

**Submission by Monaghan County Council in
Response to the Issues and Choices Paper
Relating to the National Planning Framework**

March 2017

1.0 Introduction

1.1 This submission has been prepared to provide comments to the consultation process in advance of the drafting the National Planning Framework. Monaghan County Council welcomes the opportunity to submit comments and suggestions to the 'Issues and Choices' paper and on other topics which it considers to be relevant to the preparation of the National Planning Framework.

2.0 Structure of Submission

2.1 The submission comprises of three main sections – Background, Comments Specific to Monaghan and Comments on the Contents of the Issues Paper.

3.0 Background

3.1 In the first instance it is important to understand Monaghan's position both at a regional and national level in order to provide context to this submission. Monaghan is placed equi-distant between the two largest urban centres on the island, Dublin and Belfast. Its geographical location presents both opportunities and obstacles to the future development of the county.

3.2 The proximity of Monaghan to the Eastern Economic Corridor gives it an advantage in terms of economic development and connectivity, and provides markets as well as employment opportunities to its population. However, its border location, with one of the longest border boundaries, presents significant difficulties, such as restrictions on the normal functioning of the hinterlands of its towns, particularly as the four largest towns within the county are located on or within a few kilometres of the Border. Since the Belfast Agreement, the obstacles that previously presented with the existence of the border have lessened and currently allow more freedom of movement of people and goods. However, other issues such as currency and taxation differences, and disparities in the level of social and community infrastructure remain, and are significant in the economic and social functioning of the county and the surrounding area.

4.0 Comments Specific to County Monaghan

4.1 Regional Disparity

The NPF should have due regard to the economic and spatial dynamics of the Northern and Western Region and the limited connectivity of border counties such as Monaghan to the rest of the region.

4.1.1 The counties of Monaghan, Leitrim, Louth, Cavan, Donegal and Sligo have historically suffered economically and socially, and despite a lack of investment in essential infrastructure over the lifetime of the NSS, this border region has self sustained and competed on a national and an international level, in the face of its peripheral location. It is likely that these counties will be further marginalised from EU Markets following the UK exit from the EU due to their location along the Northern Ireland border. Regardless of the consequences of UK exit from the EU, the national hierarchy needs to acknowledge that strong cross-border linkages and relationships have been established, are working for the betterment of both sides of the border, and will continue to develop. This evidenced by significant cross border dependencies with large sections of the population traversing the border each day commuting to work and in connection with cross border trade. The resilience of these Counties to survive, to continue to thrive and to build strong connections, linkages and relationships on both sides of the Border needs significant consideration and positive supporting measures in the new national framework plan.

4.1.2 There are considerable interregional issues and considerations for County Monaghan given its strategic location. It lies on the axis between Belfast and Galway, and it provides a key link between Letterkenny, Derry and Dublin. However its place within the North West Regional Assembly (NWRA) is not reflective of the reality in that it has stronger connections, synergies and similarities, economically and socially, with those counties in the Eastern and Midland Regional Assembly (Louth, Meath) and indeed those border Counties in Northern Ireland, than many in the NWRA (Galway, Mayo, Leitrim, Roscommon). Currently it is not clear how the border counties such as Monaghan will benefit from significant NPF policy decisions in favour of strengthening Galway, the main city in the NWRA. With supported and co-ordinated development, Monaghan has the capacity to increase the benefits arising from its relationship with the Eastern Economic Corridor, Northern Ireland, and the Greater Dublin Area. These growth centres need to be recognised nationally and the proposal to remove 'Hub' status from towns such as Monaghan is unsustainable. Their function in providing a

key spatial and economic role in this region needs to be recognised, acknowledged and supported in the NPF.

4.1.3 The ability of Monaghan to maintain and grow strong connections to Letterkenny, Derry, Belfast, Dundalk, Dublin and to provide a further links to other key settlements like Omagh, Armagh, Craigavon, Enniskillen and Cavan, needs to be realised and supported. It is acknowledged in the Issues and Choices paper that there are a number of towns which due to their level of service provision and extensive catchments, serve an important role for those areas that fall outside the reach and influence of cities. For Monaghan, this acknowledgment needs to be explicitly stated in order to identify its role/importance and provide the town with the opportunity to support the hinterland, given its location relative to the five major cities. The location of these five cities means that if focused upon in the NPF, a more spatially uneven pattern of regional development will continue with the urban centres in the southern and eastern regions of the country developing ahead of the towns located in the border region. Dundalk and Drogheda are significant urban centres that Monaghan can support and in addition it is argued that Monaghan offers a significant central role to support cross border co-ordinated growth.

4.2 Economic Prosperity

County Monaghan has the potential and the capacity to be a focus for economic development in a location equidistant from Ireland's two largest cities, whilst also offering direct access to the eastern economic corridor.

4.2.1 It is imperative that the NPF encourages economic performance by and builds upon local strengths to drive growth in employment in all regions. The agri-food sector has taken advantage of natural resources and changing consumer demands whilst enabling progressive increases in off farm employment. This sector is of immense importance to County Monaghan and the Border Region. A well established food production and processing sector offers further development potential that must be supported. Monaghan and Cavan play a vital role in terms of food production and specialised engineering which both have significant cross border trading activities.

4.2.2 Small to medium sized enterprises (SMEs) are central drivers in economic growth both nationally and locally. They are the cornerstone of economies in rural counties such as Monaghan.

The continued development of these rural counties is partially dependent on maintaining and enhancing the contributions that SMEs make to the economy through the provision of employment in small towns and rural areas. Government agencies provide a variety of supports to job creation through the Industrial Development Authority, Enterprise Ireland and the Local Enterprise Offices. Foreign Direct Investment (FDI) provides a source of high quality jobs in Ireland but there has been a notable absence of investment in Monaghan and the surrounding counties of this type of investment. It is apparent that a pattern is emerging where new FDI and employment gravitates towards existing companies already established in Ireland creating a clustering effect. Under current trends, this is of significant concern to Monaghan, where connections to Belfast and significant towns in Northern Ireland, as well as the north Dublin commuter belt, have the potential to attract such companies to the County. Monaghan has the capacity to provide suitable alternative locations for employers and employees to the Dublin commuter belt, where increasingly issues like water supply, traffic congestion and lack of housing are acting as barriers to FDI.

4.3 Infrastructure Provision

An upgraded N2/A5 route has been recognised as being critical to the long term sustainable economic and social development of the Northern and Western Region and specifically the Border Area.

4.3.1 This strategic radial corridor through Monaghan has been identified as the primary access route to the north west of the country with associated connections to the entire Northern Ireland region. Research has clearly outlined the importance of this corridor in supporting the future economic prosperity of the Border area. The provision of the N2 upgrade needs to be established firmly as a priority in the NPF if the goal of achieving sustainable regional development is to be realised. The N2/A5 links Dublin with Letterkenny and Derry via Ardee, Monaghan, Omagh and Strabane, and is a recognised key transport corridor that would serve the entire North West population (circa 750,000 people) with a major arterial route. The section of the upgraded N2 located in Monaghan will run from Clontibret to the border at Aughnacloy and extends for 26kms.



Source - <http://www.tii.ie/roads-tolling/our-road-network/>

4.3.2 Previous committed funding allocations to this project from the Irish Government was delayed due to economic austerity and in 2012 a decision was made to phase the delivery of the project. A submission has been made by Monaghan County Council to the mid-term review of the Infrastructure and Capital Investment Plan 2016-2021 requesting that the inclusion of the N2 Clontibret to the Border Scheme which is an integral part of the N2/A5 strategic Northwestern Radial Route receives urgent attention and is included in the forthcoming Capital Investment Plan.

The N2 Clontibret to Border Road Realignment Project - A Strategic Priority for the National Planning Framework

The IBEC and CBI Report 'Connected', (July 2016), identified the N2/A5 as one of the top ten key transport infrastructure priorities on the island of Ireland.

Certainty on the development of this Northwest Strategic Radial Corridor will allow the development of other related infrastructural links and provide a basis for the sustainable economic development of the main population centres in the Northwest and Border regions.

This scheme will complement the A5 Western Transport Corridor (Belfast to Enniskillen) scheme and provide for better integration of this transport corridor into the existing transport network regionally and nationally.

In 2008 Monaghan County Council under the aegis of the National Roads Authority (NRA) progressed the scheme between Clontibret to the Northern Ireland border in accordance with the NRA's Project Management Guidelines. The level of investment already made in the development of the N2 and the A5 Western Corridor Schemes requires further progression.

In July 2012 Phase 2 Route Selection was completed with the public display of the preferred route corridor. The preferred route corridor is 400m wide and requires further design and analysis to develop the scheme to determine the specific position of the route within this corridor, the land required to build the scheme, and the detailed environmental impact of the scheme.

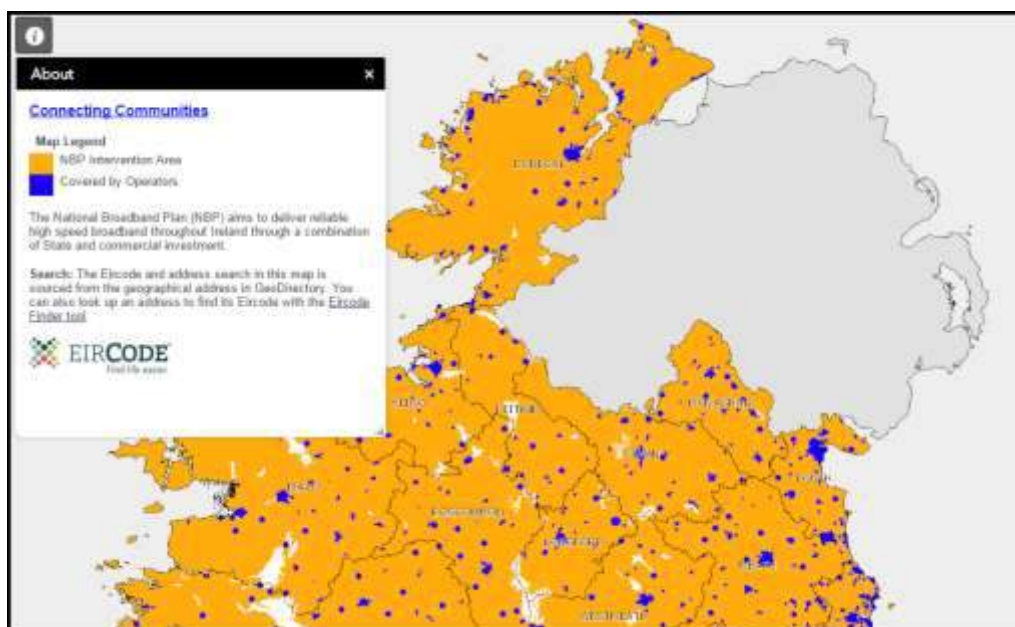
The preferred route corridor is currently protected through planning policy and is significantly limiting development potential in the identified corridor.

Traffic volumes on this route have increased by 20% between 2013 and 2016. All fiscal forecasts indicate that our economy will continue to grow and given the period of time required to progress a scheme of this scale through design and statutory approval stage, it is imperative that this scheme is prioritised before a situation of saturation level is reached on the N2.

It is imperative to prioritise transport investment in the Northwest and Border Region to negate the possible impact of the UK exit from the EU, but also to provide for a region which is suffering from a lack of infrastructural investment in the national road network, particularly given the absence of alternative methods of transport such as a rail corridor.

The timely roll out of the National Broadband Plan is critical to enabling economic growth in the Northern and Western Region

4.3.3 The provision of quality high speed broadband is a requirement for the promotion of economic development. Whilst significant improvements have been provided in the general region surrounding Dublin, there is an identified deficit in County Monaghan and the wider region when compared to the national level. This must be addressed in the NPF through specific identified policies, measures and time bound funding proposals.



Source - <http://www.dcae.gov.ie/communications/en-ie/Broadband/Pages/National-Broadband-Plan-Map-.aspx>

4.4 A Growing Population

The population of County Monaghan increased by 15% since 2006, approximately 70% of whom reside in rural areas.

4.4.1 It is noted that the national population is both growing and aging. How a predominantly rural county provides for future population growth must be considered separately to how the urbanised areas provide for their needs. The Design Standard for Apartments (2015) and the Sustainable Residential Development in Urban Areas (2009) set out standards and densities which although appropriate in highly urbanised areas, are neither desirable nor practicable in the rural towns. It is welcomed that the Issues and Choices paper states that “business as usual” is not desirable for a

variety of reasons. Policies contained within a national framework plan need to recognise that, for example, applying housing standards nationally is not appropriate. High level guidance is required which will deliver a more sustainable pattern of land use development yet allows for flexibility of residential developments within the towns of those less urbanised counties. This guidance is necessary to provide a real alternative choice to a growing population, which when offered the choice of a one off rural house or a detached/semi-detached dwelling within a high density environment, have opted for the former on the basis that it provides greater privacy, a larger garden space, and room for extension to accommodate a growing family. It is submitted that this is a poor choice and the business as usual option for one off housing to continue to be the predominant house type choice within rural counties needs to be addressed from a national level in a more holistic manner.

4.4.2 Conversely, the 2013 European Court of Justice ruling (Flemish Decree) now requires local authorities to revisit the rural generated housing section of the 2005 Guidelines and will most likely result in less onerous policy for rural housing within County Development Plans. Over the life time of the NPF issues of climate change, protection of natural habitats and water source protection will be paramount issues to ensure the quality of our environment is protected and enhanced/restored. It is imperative that that the development of one off rural housing is managed in a coherent, sustainable and consistent manner to assist in achieving this aim and the NPF must support and reinforce the application of the Sustainable Rural Housing Guidelines adopted in 2005 consistently across all local authorities.

4.5 Rural Development

Rural counties have to balance the need to accommodate demand for increased economic activity and one off rural housing, while maintaining the character and integrity of the rural environment.

4.5.1 Ireland is home to an exceptionally rich array of natural and built heritage with sites of unique biodiversity, visual amenity and nationally important heritage sites. However, pressures on the rural environment resulting from rapid changes in the rural areas due to one off rural housing and due to divergence from employment in agriculture, as well as increasing recreational activities, have begun to alter the rural environment in adverse ways.

4.5.2 Proposals for forestry, mineral extraction, telecoms and wind farms, as well as the traditional rural developments of agricultural diversification projects and rural housing, places added pressures on our countryside. Coherent direction from a national level on how to manage these pressures is required to prevent inconsistency and to ensure counties manage resources in a sustainable manner.

5.0 Comments on Contents of the Issues Paper

5.1 In the Introduction of the issues paper it is stated that the National Planning Framework will be a tool to assist the achievement of more effective regional development. This is welcomed.

5.2 The issue of population growth occurring in the surrounding hinterlands of settlements at the expense of less accessible rural areas, smaller towns and urban centres is concurred with. There is a need to address this in a coherent and consistent manner across the State within the NPF.

5.3 It is stated in paragraph 2.2.1 under Ireland's National Planning Challenges that much of the growth associated with Dublin is being accommodated in ten other counties, extending from Cavan to Wexford. It should be acknowledged that some of that growth will also be accommodated in South Monaghan, given that it is the same distance from the Greater Dublin area as South Cavan and North Wexford. In addition, it has significant capacity for growth having regard to existing infrastructure.

5.4 In paragraph 2.2.6 it is mentioned that Monaghan has experienced a combined net population loss. This is incorrect as Monaghan has consistently experienced a net population gain and should be correctly stated if referenced in the draft NPF.

5.5 It is noted in paragraph 2.2.7 that the development of the national motorway network has influenced settlement pattern. It is considered that the absence of a motorway to the northwest may have resulted in less population growth in County Monaghan than other counties served by motorways such as County Cavan. It is considered that the upgrading of the N2/A5 may change this circumstance.

5.6 It is agreed that 'Business as Usual' is not desirable for the reasons set out in paragraph 2.3.1. However, in response to calls for the provision of infrastructure in areas where it will be fully utilised, it must be acknowledged that certain areas will require infrastructural improvements to attract population, industry and commercial activity to stimulate and facilitate balanced growth. 'Positive Discrimination' in favour of the Northern and Western Region will be a necessary aspect of the NPF to ensure that all regions in the State benefit fairly from the economic upturn and increased Government investment, and thus delivering more balanced development.

5.7 The criteria for objectives set out in paragraph 2.3.3 of the issues paper are concurred with.

5.8 In paragraph 2.4.3 one of the criticisms of the NSS is stated that "it designated too many centres". However, it is considered that more balanced regional development can only be achieved by ensuring that strong urban centres are facilitated and developed in numerous locations across the country. A reduction in the number of centres would result in a concentration of investment and development in a limited number of areas and result in large sections of the country, particularly those well removed from large urban centres, failing to directly benefit. It is critical for towns such as Monaghan, which provide significant services to a rural hinterland, that their status as Hub Towns is maintained and enhanced to ensure they continue to benefit from investment and policy focus in the NPF.

5.9 The requirements set out in paragraph 2.4.8 are essential to the successful formulation and implementation of the National Planning Framework.

5.10 The statement of intent to fully co-ordinate with other major Government policies, including the reviewed Capital Investment Plan and the National Climate Change Adaption and Mitigation Strategies is welcomed. Co-ordination with bodies such as Irish Water will also be seminal.

5.11 Under 'People's Health and Well Being', the approach of reducing car dependency and promoting alternative modes of transport such as cycling and walking as a means of improving health and well being along is agreed with. However, this approach will only be if successful policies and funding are put in place through the NPF.

5.12 Support for the creation of sustainable communities, greater policy integration and joined up investment decisions across planning, health and transport policy sectors, improvement of living environments, in relation to community healthy living options and plan led development to make provision for communities is supported.

5.13 Under 'A Place Making Strategy' the stated importance of an All Island approach to place making is welcomed, particularly given the proximity of Monaghan to the large urban area associated with Belfast and Monaghan's relative proximity to Derry and other large urban areas in Northern Ireland compared to other cities such as Waterford, Cork, Limerick and Galway.

5.14 In paragraph 4.1.5 mention of the influence of Dublin now partially affecting Cavan and Longford is noted. It is considered that the NPF should recognise that the influence of Dublin extends to parts of Monaghan. In this regard it is noted that South Monaghan is as close to the Greater Dublin area as South Cavan and closer to Dublin and the Eastern Economic Corridor than Longford.

5.15 Paragraph 4.1.15 states that there are a number of towns which due to their level of service provision and extensive catchments serve an important role for those areas that fall outside the reach and influence of the cities. It is noted that these towns are not necessarily those with the largest populations. However there are concerns that the proposed move away from multiple centres will result in growth around the cities and that those areas serviced by those towns will fall into further decline if the main town in the area is not formally recognised in the NPF. There is a fundamental potential conflict between the stated aim to deliver balanced regional development and the proposal not to give larger towns which lie outside the hinterlands of larger urban areas/cities formal recognition/designation in the NPF.

5.16 The future role of our larger towns as successful places in the context of their regions, as well as the need to strengthen and promote them must be central to the NPF. This is considered to be equally as important as the consideration being given to the need to strengthen the second tier of cities in terms of achieving balance regional development.

5.17 It is agreed that consideration should be given to reform and strengthen administrative and governance structures so that they are capable of delivering the necessary alliances, collaboration

and actions to build up our main towns, cities and their regions, particularly in respect of regional assemblies, and where urban areas straddle county or regional assembly boundaries.

5.18 In respect of developing an urban policy that distinguishes between development within the existing built up area of cities and towns and green field development sites, it is considered that there needs to be both ‘a carrot and stick approach’. Incentives should be given to develop brown field and inner urban sites to make more effective use of existing urban footprints and disincentives should be associated with the development of green field sites. There is a need to shift the perception that development in urban areas is more difficult and expensive and less desirable than green field sites through the policy framework. This is necessary to prevent urban decay and car dependency arising from edge of, or out of settlement development.

5.19 In relation to distinguishing between the role of towns within the wider hinterland of the cities and those located outside the influence of the cities, it is considered that formal recognition must be given to certain large rural towns such as Monaghan, which provide a significant level of service, and play an important role for those areas that fall outside the reach and influence of the cities. This can only be effectively done by identifying these significant towns directly in the NPF as done in the NSS, so as to ensure that infrastructure and investment is channelled towards them and their role serving the surrounding hinterland is reinforced and strengthened.

5.20 It is noted in paragraph 4.2.6 that the economic productivity of the Northern and Western Region has been consistently below the national average. It is considered that low levels of infrastructural investment over the years and limited incentives to retain and increase population numbers in these areas, has resulted in a ‘brain drain’. The inclusion of economic and infrastructural policies that are favourable to the Northern and Western Region are required within the NPF to address this under performance. As previously stated ‘Positive Discrimination’ in favour of the Northern and Western Region, particularly the Border counties, will be a necessary aspect of the NPF to redress the economic imbalances and to ensure that all regions in the State benefit fairly from the economic upturn and increased Government investment.

5.21 The consideration of Effective Regional Development in paragraphs 4.2.11 to 4.2.13 is welcomed and the acknowledgement that NPF policies may differ across different regions to achieve

this is fundamental, particularly in relation to Monaghan, given its Border location. The building of 'regional resilience' is a key aspect of this, and may assist in the addressing the population loss to regions that are more prosperous.

5.22 It is noted that paragraph 4.2.15 states that reducing the proportion of people in a region with very low skills seems to make more of a difference to regional growth than increasing the share with very high skills. However this up skilling needs to take place within that particular region through institutions located in that region to service local needs. For example CombiLift, a global name in materials handling equipment based in Monaghan, has a significant demand for skilled engineering operatives. Up skilling of people outside a region often results in those people remaining outside that region once they have relocated.

5.23 In paragraph 4.2.16 the recognition of the potential for institutional collaboration on a North South basis to advance cross border regional development and strategically advance Irish higher education on an all island basis is welcomed, particularly from a Monaghan perspective, given that a number of higher education institutions in Northern Ireland are as close geographically as higher education institutions in the Northern and Western Region.

5.24 The exploitation of further development of industrial clusters outside urban areas where natural competitive advantages exist particularly in the agri-food, creative, clean energy and tourism sectors is welcomed.

5.25 The extension of the integration between land use and transport approach in the Greater Dublin Area to other regions to help them achieve their potential will have limited effect given the low levels of population density in the Northern and Western Regions and must be part of a suite of proposals to assist regions in achieving their potential.

5.26 A more tailored approach to regional development is welcomed and the strengthening of regional cities and towns as drivers of growth for the urban and rural areas of the regions is a priority.

5.27 It is considered that a regional 'value proposition' to make the regions more successful cannot be focussed on just one entity but on a combination of measures and approaches that are meaningful and enduring, and may involve direct intervention to give a region a competitive advantage over other more successful regions.

5.28 There is an inherent conflict at inter-regional basis between the inclusion of Monaghan and Cavan (with the exception of West Cavan) within the Northern and Western Regional Assembly and their natural focus towards the Eastern Economic Corridor. Much of the economic activity taking place in Monaghan and Cavan is driven by their proximity to the large urban centres of the greater Belfast and Dublin areas and the Eastern Economic Corridor, and with the exception of West Cavan there is little or no economic interaction with the remainder of the region. This must be recognised in the NPF and policies within it must address this conflict.

5.29 The need mentioned in paragraph 4.3.13 to protect some rural areas from unsustainable growth pressures as experienced in the recent past whilst ensuring that there are attractive alternatives to urban generated rural development in the hinterlands of cities and larger towns is acknowledged. This is of particular importance to rural counties such as Monaghan which are characterised by a demand for urban generated rural housing and declining populations in town centres.

5.30 The acceptance in paragraph 4.3.13 that there is an important relationship between the social and economic well being of rural areas and their proximity and accessibility to viable towns and cities is concurred with and must be supported in the NPF.

5.31 The provision of a strategic long term vision within which future challenges for rural Ireland will be framed and addressed in the NPF to build on the three year Action Plan for Rural Development (2017) is welcomed.

5.32 The concept of rural and urban areas supplementing and complimenting each other rather than competing is acknowledged and must be central to policy formulation.

5.33 It is suggested that incentives to produce 'green energy' in rural areas should be considered as a strategic policy to support economic growth while securing climate action objectives and the development of local communities.

5.34 Towns and villages have a significant role in catering for Ireland's future growth. They offer locations for housing, industrial/commercial development and service provision, as an alternative to larger urban areas and the open countryside, as well as offering a sense of place and community. The NPF needs to acknowledge their importance, identify specific roles for them, and put in place policies to support them.

5.35 As previously stated, it is considered that there needs to be both 'a carrot and stick approach' where incentives are given to develop zoned housing land, brown field sites and inner urban sites to make more effective use of existing urban footprints, and disincentives are associated with urban generated development in the rural areas close to urban areas. There is a need to shift the perception through the policy framework that development in urban areas is more difficult and expensive and less desirable than green field sites. This is necessary to prevent urban decay and car dependency arising from edge of or out settlement development, as well as to arrest consumption of agricultural land for development. These policies should be balanced with the need to accommodate genuine rural generated development in these areas. Conversely rural areas in decline need a more relaxed approach.

5.36 It is regarded as critical that the cross border relationships with Northern Ireland are retained as a focus within the NPF, as with its predecessor the NSS, particularly for Border counties.

5.37 In paragraph 4.4.7 mention is made of the Memorandum of Understanding (MoU) between Newry and Mourne District Council (now Newry, Mourne and Down District Council) and Louth Local Authorities (now Louth County Council). It is considered that the MoU between Monaghan County Council and Armagh City and District Council (now Armagh, Banbridge and Craigavon Borough Council) should also be referenced.

5.38 The mention in paragraph 4.4.9 of opportunities to identify sectors with scope for potential for cross border / all island clustering such as pharmaceuticals, medical devices and software

development to effectively brand and market such strengths is acknowledged. Opportunities in other sectors such as engineering which is prevalent on both sides of the border and exerts a significant presence in global markets, and the agri-food sector where businesses either side of the Border are interdependent of each other must also be given due recognition and support in the NPF.

5.39 Reference in paragraph 4.4.12 of the commitment of the Irish Government to contribute to the upgrade of the A5 Dublin – Derry road in Northern Ireland which along with the proposed upgrade of the N2 has particular significance for County Monaghan, is welcomed along with mention of other cross Border transport links such as the Ulster Canal Greenway and ultimately the reopening of the Ulster Canal which offers significant tourism potential to the Border region.

5.40 Acknowledgement of the ongoing need to upgrade transport networks and a requirement for fast and effective broadband on both sides of the Border in paragraph 4.4.14 is an important element of the NPF, particularly in terms of directing government investment into those areas in need of infrastructural improvement, such as rural areas.

5.41 The mention of ‘A Shared Environment’ is a fundamental part of the NPF particularly in respect of interlinked designated sites, habitats and ecosystems which have common protection requirements. County Monaghan has two European Sites of Wildlife Importance (Sliabh Beagh SPA and Kilroosky Lough Cluster SAC) which are cross border sites. In addition, a number of rivers originating in County Monaghan cross the Border and link into European Sites of Wildlife Importance in Northern Ireland.

5.42 The acknowledgement of the strategic potential of Dublin Belfast (Eastern Seaboard) Corridor, the need to look beyond administrative boundaries for effective development of regions, the greater alignment of infrastructure planning, the potential of cross border or all island clustering of economic activity, and joint thinking and management approaches to environmental management and protection within the NPF is more significant than ever, given the UK decision to exit the European Union. This must be reflected within the NPF.

5.43 It is recommended that the NPF should give specific consideration and support to those settlements that share connections across the Border and to reaffirm its commitment to facilitate

and strengthen these connections through policies and objectives contained within the Framework. Expansion of these connections such as shared broadband provision, particularly in those areas under served by broadband services, shared use of education and health facilities, as well as joint initiatives such as tourism and outdoor activities, centred on shared or proximate attractions should be proposed and supported by the NPF.

5.44 As previously stated the engineering industry is significant on both sides of the border and exerts a significant presence in global markets, while agri-food businesses either side of the Border are interdependent of each other. Consequently the NPF must give due recognition to the potential for collaboration in these areas of economic activity to present a combined approach to global markets where learning experiences and connections are shared.

5.45 The North South Ministerial Council is a significant element in the delivery of a joined up approach to the planning and delivery of strategic infrastructure and investment, as well as common economic and environmental matters that have a cross Border dimension. However, other mechanisms such as the MoUs between Newry and Dundalk and Monaghan and Armagh, and working relationships between infrastructure providers should also be utilised to their full extent.

5.46 It is considered that accelerated action on climate change and renewable energy, dealing with air quality problems in urban areas, health risks to drinking water, treating urban waste water and protecting important and vulnerable habitats mentioned in paragraph 5.1.2 under 'Ireland's Unique Environment – Sustainability' are important priorities for the NPF. Particular mention should be made of the River Basin Management Plan for Ireland 2018-2021 and any successor plans in this regard. In addition, there should be reference made to the sustainable management of waste in line with the Regional Waste Management Plans. Effective environmental management including water services, landscape, flood risk planning, coastal and marine management, climate mitigation and adaptation and land use change via the planning system as referenced in paragraph 5.1.3 of the issues paper are considered essential.

5.47 The mention in paragraph 5.2.6 of a key role for the NPF in reinforcing the structural changes required to transition to a low carbon sustainable economy and society through balanced growth,

more sustainable approaches to development and shaping national infrastructural decisions is concurred with.

5.48 It is acknowledged that the suitability of green fields as the principal option to accommodate all forms of new development must be rigorously examined given the increasing use of car based transport arising from the detachment of housing from places of work, and the need to reduce emissions from the transport sector.

5.49 It is considered that the proposal in paragraph 5.3.7 for Strategic Energy Zones or Corridors similar to Strategic Development Zones as areas of national priority for renewable energy investments has merit but requires further investigation given the implications in terms of visual and residential amenity.

5.50 The acknowledgement of the importance of Green Infrastructure in paragraph 5.5.1 and the wide diversity of natural and semi natural habitats that are coming under pressure as development increases in paragraph 5.5.3 is noted and concurred with.

5.51 The consideration of less dispersed development to reduce energy and infrastructure costs is acknowledged and the development of a tool kit to ensure greater environmental coherence when planning for future growth is an important element of the NPF.

5.52 It is considered that the NPF must place environmental considerations at the heart of policy making in respect of accommodating future growth and providing future infrastructure. Environmental considerations must shape development and future growth in a way that is sustainable.

5.53 It is considered that the key criteria to plan for growth that ensures transition to a low carbon society and climate resilient economy is to ensure that development takes place in a sustainable manner. Limiting consumption of agricultural land for development, promoting the reuse / more effective use of brown field land and inner urban areas for development, and the co-ordination of land use with transportation policies to limit car dependence is critical.

5.54 The possibility of linking spatial considerations to packaged and sequenced investment measures as what will differentiate the NPF as a strategy from a 'wish list' of projects is to be welcomed, but the NPF must be balanced in its approach to ensure that the most appropriate resources are targeted to those areas in most need of assistance.

5.55 It is considered that the identification of nationally strategic infrastructural priorities such as the N2/A5 Road upgrade, and the packaging and sequencing of spatially related infrastructural projects on a phased basis is a logical approach to the delivery of infrastructural improvements.

5.56 The identification of mechanisms to capture 'embedded infrastructural value' that exists in many settlements and supporting more attractive development at such locations is supported.

5.57 Greater policy integration and joined up investment decisions across planning, health and transport policy sectors to assist sustainable and active travel as alternatives to the private car is welcomed but may be difficult to achieve without strong policies, actions and measurable goals contained within the NPF.

5.58 It is considered that the making available of public and state lands for exemplar projects could make a difference to limiting the consumption of green field lands on the edge of settlements.

5.59 The key nationally important infrastructure projects directly relevant to County Monaghan are the provision of the N2/A5 road upgrade, the immediate roll out of the National Broadband Plan, and the reopening of the Ulster Canal.

5.60 It is considered important that an inventory of the capacity of all public infrastructure to accommodate growth/development be carried out as part of the formulation of the NPF and that this be assessed against those areas experiencing or likely to experience growth to ensure that development takes place with the most effective use of existing infrastructure.

5.61 The recognition in paragraph 7.1.1 that the NPF will need to be clear on how it will be implemented, who will implement it and what the key implementation actions are, given that the geographical and organisational boundaries of the organisations central to achieving the goals of the

NPF rarely coincide with everyday patterns of living, working and travelling to access services is very much welcomed.

5.62 Given the failures in the delivery and implementation of the key aspects of the National Spatial Strategy, the acceptance in paragraph 7.1.2 that learning must be taken from that experience and the recognition of the need for legislative support, backed up by wider political and institutional commitment to ensure that the NPF influences public policy across Government, the Regional Assembly and Local Authority administrations is welcomed.

5.63 The proposal in paragraph 7.1.4 that structures will be developed and put in place to ensure that the NPF and its main proposals are given top-level commitment, including of a budgetary and investment nature, and are therefore appropriately driven, including constant monitoring to measure progress and focus accordingly, is supported and welcomed. It is considered that further detail in relation to the form and extent of these structures must be set out in the draft NPF to ensure their timely set up and implementation.

5.64 The setting out of Key Policy Considerations in Section 7.2 is a welcome start to the mapping out of direction in terms of implementation.

5.65 It is considered that in relation to implementation and monitoring of the NPF, it may not be appropriate to set common goals that apply to every place as some underperforming areas or areas of need may require bench marking or goals that are more relevant to the region or county.

5.66 It is considered that monitoring of policy and objective setting in County Development Plans and the delivery of planning decisions to ensure they are in the compliance of the NPF is essential to ensure sustainable planning outcomes.

5.67 It is contended that the main barriers that exist to implementation are lack of political support, misdirected investment and the absence of local level relevance/connection to high level goals.

5.68 It is considered that the key indicators for measuring successful implementation of the NPF should be short term and medium term as well as at the end of lifetime of the framework. It is

strongly recommended that a review of the progress of implementation is carried out within the first five years of implementation as well as at mid term. Indicators must be able to accurately measure the success of the implementation of the NPF and so as to influence adjustments to policy direction or focus at review stages set during the lifetime of the framework.

6.0 Conclusion

6.1 It is considered that the preparation of the National Planning Framework is timely as Ireland emerges from economic recession, and concerns regarding climate change, impact of development upon the environment, rural depopulation and disparities in regional economic development require immediate attention. The UK exit from the EU will also have significant economic and social consequences for the island of Ireland that must also be recognised and addressed by the NPF.

6.2 The NPF should have due regard to the economic and spatial dynamics of the Northern and Western Region and the limited connectivity of border counties such as Monaghan to the rest of the region. There is an inherent conflict at inter-regional basis between the inclusion of Monaghan and Cavan within the Northern and Western Regional Assembly and their natural focus towards the Eastern Economic Corridor. Much of the economic activity taking place in Monaghan and Cavan is driven by their proximity to the large urban centres of the greater Belfast and Dublin areas, and the Eastern Economic Corridor. This must be recognised in the NPF and policies within it must address this conflict.

6.3 Regardless of the consequences of UK exit from the EU, the national planning policy hierarchy needs to acknowledge that strong cross-border linkages and relationships have been established, are working for the betterment of both sides of the border, and will continue to develop. It is recommended that the NPF should give specific consideration and support to those settlements that share connections across the Border and to reaffirm its commitment to facilitate and strengthen these connections through policies and objectives contained within the Framework.

6.4 Expansion of cross border connections such as shared broadband provision, particularly in those areas currently under served by broadband services, shared use of education and health facilities, as well as joint initiatives such as tourism and outdoor activities, centred on shared or proximate attractions should be supported by the NPF. The need to look beyond administrative boundaries for

effective development of regions, the greater alignment of infrastructure planning, the potential of cross border or all island clustering of economic activity, and joint thinking and management approaches to environmental management and protection within the NPF is more significant than ever, given the UK decision to exit the European Union. This must be reflected within the NPF.

6.5 County Monaghan has the potential and the capacity to be a focus for economic development in a location equidistant from Ireland's two largest cities, whilst also offering direct access to the eastern economic corridor. It is acknowledged in the Issues and Choices paper that there are a number of towns which due to their level of service provision and extensive catchments, serve an important role for those areas that fall outside the reach and influence of cities. It is noted that these towns are not necessarily those with the largest populations. However there are concerns that the proposed move away from multiple centres will result in growth focussed on the identified cities and that those areas serviced by those towns will fall into further decline if the main town in the area is not formally recognised and supported in the NPF.

6.6 There is a fundamental potential conflict between the stated aim to deliver balanced regional development and the proposal not to give larger towns which lie outside the hinterlands of larger urban areas/cities formal recognition/designation in the NPF. In relation to distinguishing between the role of towns within the wider hinterland of the cities, and those located outside the influence of the cities, it is considered that formal recognition must be given to certain large rural towns such as Monaghan, which provide an important service role for those areas that fall outside the reach and influence of the cities.

6.7 The future role of our larger towns as successful places in the context of their regions, as well as the need to strengthen and promote them must be central to the NPF. This is considered to be equally as important as the consideration being given to the need to strengthen the second tier of cities in terms of achieving balance regional development. Towns and villages have a significant role in catering for Ireland's future growth. They offer locations for housing, industrial/commercial development and service provision, as an alternative to larger urban areas and the open countryside, as well as offering a sense of place and community. The NPF needs to acknowledge their importance, identify specific roles for them, and put in place policies to support them. This can only be effectively done by identifying these significant towns directly in the NPF as done in the NSS,

so as to ensure that infrastructure and investment is channelled towards them, so that their role serving the surrounding hinterland is reinforced and strengthened.

6.8 For Monaghan, this acknowledgment needs to be explicitly stated in order to identify its role/importance and provide the town with the opportunity to support the hinterland. If the focus of the NPF is solely directed to the five cities, a more spatially uneven pattern of regional development will continue with the urban centres in the southern and eastern regions of the country developing ahead of the towns located in the border region. Balanced regional development can only be achieved by ensuring that strong urban centres are facilitated and developed in numerous locations across the country. A reduction in the number of centres would result in a concentration of investment and development in a limited number of areas and result in large sections of the country, particularly those well removed from large urban centres, failing to directly benefit. It is critical for towns such as Monaghan, which provide significant services to a rural hinterland, that their status as Hub Towns is maintained and enhanced to ensure they continue to benefit from investment and policy focus in the NPF.

6.9 The key nationally important infrastructure projects directly relevant to County Monaghan are the provision of the N2/A5 road upgrade, the immediate roll out of the National Broadband Plan, and the reopening of the Ulster Canal.

6.10 An upgraded N2/A5 route has been recognised as being critical to the long term sustainable economic and social development of the Northern and Western Region and specifically the Border Area. The provision of the N2 upgrade needs to be established firmly as a priority in the NPF if the goal of achieving sustainable regional development is to be realised. The N2/A5 links Dublin with Letterkenny and Derry via Ardee, Monaghan, Omagh and Strabane, and is a recognised key transport corridor that would serve the entire North West population (circa 750,000 people) with a major arterial route. Reference in paragraph 4.4.12 of the commitment of the Irish Government to contribute to the upgrade of the A5 Dublin – Derry road in Northern Ireland which along with the proposed upgrade of the N2 has particular significance for County Monaghan, is welcomed along with mention of other cross Border transport links. A submission has been made by Monaghan County Council to the mid-term review of the Infrastructure and Capital Investment Plan 2016-2021 requesting that the inclusion of the N2 Clontibret to the Border Scheme which is an integral part of

the N2/A5 strategic Northwestern Radial Route receives urgent attention and is included in the forthcoming Capital Investment Plan.

6.11 The timely roll out of the National Broadband Plan is critical to enabling economic growth in the Northern and Western Region. The provision of quality high speed broadband is a requirement for the promotion of economic development. Whilst significant improvements have been provided in the general region surrounding Dublin, there is an identified deficit in County Monaghan and the wider region when compared to the national level. This must be addressed in the NPF through specific identified policies, measures and time bound funding proposals.

6.12 The reopening of the Ulster Canal and the provision of the Ulster Canal Greenway are critical pieces in promoting and driving tourism in the Border area. The progression of these projects by the provision of the Ulster Canal Greenway in short term and ultimately the reopening of the Ulster Canal offers significant tourism potential to the Border region and should be given specific reference in the NPF.

6.13 The population of County Monaghan increased by 15% since 2006 but approximately 70% of the population reside in rural areas. Rural counties have to balance the need to accommodate demand for increased economic activity and one off rural housing, while maintaining the character and integrity of the rural environment. In addition, policies contained within a national framework plan need to recognise that, for example, applying housing standards nationally is not appropriate. High level guidance is required which will deliver a more sustainable pattern of land use development yet allows for flexibility of residential developments within the towns of those less urbanised counties.

6.14 The consideration of Effective Regional Development in paragraphs 4.2.11 to 4.2.13 is welcomed and the acknowledgement that NPF policies may differ across different regions to achieve this is fundamental, particularly in relation to Monaghan, given its Border location. The building of 'regional resilience' is a key aspect of this, and may assist in the addressing the population loss to regions that are more prosperous. 'Positive Discrimination' in favour of the Border area will be a necessary aspect of the NPF to redress the economic imbalances and to ensure that all regions in the

State benefit fairly from the economic upturn and increased Government investment, and thus delivering more balanced development.

6.15 It is considered that the Issues and Choices Paper produced in advance of the preparation of the draft National Planning Framework has provided an appropriate overview of the issues that require attention and it is hoped that the comments made in this submission will highlight the particular circumstances relative to Monaghan that require detailed consideration as part of a national planning policy.