01 (Chapter 2).

Outcome: See response at 3, above. **MA12** provides for revised policy in respect of Residential Density (MA 12 – Sec. 2.15 of the Plan) and extensive additional narrative. The narrative associated with the new densities is to align with the Guidance set out for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), or any update thereof. Cavan County Council has now produced Residential Density guidance which is differentiated by Town Centre / Brownfield or Infill sites / Proposed Residential & Proposed Low Residential Density, which is less than a third of the density proposed within Town Centres. This generally accords with Regional Policy Objectives and follows the model of Compact Growth.

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).

Outcome: **MA 12** sets the context for Residential Zoning in Cavan Town. There is an extended explanation as to the supply of additional lands, the new figures for Cavan Town align with the ambition and vision of the RSES.

7. That the Plan clarify the methodology (and timeframes) 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).

Outcome: **MA 24** now includes an added provision which states that each Masterplan in Virginia (s2.3.11) will include a full public consultation strategy and that the Planning Authority shall take the lead. It also provides that Masterplan 6 (Lands at Burrencarragh) shall adhere to Section 2.6 of the Spatial Planning and National Roads, Guidelines for Planning Authorities, 2012. **MA 19** proposes a similar new wording in respect of Cavan Town Masterplans (s2.2.12), wherein it proposes Cavan County Council will take a lead role in the preparation of Masterplans and shall include a full public consultation strategy. The provisions in **MA24** and **MA 19** are welcome and Policy VMP01 should be amended to be consistent with the text in respect of timelines for completion of the Masterplans (i.e. prior to lodgement as part of any planning application).



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).

Outcome: MA 182 proposes to include the emerging preferred Route Option for the N-3 by-pass (which runs close to the Northern Boundary of the Settlement) and this is welcome.

9. The plan would benefit from inclusion of timelines for preparation of Masterplans for the enterprise/employment lands (Chapter 2).

Outcome: MA 19 and **MA 24** include proposals that the masterplans shall be agreed prior to lodgement as part of any planning application. This clarification is welcome but as set out in No 7 above, Policy VMP01 should be amended to be consistent with the text in respect of timelines for completion of the Masterplans (i.e. prior to lodgement as part of any planning application).

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.

Outcome: MA 49 proposes a new Objective wording which proposes Cavan County Council will take a lead role in the preparation of Masterplans. This provision will be consistent with RPO 3.7 of the RSES and should be supported.

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).

Outcome: MA 61 relates to Chapter 5 and commits to a new objective to incorporate Cavan Town and surrounding area as a decarbonising zone (subject to Departmental approval), this includes a new Policy Objective DZ01 which reflects this ambition. There is no associated timeframe with the delivery of the Decarbonisation zone. Although the RSES does not specifically mention Decarbonisation Zones, its inclusion is consistent with the RSES.

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/>).

Outcome: The subject of Remote Working Spaces within County Cavan is referenced in relation to 2 specific projects: (i) **MA 33** - Bailieborough Courthouse – RRDF Scheme, and (ii) **MA 44** - Ballyconnell Market House – RRDF Scheme. There is otherwise no overall analysis on need, or indeed in relation to geographic imbalances, where potentially further projects would be of benefit to the County's Workforce. MAs 33 and 44 are welcome.

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13. Consider commitment to preparation of LTPs for Cootehill, Kingscourt, Virginia & Bailieborough, including timeframe.

Outcome: A number of Material Alterations are proposed in respect of the preparation of LTPs. **MA 16 & MA 18** relates to Cavan Town; **MA 23** relates to Virginia; **MA 29** relates to Ballyjamesduff; **MA 32** relates to Baileborough; **MA 36** relates to Cootehill; and **MA 40** relates to Kingscourt. The wording is unusual in that it refers to the 'commencement of the preparation' instead of simply undertaking to 'prepare' Local Transport Plans. The timeline for commencement of Cavan Town is within one year of the plan; the timeline for Virginia is two years of the adoption of the plan and the remaining LTPs are to be completed within the lifetime of the plan. The proposals to prepare the LTPs should be welcomed, as they are consistent with Chapter 6 of the RSES. However, the NWRA recommends that the wording be amended to confirm the commitment is to prepare the LTPs and that it shall commence within the stated timeframes – otherwise it could be interpreted that the commitment is solely to 'commence' their preparation – which is not the case.

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.

Outcome: **MA 67** proposes to insert that the Council will engage with the NTA in conjunction with the Northern and Western Regional Assembly. This proposed amendment is appropriate and consistent with the submission of the NWRA to the Draft Plan.

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.

Outcome: There does not appear to be clear proposals to compartmentalise Chapter 7, and the amendments are to the text within the Chapter, as opposed to the structure. As no specific MA relates to this issue, there is no opportunity to make a submission in this regard.

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.



Outcome: Whilst the above is not dealt with directly, **MA 71** proposes to incorporate additions to Sec. 7.3.8 of the Draft Plan, where 9 Key projects on 'Active Travel' are listed, and described, all these projects are approved, and funded by the NTA. This narrative is supported by a new Objective ACT 01, which supports active travel and the delivery of improvements to the provision and safety of the walking and cycling infrastructure of the County. This MA is consistent with the RSES and should be supported.

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.

Outcome: **MA 80** proposes to insert a narrative to reference that the RSES fully supports the delivery of the regionally important electricity interconnectors projects. This MA is consistent with the RSES.

18. 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.

Outcome: **MA's 94 – 96** include a new policy objective, which reads as follows: 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. This is a welcome provision, and consistent with the RSES.

19. Sec. 9 on Tourism would benefit from including Failte Ireland's themed propositions.

Outcome: There are 12 amendments within the Tourism Chapter of the Plan, (**MA's 111 – 122**) and Failte Ireland's policy framework is now more effectively reflected. These MAs are consistent with the RSES.

20. 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.

Outcome: Cavan Town's role as a Tourism 'Destination Town' and the function of same are now better reflected, see **MA 120**. Again, this is consistent with the RSES.

Commentary on Selected Proposed MAs to Draft CDP

The issues highlighted in the Assembly's initial submission to the Draft Cavan CDP have been examined in the previous section. In this section it is proposed to reflect on the Core Strategy and Settlement Strategy MAs of regional significance in respect of Cavan Town and

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Virginia. Then the proposed Material Alterations of regional significance that have not been captured in the previous section shall be drawn out and shall be grouped according to the Chapter Heading within the Draft Plan.

1. Core Strategy & Settlement Strategy

(i) Cavan Town – RSES Key Town

The Amendments to the Core Strategy, including the population targets for Cavan Town have been revised (**See MA 11**). The allocation of population growth which is assigned to Cavan Town has now been increased. This increase will reflect the ambition of the RSES, which is to grow the number of people in Cavan Town (from its 2016 base figure) by at least 30% between now and 2040.

The increase over the lifetime of this Plan (to 2028) is an ambition to boost the 2016 baseline figure by an additional 1,760 persons (i.e. 2/3 of the overall growth forecast for Cavan Town (to 2040) insofar as it is set out in the RSES). This is considered to be broadly in line with the framework of the Regional Strategy for Urban growth.

(ii) Virginia:

The settlements of Virginia and Carrickmacross (Co. Monaghan) were identified within the RSES as ‘Places of Strategic Potential’ (Sec.3.9 Refers). **MA 11** includes the Core Strategy Table on Residential Yield & Population for Virginia.

The context for this designation of Virginia as a Place of Strategic Potential is generally set out within the RSES. Any expansion upon the RSES narrative should emphasise that in recent years (Census of 2011 & 2016) a number of settlements in South Cavan have experienced population growth which have been significantly greater than other areas of the County. This growth is strongly linked to the ability of residents to commute to the GDA (Greater Dublin Area) daily. The medium-term strategy for Cavan County Council is to develop Virginia into a settlement which evolves into a self-sustaining town where the public and enterprise services, and in turn employment provision for this area of South Cavan are increased.

As already emphasised, **MA 11** relates to the Core Strategy Settlement Hierarchy, and the revised population forecasts / targets set out therein. In this plan, the Council has differentiated Virginia as the sole Tier 2 settlement for the County, elevating it above similar sized towns (i.e. Bailieborough, Ballyjamesduff & Kingscourt). The Draft Cavan County Development Plan 2022 – 2028 apports almost 10% of County-wide population growth



within the County to Virginia over its lifetime. In addition to the ambition to grow Virginia by 862 extra people by 2028 (circa. 32% population increase) the land-use settlement map (and policy) for Virginia in this plan does attempt to significantly expand the base of General Enterprise & Employment provision, with a number of medium sized sites zoned to the North-western and South-western edge of the Town.

The lands proposed to be Zoned (General Enterprise & Employment) at Burrencarragh, which are located adjacent to the preferred N-3 by-pass corridor are at a remove from the edge of Virginia, however there are several significant industrial employers already established at this location, including Glanbia on the southern side of the National Primary Road, with access via the National Road, where the 100km/h limit applies. Moreover, it is explicit within the Plan, as proposed in **MA 25 & MA 26**, that these lands will be the subject of a detailed Masterplan, which will include an evaluation of multiple factors, including Transport, with a particular emphasis on sustainable access.

The allocation of lands for employment uses and support services is to be welcomed as it seeks to address the significant issue identified in the RSES - commuting out of the town and county. It would be appropriate to consider how these lands can be developed in the period leading up to the completion of the Bypass, without prejudicing its delivery.

It is the Assembly view that a population growth rate of 32% for Virginia is perhaps overly ambitious, and it should be set below that of Cavan Town. Additionally, the key emphasis of the RSES is placed upon the provision of employment and support services to provide an alternative for the commuting population. It should also be noted that the growth ambition of 900 extra people for Virginia over the lifetime of this plan may not be realistic or achievable, unless there is an increase in capacity of the WWTP for the Town – it is understood that it is not scheduled to be completed, and in operation until 2024.

2. Housing/Sustainable Communities

MA 55 – 58: These MAs provide detail in respect of the Affordable Housing Act, incorporation of Housing for All, and requirement that 20% of housing lands be set aside for Social & Affordable Housing. Furthermore, **MA 216 – 217** proposes an amendment to Appendix 8 - Housing Strategy, setting out narrative in respect of Part V. It is also proposed that an amendment be made to the Housing Strategy and HNSA 2022-2028 – Appendix A, which includes a significant narrative setting out the assessment of need for affordable housing tenures (in addition to social housing) and uses the estimate to determine the breakdown of Part V housing requirements between social and affordable over the period of the development plan. These additions are consistent with the objectives of Sec. 7.6 of the RSES.

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3. Economic Development

MA 64: proposes to insert a new Objective (HBEA 06) to support the development of “Smart Places” and promote Cavan as part of a “Smart Region”. This is consistent with Sec. 6.6 of the RSES.

4. Transport & Infrastructure

A variety of amendments are proposed within this chapter, that are consistent with the RSES. The following are the more significant proposed amendments:

- (i) **MA 68:** Permeability of walking and cycling infrastructure (support RPO 6.26 of the RSES).
- (ii) **MA 69:** Disabled access on Public Transport in Rural Areas (support RPO 6.32 of the RSES).
- (iii) **MA 70:** Support for the Rural Link Local Transport Programme (support RSES RPOs 6.23 – 6.32).
- (iv) **MA 74 – 76:** Policies to Support the carrying capacity of the National Road Network in Cavan, as well as policies around effective Design for Urban Roads and Streets (DMURS, 2019). (MA 74 reflects RPO 6.5 and cumulatively the MAs are considered consistent with the RSES).
- (v) **MA 81:** Proposes the inclusion of an additional Objective - GE 09 – which seeks to 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. (This MA is consistent with the RSES and should be supported).
- (vi) **MA 85 – 86:** To commence a Renewable Energy Strategy for Cavan, and to facilitate proposals for Energy Storage & Infrastructure. (These proposals are consistent with the RSES – RPOs 4.16 – 4.20).
- (vii) **MA 92 – 93:** To support the use of hydrogen, and CNG (Compressed Natural Gas) through refuelling infrastructure. (The proposed amendments are consistent with RPOs 4.17, 4.18, 4.19).

5. Environment

MA 106 – 108: These Objectives support the development of green Infrastructure, river walkways and access to town centres. They also deal with Flood Risk Management, the sequential approach to flooding, and OPW co-operation in the delivery of Flood Schemes. (These proposed amendments are consistent with the RSES and in particular RPOs 8.12 – 8.23).



6. National Heritage

MA 123 – 126: These propose the introduction of several Heritage Objectives to work with stakeholders on sites of ecological importance, and recognition of the role of Appropriate Assessments in the Planning Process. (These MAs are consistent with RPO 5.7).

7. Development management

MA 146: This MA proposes the commencement of a Building Heights Study for Cavan Town and is reflective of similar studies being required in the RSES for Regional Growth Centres, and Galway MASP.

Recommendations

The Assembly consider that the majority of the proposed MAs do not create any consistency issues with the RSES. The instances where there are concerns have been outlined above and for convenience are recorded below in the form of recommendations.

1. **MA 7:** The terminology to describe Virginia as a “Place of Strategic Potential” should also be incorporated into the Settlement Hierarchy terminology to give it full effect.
2. **MA16:** The proposed wording of Objective CNR 02 needs to be further amended to reflect the intention to prepare a LTP.
3. **MA 15:** In addition to maintaining a record on Compact / Town Centre Growth, an undertaking should be given that Residential Completions within its Settlement Hierarchy shall be recorded, as this is a key statistical component to enable the Local Authority to chart progress in respect of achieving compact growth across its main Towns.
4. **MA 24 and MA 19:** These proposed amendments are welcome and Policy VMP01 should be amended to be consistent with the text in respect of timelines for completion of the Masterplans (i.e. prior to lodgement as part of any planning application).
5. **MA 16, 18, 23, 29, 32, 36, and 40:** The wording should be amended to firstly confirm the commitment is to prepare the LTPs and, secondly, that it shall commence within the timeframes specified in each MA.
6. **MA 25:** The allocation of lands for employment uses and support services is to be welcomed as it seeks to address the significant issue identified in the RSES - commuting out of the town and county.
7. **MA11:** The population growth rate of 32% for Virginia is not likely be realistic or achievable and should be set below that of Cavan Town. The WWTP has capacity

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issues and it is important that it can cater for new employment and support services necessary to address commuting out of the town and county. Upgrading of the capacity of the WWTP will be a priority and population targets should be cognisant that it is not scheduled to be completed until 2024.

The Assembly wish to thank Cavan County Council for the opportunity given to comment upon this proposed Material Alterations and we are available should any clarification on the submission be required.

Mise le meas,

David Minton Director