CHIEF EXECUTIVE'S REPORT

Material Alterations Consultation Stage - Draft Plan

2021 - 2027





SEPTEMBER 2021

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Glossary of Abbreviations

AA – Appropriate Assessment

CPO – County Policy Objective

LECP – Local Economic and Community Plan

EMRA – Eastern Midland Regional Assembly

LCC - Longford County Council

NDP - National Development Plan

NIA – Natura Impact Assessment

NIS - Natura Impact Statement

NPF – National Planning Framework

NRA - National Road Authority

NWRA – North Western Regional Authority

OPR – Office of the Planning Regulator

RESS - Renewable Electricity Support Scheme

RSO - Regional Strategic Objective

RPO – Regional Planning Objective

RSES – Regional Spatial and Economic Strategy

SEA – Strategic Environmental Assessment

SFRA - Strategic Flood Risk Assessment

SPC - Strategic Policy Committee

TII - Transport Infrastructure Ireland

1. Introduction

1.1 Purpose and Contents of the Chief Executive's Report

The purpose of the Chief Executive's Report is to report on the outcome of the consultation process on the Proposed Material Amendments to the Draft Longford County Development Plan 2021-2027, set out the Chief Executive's response to the issues raised in the submissions, and to make recommendations on the proposed amendments, as appropriate. The report forms part of the statutory procedure for the preparation of a new Development Plan.

Pursuant to Section 12 (6) of the Planning and Development Act 2000 (as amended), notice of the preparation of Proposed Material Amendments to the Draft Longford County Development Plan 2021 – 2027 was given on 12th July 2021. Submissions or observations with regard to the Proposed Material Amendments together with associated Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) Determinations and Reports only, were invited for a period of 4 weeks from 12th July 2021 to 10th August 2021 inclusive.

Pursuant to Section 12(8)(b) of the Planning and Development Act 2000 (as amended), this Chief Executive's Report provides details of submissions and observations received in relation to the proposed Material Amendments as follows:

- Lists the persons or bodies who made submissions or observations during the prescribed public consultation period;
- Provides a summary of the recommendations, submissions and observations made by the Office of the Planning Regulator;
- Summarises the submissions or observations made by any other persons during the prescribed public consultation period;
- Gives the response of the Chief Executive to the issues raised, taking account of:
 - Directions of the members of the authority regarding the preparation of the Draft Development Plan;
 - The proper planning and sustainable development of the area;
 - The statutory obligations of the Local Authority:
 - Any relevant policies or objectives of the Government or of any Minister of the Government.

This Chief Executive's Report on submissions or observations received in relation to the proposed Material Amendments to the Draft Longford County Development Plan 2021-2017 is hereby submitted to the members of the Planning Authority for consideration.

1.2 Proposed Material Amendments Consultation Process

Consultation on the Proposed Material Amendments to the Draft Longford County Development Plan 2021- 2017 together with associated Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) Determinations and Reports was carried out for a period of 4 weeks from 12th July 2021 to 10th August 2021 inclusive. In total, 303 no. material amendments were put on public display.

The key elements of the consultation programme are set out below:

- Notice of the Proposed Material Amendments to the Draft Longford County Development Plan 2021-2027 was published in the Longford Leader dated the 9th July 2021. The notice included information on how to make a submission on the Proposed Material Amendments and associated Environmental Reports and Determinations together with information on their display.
- Notice of the Proposed Material Amendments together with information on public consultation was issued to the prescribed bodies.
- The Draft Material Amendments and associated Environmental Reports and Determinations were put on public display in Longford County Council Civic Office and at local libraries (subject to the ongoing COVID-19 pandemic restrictions).
- The Longford County Council website included details of the consultation on the Proposed Material Amendments including information on how to make a submission by post, email or via the online Consultation Portal.
- Notice of the Proposed Material Amendments public display were issued via Longford County Council's social media platforms – Facebook and Twitter.

1.3 Submissions Received

A total of 68 no. submissions were received during the timeframe for the Proposed Material Amendments consultation period. A list of all the persons/bodies that made submissions or observations during the prescribed consultation period is provided (Appendix 1). The extent and detail of the submissions and observations received highlights the significant level of public interest in the plan making process. Longford County Council wishes to express its appreciation to those who made submissions/observations.

A further 2 no. submission were received outside of the timeframe and as such could not be considered in this report (see Appendix 2)

Under the Planning and Development Act 2000, (as amended), the final (third) phase of public consultation is solely limited to the Proposed Material Amendments to the Draft Plan. A number of submissions welcomed the material amendments made to the Draft Plan but did not relate to any specific Material Amendment number or offered no comment. A number of submissions (or elements thereof) were received in relation to issues which do not relate to any proposed material amendment. Accordingly having regard to Section 12(8) Chief Executive's Report on Material Amendments to the Draft County Development Plan 2021-2027 of the Planning and Development Act 2000 (as amended), these submissions (or elements thereof) cannot be considered at this stage in the plan making process.

1.4 Recommended Modifications to Proposed Material Amendments

Proposed Material Amendments to the Draft Plan, as originally displayed in July/August 2021, are identified in italics with the use of red print for additional text; while deletions to text are shown in blue with strikethrough.

In terms of modifications to Proposed Material Amendments, as recommended under this report, any modifications in the form of additional text to the proposed Material Amendments shown in green print; while the omission of any text from a proposed Material Amendments is shown in green print with strikethrough; for example:

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with the proposed Material Amendment with amended text highlighted in green:

CH 5.36 - Amend the text of the second paragraph:

The Council recognises the importance of wind energy as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and greenhouse gas emissions. The Council seeks to enable renewable and wind energy resources of County Longford to be harnessed in a manner that is consistent with proper planning and sustainable development of the area. The Council will have regard to the Wind Energy Development Guidelines for Planning Authorities and the Draft Revised Wind Energy Development Guidelines (December 2019), prepared by the Department of Environment, Heritage and Local Government, or any update made thereto. In addition, potential applicants are advised to consult with appropriate statutory and non-statutory bodies in areas which may require special protection.

CH 5.38 - Amend the Policy Objective CPO5.139 and insert the text as follows: Ensure that proposals for energy development demonstrate that human health has been considered and have regard to the forthcoming Draft Wind Energy Development Guidelines (a draft of which was published in December 2019). (2019), which are due to be finalised in the coming year (2021).

- Noise (including consistency with the World Health Organisation's 2018 Environmental Noise Guidelines for the European Region);
- Shadow Flicker (for wind turbine developments, including detailed Shadow Flicker Study);
- Ground Conditions/Geology (including landslide and slope stability risk assessment);
- Air Quality:
- Water Quality; and
- Assessment of impacts on collision risk species (bird and bats

In summary, this report recommends that the Development Plan be made with the amendments and changes recommended in this report. It is also recommended the remaining Proposed Material Amendments be made as displayed unless otherwise

provided for in this report in accordance with the Planning & Development Act 2000, as amended.

1.5 Procedure following consideration of the Chief Executive's Report

In accordance with Section 12(9) of the Planning & Development Act 2000 (as amended), the members of the Planning Authority are required to consider the material amendments to the Draft Plan and the Chief Executive's Report within six weeks of receiving the report (19th October 2021).

In accordance with section 12(10) of the Planning and Development Acts 2000 as amended, the Members, having considered the Chief Executive's Report, shall, by resolution, make the plan with or without the proposed amendments, except where a decision is made to accept the amendment subject to any modifications of a minor nature.

A further modification to a Material Amendment

- a. May be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European Site,
- b. shall not be made where it relates to:
- an increase in the area of land zoned for any purpose;
- an addition to or deletion from the Record of Protected Structures.

In accordance with Section 12 (11) of the Planning & Development Act 2000 (as amended), in making the development plan, the members are restricted to considering the proper planning and sustainable development of the area to which the development plan relates, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or any Minister of the Government.

The Longford County Development Plan 2021-2027 will have effect 6 weeks from the day that it is made (30th November, 2021).

1.6 Report Structure

The report which follows sets out the issues raised therein, the Chief Executive Response to same, and subsequent Chief Executive Recommendation as follows:

Section Two provides a summary of the recommendations and observations made by the Office of the Planning Regulator together with the Chief Executive's response and recommendations in response to same.

Section Three provides a summary of the submissions received relevant to the proposed Material Amendments in *Volume 1: Written Statement*, followed by the Chief Executive's response and recommendations in response the issues raised.

Section Four provides a summary of the submissions received relevant to the proposed Material Amendments in *Volume 2 Appendices*, followed by the Chief Executive's response and recommendations in response the issues raised.

Section Five provides a summary of the submissions received relevant to the proposed Material Amendments in *Volume 3 Annexes*, followed by the Chief Executive's response and recommendations in response the issues raised.

Section Six provides a summary of the submissions received relevant to the proposed Material Amendments in *Volume 4 Environmental and Flood Reports*, followed by the Chief Executive's response and recommendations in response the issues raised.

2. Office of the Planning Regulator Submission

Submission Ref No. Sub-36

2.1 Summary of Issues Raised and Response of the Chief Executive

The OPR considered the Draft Plan to be generally consistent with the policies in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area. However, it recommended a number of amendments to enhance its alignment with national and regional policies, and for consistency with Section 28 Guidelines.

This section contains under a series of themes (as set out in the OPR submission received), a summary of the recommendations raised in the submission of the Office of Planning Regulator (OPR) to the proposed material alterations to the Draft Plan together with the response and recommendations of the Chief Executive in relation to the issues raised. The OPR submission sets out 7 no. recommendations¹ and 3 no. observations² under the following themes:

- 1. Residential Land Supply
- 2. Zoning
- 3. Rural Housing
- 4. Flood Risk Management
- 5. Strategic National Road Network
- Climate Action
- 7. Economic Development
- 8. Built Heritage

These themes and associated OPR Recommendations and Observations are dealt with accordingly:

2.2 Residential Land Supply

The OPR is mindful of the fact that one of the core strategic aims of the draft Plan (Aim 3) is "to identify the appropriate quantum, location and phasing of development considered necessary to provide for future population growth over the plan period in accordance with National Planning Framework and Eastern and Midland Regional Spatial and Economic Strategy".

It is indicated that notwithstanding Recommendation 4b of the OPR's submission on the Draft Plan, that the revised core strategy continues to provide for the quantum of land zoned for new residential use only and does not provide the quantity in hectares

¹ Recommendations relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under Section 28. As such, the planning authority is required to implement or address recommendation(s) made by the OPR in order to ensure consistency with the relevant policy and legislative provisions.

² Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the OPR to action an observation.

for land zoned for a mix of residential and other uses. It is indicated that the land use zoning matrix (Appendix 2) confirms that residential use is either permitted or open for consideration on land zoned for 'Town Centre'; 'Strategic Residential Reserve'; and 'Light Industrial/Commercial Servicing'. The OPR have highlighted that a proportion of these lands are capable of accommodating residential use and have not been factored into the land requirement and associated supply, defining the Core Strategy.

The OPR has drawn attention to the Chief Executive's Report on the Draft Plan (Section 5.3.2) which details the response to the Core Strategy issues raised by the Eastern and Midland Regional Assembly at Draft Plan stage, which similarly reflected the concerns of the OPR as detailed under Recommendation 4b of the Office's submission on the Draft Plan.

It is indicated that the Chief Executive's Report confirms that it was proposed to amend the core strategy table to provide for an additional column indicating amongst other things, the quantum of land in hectares zoned mixed use and town/village centre including Opportunity Sites; the potential number of residential units to be delivered on mixed use and town/village centre zoning including Opportunity Sites (according to applicable densities); and the number of residential units that can be accommodated on brownfield / infill sites for each relevant settlement. The OPR have indicated that this recommendation in the Chief Executive's report does not appear to have been included in the material alterations to the Draft Plan and the OPR remains concerned that such an omission may have direct implications on the extent of 'New Residential' land that is zoned to accommodate future population growth and housing need.

MA Recommendation 1 – Core Strategy

The planning authority is required to amend the core strategy table to ensure it complies with Section 10(2A)(c) and 10(2A)(d) of the Act and the Guidance Note on Core Strategies (2010). In this regard, an additional column is required in table 4.12 to quantify in hectares the land zoned for a mix of residential and other uses including an appropriate proportion of town centre; light industrial/commercial servicing, and Canal Redevelopment Areas, all of which either permit residential use or provide for it to be open for consideration in the Draft Plan.

Chief Executive Response

The OPR require the planning authority to amend the core strategy table to ensure it complies with Section 10(2A)(c) and 10(2A)(d) of the Act and the Guidance Note on Core Strategies (2010). In this regard it is noted that as per the Planning and Development Acts (2000 as amended), it is stated as per Section 10[(2A) that a core strategy shall —

(c) in respect of the area in the development plan already zoned for residential use or a mixture of residential and other uses, provide details of— (i) the size of the area in hectares, and (ii) the proposed number of housing units to be included in the area, (d) in respect of the area in the development plan proposed to be zoned for residential use or a mixture of residential and other uses, provide details of— (i) the size of the area in hectares, (ii) how the zoning proposals accord with national policy that development of land shall take place on a phased basis,

Further guidance is also given in the *Guidance Note on Core Strategies (2010)*, the contents of which are noted.

In this regard the land zoned for new residential use has been included in the revised core strategy table, in terms of both hectares and the number of housing units to be provided. However, it is accepted that for the mixture of residential and other uses that this detail has not been provided as statutorily required and as such this should be addressed.

It is noted that the Chief Executive's Report on the Draft Plan (Section 5.3.2) indicated that it was proposed to amend the core strategy table to provide for an additional column indicating amongst other things, the quantum of land in hectares zoned mixed use and town/village centre including Opportunity Sites; the potential number of residential units to be delivered on mixed use and town/village centre zoning including Opportunity Sites (according to applicable densities); and the number of residential units that can be accommodated on brownfield / infill sites for each relevant settlement. The OPR are correct in that this recommendation in the Chief Executive's report has not been included in the material alterations to the Draft Plan. This was an oversight and clerical omission. It is accepted that the core strategy table should be revised to address this. Accordingly Table 4.12 Revised Core Strategy Table will be updated to indicate the quantity in hectares of land zoned for a mix of residential and other uses, which either permit residential use or provide for it to be open for consideration in the Draft Plan; and to indicate that number of units which said lands can accommodate. These lands will be referred to as 'Other Lands' in the Core Strategy Table.

It should be noted that 'Light industrial/Commercial Servicing' and 'Canal Redevelopment Area' zoning will not be included in these calculations, as while these zonings were indicated in the zoning matrix to include a residential use, this was an error and residential use will not be permitted in said zoning. Accordingly, this has not been included in the calculations included in the Revised Core Strategy Table and the zoning matrix will also be updated to reflect this. As such the overall land area for such 'Other Lands' encompasses the following zonings: 'Town Core' and 'Strategic Residential Reserve'. It is also noted that a significant portion of these 'Other Lands' contains lands which are zoned for 'Strategic Residential Reserve' which has an objective 'to provide for the longer term housing requirements of the town' (see Table 1). As this zoning relates to the reservation of lands for longer term development, as such it is unlikely that any residential yield will be provided on these lands.

Table 1: 'Other Lands' measurements

Settlement	Town Core (Ha)	Strategic Residential Reserve (Ha)
Longford Town	49.143	56.771
Granard	17.930	7.972
Edgeworthstown	10.647	4.955
Ballymahon	17.773	21.193 ³
Lanesborough	5.580	1.822
Abbeyshrule	1.065	4.135
Ardagh	0.883	0
Aughnacliffe	2.796	2.165
Ballinalee	6.376	6.246
Ballinamuck	1.001	0.348
Clondra	0.757	0
Drumlish	11.367	7.993
Keenagh	7.165	0.516
Legan	1.250	0
Newtownforbes	4.250	8.862

Taking account of the aforementioned Table 4.12: Core Strategy Table has been revised and is included as part of this recommendation. In terms of the residential yield from 'Other Lands', the figure of units provided is the balance between the units indicated on 'New Residential' zoned lands and the overall number of residential units to be provided for by the Plan. This is due to the fact that in terms of such 'Other Lands' it is not ascertained how much of this land is already developed and as such how many units can be provided. In the case of 'Town Core' lands these may already be substantially developed or in such complex sub-division as to provide only limited opportunity for further residential yield. Also conversely, in accordance with high level

³ This measurement includes the omission of land parcel no. 4 and 5 as per OPR MA Recommendation 2 – Strategic Residential Reserve Land Use Zoning (i) and (ii).

NPF and RSES policy this figure would also be subject to change based on the concept of compact growth and sequential development in the overall settlement, which would have an impact on the potential number of residential units which could be delivered on said lands. This is supported by a number of policies in the Draft Plan such as Core Strategy Aim 6, CPO 4.3, CPO 4.12, CPO 4.14, CPO 4.15. Section '4.10 Core Strategy Table' of the Draft Plan is also noted which states that '...in line with the NPF and RSES the release of lands will be prioritised in a sequential manner and monitoring will be employed to promote development patterns in line with the Core Strategy'.

As such (with the exception of 'Strategic Residential Reserve' Lands, which as indicated earlier is unlikely to be developed), if residential development on 'Other Lands' relating to 'Town Core' zoning, is more in keeping with the NPF principle of 'Compact Growth', the tiered approach to development, sequential development and the release of lands, additional residential development may be provided in the 'Town Core' area over 'New Residential' lands. Taking account of the aforementioned higher level principles, residential yield on 'Other Lands' will be subject to variation in making up the overall housing supply target but will not result in an exceedance of overall Housing Supply Target (HST) figures. As previously indicated in the case of 'Town Core' lands these may already be substantially developed or in such complex subdivision as to provide only limited opportunity for further residential yield. residential development of such 'Other Lands' would therefore be flexible and subject to both further or reduced residential yield, but this would be considered in conjunction with the overall development strategy and would not result in the overall residential yield for the plan being exceeded. In this regard the overall number of residential units provided will be monitored by the Planning Authority in order to ensure that overall HST targets for residential yield is not exceeded.

'Other Lands' zoned for 'Town Core' and 'Strategic Residential Reserve' have, based on previous experience, the capacity to deliver only nominal levels of residential growth over the lifetime of the Plan. In this regard, such lands are expected to provide capacity for a low housing yield over the 6-year lifetime of the Plan, which taken in conjunction with the development on 'New Residential' lands and its ability to deliver units, will not exceed the overall target figure.

Chief Executive Recommendation

To make revisions to both the Core Strategy Table and the Land Use Zoning Matrix as follows:

- To include in Table 4.12: Revised Core Strategy additional columns indicating the following:
 - (1) the quantify in hectares the land zoned for a mix of residential and other uses:
 - (2) the proposed number of housing to be included in the area.

Table 4.12: Revised Core Strategy Table

	Settlement	Populatio n 2016	New Populat ion Growth to 2027	Populati on 2027	-New HST (Housing Supply Targets)Units 2021- 2027	30% of Required Residenti al Units within Existing settlemen t	Quantum of Land Required for New Residential Units to 2027 (Ha)	Quantum of Land Zoned for new Residenti al Units under this plan (Ha)	Quantum of Land Zoned within existing settlement Footprint (Brownfield In Fill) (Ha)	Potential Units that can be delivered withing existing settlement (Brownfield/ Infill)	Housing Y 'Other Lar Quantu m of Land (Ha.)	Potentia I No. of units ⁵
Key Town	Longford Town (Density 35-40 units/ha)	10008	2502	12510	1304	391	34.77	35.33	35.33	1304	105.91	0
Self- Sustainin g Growth Town	Granard (25 units/ha)	1096	274	1370	143	43	5.71	6.40	5.31	133	25.90	10
Self Sustainin	Edgeworthstown	2072	311	2383	162	49	6.48	7.10	7.10	162	15.60	0
g Towns	Ballymahon	1877	282	2159	147	44	5.87	6	5.20	130	38.99	17
(25 units/ ha)	Lanesborough	757	151	908	79	24	3.95	4.42	1.87	47	7.40	32
Town &	Aughnacliffe	177	32	209	17	5	0.83	0.85	0.40	8	4.96	9
Villages	Ballinalee	347	62	409	33	10	1.63	2.26	2.26	33	12.62	0
(20	Drumlish	931	140	1071	73	22	3.64	3.68	3.15	63	19.376	10
units/ha)	Kenagh	581	105	686	55	16	2.73	2.95	2.95	55	7.68	0
	Legan	215	34	249	18	5	0.90	1.15	0.43	9	1.25	9
	Newtownforbes	778	140	918	73	22	3.65	3.96	3.51	70	13.11	3
Serviced	Abbeyshrule	224	34	258	19	N/A	1.17	1.21	N/A	N/A	N/A	N/A
Rural	Ardagh	210	32	242	16	N/A	1.09	1.64	N/A	N/A	N/A	N/A
Villages	Ballinamuck	232	35	267	18	N/A	1.21	1.29	N/A	N/A	N/A	N/A
(15 units/ha)	Clondra	449	67	516	35	N/A	2.34	2.80 2.62 ⁶	N/A	N/A	N/A	N/A
Rural Settlem	ent Clusters/ Open											
Countryside	•	20919	727	21646	379	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total		40873	4927	45800	2568	770	75.96					

⁴ 'Other Lands' relates to 'Town Centre' and 'Strategic Residential Reserve' zoned lands.

⁵ Residential yield on 'other lands' will be subject to variation taking account of the NPF Tiered approach to zoning and sequential development approach and 'Compact Growth' in making up the overall housing supply target but will not result in an exceedance of overall HST figures.

⁶ This is to reflect the reduction in lands in Clondra as per OPR MA Recommendation 3 – Residential zoning including Flood Risk Management (iii).

• Amend the Land Use Zoning Matrix to state that any uses with a residential component will be 'Not Normally Permitted' in respect of lands zoned 'Light Industrial / Commercial Servicing' and 'Canal Redevelopment Area' as follows:

Revised Land Use Zoning Matrix

		110	VISCU	Lam	u 036	, 2011	ing wat	117			ı	ı		
Development	Town Core	Residential; New Residential; Strategic Residential Reserve	Social/ Community/ Education / Public Utility	Social/Community/ Education	Recreation' Amenity & Green Spaces	Protected Area/Passive Amenity	Industrial/Commercial/Warehousi ng; Strategic Industrial Reserve e	Industrial / Alternative Energy	Light Industrial/Commercial Servicing	Tourism; Tourism / Mixed Use with Provision of Marina	Canal Redevelopment Area	Airport Development	Site Resolution	Constrained Land Use
Amusement Arcade	Р	Х	X	×	Х	Х	Х	X	Х	Х	Х	Х	×	Х
Bank/Financial Services	Р	Х	Х	×	Х	Х	Х	Х	О	Х	Х	Х	×	Х
Betting Office	Р	х	Х	×	Х	Х	х	Х	0	Х	Х	Х	×	Х
Boarding Kennels	Х	х	х	×	Х	Х	0	Х	0	Х	Х	Х	×	Х
Caravan Park Residential	х	0	0	0	Х	Х	Х	Х	Х	0	х	х	×	Х
Cemetery	Х	х	0	0	0	Х	Х	Х	Х	Х	Х	х	X	Х
Childcare Facilities	Р	Р	Р	Þ	Х	Х	0	0	Р	0	0	0	P	Х
Church/Place of Worship	Р	0	Р	Þ	Х	Х	0	Х	0	Х	Х	Х	中	Х
Cinema	0	Х	0	0	Х	Х	Х	0	0	0	Х	Х	×	Х
Commercial Carpark	0	Х	0	0	Х	Х	0	Х	0	0	Х	х	×	Х
Community Hall	Р	Р	Р	P	Р	Х	Х	Х	0	Р	Р	х	P	Х
Cultural Use	Р	Р	Р	P	Р	0	Х	Х	0	Р	Р	Х	P	Х
Dance Hall/Discotheque	Р	Х	0	0	Х	Х	Х	Х	0	Р	0	х	X	Х
Doctor/Dentist	Р	Р	Р	P	Х	Х	0	0	Р	Р	0	х	P	Х
Education	Р	Р	Р	P	0	Х	0	0	0	0	х	х	θ	Х
End of Life Vehicles (ELVs)	х	Х	X	×	Х	Х	Р	Р	Р	Х	х	х	×	Х
Equipment Hire	х	Х	Х	×	Х	Х	Р	Р	Р	0	х	х	×	Х
Fire/Ambulance Station	х	0	Р	P	0	Х	0	0	0	Х	х	0	Ф	Х

Development	Town Core	Residential; New Residential; Strategic Residential Reserve	Social/ Community/ Education / Public Utility	Social/Community/ Education	Recreation' Amenity & Green Spaces	Protected Area/Passive Amenity	Industrial/Commercial/Warehousi ng; Strategic Industrial Reserve e	Industrial / Alternative Energy	Light Industrial/Commercial Servicing	Tourism; Tourism / Mixed Use with Provision of Marina	Canal Redevelopment Area	Airport Development	Site Resolution	Constrained Land Use
Fuel Filling Station	х	0	Х	×	Х	Х	0	Х	Р	Х	х	0	0	Х
Fuel Depot/Distributor	Х	0	Х	×	Х	Х	0	0	Р	Х	Х	Р	×	Х
Funeral Home	Р	0	Р	₽	Х	Х	Х	Х	Р	Х	Х	Х	Ф	Х
Garden Centre	Х	0	Х	×	X	X	х	X	Р	0	Х	X	×	Х
Golf Course	х	Х	0	0	Р	0	х	Х	Х	0	х	Х	×	0
Guesthouse	Р	Р	0	θ	Х	Х	х	Х	0	Р	Р	Х	中	Х
Health Centre	Р	Р	Р	P	Х	Х	Х	Х	Р	Р	0	Х	P	Х
Hostel	Р	Х	0	0	Х	Х	Х	Х	0	Р	Р	Х	Ф	Х
Hospital	Х	Х	Р	P	Х	Х	Х	Х	0	Х	Х	Х	X	Х
Hotel	Р	0	Р	P	Х	Х	Х	0	Р	Р	Р	O X	Ф	Х
Motor Sales Outlet/Showroom	Х	Х	Х	×	Х	Х	0	0	Р	Х	х	O X	×	Х
Multi-storey Carpark	Р	Х	0	θ	Х	Х	0	0	0	0	0	Р	×	Х
Offices<100m2	Р	0	0	0	Х	Х	0	0	Р	Р	Р	Р	Ф	Х
Off Licence	Р	0	Х	×	Х	Х	0	0	Р	Р	0	0	Ф	Х
Open Space	Р	Р	Р	P	Р	Р	Р	Р	Р	Р	Р	Р	무	Р
Park & Ride	Р	Х	0	0	0	0	0	0	0	Р	0	Р	X	Х
Park/Playground	Р	Р	Р	P	Р	Р	0	Р	Р	Р	Р	0	P	0
Playing Fields	х	0	Р	P	Р	Р	х	х	х	0	О	Х	θ	0
Public House	Р	0	Х	×	Х	Х	х	х	0	Р	Р	Р	θ	Х
Recycling Facilities	х	х	Х	×	х	Х	Р	Р	Р	х	х	х	×	Х
Recycling Waste Transfer Site	х	х	Х	×	Х	Х	Р	Р	Р	Х	Х	Х	×	Х

Development	Town Core	Residential; New Residential; Strategic Residential Reserve	Social/ Community/ Education / Public Utility	Social/Community/ Education	Recreation' Amenity & Green Spaces	Protected Area/Passive Amenity	Industrial/Commercial/Warehousi ng; Strategic Industrial Reserve e	Industrial / Alternative Energy	Light Industrial/Commercial Servicing	Tourism; Tourism / Mixed Use with Provision of Marina	Canal Redevelopment Area	Airport Development	Site Resolution	Constrained Land Use
Residential Institution	0	0	Х	×	Х	Х	Х	Х	θХ	Χ	Х	Х	0	Х
Residential Single / Multiple	Р	Р	Х	×	х	Х	х	х	θХ	Р	Р Х	х	₽	Х
Restaurant/Café	Р	0	0	0	0	Х	О	0	0	Р	Р	Р	0	Х
Retail (Convenience)	Р	0	0	0	Х	Х	0 X	0 X	0	Р	Р	O X	P	Х
Retail (Comparison)	Р	х	Х	×	Х	Х	0 X	0 X	Р	0	0	O X	×	Х
Retail Warehouse	0	х	х	×	Х	Х	0 X	0 X	0	Х	Х	O X	×	Х
Retirement Home/Scheme or Nursing Home	Р	Р	Р	P	х	Х	х	х	θХ	0	O X	х	P	Х
Shops-local	Р	Р	Р	P	0		0-X	х	0	Р	Р	Х	P	Х
Shops-neighbourhood	Х	Р	0	0	0	Х	Х	Х	х	Р	Р	Х	P	Х
Shops-major	Р	х	Х	×	Х	Х	х	х	0	0	0	Х	×	Х
Sports Facility	0	0	Р	₽	Р	Х	0	0	0	0	0	0	0	Х
Take-away/Fast-food	Р	0	Х	×	Х	Х	0	х	0	0	0	х	0	Х
Taxi Office	Р	х	0	0	Х	Х	0	0	Р	0	Х	р	×	Х
Telecommunications	0	х	0	0	Х	Х	Р	Р	Р	0	0	р	×	Х
Tourism-recreational Complex	0	0	Р	P	О	0	х	0	0	Р	Р	х	0	Х
Training Centre	Р	Х	Р	P	Х	Х	0	0	Р	Р	0	Р	Ф	Х
Transport Depot	х	Х	Х	×	х	Х	0	0	0	0	х	0	×	Х
Urban-Nature Reserve	0	0	0	0	Р	Р	х	х	х	Р	Р	х	0	Р
Vehicle Servicing & Repairs	Х	х	Х	×	Х	Х	Р	0	Р	Х	Х	0	×	Х
Veterinary Surgery	Р	х	0	0	Х	Х	х	х	Р	Х	Х	Х	Ф	Х

Development	Town Core	Residential; New Residential; Strategic Residential Reserve	Social/ Community/ Education / Public Utility	Social/Community/ Education	Recreation' Amenity & Green Spaces	Protected Area/Passive Amenity	Industrial/Commercial/Warehousi ng; Strategic Industrial Reserve e	Industrial / Alternative Energy	Light Industrial/Commercial Servicing	Tourism; Tourism / Mixed Use with Provision of Marina	il Redevelopmer	Airport Development	Site Resolution	Constrained Land Use
Warehousing	Х	х	Х	X	Х	Х	Р	Р	Р	Х	Х	Р	X	Х
Wholesale Outlet	х	х	Х	×	х	Х	0	0	0	х	х	Х	×	Х
Workshop	0	х	Х	×	Х	Х	Р	0	Р	Р	0	Р	X	Х

2.3 Zoning

Strategic Residential Reserve Land Use Zoning

The OPR is concerned that there still remains significant land zoned for 'Strategic Residential Reserve' in Ballymahon, which equates to 4.5 times (c. 29 hectares) the extent of new residential zoned land required for the Plan period. It is indicated that the extent of such land use zoning in Ballymahon, associated with a policy objective that can facilitate residential development in exceptional circumstances, has the potential to distort the core strategy and the delivery of compact and coordinated growth in settlements.

Also in respect of Observation 1 of the OPR submission on the Draft Plan, the OPR notes that the planning authority did not make changes to the 'Strategic Residential Reserve' zoning objective to clarify that no residential development proposals will be considered by the planning authority, on lands identified as 'Strategic Residential Reserve' until after the full lifetime period of the Development Plan 2021-2027 as recommended by the Chief Executive.

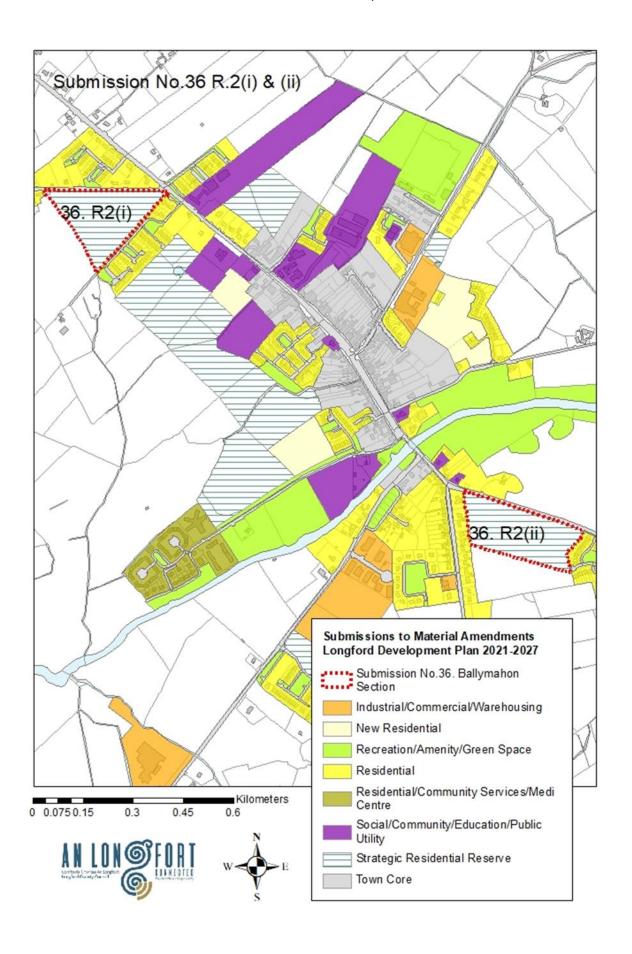
The OPR has drawn attention to material amendment AP.1C.5 which proposes to change land identified as parcel numbers 4, 5 and 6 from 'New Residential' to 'Strategic Residential Reserve' zoning. Having regard to the quantity of land zoned for 'Strategic Residential Reserve' purposes relative to the quantum of land required to facilitate growth over the plan period in Ballymahon, and the location of parcel numbers 4 and 5, the OPR advises that the zoning of the aforementioned should be reconsidered.

OPR MA Recommendation 2 – Strategic Residential Reserve Land Use Zoning Having regard to the quantum of land that continues to be zoned as Strategic Residential Reserve in Ballymahon, its position in the settlement hierarchy and anticipated future growth and national policy objectives promoting compact growth and sequential development in particular National Policy Objective (NPO) 3c and NPO 72 (a, band c), the planning authority is required to:

Amend the Strategic Residential Reserve Zoning Objective to clarify that no residential development proposals will be considered by the planning authority, until after the full lifetime period of the Development Plan 2021-2027 consistent with the recommendation of the Chief Executive in response to Observation 1 of the Office.

Alternatively, the planning authority may make the following changes to land affected by the material alterations:

- (i) amend the zoning of land parcel 4 in Ballymahon which is proposed for rezoning to strategic residential reserve as part of Material Amendment AP.1C.5 to 'No Zoning'; and
- (ii) amend the zoning of land parcel 5 in Ballymahon which is proposed for rezoning to strategic residential reserve as part of Material Amendment AP.1C .5 to 'No Zoning'.



Chief Executive Response

The OPR continue to have concerns in relation to the quantum of land that continues to be zoned as 'Strategic Residential Reserve' in Ballymahon, its position in the settlement hierarchy and anticipated future growth and national policy objectives promoting compact growth and sequential development in particular National Policy Objective (NPO) 3c and NPO 72 (a, band c).

In terms of the OPR concerns in relation to 'Strategic Residential Reserve' land use zoning they have offered 2 no. options in order to address the issue. The 1st option is to amend the 'Strategic Residential Reserve' Zoning Objective to clarify that no residential development proposals will be considered by the planning authority, until after the full lifetime period of the development plan 2021-2027. Alternatively, the OPR has indicated that the planning authority may make a number of changes to specific land affected by the material alterations. The Planning Authority is favourable to the latter option, and as such it is recommended that Material Amendment AP.1C.5 and associated mapping should be amended accordingly, to remove the 'Strategic Residential Reserve' zoning and change to 'No Zoning' on land parcel 4 and 5 in the settlement of Ballymahon.

Chief Executive Recommendation

Amend Proposed Amendment AP.1C.5 and associated mapping as indicated in green strikethrough and green to:

- (i) amend the zoning of land parcel 4 which is proposed for rezoning to 'Strategic Residential Reserve' to 'No Zoning'; and
- (ii) amend the zoning of land parcel 5 which is proposed for rezoning to 'Strategic Residential Reserve' to 'No Zoning'.

Proposed Amendment AP.1C.5

Amend the Land Use Zoning map to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for Ballymahon incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Ballymahon: Proposed Material Amendment Map:

Residential Related:

Land parcel no. 4, 5, 6, 22 – 'Strategic Residential Reserve';

Land parcel no. 11, 12, 13, 14, 15 - no zoning;

Land parcel no. 18 'Residential' and 'New Residential';

Land parcel no. 16 and 20 - 'New Residential'.

Other Uses:

Land Parcel no. 4, 5, 7, 8, 9, 10 – no zoning;

Residential zoning including Flood Risk Management

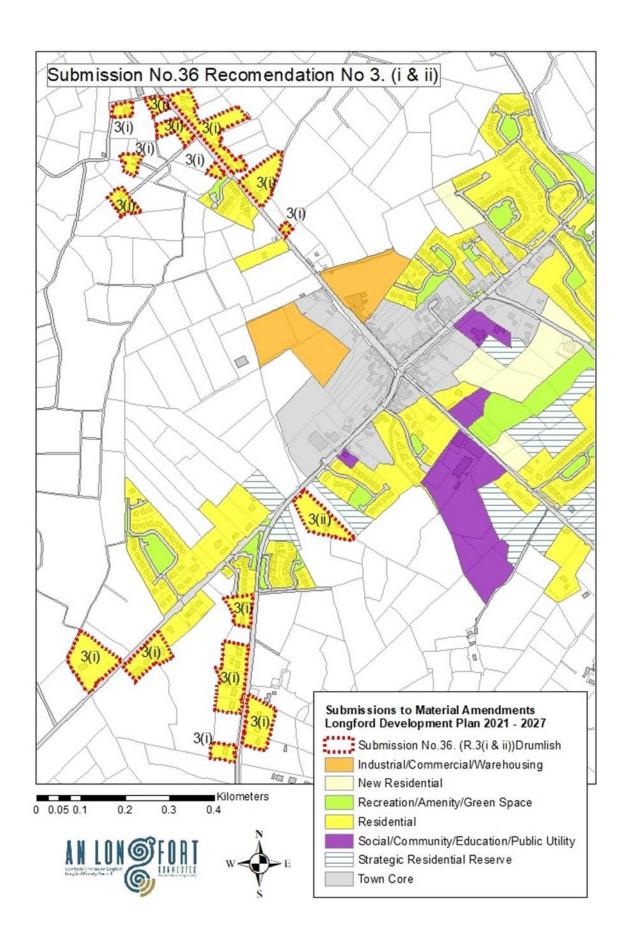
The OPR has noted that a number of additional material amendments insert additional 'Residential' and 'New Residential' zonings for Tier 4 Towns & Villages and Tier 5 Serviced Villages. The OPR considers that the following proposed amendments to land use zonings are not justified due, in particular, to the incomplete application of the requirements under *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*, including the plan-making Justification Tests, and/or because they are inconsistent with the objectives under the NPF and RSES for compact growth (NPO 3c and RPO 3.2).

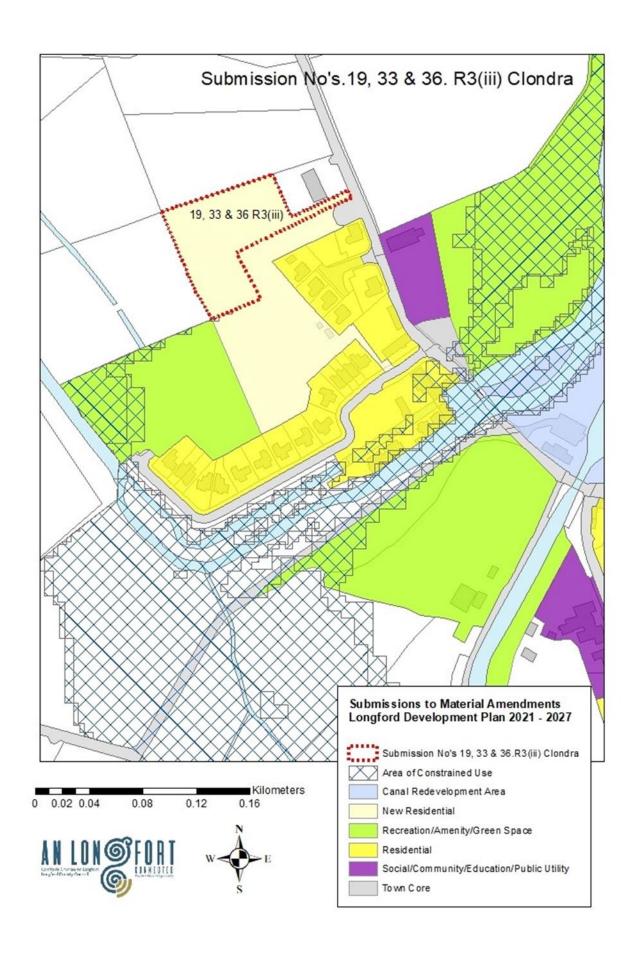
- Material Amendment AP.1D.15 proposes to zone significant additional 'Residential' zoned land in Drumlish (Parcels 6 20). Located substantially removed from the town centre to the north west and south west, the zoning appears to be piecemeal in nature, incorporating existing one-off housing and is in general isolated from other zoned land. There is no coherent land use strategy in defining such land for 'Residential Use', which could in the future benefit from further development and intensification of use. Further parcel 32 has been zoned 'Residential', surrounded by land zoned as 'Strategic Residential Reserve' and located within an area identified as being subject to flooding and no Justification Test has been undertaken in support of such zoning.
- Material Amendment AP.1E.18 proposes to zone parcel 1, for 'New Residential' zoning in Clondra by extending the settlement boundary to the north. The amended Strategic Flood Risk Assessment (and Strategic Environmental Assessment) confirm that this site is located in a flood risk area, and it is noted that no Justification Test has been undertaken in support of such zoning. It is further noted that the 'Constrained Land Use' zoning was not updated on the revised map for Clondra.

OPR MA Recommendation 3 - Residential zoning including Flood Risk Management

Having regard to National Policy Objective NPO 3c and the section 28 guidelines The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), the planning authority is required to omit the following which are included as proposed material amendments to the land use zoning objectives included in Volume 2 Appendices Longford Settlement Zonings:

- (i) omit the rezoning of parcels 6 20 to residential in Drumlish which are proposed as part of Material Amendment AP.1D.15 as they are not justified and would be contrary to compact growth and sequential development of the settlement;
- (ii) omit the rezoning of parcel 32 to residential in Drumlish which is proposed as part of Material Amendment AP.1D.15 as the land is located in an area that is at risk of flooding; and
- (iii) omit the rezoning of parcel 1 to new residential in Clondra which is proposed as part of Material Amendment AP.1E.18 as the land is located in an area that is at risk of flooding.





Chief Executive Response

The OPR's comments relate to land use zonings not being justified due, in particular, to the incomplete application of the requirements under *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*, including the plan-making Justification Tests, and/or because they are inconsistent with the objectives under the NPF and RSES for compact growth (NPO 3c and RPO 3.2).

The following higher- level policies relate:

- National Policy Objective NPO 3c: Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints;
- Regional Policy Objective RPO 3.2; Compact Growth: Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas;
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).
- The OPR submission requires the planning authority to omit a number of land use zoning objectives included in Volume 2 Appendices Longford Settlement Zonings.

Drumlish:

In relation to Material Amendment AP.1D.15, to zone significant additional 'Residential' zoned land in Drumlish (Parcels 6-20), the OPR has raised concerns that said lands are substantially removed from the town centre. It is accepted by the Planning Authority that this area is substantially removed from the town centre to the northwest and southwest and incorporates existing one-off housing and is in general isolated from other zoned land. As such the Planning Authority accept that this is inconsistent with the objectives under the NPF and RSES for compact growth (NPO 3c and RPO 3.2) and are satisfied to remove this zoning in accordance with the OPR submission requirements.

In relation to land parcel 32 zoned 'Residential' it is accepted that this is located within an area identified as being subject to flooding and no Justification Test has been undertaken in support of such zoning. This is not in accordance with the requirements under The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), and as such the Planning Authority is satisfied that this zoning should also be removed.

Clondra:

In relation to Material Amendment AP.1E.18 which proposes to zone parcel 1, for 'New Residential' zoning in Clondra by extending the settlement boundary to the north, it is accepted that part of the site lies within the flood risk area. However it should be noted that only part is within the flood risk area and that the remainder of the site not affected by flooding. As such in order to comply with the requirements

under *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*, the Planning Authority is satisfied that the portion of land parcel no. 1 where the zoning is affected by flooding should be unzoned. The remainder of the site not affected by flooding will remain 'New Residential'. The portion of the site omitted from 'New Residential' zoning will reduce the quantum of 'New Residential Lands' in the core strategy table which has been amended accordingly.

In relation to the OPR's comments that the 'Constrained Land Use' zoning was not updated on the revised map for Clondra, this will be included in the revised map for Clondra to be included in the final Plan.

Chief Executive Recommendation

Drumlish:

Amend Proposed Amendment AP.1D.15 and associated mapping, as indicated in green strikethrough and green to:

- (i) omit the rezoning of parcels 6 20 to 'Residential' and change to 'No Zoning';
- (ii) omit the rezoning of parcel 32 to 'Residential' and change to 'No Zoning'.

Proposed Amendment AP.1D.15

Amend the Land Use Zoning map to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for each settlement incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Drumlish: Proposed Material Amendment Map - Area A:

Residential Related:

Land parcel no. 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 24, 27, 30, 32 – *'Residential'* zoning;

Land parcel no. 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20,25, 26, 29, 31 – No zoning;

Land parcel no. – 'Recreation/Amenity/Green Space' zoning;

Land parcel no. 35 - 'Light Industrial/Commercial/Servicing' zoning;

Land parcel no. 36 - 'Social/Community/Education/Public Utility' zoning;

Other Uses:

Land parcel no. 21, 22, 23 – No zoning.

See Drumlish: Proposed Material Amendment Map - Area B:

Residential Related:

Land parcel no. 42, 43, 48 - 'New Residential' zoning

Land parcel no. 33, 38, 46, 50 - 'Residential' zoning

Land parcel no. 34, 39, 40, 44, 45, 47, 49 – No zoning;

Land parcel no. 41 – 'Recreation/Amenity/Green Space' zoning:

Other Uses:

Land parcel no. 37 – No zoning;

Clondra:

Amend Proposed Amendment AP.1E.18 and associated mapping, as indicated in green strikethrough and green to:

- (iii) Omit the portion of the rezoning of parcel 1 to 'New Residential' in Clondra and change to 'No Zoning' which is affect by flood constraints (see map);
- (iv) Include the 'Constrained Land Use' zoning on the Clondra Material Alterations map.

Proposed Amendment AP.1E.18

Amend the Land Use Zoning maps to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for each settlement incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Clondra: Proposed Material Amendment Map:

Land parcel no. 1 (part), 2, – 'New Residential' zoning; Land parcel no. 7 – 'Residential' zoning; Land parcel no. 1 (part) – 'No Zoning'.

- Include the *Constrained Land Use* zoning on the revised map for Clondra (previously omitted by error on the Material Alterations map).

Tiered Approach to Zoning

Recommendation 6 of the OPR's submission on the Draft Plan requested the planning authority to demonstrate that a tiered approach to zoning (TAZ) in accordance with NPO 72a, NPO 72b and NPO 72c has been applied, which should have regard to the provisions of an Infrastructural Assessment Report, details of which must be included in the Development Plan, all in accordance with the methodology set out in Appendix 3 of the NPF.

The OPR notes that the planning authority has endeavoured to comply with Recommendation 6 of the OPR's submission on the Draft Plan, by including a working Draft of the Infrastructure Assessment Report (IAR) in Appendix 3 of the Material Alterations Report. Further, new text is proposed in Section 4.3.1 of the Draft Plan which explains how the IAR process has influenced and amended zoning in the Draft Plan. However, the IAR does not classify the zoned lands in line with the methodology under Appendix 3 of the NPF and does not conclusively distinguish between zoned land that is available for development and zoned land that requires significant further investment in services for infrastructure for development to be realised.

The OPR indicate that a comprehensive IAR prepared in accordance with Appendix 3 of the NPF is intended to provide all stakeholders, including elected members with relevant information to determine which areas to be zoned can readily be implemented to accommodate the delivery of housing and employment development targets under the plan. It is also intended to highlight those areas where there are infrastructural and services capacity constraints that will need to be resolved before such development can be delivered and the cost of same. This evidence-based approach is therefore intended to support the planning authority in devising an implementable strategy.

However, the OPR accept that there are practical obstacles, in terms of statutory time limits and statutory limits on what amendments can be made at this stage of the plan preparation process. Accordingly, a practical option would be to require the planning authority to include an objective to finalise the IAR and implement the TAZ through the local area plan preparation process, perhaps through the phasing and sequential development of those lands according to the availability or feasibility of delivering services.

OPR MA Recommendation 4 – Infrastructure Assessments

Having regard to NPO 72, the planning authority is required to insert an objective as a minor amendment to the Development Plan committing to the preparation of detailed infrastructure assessments, consistent with NPO 72 and the methodology for a Tiered Approach to Zoning under Appendix 3 of the NPF, to inform the development strategy for future Local Area Plans in the county such as for Longford Town (policy objective CPO 4.8).

Chief Executive Response

In terms of the OPR submission the following policy references are noted:

- NPO 72a: Planning authorities will be required to apply a standardised, tiered approach to differentiate between (i) zoned land that is serviced and (ii) zoned land that is serviceable within the life of the plan;
- NPO 72b: When considering zoning land for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages;
- NPO 72c: When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development;
- Appendix 3 A Methodology for a Tiered Approach to Land Zoning.

In this regard it is noted that the higher-level policy of the NPF requires a standardized 2-tiered approach to differentiate between (i) zoned land that is serviced and (ii) zoned land that is serviceable within the lifetime of the plan. Also as part of associated Appendix 3 A Methodology for a Tiered Approach to Land Zoning the infrastructural assessment must: a) include a reasonable estimate of the full cost of delivery of the required infrastructure to the identified zoned lands.

The OPR raises concerns that the IAR does not classify the zoned lands in line with the methodology under Appendix 3 of the NPF and does not conclusively distinguish between zoned land that is available for development and zoned land that requires significant further investment in services for infrastructure for development to be realised. It is accepted that the Infrastructure Assessment Report (IAR) completed to date contains shortcomings in terms of the requirements above. These outstanding issues will be addressed in the future but due to the extent of the revisions required and time constraints these are unlikely to be fully completed before the final adoption of the plan. However the work which can be completed on revisions to the IAR before the final adoption of the Plan will be included. A copy of the revisions completed to date on the IAR are enclosed as per Appendix 3. This will be further updated prior to the final adoption of the Plan.

The extent of the work required to revise the existing IAR and the limited timeframe is acknowledged by the OPR. The OPR suggests that a practical option would be to require the planning authority to include an objective to finalise the IAR and implement the TAZ through the local area plan preparation process, perhaps through the phasing and sequential development of those lands according to the availability or feasibility of delivering services. This is considered by the Planning Authority to be the most practical solution taking account of the extent of work to be completed and the restricted timelines involved. It should be noted that Irish Water will be carrying out a major study over the next three years which will more properly inform the IAR for final completion in 4 years time for the next review. Further work will also be done for the Longford Town Local Area Plan.

Accordingly the planning authority will insert into the relevant section of the Draft Plan (section 4.3.1) additional text committing to the preparation of detailed infrastructure assessments, consistent with NPO 72 and the methodology for a Tiered Approach to Zoning under Appendix 3 of the NPF, to inform the development strategy for future Local Area Plans in the county such as for Longford Town (policy objective CPO 4.8); and also indicating that the planning authority shall finalise the IAR and implement the TAZ through the local area plan preparation process, through the phasing and sequential development of those lands according to the availability or feasibility of delivering services.

Chief Executive Recommendation

Amend Proposed Amendment CH.4.1 as indicated with additional text as shown in green:

Proposed Amendment CH 4.1								
Heading	Page no.							
Project Ireland 2040 - National	72							
	Heading							

Amend section 4.3.1 of the Plan and insert the following text:

As part of the plan preparation process, substantial discussions were undertaken with Irish Water and local authority engineers regarding infrastructure needs. This will be augmented in accordance with national policy objective NPO 72A of the NPF which states that Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.' and in accordance with the associated methodology for a tiered approach to land zoning as set out in Appendix 3 of the NPF.

In this regard an Infrastructure Assessment Report (IAR) has been used to identify the existing and projected level of infrastructure provision within settlements. This has identified lands fully serviced and available for development and other sites that are in need of more infrastructural investment prior to development. The zoning of certain sites has been altered to reflect the findings of the IAR (see Volume 2: Appendices).

The Planning Authority is committed to the preparation of detailed infrastructure assessments, consistent with NPO 72 and the methodology for a Tiered Approach to Zoning under Appendix 3 of the NPF, to inform the development strategy for future Local Area Plans in the county such as for Longford Town (policy objective CPO 4.8).

The planning authority shall finalise the IAR and implement the TAZ through the local area plan preparation process, through the phasing and sequential development of those lands according to the availability or feasibility of delivering services.

2.4 Rural Housing

The OPR commends the planning authority for making significant progress in addressing Recommendation 8a of the OPR submission on the Draft Plan. References to the previous rural typologies contained in the Draft Plan (i.e. Structurally Weak Rural Areas and Stronger Rural Areas as well as the high amenity Broad Zone areas) have been removed from the rural housing policy framework and Figures 4.5 and 4.6 have been amended to reflect two rural typologies only, in accordance with NPO 19.

However, it is noted that proposed Material Amendment CH 4.16 seeks to amend the local need criteria in policy objective CPO 4.22 in the Draft Plan to reflect the provisions of the current County Development Plan, until such time as appropriate rural guidance is issued and to insert a new policy objective in the Draft Plan which commits to a review of rural housing policy in line with the Development Plan Guidelines or other relevant Guidelines issued by the Minister in this area having regard to NPO 19 of the NPF.

The OPR indicates that notwithstanding the commitment in section 4.8.12 of the Draft Plan 'to manage sustainable growth in designated 'Rural Areas Under Strong Urban Influence' and facilitate the provision of single houses in the countryside based on the core consideration of demonstrable economic or social requirement to live in a rural area...', proposed Material Amendment CH 4.16 does not adequately respond to the changed policy context arising from the NPF and the RSES contrary to the provisions of Section 27(1) of the Act. In particular attention is drawn to RPO 4.80 which requests that local authorities manage urban generated growth in Rural Areas Under Strong Urban Influence by ensuring that in these areas the provision of single houses in the open countryside is based on the core consideration of demonstrable economic or social need to live in a rural area, and compliance with statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.

OPR MA Recommendation 5 – Rural Housing Policy

Having regard to National Policy Objective (NPO) 19 of the National Planning Framework, Regional Policy Objective (RPO) 4.8 of the Regional Spatial and Economic Strategy, and section 4.8.12 of the Draft Plan which states 'The Council will manage sustainable growth in designated 'Rural Areas Under Strong Urban Influence' and facilitate the provision of single houses in the countryside based on the core consideration of demonstrable economic or social requirement to live in a rural area ...', the planning authority is required to review the changes proposed to policy objective CPO 4.22 (Material Amendment CH 4.16) to ensure that references to landowners and family members is related to social and economic need having regard to NPO19, and ensure that commensurate controls are included such that the dwelling is the first home.

Chief Executive Response

The OPR notes that the planning authority has reverted to the rural housing policy provisions contained in the Longford County Development Plan 2015 - 2021, which are not based on the core consideration of demonstrable economic or social need to live in a rural area.

The following policy references by the OPR are noted:

- National Planning Framework: National Policy Objective (NPO) 19: In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements;
- EMRA Regional Spatial and Economic Strategy: Regional Policy Objective (RPO) 4.80: Local authorities shall manage urban generated growth in Rural Areas Under Strong Urban Influence (i.e. the commuter catchment of Dublin, large towns and centres of employment) and Stronger Rural Areas by ensuring that in these areas the provision of single houses in the open countryside is based on the core consideration of demonstrable economic or social need to live in a rural area, and compliance with statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.
- Section 4.8.12 Draft Plan:'The Council will manage sustainable growth in designated 'Rural Areas Under Strong Urban Influence' and facilitate the provision of single houses in the countryside based on the core consideration of demonstrable economic or social requirement to live in a rural area ...'.

Having regard to the aforementioned National and Regional Policy Objectives and section 4.8.12 of the Draft Plan which states 'The Council will manage sustainable growth in designated 'Rural Areas Under Strong Urban Influence' and facilitate the provision of single houses in the countryside based on the core consideration of demonstrable economic or social requirement to live in a rural area ...', as requested by the OPR the planning authority have reviewed the changes proposed to policy objective CPO 4.22 (Material Amendment CH 4.16) to ensure that references to landowners and family members is related to social and economic need having regard to NPO19, and ensure that commensurate controls are included such that the dwelling is the first home.

Chief Executive Recommendation

Amend Proposed Amendment CH4.16 as indicated in green strikethrough and green:

Proposed Amendment CH 4.16								
Section	Heading	Page no.						
4.8.12	Rural Settlement Strategy – Rural Housing CPO	105						

Amend CPO 4.22 as follows:

Accommodate demand from individuals for permanent residential development in defined 'Rural Areas Under Strong Urban Influence,' "Stronger Rural Areas and Broad Zone Areas" who have strong links to the area and who are an intrinsic part of the rural community, subject to good planning practice, environmental carrying capacity and landscape protection considerations.

Applicants seeking permission for the development of single dwelling rural housing in areas defined 'Rural Areas Under Strong Urban Influence'. "Stronger Rural Areas and Broad Zone Areas" must satisfy the following criteria:

- 1. The applicant was born within the local rural area, or is living or has lived in the local rural area for a minimum of 5 years at any stage prior to making the planning application. It includes returning emigrants seeking a permanent home in their local rural area. The 'Local Rural Area' for the purpose of this policy is defined as the area generally within an 8km radius of where the applicant was born, living or has lived.
 - For the purpose of this policy, the rural area is taken to include 'Rural Settlement Clusters' listed in the Settlement Hierarchy, but excludes the Key Town, Self-Sustaining Growth Town, Self-Sustaining Towns, Towns and Villages and Serviced Rural Villages listed in the Settlement Hierarchy.
- 2. The applicant has a functional economic or social requirement to reside in this particular rural area such as in any of the following 2 situations:
 - (a) Economic requirements will normally encompass persons referred to in the revision to the Sustainable Rural Housing Guidelines 2005 and, if applicable, circulars. It includes persons involved in full-time farming, horticulture or forestry as well as similar rural-based part-time occupations where it can be demonstrated that it is the predominant occupation.
 - (b) Social requirements will normally encompass persons referred to in the revision to the Sustainable Rural Housing Guidelines 2005 and, if applicable, circulars. Pending the making of the revised Sustainable Rural Housing Guidelines by the Minister, a Functional Social Requirement in County Longford shall be taken as compliance with point 1 above.

Special consideration shall be given in cases of exceptional health circumstances - supported by relevant documentation from a registered medical practitioner and a disability organisation proving that a person requires to live in a particular environment or close to family support, or

- requires a close family member to live in close proximity to that person.
- 3. The applicant does not already own or has not owned a house in the open countryside.
- 4. If the site is located within an Area of Special Control, there is no alternative site outside of Areas of Special Control.
- 5. High quality siting and design.
- Members of farm families, seeking to build on the family farm. Persons who were born within the local rural area or has been living in the local rural area for a minimum of 5 years at any stage prior to the making of the planning application for rural housing. The "Local Rural "Area" for the purpose of this policy is defined as the area generally within an 8km radius (2km radius particular to Broad Zone areas) of where the applicant was born, living or has lived. For the purpose of this policy, the rural area is taken to include the Serviced Rural Villages and Rural Settlement Clusters identified under the "Rural" tier of the Settlement Hierarchy.
- b) Landowners with reasonably sized farm holdings who wish to live on their land.
- Persons who have a functional economic requirement (for example, actively engaged in agriculture, horticulture, forestry, bloodstock industries or in a profession that provides a vital service to the immediate rural community) or have a social requirement to reside in the subject rural area (in this regard, applicants who fulfil the requirements of criterion (a) above)
- c)Members of the rural community in the immediate area, this includes returning emigrants or their children with remaining substantial family or community ties, who wish to permanently settle in the area. Applicants do not already own or have not previously owned a house in the open countryside.
- d)Persons whose primary full or part-time employment is locally based or who are providing a service to the local community. High quality siting and design.

2.5 Flood Risk Management

The OPR has indicated that the amended Strategic Flood Risk Assessment (SFRA) states that there are no longer new residential or strategic residential reserve lands zoned, which are subject to flooding. Notwithstanding such statement, the SFRA subsequently confirms that land zoned 'New Residential' zoning in Clondra (Material Amendment AP.1E.18) would not be in compliance with the *Planning System and Flood Risk Assessment Guidelines and Circular PL 212014*, but yet continues to be zoned (see MA Recommendation 3).

The OPR notes the addition of Table 6: 'Justification of the Constrained Land Use Approach for Previously Developed Lands' which covers the individual settlements. As such, plan-making Justification Tests have not been undertaken for existing developed land in flood zones as required by the Guidelines and *Circular PL 212014*. The planning authority is advised that where the Constrained Land Use approach is being relied upon, development must be limited to minor development. Alternatively, a plan-making Justification Test should be carried out and satisfied prior to the adoption of the plan where future development (for vulnerable development) of areas at a high or moderate risk of flooding is to be considered.

OPR MA Recommendation 6 – Flood Risk Management

Having regard to the Flood Risk Management Guidelines (2009), as revised, and Circular PL 212014, the planning authority is required to either:

- (i) amend Objective CPO 5.108 to clarify that future development is limited to minor development where plan-making Justification Tests have not been undertaken and the Constrained Land Use applies; or
- (ii) review the Strategic Flood Risk Assessment in accordance with the application of the sequential approach, and the Justification Test where appropriate, and having regard to potential climate change effects. This review may entail the deletion of zonings where they fail to satisfy the plan- making Justification Test to ensure consistency with the guidelines.

Chief Executive Response

Any internally conflicting statements in the SFRA document will be updated on adoption of the Plan.

In terms of the 2 no. options presented by the OPR, option (i) is favoured. Accordingly, it is recommended to further modify Objective 5.108 to take account of the OPR's submission with additional text so that future development on these lands is limited to minor development where plan-making Justification Tests have not been undertaken and the Constrained Land Use applies.

Chief Executive Recommendation

Amend the text in Proposed Amendment CH5.28 with additional text as indicated in green:

Proposed Amendment CH 5.28							
Section Heading Page no.							
5.5	Flood Risk Management	154					

Amend Policy Objective CPO 5.108 with additional text as indicated in green as follows:

Facilitate the appropriate management and sustainable use of flood risk areas designated as 'Constrained Land Use' on Settlement Plan zoning maps. Future development on these lands is limited to minor development where plan-making Justification Tests have not been undertaken and the Constrained Land Use applies.

SFRA datasets will be made available to the lower-tier forward planning and Development Management and associated SFRA/FRA processes in the Council. These processes may lead to the identification of areas where the Constrained Land Use Zoning provisions contained within this Plan may apply. In this regard, prospective applicants for developments in areas that have been previously developed and are at elevated levels of flood risk are encouraged to consult with the Planning Department at the earliest opportunity. Appendix II of the SFRA that accompanies the Plan includes mapping at a County level of historic (page 2) and predictive (page 3) flood risk indicators.

2.6 Strategic National Road Network

Observation 6 of the OPR's submission on the Draft Plan advised the planning authority to review and strengthen the policy objectives for national roads to ensure that adequate policy is in place to maintain the strategic function, capacity and safety of the county's national roads network. Further the planning authority was requested to ensure that any changes were in accordance with national policy and guidance including the *Strategic Investment Framework For Land Transport (2014), Smarter Travel (2009)* and the provisions of the Section 28 Ministerial Guidelines *Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012).*

The OPR has raised concerns in relation to a new policy objective introduced under Material Amendment CH 5.10 which seeks to apply a less restrictive approach to non-residential development of strategic or national importance or extensions to such developments accessing onto the National Road Network. It is considered that Material Amendment CH 5.10 does not accord with Section 2.6 of the *Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012),* which states, "a less restrictive approach may be adopted in the case of developments of national and regional strategic importance, which by their nature are most appropriately located outside urban areas, and where the locations concerned have specific characteristics that make them particularly suitable for the developments proposed". It is indicated that Material Amendment CH 5.10 omits the wording in the extract above and instead restricts development solely to that of national and regional strategic importance.

OPR MA Observation 1- Access to National Roads

The planning authority is requested to fully comply with Observation 6 of the Office's submission on the Draft Plan and make minor amendments to the policy objective proposed under Material Amendment CH 5.10 to ensure it fully accords with Section 2.6 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012), ensuring that developments of national and regional strategic importance are only permitted access onto national roads where by their nature they are most appropriately located outside urban areas, and where the locations concerned have specific characteristics that make them particularly suitable for the developments proposed.

Chief Executive Response

Section 2.6 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012), relates to ensuring that developments of national and regional strategic importance are only permitted access onto national roads where by their nature they are most appropriately located outside urban areas, and where the locations concerned have specific characteristics that make them particularly suitable for the developments proposed.

Proposed Amendment CH5.10 which relates to the '5.2.3 Road and Street Network' relates to the inclusion of a new Policy Objective as follows:

To apply a less restrictive approach to non-residential development of strategic or national importance or extensions to such developments accessing onto the National Road Network in in accordance with the provisions of Section 2.6 of the 'Spatial

Planning and National Roads -Guidelines for planning authorities' (2012).

It is accepted that this is not fully in accordance with the ethos of Section 2.6 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) which states, 'a less restrictive approach may be adopted in the case of developments of national and regional strategic importance, which by their nature are most appropriately located outside urban areas, and where the locations concerned have specific characteristics that make them particularly suitable for the developments proposed'.

Accordingly in accordance with the requirements of the OPR it is accepted that minor amendments should be made to the policy objective proposed under Material Amendment CH 5.10 to ensure it fully with the aforementioned accords with the aforementioned Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012)'. It is considered that the wording which it has been indicated by the OPR which has been omitted from Material Amendment CH 5.10 should be included to address this issue.

Chief Executive Recommendation

Delete the following text and include the following additional text in Proposed Amendment CH5.10 as indicated in green strikethrough and green respectively:

Proposed Amendment CH 5.10						
Section Heading Page no.						
5.2.3	Road and Street Network	135				

Insert a new Policy Objective after CPO5.17 as follows:

To apply a less restrictive approach to non-residential development of strategic or national and regional strategic importance, or extensions to such developments accessing onto the National Road Network which by their nature are most appropriately located outside urban areas, and where the locations concerned have specific characteristics that make them particularly suitable for the developments proposed in accordance with the provisions of Section 2.6 of the 'Spatial Planning and National Roads -Guidelines for planning authorities' (2012).

2.7 Climate Action

Further to Observation 7 of the OPR's submission on the Draft Plan, the OPR acknowledges the planning authority's position regarding the absence of revised Development Plan Guidelines to support the preparation of the Draft Plan. Notwithstanding, the OPR considers it appropriate that the outcomes of any future guidelines be reviewed by the planning authority over the lifetime of the plan and that any steps considered necessary to review the Plan be taken.

The OPR notes that amendment CH 3.3 does provide a new objective in the Draft Plan which seeks to, "create an 'Implementation Plan' of adequate detail that will allow for continued monitoring of Local Authority actions, responsibilities and progress specifically related to Climate Action". While this new objective is welcomed along with the consideration of climate action as a cross cutting theme within the Draft Plan, the OPR considers that a commitment to ensure that the Development Plan will be

consistent with the approach to climate action recommended in the revised Development Plan Guidelines as adopted or any other relevant guidelines is necessary.

OPR MA Observation 2 – Climate Action

Given the importance attributed to climate action by Government, as evidenced by, inter alia, the publishing of the Climate Action Plan 2019, the planning authority is reminded that an objective should be included as a minor amendment to the Draft Plan to consider a variation of the Development Plan within a reasonable period of time, or to include such other mechanism, as may be appropriate, to ensure the Development Plan will be consistent with the approach to climate action recommended in the revised Development Plan Guidelines as adopted or any other relevant guidelines.

Proposed Amendment CH 3.3							
Section Heading Page no.							
3.6	County Longford Climate	69					
Strategy							

Chief Executive Response

The OPR notes that amendment CH 3.3 does provide a new objective in the Draft Plan which seeks to, "create an 'Implementation Plan' of adequate detail that will allow for continued monitoring of Local Authority actions, responsibilities and progress specifically related to Climate Action".

The importance attributed to climate action by Government, as evidenced in the publishing of the Climate Action Plan 2019 is accepted and the planning authority will include an objective as requested by the OPR as a minor amendment to the Draft Plan to consider a variation of the Development Plan within a reasonable period of time, or to include such other mechanism, as may be appropriate, to ensure the development plan will be consistent with the approach to climate action recommended in the revised Development Plan Guidelines as adopted or any other relevant guidelines. Proposed Amendment CH 3.3 can be amended accordingly to reflect this additional content.

Chief Executive Recommendation

Include the following additional text in Proposed Amendment CH3.3 as indicated in green:

Include the following additional CPO after CPO 3.18:

- (i) Create an 'Implementation Plan' of adequate detail that will allow for continued monitoring of Local Authority actions, responsibilities and progress specifically related to Climate Action'.
- (ii) Consider a variation of the development plan within a reasonable period of time, or to include such other mechanism, as may be appropriate, to ensure the Development Plan will be consistent with the approach to climate action recommended in the revised Development Plan Guidelines as adopted or any other relevant guidelines.

2.8 Economic Development

The OPR notes the significant policy changes proposed in respect of facilitating economic development and in particular FDA and /or IDA Ireland affiliated enterprises, including amendments CH 8.3 and CH 8.4. Positively, the policies seek to collaborate with agencies to identify key strategic employment landbanks and landing space within the county principally to accommodate prospective Foreign Direct Investment (FDI) employment and/or IDA Ireland affiliated enterprises. This approach is supported by the OPR.

It is indicated by the OPR that although the accommodation of FDI and IDA affiliated enterprises in County Longford within the Draft Plan is important and is to be welcomed, it is necessary that a 'plan led' approach to development is considered in the first instance and consideration is given to the location of such sites within settlement boundaries on suitably zoned land. There continues to be extensive Industrial/Commercial/Warehousing use zoned land in settlements in the county including Longford, Edgeworthstown and Granard, extensive industrial/alternative energy land in Lanesborough and strategic industrial reserve land in Granard. It is important, therefore, that consideration is given to sequentially preferable sites in advance of more peripheral locations in accordance with (NPO3c; NSO1 and RSO2).

OPR MA Observation 3 – Location of Strategic Employment

Having regard the extent of land zoned for Industrial/Commercial/Warehousing purposes within the top tier settlements, extensive land zoned for Industrial/Alternative Energy in Lanesborough, national and regional policy objectives to provide for compact growth (NPO 3c) and the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), the planning authority is requested to make minor amendments to the policy objectives proposed as part of Material Amendment CH 8.3 and CH 8.4 to ensure that priority is given to sites and landbanks within settlement boundaries in the first instance and only where it can be demonstrated that no alternative landbank / landing space can be suitably identified, will a location outside of a defined settlement be considered.

Chief Executive Response

The following National and Regional higher-level policy which have been drawn specific attention to by the OPR are noted:

- National Policy Objective (NPO) 3c: Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints;
- NSO1: Compact Growth;
- RSO2: Compact Growth and Urban Regeneration Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens. (NSO 1).

The OPR has indicated that there continues to be extensive Industrial/Commercial/Warehousing use zoned land in settlements in the county including Longford, Edgeworthstown and Granard, extensive industrial/alternative energy land in Lanesborough and strategic industrial reserve land in Granard. It is important, therefore, that consideration is given to sequentially preferable sites in

advance of more peripheral locations in accordance with (NPO3c; NSO1 and RSO2). It is indicated by the OPR that Material Amendment CH 8.3 and CH 8.4 should ensure that priority is given to sites and landbanks within settlement boundaries in the first instance and only where it can be demonstrated that no alternative landbank/landing space can be suitably identified, will a location outside of a defined settlement be considered

It is accepted that in accordance with the aforementioned policies which reference compact growth and urban regeneration, that is necessary that a 'plan led' approach to economic development sites is considered, with consideration given to the location of such sites within settlement boundaries on suitably zoned land. Taking account of the higher level national and regional policy outlined, the necessity for the suggested modification by the OPR is recognised and it is considered that both of these Material amendments should be amended accordingly through the addition of additional wording to this effect.

Chief Executive Recommendation

Include the following additional text in Proposed Amendment CH8.3 and CH8.4 as indicated in green:

Proposed Amendment CH 8.3								
Section	Page no.							
8.7	County Economic Developmen – CPO	Longford at Strategy	238					

Insert the following Policy Objective after CPO8.22 as follows:

Collaborate with agencies such as Enterprise Ireland, Connect Ireland and IDA Ireland in identifying key, strategic employment land banks within the County to principally accommodate prospective Foreign Direct Investment (FDI) employment and/or IDA Ireland affiliated enterprises and ensure that priority is given to sites and landbanks within settlement boundaries in the first instance and only where it can be demonstrated that no alternative landbank / landing space can be suitably identified, will a location outside of a defined settlement be considered.

Proposed Amendment CH 8.4								
Section	ction Heading Page							
8.7	County Longford Economic Development Strategy – CPO	238						

Insert the following Policy Objective after CPO 8.22:

Facilitate the delivery of strategic employment landing space to principally accommodate FDI employment and IDA Ireland affiliated enterprises where appropriate and ensure that priority is given to sites and landbanks within settlement boundaries in the first instance and only where it can be demonstrated that no alternative landbank / landing space can be suitably identified, will a

location outside of a defined settlement be considered.

2.9 Built Heritage

The OPR notes that a number of properties are proposed for deletion from the Record of Protected Structures as part of the material alterations including Danesfort House, Curry; Houricans, Granard; and John O'Hara's, Granard (Material Amendments AP.6.2, AP.6.4 and AP.6.5). The Strategic Environmental Assessment (SEA) for the relevant proposed material alterations states the following:

Proposed Material Alterations AP.6.2, AP.6.4, AP.6.5 propose the removal of architectural heritage from the Record of Protected Structures in the absence of evidence demonstrating that this heritage does not warrant the protection afforded by inclusion on the Record. In the absence of evidence to the contrary, it must be assumed, taking a precautionary approach, that removal of these structures would be likely to result in significant adverse effects on the County's architectural heritage.

In respect of built heritage in rural towns, the NPF states 'Investment in our towns and villages through regeneration, public realm improvements and the appropriate adaptation and re-use of our built heritage, are key factors in developing, promoting and investing in a sense of place and aligning the objectives of creating high quality with that of spatial planning.'

Having regard to the information contained on the National Inventory of Architectural Heritage about the relevant structures and the SEA for the relevant Material Amendments, the OPR considers that the deletions from the Record of Protected Structures are not evidence based and should be reconsidered.

OPR MA Recommendation 7 – Record of Protected Structures

Having regard to National Policy Objective 17 of the National Planning Framework, the National Inventory of Architectural Heritage and Strategic Environmental Assessment (SEA) for relevant proposed material alterations, the planning authority is required to omit the deletion of the following properties from the Record of Protected Structures (RPS):

- (i) RPS No. 212 Danesfort House, Curry (Material Amendment AP.6.2);
- (ii) RPS No. 328- Houricans, Granard (Material Amendment AP.6.4); and
- (iii) RPS No. 345 John O'Hara's, Granard (Material Amendment AP.6.5)

The planning authority is advised to consult with the Department of Housing, Local Government and Heritage regarding the above and any other changes proposed to the Record of Protected Structures.

Chief Executive Response

The OPR is particularly concerned in relation to the unjustified removal of the following Protected Structures:

- Proposed Amendment AP.6.2 relates to the removal of RPS No. 212 from the Record of Protected Structures – Danesfort House, Curry;
- Proposed Amendment AP.6.4 relates to the removal of RPS no. 328 from the Record of Protected Structures Houricans, Granard;

 Proposed Amendment AP.6.5 relates to the removal of RPS no. 345 from the Record of Protected Structures – John O'Hara's, Granard.

As part of the Chief Executive Report on the Draft Plan the removal of a total of 5 no. Protected Structures was proposed and approved by resolution by the elected members. The Chief Executive Report on the Draft had initially made recommendations in relation to the removal of only 1 no. Protected Structures – the removal of RPS No. 360 from the Draft Plan Record of Protected Structures – 'Attached Houses', Keenagh. However at a Council meeting on June 21st 2021, 4 no. additional structures were added by the elected members for removal:

- Proposed Amendment AP.6.2 relates to the removal of RPS No. 212 from the Record of Protected Structures – Danesfort House, Curry;
- Proposed Amendment AP.6.3 relates to the removal of RPS No. 357 from the Record of Protected Structures Thatch Cottage, Keenagh.
- Proposed Amendment AP.6.4 relates to the removal of RPS no. 328 from the Record of Protected Structures – Houricans, Granard;
- Proposed Amendment AP.6.5 relates to the removal of RPS no. 345 from the Record of Protected Structures John O'Hara's, Granard.

In this regard it should be noted that under section 12(6) of the Planning and Development Act 2000 (as amended) elected members may either adopt the Draft Plan, adopt subject to Chief Executive Recommendations or adopt subject to modification. The inclusion of the removal of the Protected Structures highlighted of concern by the OPR (Proposed Amendment AP.6.2, AP.6.4 and AP.6.5) were such modifications proposed to the Chief Executive report on the Draft Plan and adopted by way of resolution by the members as material alterations to the Draft Plan (as was AP.6.3 but not raised as a concern by the OPR). As such the removal of such structures is considered to be covered by way of legislative provision in the Planning and Development Act 2000 (as amended).

In terms of the requirement for the planning authority to consult with the Department of Housing, Local Government and Heritage regarding the deletion of the highlighted 3 no. protected structures to which the OPR has highlighted, or any other changes proposed to the Record of Protected Structure, it should be noted that in accordance with the requirements of the Planning and Development Act 2000 the Department constitutes a prescribed body, and as such they were notified of the public display of all of the proposed material amendments, which included the removal of a total of 5 no. Protected Structures in total. As such the Planning Authority have consulted with the Department of Housing, Local Government and Heritage in relation to the Proposed Material Amendments as a prescribed body, however no response was received from the Department within the public display period.

Chief Executive Recommendation

No change is recommended to the following Material amendments AP.6.2, AP.6.4 and AP.6.5 which shall remain as follows:

Proposed Amendment AP.6.2					
Section Heading Page no.					
Appendix 6 Draft Record of Protected 202					

The removal of RPS No. 212 from the Record of Protected Structures – Danesfort House, Curry.

Proposed Amendment AP.6.4							
Section Heading Page no.							
Appendix 6	Draft Record of Protected	213					
	Structures						

The removal of RPS no. 328 from the Record of Protected Structures – Houricans, Granard.

Proposed Amendment AP.6.5						
Section Heading Page no.						
Appendix 6	Draft Record of Protected Structures	214				

The removal of RPS no. 345 from the Record of Protected Structures – John O'Hara's, Granard.

3. Other Submissions Received on the Material Alterations to Draft Plan per Chapter

3.1 Chapter 4: Core, Settlement and Housing Strategies

Proposed Amendment CH 4.13 to CH 4.21

Details of the amendment:

CH 4.13 - Insert an additional Policy Objective in the 'Rural Settlement Clusters – County Policy Objectives' after CPO 4.21:

CH 4.14 Amend the text provided in Section 4.8.12 – Rural Settlement Strategy of the Draft Plan as follows:

CH 4.15 Amend the Rural Typology Map (Figure 4.5) of the Draft Plan to reflect the recommended revised Rural Typology Map.

CH 4.16 Amend CPO 4.22 to reflect the Local Need Criteria as set out in the current Longford County Development Plan 2015-2021 under Objective C12:

CH 4.17 Insert a Policy Objective CPO after CPO 4.22 as follows:

CH 4.18 Amend the Policy Objective CPO 4.23 as follows:

Accommodate demand from individuals for permanent residential development in defined "Structurally Weak Rural Areas" "Rural Areas Elsewhere", subject to sustainable planning principles (appropriate siting and design and the demonstration of negligible impacts to existing amenities or sensitive environments).

CH4.19 Amend the Policy Objective CPO 4.25 as follows:

Attach an occupancy condition to planning permissions in respect of rural housing applications in identified 'Rural Areas Under Strong Urban Influence', "Stronger Rural Areas" and "Broad Zone Areas" pursuant to Section 47 of the Planning and Development Act 2000, as amended, restricting the use of the dwelling to the applicant, as a place of permanent residence. The period of occupancy will be limited to a period of 7 years from the date of first occupation.

CH 4.20 Amend the Policy Objective CPO 4.39 as follows:

Accept the replacement of a dwelling other than a vernacular dwelling in circumstances where such a dwelling house is habitable, subject to the following:

- a) The structure must last have been used as a dwelling and the internal and external walls and roof must be intact.
- b) A report from a suitably qualified competent person shall be submitted to verify that the dwelling is habitable but that replacement of the dwelling is the most sustainable option.
- c) Documentary evidence of the most recent date of occupation should be submitted with the application.
- d) The design of the proposed replacement house shall be of a high standard and its scale and character appropriate to the site and to existing development in the vicinity and to the rural area.
- e) Normally a condition to demolish the existing dwelling will be included in any grant of permission.

f) Require applicants in defined 'Rural Areas Under Strong Urban Influence', "Stronger Rural Areas" and "Broad Zone" to comply with local need criteria identified in CPO 4.22 of this plan. Normal planning considerations will be taken into account in the assessment of planning applications for replacement dwellings. g) In cases where an applicant/occupant wishes to replace an existing habitable dwelling on the same footprint and of the same or similar floor area there will be no requirement to comply with local need criteria identified in this plan. Ch 4.21 Amend Figure 4.6 of the Draft Plan - Core Strategy Map to reflect recommended revised Settlement Hierarchy.

Submission(s) Received: Sub-04

Summary of the Issues raised in the Submission(s):

Submission expresses support for the proposed amendment which relate to the Council's Rural Settlement Strategy. TII acknowledges and supports the need to sustain rural communities.

Submission suggests a minor alteration and to include a cross reference with the CPO's included under Section 4.8.10 Town and Villages and Section 4.8.11 Rural (Serviced Rural Villages, Rural Settlement Clusters and Open Countryside) to CPO 5.17 (as proposed to be amended). It is suggested that in the interests of clarification and as an advisory to potential applicants for development in rural areas of the requirement to adhere to the provisions of official policy in relation to development accessing national roads. An appropriate cross reference to CPO 5.17 where there may be implications for the strategic national road network.

Chief Executive's Response:

The contents of the submission supporting the inclusion of amendment are noted and welcomed.

The proposed insertion of the cross reference to CPO5.17 is considered appropriate given minor in nature, and the

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with the proposed Material Amendment as displayed for the proposed Material Amendments CH 4.13 to CH 4.21 Rural Housing.

It is recommended that the Development Plan be made with the proposed addition of a cross reference to CPO 5.17 as detailed below:

Section 4.8.10 Towns and Villages

Towns and Villages - County Policy Objectives (please refer also to CPO 5.17 in respect of the need to adhere to the provisions of official policy in relation to development accessing national roads)

Section 4.8.11 Rural (Serviced Rural Villages, Rural Settlement Clusters and Open Countryside)

Rural Settlement Clusters - County Policy Objectives (please refer also to CPO 5.17 in respect of the need to adhere to the provisions of official policy in relation to development accessing national roads)

Proposed Amendment CH 4.22

Details of the amendment:

Amend the Core Strategy Table (Table 4.12) with the revised Core Strategy Table as follows

Table 4.12 Core Strategy Table

Total	Serviced Rural Villages (15 units/ha) Rural Settlement Clust Open Countryside			Augh Towns and Villages (20 Dru unitsha) Serviced Rural Villages (15 Abbe unitsha) Rural Settlement Clusters Open Countryside					Self-Sustaining Towns (25 units/ha)		Self-Sustaining Growth Town (25 units/ha)	Key Town (Density 35-40 units that)						
	ys ide	Clusters	Clondra	Ballinamuck	Ardagh	Abbeyshrule	Newtownforbes	Legan	Keenagh	Drumlish	Ballinalee	Aughnacliffe	Lanesborough	Ballymahon	Edgeworthstown	Granard	Longford Town	Settlement
40873	20010	20919	449	232	210	224	778	215	581	931	347	177	757	1877	2072	1096	10008	Population 2016
4927	121	707	67	35	32	24	140	34	105	140	62	32	151	282	311	274	2502	NEW Population Growth to 2027
45800	100	21646	516	267	242	258	918	249	686	1071	409	209	908	2159	2383	1370	12510	Population 2027
2568	0,0	379	35	18	16	18	73	18	55	73	33	17	79	147	162	143	1304	NEW HST Units 2021-2027
770	3	A/N	NA	NA	NA	NA	22	5	16	22	10	5	24	44	49	43	391	30% of Required Residential Units Within Existing Settlement
75.96	140	AW	2.34	1.21	1.09	1.17	3.65	0.90	2.73	3.64	1.63	0.83	3,95	5.87	6.48	5.71	34.77	Quantum of Land Required for New Residential Units to 2027 (Ha)
	1	AWA	2.80	1.29	1.64	1.21	3.96	1.15	2.95	3.68	2.26	0.85	4.42	6	7.10	6.40	35.33	Quantum of Land Zoned for New Residential Units under this Plan (Ha)
	3	AIN AIN	NA	NA	NA	NA	3.51	0.43	2.95	3.15	2.26	0.40	1.87	5.20	7.10	5.31	35.33	Quantum of Land Zoned Within Existing Settlement Footprint (Brownfield/Infill) (Ha)
	3	NA	WA	WA	WA	WA	70	9	55	63	33	8	47	130	162	133	1304	Potential Units that can be Delivered Within Existing Settlement (Brownfield/Infill) (Ha)

Submission(s) Received: Sub-18

Summary of the Issues raised in the Submission(s):

The submission does not refer to a specific Proposed Material Alteration. However, the submission does relate to the provision of housing (traveller accommodation), which is covered under the Housing Strategy and Housing Need and Demand Assessment, which forms part of the Proposed Material Alterations, together with the amended Core Strategy and application of Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020' as introduced by Proposed Material Alteration CH 4.2.

The submission makes the following comments;

- Traveller specific accommodation developments completed under the last development plan period should be outlined in the Development Plan.
- In order to properly assess the level of preference for Traveller Specific Accommodation amongst Travellers in County Longford, we recommend that Travellers ideal preference for accommodation be recorded, in addition to whatever form of accommodation is currently available to them.
- National-level planning guidelines for Development Plans set out that the range and type of housing required and the land use aspects of the TAP are incorporated into the Development Plan. The Guidelines also state that this should take the form of '... objectives that clearly set out the approach of the Development Plan in addressing the accommodation needs of the Traveller community and an indication of the specific locations of known Traveller accommodation projects. To support the identification of additional locations for such projects, zoning policies should also be drawn up in a flexible manner to reflect the urgent need to secure additional Traveller accommodation over the lifetime of the plan.' (Section 4.56 of Development Plans: Planning Guidelines for Planning Authorities, 2007). Therefore, projects committed to under the 2019-2024 Traveller Accommodation Programme should be listed as objectives in the Development Plan with clear timelines as per the Housing (Traveller Accommodation) Act 1998 PART III (27) (10)
- Sites should be identified and zoning of land for Traveller specific accommodation, including transient accommodation, should be mapped and illustrated in the new County Development Plan, in line with the Planning and Development Act, (2000) as amended, particularly s10(2)(i). The legislation requires that a Development Plan shall include objectives for: 'The provision of accommodation for Travellers, and the use of particular areas for that purpose.' Given the lifespan of the development plan, consideration should also be given for how sites will be identified for the next Traveller Accommodation Programme.
- All developments should be carried out with meaningful consultation at every stage of the process, including with children and young people.

- The Development Plan should identify Travellers as a priority group in its plans to address homelessness and identify what tangible steps will be taken to prevent Travellers becoming homeless in county Longford.
- Appropriate baseline studies on Traveller accommodation needs should be carried out as part of integrated Housing Need and Demand Assessments for Development Plans.
- The Development Plan should outline relevant objectives to implement the recommendations made by the Irish Human Rights and Equality Commission in their equality review of the provision of Traveller-specific accommodation by Longford County Council, published in July 2021.
- Travellers are disproportionately adversely affected by energy poverty as highlighted in National Traveller MABS 2019 report "Accommodating Ethnicity, Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers". This report found that Travellers living in mobile homes spend on average between 26.1% (median) and 28% (mean) of their income on energy. This is five to six times higher than the corresponding figure of 4.6% of the general population. This should be considered in all efforts to improve the sustainability and energy efficiency of accommodation within the Local Authority area during the lifespan of the Plan. The Development Plan should outline Longford County Council's plans for retrofitting Traveller accommodation, including timelines for this.
- The provision of good quality, well managed, transient sites are an imperative part of preserving Traveller culture, including nomadism. In line with the local authorities' statutory obligations under the Housing (Traveller Accommodation) Act 1998, we recommend that sites are identified for transient sites within the Development Plan, in consultation with the local Traveller community.
- The Development Plan should reference the work being done on a national level to implement the recommendations of the Traveller Accommodation Expert Review and commit to incorporating the work and decisions of the programme board into its future processes

Chief Executive's Response:

The Longford Traveller Accommodation Programme 2019–2024, is specifically referred to in section 4.13.6 of the draft County Development Plan and the Housing Strategy.

Section 10(2)(i) of the Planning and Development Act 2000 (as amended) requires that a development plan includes objectives for the provision of accommodation for travellers, and the use of particular areas for that purpose. The Council recognises the needs of the Travelling Community within the county. These are addressed and delivered within the context of an adopted Traveller Accommodation Programme 2019-2024 and subsequent programmes, subject to funding. In terms of the remit under the County Development Plan, the Draft Plan supports the delivery of the

Longford Traveller Accommodation Programme 2019 – 2024. CPO 4.61 refers "Provide appropriate accommodation to meet the needs of the Travelling Community and to secure the implementation of the Longford County Council Traveller Accommodation Programme 2019-2024". CPO 4.53 refers to homelessness and the travellers; "Provide housing appropriate to the needs of the elderly (in accordance with the Longford Age Friendly Strategy 2015-2020 and any subsequent strategies), persons with disabilities, lone parents, Travellers, and the homeless. The Council shall support and promote the use of Universal Design principles and life-long adaptability in new housing developments to meet the needs of diverse groups and an aging population."

The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). The population target includes all sections of society including the Travelling Community. The housing needs of the Travelling Community is monitored through the Longford Traveller Accommodation Programme 2019 – 2024, with anticipated growth and associated housing need provided for in the draft County Development Plan by way of policy which supports delivery of accommodation for the Travelling Community. Baseline studies and assessment of accommodation needs are covered in the Traveller Accommodation Programme, which in turn has been considered as part the Housing Strategy and Housing Need & Demand Assessment.

With regards to the core strategy, please also refer to the response to the Office of the Planning Regulator submission. The planning authority is required to amend the core strategy table to ensure it complies with Section 10(2A)(c) and 10(2A)(d) of the Act and the Guidance Note on Core Strategies (2010). Table 4.12 Revised Core Strategy Table will be updated to indicate the quantity in hectares of land zoned for a mix of residential and other uses including an appropriate proportion of 'Town Centre'; and 'Canal Redevelopment Areas', all of which either permit residential use or provide for it to be open for consideration in the Draft Plan; and to indicate that number of units which said lands can accommodate.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 4.22 subject to the changes as set out in the response to the OPR submission which are repeated below;

To make revisions to both the Core Strategy Table and the Land Use Zoning Matrix as follows:

- To include in Table 4.12: Revised Core Strategy additional columns indicating the following:
- (1) the quantify in hectares the land zoned for a mix of residential and other uses;

(2) the proposed number of housing to be included in the area.

Proposed Amendment CH 4.17

Details of the amendment:

Insert a Policy Objective CPO after CPO 4.22 as follows;

In line with Circular Letter PL 2/2017, review rural housing policy in line with Development Plan or other relevant Guidelines issued by the Minister in this area having regard to NPO 19 of the NPF.

Submission(s) Received: Sub-18

Summary of the Issues raised in the Submission(s):

Sub-18 from the NWRA notes that from a regional perspective, the proposals are generally positive and include the proposals that will enable the NWRA and other interested parties to engage further at the appropriate time. In finalising holistic policies for rural development it will be important for the plan to carefully incorporate the requirements of the Sustainable Rural Housing Guidelines and the National Strategic Outcome to provide an appropriate framework for the county and its surrounding area.

Chief Executive's Response:

The contents of the above submission are acknowledged.

The Planning Authority notes the obligation on planning authorities, in line with Circular Letter PL 2/2017 dated 31st May 2017, to ensure that existing *Sustainable Rural Housing Guidelines for Planning Authorities (2005)* policy, specifically to the application of the "local housing needs residency criteria", remain in place pending the conclusion of the national policy review process and updating of the aforementioned guidelines by the Department following the judgement by the European Court of Justice (ECJ) in 2013 in relation to the 'Flemish Decree' case.

For the benefit of those unfamiliar with the 'Flemish Decree' case and its implications for rural housing policy in Ireland, the European Commission issued an infringement notice against Ireland in 2007 in relation to the "local needs criteria" provided for in the *Sustainable Rural Housing Guidelines for Planning Authorities* (2005). This infringement notice was subsequently deferred pending the outcome of an infringement case taken against Belgium (the 'Flemish Decree' case) and on which the ECJ ruled that the 'Flemish Decree' (a requirement to demonstrate "a sufficient connection" to an area) constituted an unjustified restriction on fundamental freedoms under the Treaty on the Functioning of the European Union (the EU Treaty), in particular that it breached article 43 of the EU Treaty on the freedom of movement of citizens.

In order to avoid an up-scaling of the previous infringement notice against Ireland and referral of the matter to the ECJ for determination, the Department of Housing, Local Government and Heritage previously indicated their intention to revise the 2005 Guidelines to ensure that rural housing policies and objectives contained in local authority development plans comply with Article 43 of the EU Treaty on the freedom of movement of citizens.

Notwithstanding, under Circular Letter PL 2/2017 Planning Authorities are required to "defer amending their rural housing policy/ local housing need criteria in existing statutory development plans either by way of the cyclical review or variation procedures. This is considered prudent in order to avoid planning authorities adopting different approaches on the matter in the interim."

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 4.17

3.2 Chapter 5: Transport, Infrastructure, Energy and Communications

Proposed Amendment CH 5.1

Details of the amendment:

CH 5.1 Amend the Policy Objective CPO5.9 and insert text as follows:

Prepare and implement a Local Transport Plan (LTP) for Longford Town in conjunction with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other relevant stakeholders, in accordance with the guidance note Area Based Transport Assessment 2019 (or any subsequent update) produced by the NTA and TII.

Submission(s) Received: Sub-47

Summary of the Issues raised in the Submission(s):

The submission acknowledges the Council Policy to support the development and reinforcement of walking and cycling within the County, the NTA reiterates its recommendation that the Development Plan includes sustainable transport indicators, including mode share for the purposes of monitoring the efficacy of policies and the development of objectives against a range of sustainable development indicators.

Chief Executive's Response:

The contents of the submission and the support for the material amendments proposed is welcomed.

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with Proposed Material Amendment CH 5.1

Proposed Amendment CH 5.2

Details of the amendment:

Amend the wording of policy objective CPO5.11 as follows:

Require all major developments to submit Traffic Impact Assessments and Mobility Management Plans. Mobility management / travel plans shall be submitted with applications for trip intensive developments including schools, significant employers, business parks and industrial estates, prepared in accordance with the TII Traffic and Transport Assessment Guidelines (2014) (PE-PDV-02045).

Submission(s) Received: Sub-04

Summary of the Issues raised in the Submission(s):

Submission expresses support for the proposed amendment. However, it states that in the interest of clarification the TII traffic and Transport Assessment Guidelines (2014) provide guidance on the preparation of Traffic and Transport Assessments relating to development proposals relating to development proposals affecting national roads. The TII Guidelines are not guidance for the preparation of Mobility Management Plans.

Chief Executive's Response:

The contents of the submission supporting the inclusion of amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with the proposed Material Amendment as displayed. Amend the text in Section 5.2.2 Land Use and Transportation Planning, CPO 5.11 of the Plan as follows:

Amend the wording of policy objective CPO5.11 as follows with text highlighted in green:

Require all major developments to submit Traffic Impact Assessments and Mobility Management Plans.

Traffic Impact Assessments shall be prepared in accordance with the TII Traffic and Transport Assessment Guidelines (2014) (PE-PDV-02045).

Mobility management / travel plans shall be submitted with applications for trip intensive developments including schools, significant employers, business parks and industrial estates, prepared having regard to:

NTA Achieving Effective Workplace Travel Plans Guidance for Local Authorities: <u>Achieving-Effective-Workplace-Travel-Plans-Guidance-for-Local-Authorities11.pdf</u> (nationaltransport.ie)

Dublin Transportation Office – Advice Note Mobility Management Plans (2002): https://www.nationaltransport.ie/wp-content/uploads/2011/12/mobility_management_plans_2002.pdf

Proposed Amendment CH 5.10

Details of the amendment:

Insert a new Policy Objective after CPO5.17 as follows:

To apply a less restrictive approach to non-residential development of strategic or national importance or extensions to such developments accessing onto the National Road Network in in accordance with the provisions of Section 2.6 of the 'Spatial Planning and National Roads -Guidelines for planning authorities' (2012).

Submission(s) Received: Sub-04

Summary of the Issues raised in the Submission(s):

Submission states that the Council will be aware that the official policy requirement of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) requires the planning authority policy to avoid the creation of any new access or the intensification of existing access to national roads where speed limits are greater than 50-60kmph apply.

The Submission further states that the provision of exceptional circumstances is addressed in Section 2.6 of the DoECLG Guidelines and that such provisions are required to be identified plan-led and incorporated into the Development Plan through consultation with TII. It states further that deferring significant official policy and road safety considerations to the Development Management function of the planning authority is considered inappropriate and contrary to the provisions of the Section 28 Ministerial Guidelines.

The Submissions suggests a revised wording of the CPO 5.17 as follows

To apply a less restrictive approach to non-residential development of strategic or national importance or extensions to such developments accessing onto the National Road Network in in accordance with the provisions of Section 2.6 of the 'Spatial Planning and National Roads -Guidelines for planning authorities' (2012),

such provisions will be identified in an evidence based plan-led manner for incorporation in the Development Plan.

Chief Executive's Response:

The contents of the submission and the proposed additional text to the CPO are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with the proposed Material Amendment as displayed subject to the following minor modification;

Insert a new Policy Objective after CPO5.17 as follows, with the additional text highlighted in green:

To apply a less restrictive approach to non-residential development of strategic or national importance or extensions to such developments accessing onto the National Road Network in in accordance with the provisions of Section 2.6 of the 'Spatial Planning and National Roads -Guidelines for planning authorities' (2012), such provisions will be identified in an evidence based plan-led manner for incorporation in the Development Plan.

Proposed Amendment CH 5.16

Details of the amendment:

Include the following text into Section 5.2.5 Sustainable Public Transport:

Sustainable Transport Principles

The promotion of use and increased delivery of sustainable modes of transport is fundamental to achieving Ireland's carbon emission reduction requirements of 20% by 2020 and 30% by 20304. In addition to the reduction of emissions, failure to deliver public transport investment will result in a highly congested network that cannot meet the economy's transport needs. 'The provision of a well-functioning, integrated public transport system, enhancing competitiveness, sustaining economic progress and enabling sustainable mobility choices for citizens supports the overall objectives of Ireland 2040'5.

- 4 https://ec.europa.eu/clima/policies/strategies/progress_en
- 5 https://www.gov.ie/en/policy/e9ec84-transport/

The following are considered to constitute the key principles underlying future sustainable transport:

1. Favour the established hierarchy of 'putting the pedestrian first' followed by the provision of cycling and public transport, at both micro and macro level, over developments that prove more beneficial to car use and dependency;

- 2. Encourage cycling and its connectivity to existing public transport hubs and centres of activity and tourism, particularly those that provide an onward network of sustainable transport options;
- 3. Apply the concept of the 'Complete Street' design to safety serve all users and modes of traffic in urban and residential areas, and to include adherence to the Design Manual for Urban Roads and Streets (DMURS) 2013.
- 4. Implement measures that will reduce vehicular speed in urban and residential areas for improved safety and system performance, where possible and appropriate;
- 5. Support the development of high-quality public space that contain small blocks / small streets, urban parks and dense, mixed-use, people-orientated design;
- 6. Use Sections 48 and 49 of the Planning & Development Acts 2000 as amended to secure financial contributions towards the capital costs of providing and/or upgrading strategic public transport infrastructure;
- 7. Target transport investment that first seeks to enhance the efficiency of the existing network through the application Intelligent Transportation Systems (ITS) in delivering increased information, service, travel modes, and telecommunication;
- 8. Implement measures that improve the efficiency and sustainability of high quality, urban transport through expanded public transport, capacity, improved traffic management and bus priority, and walking and cycling infrastructure;
- 9. Facilitate the efficient movement of goods and people in the interest of commerce and enterprise;
- 10. Secure implementation of transport projects supported by national and regional spatial planning policies, and in adherence to the "Smarter Travel, A Sustainable Transport Future 2009-2020";
- 11. Approach sustainable transport comprehensively and agree to undertake regular monitoring to include trip profiles (number, duration, modal use) and emissions, and at critical junctions, to benchmark performance and better inform future Urban Mobility, Permeability, Local Traffic and Climate Change Action Plans.

Submission(s) Received: Sub-06

Summary of the Issues raised in the Submission(s):

Sub-06 expresses support for the comprehensive Longford Draft County Development Plan 2021-2027. The Submission states that the Department is developing a new National Sustainable Mobility Policy which will be published later in 2021, which will replace the Smarter Travel policy – A Sustainable Transport Future 2009-2020, referenced in Section 5,2,5 Sustainable Public Transport under item 10. It is suggested that the wording of the Draft Plan be changed in order to reflect this.

It is recognised that many of the key policy approaches on sustainable mobility in the draft plan align with the key areas being considered in the development of the new sustainable mobility policy such as the importance of integrating land use and transport policies and the delivery of high quality, permeable pedestrian and cycling networks as part of the transition to a climate resilient society.

Sub-47 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of amendment are noted and welcomed. The references to the proposed new National Sustainable Mobility Policy will be referenced.

Chief Executive's Recommendation:

Having consideration to the foregoing, it is recommended that the Development Plan be made with the proposed Material Amendment subject to the following minor modification and inserted text.

Include the following text into Section 5.2.5 Sustainable Public Transport:

Sustainable Transport Principles

The promotion of use and increased delivery of sustainable modes of transport is fundamental to achieving Ireland's carbon emission reduction requirements of 20% by 2020 and 30% by 20304. In addition to the reduction of emissions, failure to deliver public transport investment will result in a highly congested network that cannot meet the economy's transport needs. 'The provision of a well-functioning, integrated public transport system, enhancing competitiveness, sustaining economic progress and enabling sustainable mobility choices for citizens supports the overall objectives of Ireland 2040'5.

- 4 https://ec.europa.eu/clima/policies/strategies/progress en
- 5 https://www.gov.ie/en/policy/e9ec84-transport/

The following are considered to constitute the key principles underlying future sustainable transport:

- 1. Favour the established hierarchy of 'putting the pedestrian first' followed by the provision of cycling and public transport, at both micro and macro level, over developments that prove more beneficial to car use and dependency;
- 2. Encourage cycling and its connectivity to existing public transport hubs and centres of activity and tourism, particularly those that provide an onward network of sustainable transport options;
- 3. Apply the concept of the 'Complete Street' design to safety serve all users and modes of traffic in urban and residential areas, and to include adherence to the Design Manual for Urban Roads and Streets (DMURS) 2013.
- 4. Implement measures that will reduce vehicular speed in urban and residential areas for improved safety and system performance, where possible and appropriate;
- 5. Support the development of high-quality public space that contain small blocks / small streets, urban parks and dense, mixed-use, people-orientated design;
- 6. Use Sections 48 and 49 of the Planning & Development Acts 2000 as amended to secure financial contributions towards the capital costs of providing and/or upgrading strategic public transport infrastructure;
- 7. Target transport investment that first seeks to enhance the efficiency of the existing network through the application Intelligent Transportation Systems (ITS) in delivering increased information, service, travel modes, and telecommunication;

- 8. Implement measures that improve the efficiency and sustainability of high quality, urban transport through expanded public transport, capacity, improved traffic management and bus priority, and walking and cycling infrastructure;
- 9. Facilitate the efficient movement of goods and people in the interest of commerce and enterprise;
- 10. Secure implementation of transport projects supported by national and regional spatial planning policies, and in adherence to the "Smarter Travel, A Sustainable Transport Future 2009-2020" and its replacement the new "National Sustainable Mobility Policy" to be published in 2021;
- 11. Approach sustainable transport comprehensively and agree to undertake regular monitoring to include trip profiles (number, duration, modal use) and emissions, and at critical junctions, to benchmark performance and better inform future Urban Mobility, Permeability, Local Traffic and Climate Change Action Plans.

Proposed Amendment CH 5.17

Details of the amendment:

Insert the following Policy Objectives after section 5.2.5 and before CPO 5.40:

CPOXX Ensure new development areas and employment land-uses are permeable for walking and cycling and are laid out in such a way as to facilitate the operation of and access to public transport by residents and employees.

CPOXX Ensure that the layout and design of new developments provide for bus stops, passenger waiting facilities, and bus turning and service regulatory layover facilities, as required.

CPOXX Support and develop public transport routes throughout the County through collaboration with the National Transport Authority.

CPOXX Retrospectively provide public transport, walking and cycling infrastructure and facilities in existing development areas to achieve growth in sustainable mobility.

CPOXX Provide suitable infrastructure on public transport corridors to improve safety and efficiency for public transport users.

Submission(s) Received: Sub-06

Summary of the Issues raised in the Submission(s):

Sub-06 expresses support for the comprehensive Longford Draft County Development Plan 2021-2027. The Department welcomes the strengthened text around sustainable mobility in Longford, particularly in the area of Active Travel (walking and cycling). The modal hierarchy outlined, namely where the promotion of walking and cycling is prioritised over public transport and private car use, is in line with the draft National Investment Framework for Transport in Ireland. The Submission highlights additional national policy developments which should be reflected in the proposed plan.

1) The publication of the whole of Government National Disability Inclusion Strategy (NDIS) 2017-2022 which includes specific actions assigned to

- Local Authorities action 108 dishing of footpaths and action 109 accessible furniture;
- 2) The ratification by Ireland in 2018 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). The UNCRPD puts obligations on State Parties to ensure access for persons with disabilities to, inter-alia the physical environment and transportation in both urban and rural areas:
- 3) The DMURS Interim Advice Note-Covid 19 Pandemic Response published on the DMURS website 2020. It includes guidance that designers should ensure that measures align with the principles of universal design, consider Government policy on accessibility for people with disabilities and consult people with disabilities to further appraise measures. References in the draft plan to the earlier versions of DMURS should be replaced, as appropriate with references to the 2020 DMURS Interim Advice Note- Covid 19 Pandemic Response.
- 4) To make public transport fully accessible to people with disabilities requires a 'whole journey approach' which refers to all elements that constitute a journey from the starting point to destination. Local Authorities are a key stakeholder in this regard in the context of ensuring a universal design approach to the built environment.
- 5) The publication by the National Transport Authority (NTA) of its 'Local Link Rural Transport Programme Strategic Plan 2018 to 2022'. Its mission statement is "to provide a quality nationwide community based public transport system in rural Ireland which responds to local needs."
- 6) The Department welcomes the support for the NTA's Connecting Ireland Rural Mobility Plan on page 42.

Sub-47 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of amendment are noted and welcomed. The Council acknowledges the comments from the Department in respect of the strengthened text around sustainable mobility and Active Travel (walking and cycling). The modal hierarchy outlined, namely where the promotion of walking and cycling is prioritised over public transport and private car use, is in line with the draft National Investment Framework for Transport in Ireland.

In respect of the new national policy updates taking each in turn:

- 1. The Plan will reference the National Disability Inclusion Strategy (NDIS) 2017-2022:
- 2. The Plan will reference the United Nations Convention on Rights of Persons with Disabilities:
- 3. DMURS Interim Advice Note Covid-19 Pandemic Response will be referenced in the Plan.

- 4. Whole journey approach and universal design the Plan will reference this as a CPO;
- National Transport Authority (NTA) 'Local Link Rural Transport Programme Strategic Plan 2018to 2022' and its mission statement "to provide a quality nationwide community based public transport system in rural Ireland which responds to local needs" – this Policy is referenced in Section 5.2.1.9 and no further action is proposed;
- 6. NTA Connecting Ireland Rural Mobility Plan the Council acknowledges the Departments support of this inclusion within the Plan.

Chief Executive's Recommendation:

Having consideration to the foregoing, it is recommended that the Development Plan be made with the proposed Material Amendment as displayed subject to the following minor modification and inserted text.

Include the following text into Section 5.2.1 Transport Policy Context:

5.2.1.6 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response Design Manual for Urban Roads and Streets, 2020

The current Design Manual for Urban Roads and Streets (DMURS) by the Department of Transport, Tourism and Sport sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland, incorporating good planning and design practice and focus on the public realm. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

5.2.1.11 National Disability Inclusion Strategy (NDIS) 2017-2022:

The NDIS includes specific actions assigned to Local Authorities – action 108 dishing of footpaths and action 109 accessible furniture.

5.2.1.12 United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) 2018:

The UNCRPD puts obligations on State Parties to ensure access for persons with disabilities to, inter-alia the physical environment and transportation in both urban and rural areas.

Insert the following Policy Objectives after section 5.2.5 and before CPO 5.40:

CPOXX Ensure new development areas and employment land-uses are permeable for walking and cycling and are laid out in such a way as to facilitate the operation of and access to public transport by residents and employees.

CPOXX Ensure that the layout and design of new developments provide for bus stops, passenger waiting facilities, and bus turning and service regulatory layover facilities, as required.

CPOXX Support and develop public transport routes throughout the County through collaboration with the National Transport Authority.

CPOXX Retrospectively provide public transport, walking and cycling infrastructure and facilities in existing development areas to achieve growth in sustainable mobility.

CPOXX Provide suitable infrastructure on public transport corridors to improve safety and efficiency for public transport users.

Proposed Amendment CH 5.18

Details of the amendment:

Amend the Policy Objective CPO5.44 and insert additional text as follows:

Support the (NTA) Connecting Ireland: Rural Mobility Plan and encourage public transport providers and rural community transport initiatives to enhance the provision of public transportation services linking the rural villages to the main towns within Longford.

Submission(s) Received: Sub-06

Summary of the Issues raised in the Submission(s):

The Department welcomes the support for the NTA's Connecting Ireland Rural Mobility Plan on page 142.

Sub-47 (NTA) supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of amendment are noted and welcomed.

Chief Executive's Recommendation:

Having consideration to the foregoing, it is recommended that the Development Plan be made with Proposed Material Amendment CH 5.18.

Proposed Amendment CH 5.19

Details of the amendment:

Insert a new Policy Objective after CPO5.57:

Promote walking through the development and expansion of a network of safe walking trails within towns and villages and their environs. Such routes can link with existing walking trials, Sli na Slainte and the Green Infrastructure Network and existing or new public rights of way.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 5.19

Proposed Amendment CH 5.21

Details of the amendment:

Amend the Policy Objective CPO5.63 and insert the following text:

Ensure that the upgrading of roads will not impact negatively on the safety and perceived safety of cyclists. Support the development of safe cycle routes and enhance and maintain these routes with quality signposting, lighting and road surfaces separated from vehicular traffic.

Encourage the development of off-road cycling. Ensure that the upgrading of roads will not impact negatively on the safety and perceived safety of cyclists. Ensure that any dedicated cycle routes which are developed away from the main public carriageway are well lit. Routes should, where possible, follow off-road tracks and quiet country roads.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

The Department welcomes the strengthened text around sustainable mobility in Longford, particularly in the area of Active Travel (walking and cycling). The modal hierarchy outlined, namely where the promotion of walking and cycling is prioritised over public transport and private car use, is in line with the draft National Investment Framework for Transport in Ireland. The Department proposes that Amendment CH 5.21 could also include a reference to the various standards which will be adhered to including DMURS and also the NTA's National Cycle Manual a new iteration of which should be finalised by the end of 2021.

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of amendment are noted and welcomed. The suggested references to the various standards which will be adhered to including DMURS and the NTA's National Cycle Manual are further noted.

Chief Executive's Recommendation:

Having consideration to the foregoing, it is recommended that the Development Plan be made with the proposed Material Amendment subject to the following additional text below:.

Amend the Policy Objective CPO5.63 and insert the following text highlighted in green:

Ensure that the upgrading of roads will not impact negatively on the safety and perceived safety of cyclists. Support the development of safe cycle routes and enhance and maintain these routes with quality signposting, lighting and road surfaces separated from vehicular traffic following the standards set out in 2020 DMURS Interim Advice Note — Covid-19 Pandemic Response and the NTA's National Cycle Manual and any further review and iteration of the same.

Encourage the development of off-road cycling. Ensure that the upgrading of roads will not impact negatively on the safety and perceived safety of cyclists. Ensure that any dedicated cycle routes which are developed away from the main public carriageway are well lit. Routes should, where possible, follow off-road tracks and quiet country roads.

Proposed Amendment CH 5.22

Details of the amendment:

Amend the Policy Objective CPO5.64 as follows:

Promote the development of long-distance off-road walking and cycling routes, particularly those with historical and cultural associations and links to other routes in adjacent counties in association with the Irish Sports Council. Aim to establish and link with a strategic network of trails from residential areas, open spaces and existing or new public rights of way to facilitate the creation of a secure and safe greenway network.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 5.22

Proposed Amendment CH 5.23

Details of the amendment:

Amend the Policy Objective CPO5.67 as follows:

Provide signposting, information boards and public lighting for walking and cycling routes at appropriate locations.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 5.23

Proposed Amendment CH 5.27

Details of the amendment:

Amend the Policy Objective CPO 5.98 as follows:

Protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in DMS 16.204. Where a development/land use is proposed that is inappropriate within the Flood Zone, then the development proposal will need to be accompanied by a Development Management Justification Test and site-specific Flood Risk Assessment in accordance with the criteria set out under with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 and Circular PL2/2014 (as updated/superseded).

In Flood Zone C, (Please also refer to Development Management Standard, Development Management Standard, DMS 16.204, where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed.

The County Plan SFRA datasets and the most up to date CFRAM Programme climate scenario mapping should be consulted by prospective applicants for developments in this regard and will be made available to lower-tier Development Management processes in the Council.

Submission(s) Received: Sub-19

Summary of the Issues raised in the Submission(s):

Sub-19 (OPW) notes that Proposed Amendment CH5.27, includes the addition of text that a site-specific Flood Risk Assessment may be required for Flood Zone C. It should be noted that the flood zones maps should not be used to suggest that any areas are free from flood risk, since they do not include the effects of other forms of flooding such as from groundwater or artificial drainage systems. All flood zones are subject to FRA of flood hazard from other sources, which should assess all potential sources of flooding that may affect the site - from rivers and the sea, streams, surface water run-off, sewers, groundwater, reservoirs, canals and other artificial sources or any combination of these.

The submission also notes that the OPW had previously commented on the Draft Plan that applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The CE Report in relation to this notes the Council's policy to support the implementation of the Guidelines and Circular PL2/2014, as well as referencing Policy Objectives CPO 5.97 and CPO 5.98, which are the Council's policies to support these. However, Arterial Drainage Schemes and Drainage Districts datasets are not used in the production of flood zones and lands which are not in a flood zone may be in a benefitting land area. The location of Arterial Drainage Schemes and Drainage Districts have been identified in the Historical Indicator maps in the SFRA and may also be viewed on www.floodinfo.ie.

Chief Executive's Response:

Noted. It is recommended to further modify CPO 5.98 as follows;

CPO 5.98 Protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in DMS 16.204. Where a development/land use is proposed that is inappropriate within the Flood Zone, then the development proposal will need to be accompanied by a Development Management Justification Test and site-specific Flood Risk Assessment in accordance with the criteria set out under with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 and Circular PL2/2014 (as updated/superseded).

In Flood Zone C, (Please also refer to Development Management Standard, Development Management Standard, DMS 16.204, where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed. The County Plan SFRA datasets and the most up to date CFRAM Programme climate scenario mapping should be consulted by prospective applicants for developments in this regard and will be made available to lower-tier Development Management processes in the Council.

Flood Zone maps should not be used to suggest that any areas are free from flood risk as they do not include groundwater or artificial drainage system flood risk.

Applications for development on land identified as Benefitting Land (under Arterial Drainage Schemes /Drainage Districts) may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The Council will ensure that new developments proposed in Arterial Drainage Schemes and Drainage Districts do not result in a significant negative impact on the integrity, function and management of these areas.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 5.27 subject to the following minor modifications;

CPO 5.98 Protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in DMS 16.204. Where a development/land use is proposed that is inappropriate within the Flood Zone, then the development proposal will need to be accompanied by a Development Management Justification Test and site-specific Flood Risk Assessment in accordance with the criteria set out under with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 and Circular PL2/2014 (as updated/superseded).

In Flood Zone C, (Please also refer to Development Management Standard, Development Management Standard, DMS 16.204, where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed. The County Plan SFRA datasets and the most up to date CFRAM Programme climate scenario mapping should be consulted by prospective applicants for developments in this regard and will be made available to lower-tier Development Management processes in the Council.

Flood Zone maps should not be used to suggest that any areas are free from flood risk as they do not include groundwater or artificial drainage system flood risk.

Applications for development on land identified as Benefitting Land (under Arterial Drainage Schemes /Drainage Districts) may be prone to flooding, and as such site-

specific flood risk assessments may be required in these areas. The Council will ensure that new developments proposed in Arterial Drainage Schemes and Drainage Districts do not result in a significant negative impact on the integrity, function and management of these areas.

Proposed Amendment CH 5.30

Details of the amendment:

CH 5.30 - Insert a new Policy Objective before CPO5.123 as follows:

Support the development, reinforcement, renewal and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required to provide for the future physical and economic development of County Longford.

Submission(s) Received: Sub-05, Sub-09 and Sub-53

Summary of the Issues raised in the Submission(s):

Submission by ESB welcomes the insertion of the new Policy Objective before CPO 5.123.

Submissions by EirGrid (Sub-09) notes and welcomes the proposed new Policy Objective before CPO5.123 under the Material Amendment CH 5.30. The Submission states that this emphasis is imperative to meeting national targets for renewable electricity generation, climate change and also ensuring the security of energy supplies into the future.

Submission from Wind Energy Ireland (Sub-53) supports the proposed new Policy Objective before CPO5.123. However, the Submission states, for the avoidance of doubt the following change be made "lines" be replaced with "overhead lines, underground cables".

Chief Executive's Response:

The contents of the submissions and the comments made about the new CPO before CPO5.123 are welcomed. The proposed minor alteration to the new CPO will be inserted.

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with the proposed Material Amendment as displayed:

CH 5.30 - Insert a new Policy Objective before CPO5.123 as follows, with the text amended as follows:

Support the development, reinforcement, renewal and expansion of the electricity transmission and distribution grid, including the development of new lines overhead lines, underground cables, pylons and substations as required to provide for the future physical and economic development of County Longford.

Proposed Amendment CH 5.31

Details of the amendment:

Amend the wording of Policy Objective CPO 5.123 as follows:

Require that the location of local energy services for developments, such as electricity/telecommunications, be undergrounded, where appropriate. Where undergrounding of cables is being pursued, proposals should demonstrate that environmental impacts including the following are minimised:

- Habitat loss as a result of removal of field boundaries and hedgerows (right of way preparation) followed by topsoil stripping (to ensure machinery does not destroy soil structure and drainage properties);
- Short to medium term impacts on the landscape where, for example, hedgerows are encountered;
- Impacts on underground archaeology;
- Impacts on soil structure and drainage;
- Impacts on surface waters as a result of sedimentation.

Submission(s) Received: Sub-05

Summary of the Issues raised in the Submission(s):

In respect of the proposed re-wording of CPO 5.123 the Submission by ESB references the Government Policy Statement on the Strategic Importance of Transmission and other Energy Infrastructure (July, 2012) – the policy emphasises the strategic and economic importance of investment in networks and energy infrastructure. This policy further states that the Government has mandated the State-owned Network Companies to deliver the State's network investment programmes in the most cost efficient and timely way possible. The Government affirms that EirGrid, ESB Networks and Bord Gáis are obligated to adhere to all relevant guidelines and standards and that they act in the national interest, and on behalf of all electricity consumers.

Chief Executive's Response:

The contents of the submissions and the comments made about the CPO5.123 are welcomed.

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with the proposed Material Amendment CH 5.31

Proposed Amendment CH 5.32

Details of the amendment:

Insert text into Section 5.8 as follows:

The Council will undertake an assessment of the metrics including an assessment of the proportion of the national 4GW of renewable energy target to be allocated for County Longford. The results of this assessment will be included within the Draft Plan along with a new policy objective. Based on a total land area for the County which equates to 1,091km2 (1.6% of the state area of Republic Ireland 70,273km2); the 4GW national target would equate to 1.6% from the above to 64 Megawatts. Furthermore, within the County a number of renewable energy projects have also been granted with the potential to generate a combined output of between 160.1/175.1MW of clean renewable energy.

Longford County Renewable Energy approved projects:

Planning Ref	Name – Location	Description
PL18135	Kilashee - Middleton,	Ten year permission for a solar farm
	Ballycore, Treanboy and	on a site of 51.38ha, up to
	Newtown	216,000sq.m of solar PV panels to
		generate 35MW to 50MW
PL19222	Ballykenny	25 year permission for a solar farm
		up to 19Ha with an export capacity
		of 9MW comprising of solar PV
		panels
PL1681	Edgeworthstown –	25 year permission for a solar farm
	Lisnageeragh	for a 4.2MVA on a 14.5Ha site
PL18146	Fisherstown, Clondra	30 year permission for a solar farm
		with an export capacity of 4MW
		comprising solar PV panels.
PL14.248470 /	Cleghill	25 year operational period solar
PL.Ref.17/47		farm with export capacity of
		11.1MW on a 19Ha site
ABP	Derryad Windfarm	10 year planning permission for 24
PL14.303592		no. wind turbines – 96MW capacity
Total Granted	175.1MW H	ligh estimate / 160.1MW low

Submission(s) Received: Sub-53 and Sub-63

Summary of the Issues raised in the Submission(s):

Submission by Wind Energy Ireland states that the first part of the proposed new text constitutes an objective with the balance of the text an assessment. The Submissions continues by setting out the targets in Section 7.2 of the Climate Action Plan 2019:

"To meet the required level of emissions reduction by 2030 we will:

- Reduce CO2 eq. emissions from the sector by 50-55% relative to 2030 Pre-NDP projections;
- Deliver an early and complete phase out of coal and peat-fired electricity generation
- Increase electricity generated from renewable sources to 70% indicatively comprised of the following:
 - 1. At least 3.5GW of offshore renewable energy
 - 2. Up to 1.5GW of grid-scale solar energy
 - 3. Up to 8.2GW total of increased onshore wind capacity
 - 4. Meet 15% of electricity demand by renewable sources contracted under Corporate PPAS

The Submission states that the proposed new text relates (incorrectly) to a national target of 4GW of additional renewable energy whereas the total onshore target is 9.7GW (up to 8.2GW of increased onshore wind and up to 1.5GW of solar). The common interpretation is 4GW of additional wind plus 1.5GW of solar.

The Submission states the capacity for wind farms is typically in the range of 30-40% whereas solar farms have the capacity of 9-12%.

The Submission further states that the planning approval for the Derryadd Windfarm has been quashed (The High Court, Judicial Review 2020 No. 557 of Justice Humphreys delivered on the 16th June 2021).

The Submission states that the new text should state the following:

"The Council will undertake an assessment of the metrics including an assessment of the proportion of national renewable energy targets to be allocated for County Longford. This assessment will form part of a Renewable Energy Strategy for the County."

Submission by Bord na Móna identifies the following text proposed to be inserted into Section 5.8 which states the following:

"The Council will undertake an assessment of the metrics including an assessment of the proportion of the national 4GW of renewable energy target to be allocated for County Longford. The results of this assessment will be included within the Draft Plan along with a new policy objective. Based on a total land area for the County which equates to 1,091km2 (1.6% of the state area of Republic Ireland 70,273km2); the 4GW national target would equate to 1.6% from the above to 64 Megawatts."

The Submission states that the proposed text conflicts with the proposed amendment CH 16.14 which refers to working with EMRA to identify Strategic Energy Zones.

Chief Executive's Response:

The contents of the submission and the comments made about the amended text in Section 5.8 of the Draft Plan are welcomed. The table of Longford renewable energy approved projects provides useful context in respect of approved renewable energy projects in the County. It is considered appropriate to revise the table of approved renewable energy projects within the County and to remove the latest updates in respect of the quashed Derryadd Windfarm project.

In respect of the references to Strategic Energy Zones the proposed text will be revised to reflect the working with EMRA.

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with the proposed Material Amendment subject to the following minor modification;

Insert text into Section 5.8 as follows:

"The Council recognises the importance of Renewable Energy and its potential in contributing to the reductions in fossil fuel dependency and greenhouse gas emissions. EMRA will be working with the Council and other County Councils in the region to identify potential Strategic Energy Zones. In addition, during the lifetime of the Development Plan the Council will produce a Renewable Energy Strategy (Including a Wind Energy Strategy) for the County, which will include an assessment of the metrics including an assessment of the proportion of national renewable energy targets to be allocated for County Longford. This assessment will form part of the Renewable Energy Strategy for the County."

The Council will undertake an assessment of the metrics including an assessment of the proportion of the national 4GW of renewable energy target to be allocated for County Longford. The results of this assessment will be included within the Draft Plan along with a new policy objective. Based on a total land area for the County which equates to 1,091km2 (1.6% of the state area of Republic Ireland 70,273km2); the 4GW national target would equate to 1.6% from the above to 64 Megawatts.

Furthermore, within the County a number of renewable energy projects have also been granted with the potential to generate a combined output of between 160.1/175.1MW of clean renewable energy.

Longford County Renewable Energy approved projects:

Planning Ref Name – Location Description

PL18135	Kilashee - Middleton, Ballycore, Treanboy and Newtown	Ten year permission for a solar farm on a site of 51.38ha, up to 216,000sq.m of solar PV panels to generate 35MW to 50MW					
PL19222	Ballykenny	25 year permission for a solar farm up to 19Ha with an export capacity of 9MW comprising of solar PV panels					
PL1681	Edgeworthstown – Lisnageeragh	25 year permission for a solar farm for a 4.2MVA on a 14.5Ha site					
PL18146	Fisherstown, Clondra	30 year permission for a solar farm with an export capacity of 4MW comprising solar PV panels.					
PL14.248470 / PL.Ref.17/47	Cleghill	25 year operational period solar farm with export capacity of 11.1MW on a 19Ha site					
ABP PL14.303592	Derryad Windfarm	10 year planning permission for 24 no. wind turbines – 96MW capacity Quashed by JR 2020 No.557 Justice Humphreys delivered 16 th June 2021.					
Total Granted	175.1MW High estimate / 160.1MW low 78.3MW High Estimate of potential MW output						
	63.3MW Low Estimate of potential MW output						

Proposed Amendment CH 5.33

Details of the amendment:

Amend the Policy Objective CPO5.129 as follows:

Prepare a Renewable Energy Strategy for the County over the lifetime of this plan and subject to the availability of resources. This strategy will support the development of renewable energy infrastructure to deliver government objectives in relation to energy efficiency and the transition to a low carbon future. The Strategy will include a Wind Energy Strategy for the County.

Submission(s) Received: Sub-04, Sub-05, Sub-18, Sub-53 and Sub-63

Summary of the Issues raised in the Submission(s):

The submission by TII (Sub-04) states that any future Renewable Energy Strategy should have regard to the provisions of official policy relating to development management and access to national roads as set out in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines' (DoECLG, 2012). TII

is available for consultation with the Council in relation to any future Renewable Energy Strategy prepared.

Submission by ESB welcomes the amendments to the text in CH 5.33 and CH 16.14 and the acknowledgment from the Council that it has an important role to play in realising the national targets for raising the amount of electricity generated from renewable sources. The Submission supports the amendment that specifically states that a Wind Energy Strategy will form part of the Renewable Energy Strategy that will be prepared over the lifetime of the Draft Plan.

The submission form the NWRA (Sub-18) notes that from a regional perspective, the proposals are generally positive and include the proposals that will enable the NWRA and other interested parties to engage further at the appropriate time, through for example the preparation of the proposed renewable energy strategy.

Submission by Wind Energy Ireland (Sub-53) welcomes the amended text of CPO5.129.

Submission by Bord na Móna (Sub-63) welcomes the amended text of CPO5.129.

Chief Executive's Response:

The contents of the submission are noted. The Planning Authority acknowledge the links to the Ministerial Guidelines and the offer of consultation in respect of the development of the proposed Renewable Energy Strategy from TII and the NWRA.

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with Proposed Material Amendment CH 5.33

Proposed Amendment CH 5.34

Details of the amendment:

Insert a new Policy Objective after CPO5.134 as follows:

Require an assessment of alternative grid connection routing options to be submitted prior to any proposal being considered for a grid connection utilising the national road network.

Submission(s) Received: Sub-04, Sub-53

Summary of the Issues raised in the Submission(s):

Submission acknowledges the Council Policy to support the development and reinforcement of the electricity transmission and distribution network to provide for the future physical and economic development of County Longford.

TII identify that due to the dispersed nature of renewable energy resources has the potential to result in interactions to varying degrees with the strategic national road network that require careful consideration and management. Therefore, TII recommends that grid connection proposals should be developed which safeguard the strategic function of the national road network by utilising alternative available routes in the first instance.

TII therefore suggests a revision to the wording of the Material Amendment CH 5.34 to reflect the provisions of official policy:

Insert a new Policy Objective after CPO5.134 as follows:

Grid connection routing options should be developed to safeguard the strategic function of the national road network in accordance with Government Policy by utilising alternative available routes. The Council requires an assessment of alternative grid connection routing options to be submitted prior to any proposal being considered for a grid connection utilising the national road network.

Submission by Wind Energy Ireland acknowledges that alternative grid connections are required as part of the Environmental Impact Assessment process. The Submission, however, identifies that the text as presented in the proposed CPO appears to suggest that grid connections would only be placed in roads as a last resort. The Submission states that it is imperative that grid connections can be built to the technical standards of the Transmission System Operator (EirGrid) and Distributor System Operator (ESB Networks) and the grid connection asset owner on completion of the project (ESB Networks). The Submission references the grid connection for the Upperchurch Wind Farm in Co. Tipperary – planning permission refused by ABP under appeal reference PL92.301959 (17/12/2018). The Submission concludes that a robust assessment of alternative needs must be conducted for each project and recommends that the new CPO be removed.

Chief Executive's Response:

The contents of the submission and the proposed additional text to the CPO are noted and welcomed. The proposed revisions to the policy objective will be included.

With regard to Sub-53, the contents of the submission and the comments made about the proposed new Policy Objective after CPO5.134 are noted. Whilst the Council acknowledge the points made, the underlying principle of requiring a full and complete assessment of all alternative connection options is and remains a priority. The consideration and issues identified in the proposed CPO remain appropriate, in particularly as the appeal identified that "undue weight has been given to matters pertaining to impacts on the local road network (my emphasis)

over environmental matters, particularly biodiversity." However, the specific emphasis in the CPO relates to impacts on the National Road Network, roads of strategic importance.

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with the proposed Material Amendment subject to the proposed additional text highlighted in green:

Insert a new Policy Objective after CPO5.134 as follows:

Grid connection routing options should be developed to safeguard the strategic function of the national road network in accordance with Government Policy by utilising alternative available routes. The Council rRequires an assessment of all alternative grid connection routing options to be submitted prior to any proposal being considered for a grid connection utilising the national road network.

Proposed Amendment CH 5.35

Details of the amendment:

CH 5.35 - Insert a new Policy Objective into Section 5.8 Renewable Energy after CPO5.134 as follows:

The Council shall give consideration to extending the length of the Planning Permission and the life of renewable energy projects on a case by case basis given the nature of the proposed development and the type of renewable energy project.

Submission(s) Received: Sub-05

Summary of the Issues raised in the Submission(s):

Sub-05 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 5.35

Proposed Amendment CH 5.36

Details of the amendment:

Amend the text of the second paragraph:

The Council recognises the importance of wind energy as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and greenhouse gas emissions. The Council seeks to enable renewable and wind energy resources of County Longford to be harnessed in a manner that is consistent with proper planning and sustainable development of the area. The Council will have regard to the Wind Energy Development Guidelines for Planning Authorities and the Draft Revised Wind Energy Development Guidelines (December 2019), prepared by the Department of Environment, Heritage and Local Government, or any update made thereto. In addition, potential applicants are advised to consult with appropriate statutory and non-statutory bodies in areas which may require special protection.

Submission(s) Received: Sub-05, Sub-32, Sub-53

Summary of the Issues raised in the Submission(s):

The submissions support the proposed amendment that seeks to ensure that proposals for wind energy developments will be considered having regard to the Draft Wind Energy Development Guidelines (2019).

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 5.36

Proposed Amendment CH 5.37

Details of the amendment:

Amend the Policy Objective CPO5.138 and insert the following text:

Ensure that the assessment of wind energy development proposals will have regard to the following:

- sensitivities of the county's landscapes;
- visual impact on protected views, prospects, scenic routes, as well as local visual impacts;
- impacts on nature conservation designations, archaeological areas, county geological sites and historic structures, public rights of way and walking routes;
- local environmental impacts, including those on residential properties, such as noise and shadow flicker;

- visual and environmental impacts of associated development, such as access roads, plant and grid connections;
- scale, size and layout of the project and any cumulative effects due to other projects; the impact of the proposed development on protected bird and mammal species;
- County Longford Wind Energy Strategy (when adopted);
- impact of the grid connection from the proposed wind farm to the ESB network.

Submission(s) Received: Sub-03 and Sub-32

Summary of the Issues raised in the Submission(s):

Sub-03 and Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 5.37

Proposed Amendment CH 5.38

Details of the amendment:

Amend the Policy Objective CPO5.139 and insert the text as follows:

Ensure that proposals for energy development demonstrate that human health has been considered and have regard to Draft Wind Energy Development Guidelines (2019), which are due to be finalised in the coming year (2021).

- Noise (including consistency with the World Health Organisation's 2018 Environmental Noise Guidelines for the European Region);
- Shadow Flicker (for wind turbine developments, including detailed Shadow Flicker Study);
- Ground Conditions/Geology (including landslide and slope stability risk assessment);
- Air Quality;
- Water Quality; and
- · Assessment of impacts on collision risk species (bird and bats

Submission(s) Received: Sub-05, Sub-32, Sub-53

Summary of the Issues raised in the Submission(s):

The submissions support the proposed amendment that seeks to ensure that proposals for wind energy developments will be considered having regard to the Draft Wind Energy Development Guidelines (2019).

Submission by Wind Energy Ireland (Sub-53) welcomes the insertion about the new Wind Energy Development Guidelines but suggests a further slight amendment as follows to CPO 5.139:

CH 5.38 - Amend the Policy Objective CPO5.139 and insert the text as follows: Ensure that proposals for energy development demonstrate that human health has been considered and have regard to the forthcoming Draft Wind Energy Development Guidelines (a draft of which was published in December 2019). (2019), which are due to be finalised in the coming year (2021).

- Noise (including consistency with the World Health Organisation's 2018 Environmental Noise Guidelines for the European Region);
- Shadow Flicker (for wind turbine developments, including detailed Shadow Flicker Study);
- Ground Conditions/Geology (including landslide and slope stability risk assessment);
- Air Quality;
- Water Quality; and
- Assessment of impacts on collision risk species (bird and bats

Chief Executive's Response:

The contents of the submission and the comments made about the amended text and CPO 5.139 are welcomed.

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with the proposed Material Amendment with amended text highlighted in green:

CH 5.36 - Amend the text of the second paragraph:

The Council recognises the importance of wind energy as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and greenhouse gas emissions. The Council seeks to enable renewable and wind energy resources of County Longford to be harnessed in a manner that is consistent with proper planning and sustainable development of the area. The Council will have regard to the Wind Energy Development Guidelines for Planning Authorities and the Draft Revised Wind Energy Development Guidelines (December 2019), prepared by the Department of Environment, Heritage and Local Government, or any update made thereto. In addition, potential applicants are advised to consult with appropriate statutory and non-statutory bodies in areas which may require special protection.

CH 5.38 - Amend the Policy Objective CPO5.139 and insert the text as follows: Ensure that proposals for energy development demonstrate that human health has been considered and have regard to the forthcoming Draft Wind Energy Development Guidelines (a draft of which was published in December 2019). (2019), which are due to be finalised in the coming year (2021).

- Noise (including consistency with the World Health Organisation's 2018 Environmental Noise Guidelines for the European Region);
- Shadow Flicker (for wind turbine developments, including detailed Shadow Flicker Study);
- Ground Conditions/Geology (including landslide and slope stability risk assessment);
- Air Quality;
- Water Quality; and
- Assessment of impacts on collision risk species (bird and bats

Proposed Amendment CH 5.39

Details of the amendment:

Amend the Section 5.8.4 Geothermal Energy as follows:

Geothermal energy refers to heat energy stored in the ground. Deep geothermal energy can only be accessed through geological processes or by drilling through the surface. The second source of heat in the ground is from radiation from the sun and is regarded as stored energy, which stays relatively warm throughout the year and can be extracted using a ground source heat pump.

To support the increased use of geothermal energy for heat in Ireland, the Department of the Environment, Climate and Communications (DECC) have published An Assessment of Geothermal Energy for District Heating in Ireland a non-technical Roadmap for a Policy and Regulatory Framework and a mapping tool to identify and assess Geothermal Site Suitability - Geoenergy (gsi.ie)

Submission(s) Received: Sub-03

Summary of the Issues raised in the Submission(s):

Submission expresses support for the proposed amendment. It is stated that two separate publications were referenced in the highlighted text.

Geothermal Energy in Ireland - a roadmap for a policy and regulatory framework was published by the Department of Environment, Climate and Communications (DECC)

An Assessment of Geothermal Energy for District Heating in Ireland was published by the GSI

Chief Executive's Response:

The contents of the submission supporting the inclusion of amendment are noted and welcomed. The references to the two identified publications will be corrected and appropriately referenced.

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with the proposed Material Amendment as displayed with the additional text highlighted in green inserted.

Amend the Section 5.8.4 Geothermal Energy as follows:

Geothermal energy refers to heat energy stored in the ground. Deep geothermal energy can only be accessed through geological processes or by drilling through the surface. The second source of heat in the ground is from radiation from the sun and is regarded as stored energy, which stays relatively warm throughout the year and can be extracted using a ground source heat pump.

To support the increased use of geothermal energy for heat in Ireland, the Department of the Environment, Climate and Communications (DECC) have published the following:

Geothermal Energy in Ireland - a roadmap for a policy and regulatory framework published by the Department of Environment, Climate and Communications (DECC)

An Assessment of Geothermal Energy for District Heating in Ireland published by the GSI

An Assessment of Geothermal Energy for District Heating in Ireland a non-technical Roadmap for a Policy and Regulatory Framework and a mapping tool to identify and assess Geothermal Site Suitability - Geoenergy (gsi.ie)

Proposed Amendment CH 5.41

Details of the amendment:

CH 5.41 - Amend the Policy Objectives CPO5.151as follows:

Facilitate the development of projects that convert biomass to energy, subject to proper planning considerations. Such projects where it can be demonstrated that the feedstock source is sustainable and where the end product will not be mixed with fossil gas.

Submission(s) Received: Sub-64

Summary of the Issues raised in the Submission(s):

Submission by Gas Networks Ireland identifies that it is essential that Ireland decarbonises the gas flowing through the gas network. It states that this decarbonisation will happen over time and that having gradually increasing levels of blended renewable gas and natural gas will be critical to achieving this target. It is stated that it's vital that biomethane can enter the gas network as a direct replacement for natural gas. In addition it is envisaged that blends of hydrogen in the gas network will help to reduce emissions until it is possible to have a 100% hydrogen gas network.

The Submission references the Government published Interim Climate Actions (March 2021), this plan includes an overarching action to decarbonise the gas network (Action 54) — this action includes a number of elements related to developing "biomethane grid injection infrastructure" and testing the feasibility of technically and safely injecting green hydrogen blends into the gas grid as a means of decarbonising the gas network.

The Submission concludes that the proposed additional text should be removed.

Chief Executive's Response:

The contents of the submission and the comments made about the amended Policy Objective CPO5.151 are noted. The references made to not mixing bio-gass with natural gas will be removed and the wording of the policy objective revised.

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with the proposed Material Amendment with the following text amendments highlighted in green:

CH 5.41 - Amend the Policy Objectives CPO5.151as follows:

Facilitate the development of projects that convert biomass to energy, subject to proper planning considerations. Such projects and where it can be demonstrated that the feedstock source is sustainable. and where the end product will not be mixed with fossil gas.

3.3 Chapter 7: Placemaking

Proposed Amendment CH 7.2

Details of the amendment:

Amend Section 7.4.1 Placemaking and include the following text:

It is recognised that good Placemaking is both physical and social environmental and as such incorporates both tangible and non-tangible elements (see Figure 7.1). It incorporates an appropriate recognition and placement of the role of the town centre, associated good town centre management, public realm works and the creation of creative spaces and the provision of adequate social infrastructure.

Submission(s) Received: Sub-43

Summary of the Issues raised in the Submission(s):

Sub-43 does not refer to a specific Proposed Material Alteration. However, the submission does relate to the provision of Social Infrastructure. The submission supports the Longford PNN submission to the draft plan in particular that *"intergenerational training through Men's and Women's sheds should be supported"*. The ICA ladies support and give training to women from the age of 18 upwards and would appreciate support and recognition in this regard.

Chief Executive's Response:

Sub-43 does not refer to a specific Proposed Material Alteration. However, the submission does relate to the provision of Social Infrastructure which is covered under the 'Placemaking' section of the County Development Plan. Proposed Amendment CH 7.2 refers to Placemaking that is both physical and social environmental and as such incorporates both tangible and non-tangible elements.

The Draft Plan considers the provision of adequate social and community infrastructure as an integral part of placemaking. Successful places support a wide range of services and facilities that meet local and strategic needs and contribute towards a good quality of life.

In terms of the remit under the County Development Plan, the draft Plan supports the delivery of community services; CPO 7.26 refers; "Work collaboratively with relevant service providers and stakeholders to facilitate the provision of community services and social infrastructure, where appropriate, in order to meet the needs of new and existing communities"

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 7.2

Proposed Amendment CH 7.10

Details of the amendment:

Insert the following Policy Objective after CPO 7.39 as follows:

To support the intensification of development (for educational purposes) on existing school sites.

Submission(s) Received: Sub-48

Summary of the Issues raised in the Submission(s):

Sub-48 welcomes the proposed amendments to insert policy objective 7.39 in Chapter 7 of the Plan. It is noted that the requirements as identified in the Department's submission to the draft CDP remain unchanged. The Department of Education thanks Longford County Council for ongoing assistance in relation to school planning matters and looks forward to continuing to work together to deliver educational requirements for County Longford

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 7.10

3.4 Chapter 8: Economic Development

Proposed Amendment CH 8.6

Details of the amendment:

Insert a new Policy Objective after CPO 8.68 as follows:

Conduct a review of the Longford County Retail Strategy within two years of the adoption of the County Development Plan

Submission(s) Received: Sub-18

Summary of the Issues raised in the Submission(s):

Sub-18 from the NWRA notes that from a regional perspective, the proposals are generally positive and include the proposals that will enable the NWRA and other interested parties to engage further at the appropriate time, through for example the preparation of the proposed retail strategy.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 8.6

Proposed Amendment CH 8.1

Details of the amendment:

Amend the Economic Development Hierarchy provided in Table 8.4 to reflect the revised settlement hierarchy as follows:

Hierarchy of En	nployment Centres		Sectoral Strengths
Primary Economic Growth Town	Longford Town	Designated as a 'Key Town' in the RSES and most economically active settlement that provides employment for its surrounding area with high-quality transport links and the capacity to act as a growth driver to complement the Regional Growth Centre of Athlone.	 Significant incommuting and employment in sectors such as advanced manufacturing, pharma and agri-food. Main administrative centre for the county Primary retail centre.
Secondary Economic Growth Town	Granard	Important supporting and complementary role in developing regional and county-level economic growth in tandems with the primary economic growth town of Longford Town.	 Well-established manufacturing base. Particular emphasis on food and agri-feed sectors. Growing tourism and heritage sector, driven by the Granard Motte historical site.
Key Employment Centres	Edgeworthstown Ballymahon Lanesborough	Key settlements proving significant employment for respective	 Edgeworthstown Long-established manufacturing and light-industrial base. Focus on agri-food and the service sector.

urban areas and wider hinterland.

 Excellent transports links through the N4 and Sligo-Dublin InterCity rail line.

Ballymahon

- Strong manufacturing and light-industrial base.
- Key retail and servicesector centre.

Significant growth in tourism-orientated services and tourism accommodation which has coincided with the opening of the nearby Longford Forest Center Parcs resort in July 2019.

Lanesborough

- Currently in a state of structural economic change with the closure of the Lough Ree power station.
- Key target area for employment and investment from the Just Transaction Fund.
- Significant positive impacts on a variety of sectors, ranging from agri-food to tourism to alternative energy sectors.
- Secured funding for the development of tourism and community development projects, notably a new community enterprise

			food hub which will create up to 90 jobs. Strong retail and service sectors.
Local Employment Centres	Drumlish Newtownforbes Ballinalee Keenagh Abbeyshrule Ardagh Clondra Ballinamuck Aughnacliffe	Small towns and key villages providing employment needs for local hinterlands.	Local investment, generally small-scale industry.
Rural Areas	Rural Settlements, Rural Nodes and Rural Countryside	Rural employment in the countryside	Agriculture, forestry, horticulture, silviculture, hydroponics, energy production, rural resource-based enterprises, micro industries and home working.

Submission(s) Received: Sub-02

Summary of the Issues raised in the Submission(s):

Sub-02 does not refer to a specific Proposed Material Alteration. However, the submission does relate to the Social Enterprise Sector which is an integral part of the overall Economic Development Strategy.

The key points of the submission are as follows;

- 1. A commitment to facilitate, enable and support the development of a vibrant Social Enterprise sector, as a valuable and important component of the overall Economic Development vision
- A commitment to work with Social Enterprises to access and develop appropriate fit for purpose land and buildings as spaces to enable development and growth of new services and products.
- 3. A commitment to include Social Clauses in Public Procurement.
- 4. A commitment to identity and disseminate best practice local examples of social enterprises and increase public understanding of their contribution to society and the economy.

Chief Executive's Response:

The submission relates to the Social Enterprise Sector which is covered under the Economic Development Strategy section of the County Development Plan. Proposed Amendment CH 8.1 refers to an amendment to the Economic Development Hierarchy provided to reflect the revised settlement hierarchy.

In terms of the remit under the County Development Plan, the draft Plan supports the delivery of community services; CPO 8.2 refers; "Support and facilitate the economic development of the county in accordance with the Economic Development Strategy of the County Development Plan, across a range of sectors. There will be a general presumption against development that would prejudice the achievement of the Economic Development Strategy

The Draft Plan also provides an adequate supply of zoned land for employment purposes at appropriate locations to accommodate employment growth.

With regards to point 3 and 4 of the submission, these issues do not relate to a Material Alteration and do not fall within the remit of the County Development Plan

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 8.1

3.5 Chapter 9: Rural Economy

Proposed Amendment CH 9.4

Details of the amendment:

Amend the Policy Objective CPO9.27 as follows:

Encourage the planting of diverse and native species, with higher proportions of broadleaf, to ensure rich and varied biodiversity value, particularly in areas where there is evidence of a dominant conifer species planted cumulatively within the landscape.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

The submission supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 9.4

3.6 Chapter 10: Tourism

Proposed Amendment CH 10.1

Details of the amendment:

Add the following text to the title and text of Section 10.5.2 as follows:

Sustainable Tourism and Ecotourism Principles for Tourism Development

It is intended to encourage the use of Sustainable Tourism and where relevant Ecotourism principles in the development of Tourism products in Longford. The intention of the Council is to encourage car free tourism and to encourage more longer area-based stays, based on enhanced promotion and development of safe greenway cycling routes, and attractive walking and hiking routes for all ages and abilities.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

The submission supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 10.1

Proposed Amendment CH 10.3

Details of the amendment:

Amend the Policy Objective CPO10.2 with the following additional text:

Ensure all tourism developments shall integrate climate change adaptation, the enhancement of nature and biodiversity measures and the protection of the natural environment and the County's heritage into their activities, plans and proposals.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

The submission supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 10.3

Proposed Amendment CH 10.5

Details of the amendment:

Amend the Policy Objective CPO10.7 with the following additional text:

Protect and conserve the natural, built recreational and cultural heritage features which add value to the visitor experience in County Longford and seek to restrict and prevent developments which would damage or detract from the quality of scenic areas and identified natural and cultural heritage assets. Particular care shall be taken in regard to the siting of noise generating sports and golf course development so as not to conflict with the enjoyment of areas used for informal recreation and existing public rights of way and walking routes.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

The submission supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 10.5

Proposed Amendment CH 10.6

Details of the amendment:

Amend the Policy Objective CPO10.9 with the following additional text:

Support the Shannon Tourism Masterplan and tourism projects as a result of the Just Transition process and to support an application for UNESCO Biosphere Reserve for the Lough Ree area during the lifetime of this plan. Continue to support the development and expansion of tourism-related enterprise including visitor attractions, services and accommodation, food and craft businesses.

Submission(s) Received: Sub- 32

Summary of the Issues raised in the Submission(s):

The submission supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 10.6

Proposed Amendment CH 10.7

Details of the amendment:

Amend the Policy Objective CPO10.10 with the following additional text:

Prepare and update a comprehensive tourism mapping and signage plan for the county, in collaboration with Fáilte Ireland, ensuring that new signage is consistent and complementary to signage planned for Ireland's Hidden Heartlands Regional Experience Brand. Signpost and waymark walking and cycle routes with appropriately designed quality signage and information boards and public lighting where appropriate shall be developed.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

The submission supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 10.7

Proposed Amendment CH 10.12

Details of the amendment:

Amend the Policy Objective CPO10.27 with the following additional text:

Facilitating the development of visitor infrastructure linked to natural, physical, geological and heritage environments, while ensuring that it does not detract from the status, quality and value of these environments.

Submission(s) Received: Sub-03 and Sub-32

Summary of the Issues raised in the Submission(s):

The submissions support the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 10.12

Proposed Amendment CH 10.13

Details of the amendment:

Amend the Policy Objective CPO10.30 with the following additional text:

Encourage landowners and private businesses to cooperate with the development of off-road tracks and trails and tourism infrastructure in rural areas. Where necessary to ensure the provision and completion of this infrastructure the Council shall use its CPO powers to acquire the required property. The Council will endeavour to exhaust all options of voluntary agreements before considering using these CPO powers.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

The submission supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 10.13

Proposed Amendment CH 10.14

Details of the amendment:

Amend the Policy Objective CPO10.31 with the following additional text:

Support the implementation of the County Heritage Plan by encouraging sustainable tourism enterprise development associated with rural lifestyle, landscape, natural and <u>built</u> heritage locations to develop the Longford's infrastructure and gain the benefit from increased visitors, subject to development management standards.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

The submission supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 10.14

Proposed Amendment CH 10.15

Details of the amendment:

Insert the following Policy Objective after CPO10.31:

Prepare and implement a strategy for access to heritage routes by identifying, promoting and supporting the development of a network of heritage trails, with a focus on publicly accessible heritage sites and attractions in co-operation with community groups, landowners and other stakeholders incorporating features of heritage interest.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 10.15

Proposed Amendment CH 10.16

Details of the amendment:

Amend the Policy Objective CPO10.36 with the following additional text:

Support appropriate protection and conservation works to planned/designed landscapes, heritage structures, historic properties, historic urban centres and other built heritage assets, in order to safeguard these amenities for the long term. In this regard the five themes of the National Policy on Architecture shall be taken into account including mitigating the negative impact of new developments on the historic character of areas and buildings.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub- 32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 10.16

Proposed Amendment CH 10.18

Details of the amendment:

Amend the Policy Objective CPO10.46 with the following additional text:

Support development, in co-operation with various stakeholders to promote, preserve, improve, encourage public access to lakes, islands, riversides, uplands and other areas that have been traditionally used for outdoor recreation and extend recreational amenities including riverside and canal walks and walking and cycling routes. This shall include the provision of walking and cycling links between lakes, rivers, bogs and nearby towns, villages and visitor attractions, provided such developments do not negatively impact on sensitive environments.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 10.18

Proposed Amendment CH 10.19

Details of the amendment:

Amend the Policy Objective CPO10.49 with the following additional text:

Promote and encourage the recreational use of rivers and the development of blueways which provide opportunities for walkers, cyclist and canoers. Examine the potential for development of fishing and canoe trails on the rivers and inner lakes of Lough Ree and work with Waterways Ireland to develop facilities where appropriate, subject to the requirements of the Birds and Habitats Directives.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 10.19

Proposed Amendment CH 10.20

Details of the amendment:

Amend the Policy Objective CPO10.51 with the following additional text:

Continue to work closely with Bord na Móna, Fáilte Ireland, Waterways Ireland, NPWS, Coillte, Just Transition related groups and neighboring counties to realise and develop the potential of the Mid Shannon Wilderness Park and Lough Ree Biosphere Nature Reserve. In this consideration shall be given to Bord na Mona's

integrated land use-strategy and be mutually inclusive of any of Bord na Mona's future uses of their land banks.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 10.20

Proposed Amendment CH 10.21

Details of the amendment:

Insert the following Policy Objective after CPO10.51:

Support the development and expansion of tourism/recreation facilities including forest-based tourism accommodation at appropriate locations while ensuring minimum impact on the natural environment, biodiversity and public recreation.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 10.21

Proposed Amendment CH 10.22

Details of the amendment:

Amend the Policy Objective CPO10.54 with the following additional text:

Continue to develop the greenways in the county and to augment the visitor experience through the provision of infrastructure including car parking and access barriers, having regard to the Department of Transport, Tourism and Sport various Guidelines along with high quality signage and links to nearby visitor attractions and places of interest.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 10.22

3.7 Chapter 12: Natural Heritage and Environment

Proposed Amendment CH 12.1

Details of the amendment:

Amend the wording of Policy Objective CPO12.5 and insert the text as follows:

Protect and conserve the conservation value of Special Areas of Conservation, candidate Special Areas of Conservation, Special Protection Areas, Natural Heritage Areas and proposed Natural Heritage Areas and any other sites that may be proposed for designation during the lifetime of this Plan.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 12.1

Proposed Amendment CH 12.2

Details of the amendment:

Insert a new Policy Objective after CPO12.5 as follows:

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

Submission(s) Received: Sub-04 and Sub-32

Summary of the Issues raised in the Submission(s):

Sub-04 requests the Council consider the proposed wording of the policy objectives proposed in Material Amendments CH 12.2 in order to ensure conformance with Article 6(3) and Article 6(4) of the Habitats Directive and in the interests of consistency with the text included in Section 12.5.3 of the Draft Plan.

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submissions regarding the material amendment are noted and welcomed. It is therefore proposed to insert additional text after each of the new Policy Objectives, as follows:

Except as provided for in Article 6(4) of the Habitats Directive; in so far as there must be - (a) no alternative solution available (b) imperative reasons of an overriding public interest for the project to proceed; and (c) Adequate compensatory measures in place.

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with the proposed Material Amendment with the proposed additional text highlighted in green;

CH12.2 Insert a new Policy Objective after CPO12.5 as follows:

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

Except as provided for in Article 6(4) of the Habitats Directive; in so far as there must be - (a) no alternative solution available, (b) imperative reasons of an overriding public interest for the project to proceed; and (c) Adequate compensatory measures in place.

Proposed Amendment CH 12.3

Details of the amendment:

Insert a new Policy Objective after CPO12.5 as follows:

Ensure that any plan or project that could have a significant adverse impact (either by themselves or in combination with other plans and projects) upon the conservation objectives of any Natura 2000 Site or would result in the deterioration of any habitat or any species reliant on that habitat will not be permitted.

Submission(s) Received: Sub-04, Sub-32

Summary of the Issues raised in the Submission(s):

Sub-04 requests the Council consider the proposed wording of the policy objectives proposed in Material Amendments CH 12.3 in order to ensure conformance with Article 6(3) and Article 6(4) of the Habitats Directive and in the interests of consistency with the text included in Section 12.5.3 of the Draft Plan.

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submissions regarding the material amendment are noted and welcomed. It is therefore proposed to insert additional text after each of the new Policy Objectives, as follows:

Except as provided for in Article 6(4) of the Habitats Directive; in so far as there must be - (a) no alternative solution available (b) imperative reasons of an overriding public interest for the project to proceed; and (c) Adequate compensatory measures in place.

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with the proposed Material Amendment with the proposed additional text highlighted in green;

CH 12.3 Insert a new Policy Objective after CPO12.5 as follows:

Ensure that any plan or project that could have a significant adverse impact (either by themselves or in combination with other plans and projects) upon the conservation objectives of any Natura 2000 Site or would result in the deterioration of any habitat or any species reliant on that habitat will not be permitted.

Except as provided for in Article 6(4) of the Habitats Directive; in so far as there must be - (a) no alternative solution available, (b) imperative reasons of an overriding public interest for the project to proceed; and (c) Adequate compensatory measures in place.

Proposed Amendment CH 12.4

Details of the amendment:

Amend the wording of Policy Objective CPO12.7 and insert text as follows:

Ensure an Appropriate Assessment is carried out in respect of any plan or project not directly connected with or necessary for the management of the site but likely to have a significant effect on the integrity of a European Site(s), either individually or in-combination with other plans or projects, in view of the site's conservation objectives to comply with the Habitats Directive.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 12.4

Proposed Amendment CH 12.5

Details of the amendment:

Insert a new Policy Objective after CPO 12.14 as follows:

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

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 12.5

Proposed Amendment CH 12.6

Details of the amendment:

Insert a new Policy Objective after existing CPO 12.14 as follows:

Where surveys carried out for the preparation of Environmental Impact Assessment (EIA/EcIA)/Natura Impact Statement or other assessments generate biodiversity

data previously unknown or unrecorded in the County this data be submitted to the National Biodiversity Data Centre (NDBC).

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 12.6

Proposed Amendment CH 12.7

Details of the amendment:

Amend the wording of Policy Objective CPO12.15 with the text as follows:

Ensure, where appropriate, the protection and conservation of areas, sites, species and ecological/networks of natural heritage, biodiversity and environmental value outside designated sites and to require an appropriate level of ecological assessment by suitably qualified professional(s) to accompany development proposals likely to impact on such areas or species.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 12.7

Proposed Amendment CH 12.8

Details of the amendment:

Insert the text into Section '12.6 Geological Sites' as follows:

An audit of Geological Heritage sites in County Longford confirmed 15 no. County Geological Sites (CGS)₂ and recommended the removal of 8 no. geological sites from the list of the County Geological Sites identified in the County Development Plan 2015-2021). The 8 no. geological sites recommended for removal are as follows:

- 1. Ardnacassagh Quarry
- 2. Ballinamuck unconformity
- 3. Carrickateane Quarry
- 4. Coolcor Quarry
- 5. Esker North townland
- 6. Garrycam
- 7. Kilcourcey Quarry
- 8. Terlicken

While the 8 sites were included in the previous CDP 2015-2021, they had not been audited and were based on a preliminary 'master list' of CGS for the County. During the Longford County Geological Heritage Audit 2015 the sites listed below were assessed as being unsuitable for the CGS status and were listed as rejected in Appendix 4 of the Geological Heritage of County Longford report.

Submission(s) Received: Sub-03 and Sub-32

Summary of the Issues raised in the Submission(s):

Sub-03 and Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 12.8

Proposed Amendment CH 12.9

Details of the amendment:

Amend the Policy Objective CPO12.27 as follows:

Protect and conserve wetlands from infilling, fragmentation, degradation and resist development that would destroy, fragment or degrade any wetland in the County.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 12.9

Proposed Amendment CH 12.10

Details of the amendment:

Amend the Policy Objective and insert the following text into CPO12.37:

Protect, enhance and preserve the built and natural heritage of the Royal Canal and its associated structures including the maintenance of the broadzone protection area at 100m either side of the Canal. This shall include a visual assessment zone of 500m from each bank in which all development proposals are assessed for their impact on the natural setting of the canal and its views and prospects. If a proposed development is deemed to have a detrimental negative impact on the integrity of the Royal Canal, then it shall not be permitted.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 12.10

Proposed Amendment CH 12.11

Details of the amendment:

Insert the 3 no. additional Policy Objectives after CPO12.41 as follows:

CPO 12.XX Support and promote, with the co-operation of private landowners, public access to islands in the County.

CPO 12.XX	Adopt bye-laws prohibiting or restricting jet-skiing, water skiing and any other noise generating activities during the lifetime of this Plan.
CPO 12.XX	Reserve land adjacent to the canal, riverbanks and other waterbodies to promote and facilitate the creation of waterside linear routes to link with existing routes and amenity spaces and to facilitate the provision of walking/cycling routes along canals and watercourses. Protect, enhance and improve existing public rights of way and, where possible, provide additional access to inland waterways through agreement, permissive access and/or the acquisition of land for public rights of way and parking and layby facilities.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 12.11

Proposed Amendment CH 12.12

Details of the amendment:

Insert the following Policy Objective after CPO 12.41 as follows:

Development on or within the vicinity of the Royal Canal Spur and/or Harbour that potentially hinders the continued preservation or future reinstatement of either is to be discouraged.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 12.12

Proposed Amendment CH 12.13

Details of the amendment:

Insert 2 no. additional Policy Objectives after CPO12.45 as follows:

CPO12.XX	Support the National Peatlands Strategy and the implementation of the National Raised Bog Special Area of Conservation Management Plan 2017-2022 and restoration works which will be both a positive conservation measure and help to reduce carbon loss in the County.
CPO12.XX	Designated and non-designated peatlands may be subject to the requirements of the planning code, Environmental Impact Assessment Directive (EIA screening and EIA where applicable) and the requirements of the Habitats Directive.
	Planning permission will be required where the area impacted by works relating to the drainage or reclamation of a wetland exceeds 0.1 hectares or where such works may have a significant effect on the environment. Such planning applications will need to be supported by an Appropriate Assessment and/or Environmental Impact Assessment where necessary.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 12.13

Proposed Amendment CH 12.15

Details of the amendment:

Insert a new Policy Objective after CPO12.59 as follows:

Identify and map the identified wildlife corridors within the County during the lifetime of the Plan, as resources and capacity exists. To review the Ecosystems Service Scoring mechanism as a potential tool to support the evaluation of these identified habitats and their biodiversity value across the County.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

he contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 12.15

3.8 Chapter 13: Green Infrastructure

Proposed Amendment CH 13.2

Details of the amendment:

Amend the Policy Objective CPO13.7 to include additional text as follows:

Ensure the protection, enhancement and maintenance of Green Infrastructure in the Development Management Process. Require an Ecological Impact Assessment (EcIA) for all development proposals on lands zoned Recreation / Amenity / Green Space, to ensure that the potential impacts on protected species and habitats can be assessed.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 13.2

Proposed Amendment CH 13.4

Details of the amendment:

Insert an additional Policy Objective after CPO13.19 as follows:

Proposals for greenway/blueway development should contribute towards the protection or enhancement of existing green infrastructure and have regard to the "Connecting with nature for health and wellbeing" EPA Research Report 2020.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 13.4

Proposed Amendment CH 13.5

Details of the amendment:

Amend Section 13.9 Public Rights of Way with the following additional text:

13.9 Public Rights of Way, Walking and cycling routes and Trails

Public Rights of Way constitute an important recreational amenity. They enable the enjoyment of high-quality landscape, natural and archaeological heritage and provide valuable links to natural assets and amenities such as rivers lakes, bogs, forests and places of natural beauty. A public right of way is a physically defined route over which the public have a right of passage even if the route is not in public ownership. It is described as "a user as of right" and confers an unrestricted right of the general public to pass and repass at all times of the day or night and at all seasons without notice to, or permission from the landowner.

The Planning and Development Acts 2000 (as amended) includes a mandatory objective for a County Development Plan to indicate locations on a map and to preserve public rights of way, which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility. A list of the known public rights of way in Longford is attached below and these are also mapped in Appendix 8. When additional rights of way are identified they shall be incorporated them into the Plan by way of a Variation or at the next review of the plan.

Existing public rights of way constitute an important amenity and they enable the enjoyment of high-quality landscapes, providing a valuable link to natural assets and places of natural beauty, such as the lakes, bogs and forests to those that live and visit the County. There are a number of public accesses to the lakes within the county. There are several walking routes throughout the County through publicly owned lands including along the Royal Canal Way. There are other pedestrian rights of way within the County such as mass paths, which have existed for centuries but not all of which are readily identifiable. The Council recognises the importance of maintaining established rights of way and supports initiatives for establishing new walking routes and enhanced accessibility.

Appendix 8: Green Infrastructure a public right of way map has been included for those known routes to date. In addition, the appendix includes a map of the existing trails and walking routes identified to date, in accordance with this provision.

However, it is important to note that this is not an exhaustive list and that the omission of any right of way shall not be taken as an indication that such a right of way is not a public right of way or has been extinguished.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 13.5

Proposed Amendment CH 13.6

Details of the amendment:

Amend Section 13.9 as follows to include the addition of the following table:

Table XX: County Longford Public Rights of Way

County Longford Public Rights of Way

- 1. The Mall Walk
- 2. Royal Canal Walk
- 3. Commons North Walk
- 4. Granard Motte Access
- 5. St. Patrick Terrace to N55
- 6. Derrycassin Wood
- 7. Ballymahon Riverbank
- 8. Lough Ree access, Cashel
- 9. Lyanmore Path
- 10. Lough Gowna lakeshore & carpark
- 11. Leebeen Park
- 12. Lough Forbes SAC

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 13.6

Proposed Amendment CH 13.7

Details of the amendment:

Insert 2 no. additional Policy Objectives after CPO13.31 as follows:

CPO 13.XX	Encourage and facilitate the creation of additional rights of way and extend existing ones for pedestrian, cycling, amenity or recreational purposes, either by agreement or by the use of compulsory powers, for the creation of public rights of way, particularly in areas of high amenity and recreational importance.
CPO 13.XX	Promote the preservation, protection, enhancement, maintenance and improvement, for the common good of all public rights of way particularly those giving access to lakes, riverbanks, geomorphological features of heritage value and other places of natural beauty or recreational utility/activity.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 13.7

3.9 Chapter 14: Landscape Character

Proposed Amendment CH 14.1

Details of the amendment:

Amend Policy Objective CPO14.4 with the following additional text:

Ensure the preservation of the uniqueness of a landscape character type by having regard to the character, value and sensitivity of a landscape in new development proposals. Any new development should respect and reinforce the distinctiveness and sense of place of the landscape character types, including the retention of important features or characteristics, taking into account the various elements which contribute to their distinctiveness.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 14.1

Proposed Amendment CH 14.2

Details of the amendment:

Insert the following Policy Objective after CPO14.18:

Preserve, maintain and enhance these important landscapes and **protect** the amenity value and visual integrity of the northern upland areas. Discourage inappropriate development in open countryside and prohibit developments which are likely to have material adverse visual impacts, either individually or cumulatively, on the character of these uplands. Ensure that new development will not materially interfere or detract from the scenic uplands and require that proposed developments demonstrate that every effort has been made to reduce visual impacts (including excessive bulk and inappropriate siting) and that visually prominent sites have been avoided to minimise visibility from scenic routes, lakes, walking trails, public amenities, settlements and roads. In regard to the potential impacts of development on sensitive upland areas potential developments shall consider the difficulty of establishing and maintaining screening vegetation.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 14.2

3.10 Chapter 16: Development Management Standards

Proposed Amendment CH 16.12

Details of the amendment:

Amend DMS 16.175 as follows:

Require that all extract industry development complies with the requirements of Section 261 and Section 261A of the Planning and Development Act, 2000 (as amended), the Quarries and Ancillary Activities Guidelines 2004 or any updates thereof; and EPA Guidelines for Environmental Management in the Extractive Industry 2006 or any updates thereof and Geological Heritage Guidelines for the Extractive Industry.

Submission(s) Received: Sub-03

Summary of the Issues raised in the Submission(s):

Submission expresses support for the proposed amendment to DMS 16.175.

Chief Executive's Response:

The contents of the submission supporting the inclusion of amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Development Plan be made with the proposed Material Amendment as displayed.

Proposed Amendment CH 16.14

Details of the amendment:

Insert additional text under Section 16.4.17 Renewable Energy as follows:

The Council recognises the importance of Renewable Energy and its potential in contributing to the reductions in fossil fuel dependency and greenhouse gas emissions. EMRA will be working with the Council and other County Councils in the region to identify potential Strategic Energy Zones. In addition, during the lifetime of the Draft Plan the Council will produce a Renewable Energy Strategy (Including a Wind Energy Strategy) for the County.

Submission(s) Received: Sub-32, Sub-05, Sub-63

Summary of the Issues raised in the Submission(s):

Submission by ESB welcomes the amendments to the text in CH 16.14 (and CH 5.33) and the acknowledgment from the Council that it has an important role to play

in realising the national targets for raising the amount of electricity generated from renewable sources. The Submission supports the amendment that specifically states that a Wind Energy Strategy will form part of the Renewable Energy Strategy that will be prepared over the lifetime of the Draft Plan.

Submission by Bord na Móna further welcomes the proposed new text in CH 16.14. The Submission identifies that the National Climate Action Plan (2019) has set out an ambitious 70% target for renewable energy production out to 2030. The Submission states to meet this target the amount of electricity generated from renewables will have to be doubled on current figures. Designating strategic energy zones on a regional basis will ensure that a single consistent methodology can be used across an entire region, county and local authority boundary areas to meet the 70% target. It is also noteworthy that rural areas have significantly contributed to the energy needs of the country to date,

The Submission acknowledges Project Ireland 2040 NPF and the contribution that rural communities have made to our energy landscape and with regard to future energy development.

The Submission concludes that planning has an important role to play in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 16.14

Proposed Amendment CH 16.17

Details of the amendment:

Insert the following DMS after existing DMS16.199 as follows:

The Council in assessing development proposals will consider the following criteria: where conditions are imposed for the protection or preservation of the archaeological heritage, the costs of implementing these shall to be borne by the developer.

Submission(s) Received: Sub-32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment CH 16.17

4. Volume 2: Appendices

4.1 Appendix 1B: Self-Sustaining Growth Towns

4.1.1 Granard

Proposed Amendment AP.1B.5

Details of the amendment:

Amend the Land Use Zoning map of the Draft Plan to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for each settlement incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Granard: Proposed Material Amendment Zoning Map – Area A:

Residential Related:

Land parcel no. 6, 14 - no zoning.

Other Uses:

Land parcel no. 12 - no zoning.

Land parcel no. 27 - no zoning.

See Granard: Proposed Material Amendment Zoning Map – Area B:

Residential Related:

Land parcel no. 7,19, (part) 20, 28 and 30 - 'Residential'.

Land parcel no. 9 and 16 – 'New Residential';

Land parcel no. 15 – 'New Residential' and no zoning;

Land parcel no. 17, 18, (part) 20, 29 - no zoning;

Other Uses:

Land parcel no. 8 (part) - 'Social/Community/Education/Public Utility'.

Land parcel no. 10, 11 and (part) 21 - 'Transport & Utility Objective'.

Land parcel no. 13 (part) - no zoning

Land parcel no. 24, 26 - no zoning.

Submission(s) Received: Sub-26

Summary of the Issues raised in the Submission(s):

Sub-26 requests a change of land zoning on Parcel 11, 21, and 26 to 'Strategic Residential Reserve' from 'no zoning' on lands at Granard in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

There is demand for new housing locally.

 Recently constructed housing development also on lands zoned Strategic Residential Reserve and Transport & Utility Objective.

Chief Executive's Response:

The subject site is identified and zoned as "no zoning" in the amended Plan with an additional zoning "Transport & Utility Objective". The subject site is being held in order to facilitate a much-needed by-pass for the town and once the new link road has been built, it may provide an opportunity for potential subsequent residential development for the town at a point in the future once other residential sites have been utilised.

In the preparation of the Material Alterations to the Draft Plan the planning authority has sought to proactively addressing the legacy of over zoning in the county, by proposing a number of material amendments which significantly reduce the extent of residential and strategic reserve land, along with consideration of a sequential approach to the zoning of lands.

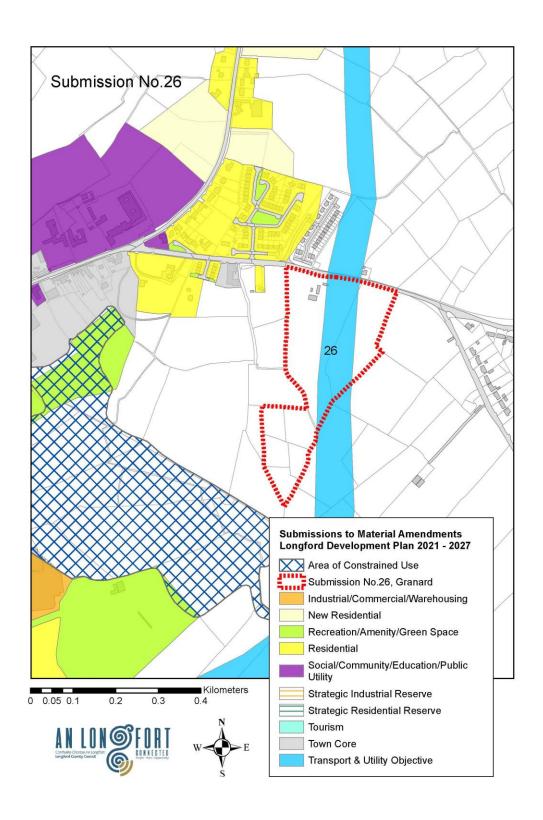
Granard is defined as a 'Self Sustaining Growth Town'. Such towns are considered 'towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'. It is considered that there are sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

It is also an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. These greenfield sites, removed from the established settlement boundary do not provide for brownfield or the sequential development of the town and in this regard, it is not considered that the proposed lands, in this instance, fulfil this objective.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time. It is considered that there are sufficient lands provided for in the Draft Plan for residential development for the duration of the Plan, given the anticipated demand.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment AP.1C.5



4.2 Appendix 1C: Self-Sustaining Towns

4.2.1 Ballymahon

Proposed Amendment AP.1C.5

Details of the amendment:

Amend the Land Use Zoning map to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for Ballymahon incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Ballymahon: Proposed Material Amendment Map:

Residential Related:

Land parcel no. 4, 5, 6, 22 – 'Strategic Residential Reserve';

Land parcel no. 11, 12, 13, 14, 15 - no zoning;

Land parcel no. 18 'Residential' and 'New Residential';

Land parcel no. 16 and 20 - 'New Residential'.

Other Uses:

Land Parcel no. 7, 8, 9, 10 - no zoning;

Submission(s) Received: Sub-12, Sub-58

Summary of the Issues raised in the Submission(s):

Sub-12 requests a change of land zoning on Parcel 5 to 'New Residential' from 'Strategic Residential Reserve' and on Parcel 14 and to 'New Residential' from 'no zoning' on lands at Creevagh Beg, Ballymahon in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

- Key site location along one of the main arterial routes into Ballymahon.
- Within 5 minutes' walk of Ballymahon town centre
- Readily serviced with a main sewer currently transversing the site
- Dual fronted location with roads and footpaths currently in place.
- Site bounded by existing residential along Goldsmith Terrace to the West and Creevaghglass to the East.
- Opportunity to form a residential link from the satellite estate of Creevaghbeg back into the town center of Ballymahon
- In consideration of the existing established residential settlement pattern, the proposed zoning of residential reserve is unsuitable in this location

Sub-58 requests a change of zoning of part of the site at Parcel 7 to "New Residential" from "no zoning" on lands at Thomand Hall, Ballymahon, in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

- Strategic rezoning of lands and settlement hierarchy due to the site's location as an extension of existing development
- Provides for increased and appropriate access to the riverside amenity
- Expansion and growth would be in a managed way due to the location of the site
- The proposed development is considered sustainable as there is an identified need for high quality residential units in the area to sustain and grow the town.
- The site is serviced by a foul pumping station designed in agreement with the local authority to serve the area and public water supply with sufficient capacity for the proposed development.
- The subject site is appropriately served by road and pedestrian access.
- The subject site is outside of areas identified as constrained use due to flood risk.

Chief Executive's Response:

In the preparation of the Material Alterations to the Draft Plan the planning authority has sought to proactively address the legacy of over zoning in the county, by proposing a number of material amendments which significantly reduce the extent of residential and strategic reserve land, along with consideration of a sequential approach to the zoning of lands, particularly in the settlements of Edgeworthstown and Ballymahon.

The submission by the OPR notes that notwithstanding such endeavours, there still remains significant land zoned for 'Strategic Residential Reserve' in Ballymahon, which equates to 4.5 times (c. 29 hectares) the extent of new residential zoned land required (c. 6 hectares) for the Plan period. The extent of such landuse zoning in Ballymahon, associated with a policy objective that can facilitate residential development in exceptional circumstances, has the potential therefore to distort the core strategy and the delivery of compact and coordinated growth in settlements

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional new residential zoning to be included as part of the Plan at this time. It is considered that there are sufficient lands provided for in the Draft Plan for residential development for the duration of the Plan, given the anticipated demand. Furthermore, the OPR has recommended amending the zoning of land parcel 4 and 5 in Ballymahon which are proposed for rezoning to 'Strategic Residential Reserve' as part of Material Amendment AP.1C.5 to 'No Zoning'.

Chief Executive's Recommendation:

Amend Proposed Amendment AP.1C.5 and associated mapping as indicated in green strikethrough and green to:

- (i) amend the zoning of land parcel 4 which is proposed for rezoning to 'Strategic Residential Reserve' to 'No Zoning'; and
- (ii) amend the zoning of land parcel 5 which is proposed for rezoning to 'Strategic Residential Reserve' to 'No Zoning'.

Proposed Amendment AP.1C.5

Amend the Land Use Zoning map to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for Ballymahon incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Ballymahon: Proposed Material Amendment Map:

Residential Related:

Land parcel no. 4, 5, 6, 22 – 'Strategic Residential Reserve';

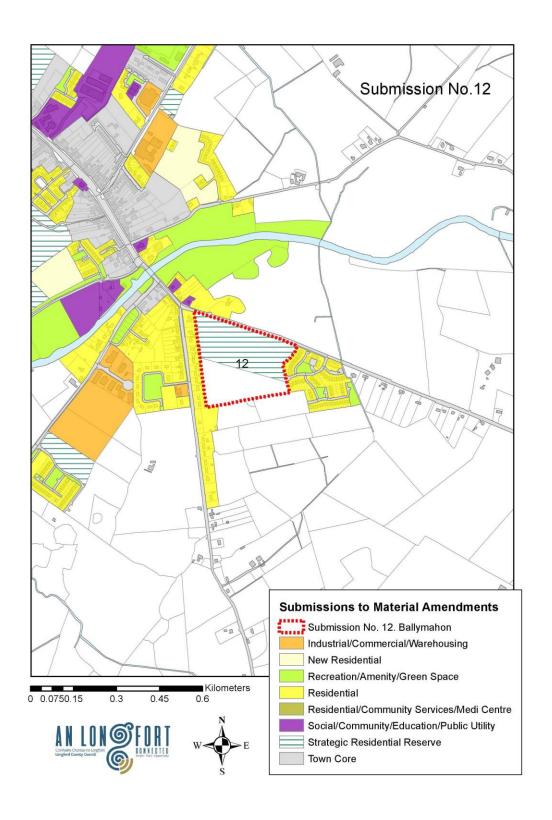
Land parcel no. 11, 12, 13, 14, 15 - no zoning;

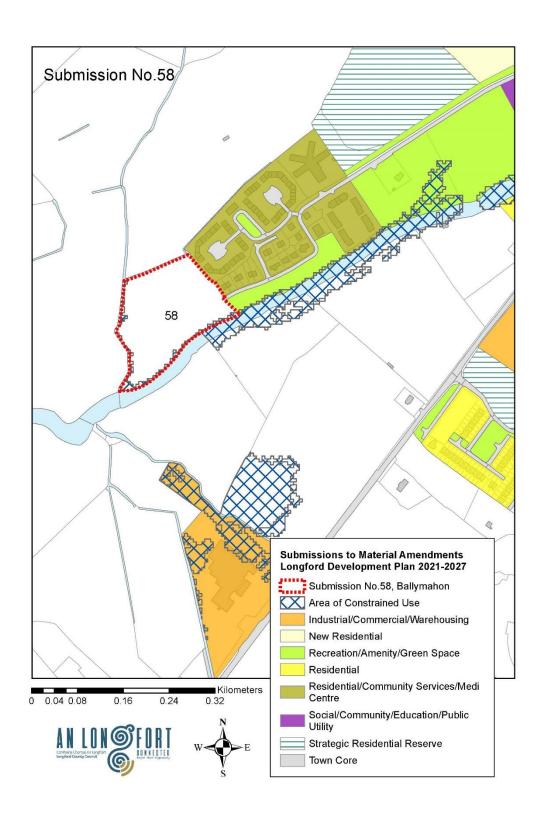
Land parcel no. 18 'Residential' and 'New Residential';

Land parcel no. 16 and 20 - 'New Residential'.

Other Uses:

Land Parcel no. 4, 5, 7, 8, 9, 10 – no zoning;





4.2.2 Edgeworthstown

Proposed Amendment AP.1C.13

Details of the amendment:

Amend the Land Use Zoning map of the Draft Plan to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for each settlement incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Edgeworthstown: Proposed Material Amendment Map - Area A:

Residential Related:

Land parcel no. 3 – 'Strategic Residential Reserve';

Land parcel no. 19 'Residential';

Land parcel no. 4, 10, 11, 14, 15, 16, 17, 19 - no zoning.

Other Uses:

Land parcel no. 18 - 'Recreational / Amenity / Green Space';

Land parcel no. 5, 6, 7, 8, 9, 12 - no zoning;

Land parcel no. 33 - 'Social / Community / Education / Public Utility'.

See Edgeworthstown: Proposed Material Amendment Map - Area B:

Residential Related:

Land parcel no. 23, 27, 29 - no zoning;

Land parcel no. 28, 30, 34, 35 - 'Residential';

Land parcel no. 31 - 'New Residential':

Land parcel no. 26 - 'Social / Community / Education / Public Utility' and no zoning.

Other Uses:

Land parcel no. 20, 21, 22, 24, 32 - no zoning.

Submission(s) Received: Sub-39

Summary of the Issues raised in the Submission(s):

Sub-39 requests a change of land zoning on Parcel 4 to residential from "no zoning" on lands at Edgeworthstown in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes;

 An Bord Pleanála previously granted planning permission for 81 houses on the lands that expired in 2017 [ABP Ref 218458 (78 houses) and ABP Ref 231422 (3 additional houses)].

- All of "Land Parcel 4" is deemed suitable for "Potential Development" in the County Council's Infrastructural Assessment Report (IAR), due to the connectivity with the adjoining "Tier 1 Serviced Lands".
- Retention of "Residential" Zoning on "Land Parcel 4" would be in conformity with National & Regional Planning Objectives NPO 3C & RPO 3.2
- The only other lands in Edgeworthstown (other than Bloomfield Park) that are proposed to remain as "Residential" in the next County Development Plan 2021-2027 have a low probability of being developed for housing within the lifetime of the next County Development Plan, as they
 - have significant wayleave constraints
 - have a more inferior infrastructure appropriateness score ranking compared to Bloomfield Park and
 - have never been granted planning permission, with all three historic planning applications refused by An Bord Pleanala
- A Strategic Housing Development (SHD) planning application is presently being finalised, for which a SHD Tripartite Pre Consultation Meeting with LCC and ABP has already taken place and for which "Land Parcel 4" was included in same. The Board are unable to materially contravene on matters related to toning under the SHD legislation and accordingly, the SHD will no longer be possible if "Land Parcel 4" does not retain its residential zoning.

Chief Executive's Response:

In the preparation of the Material Alterations to the Draft Plan the planning authority has sought to proactively address the legacy of over zoning in the county, by proposing a number of material amendments which significantly reduce the extent of residential and strategic reserve land, along with consideration of a sequential approach to the zoning of lands, particularly in the settlements of Edgeworthstown and Ballymahon.

The Settlement Hierarchy has been revised to position Edgeworthstown as a Tier 3 settlements (Self-Sustaining Towns) within the revised Settlement Hierarchy.

The Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes in Edgeworthstown. The core strategy table (Proposed Amendment CH 4.22) identifies the quantum, location and phasing of development in County for the life of the Longford County Development Plan. The Draft Plan took into account the high levels of population growth experienced in Edgeworthstown and Ballymahon in recent years, Notwithstanding the significant population increase experienced in Edgeworthstown and Ballymahon over the last 25 years, their capacities to assimilate future development within their settlements is impeded by current limited capacities of their respective wastewater treatment plants (wwtps). Whilst Irish Water (IW) is committed to upgrading these plants over the lifetime of the plan, no such works will take place before 2024. Accordingly, given this need for 'catch up' investment, Edgeworstwon is categorised as 'Self-

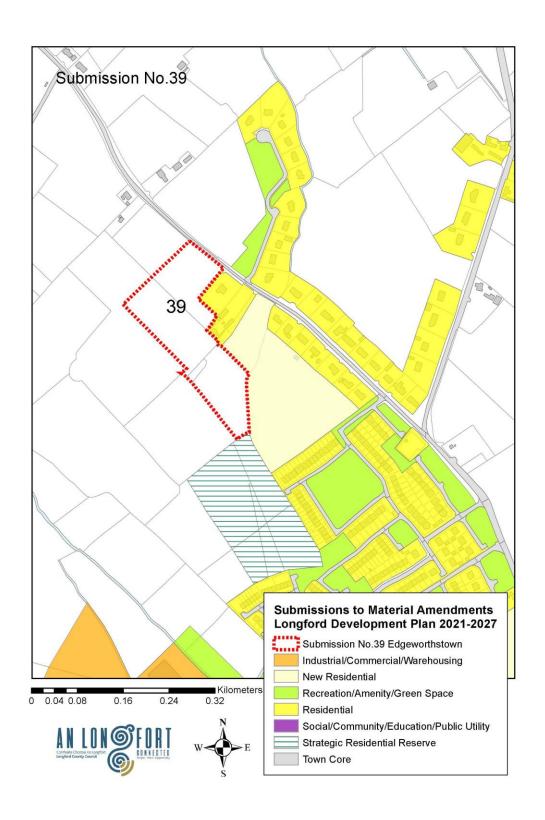
Sustaining Towns'. It is considered that there are sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period.

Whilst it is acknowledged the submission indicates these lands are at an advanced planning application preparation stage, the SHD development is not yet permitted and it would be considered inappropriate to amend the zoning as a result.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time. It is considered that there are sufficient lands provided for in the Draft Plan for residential development for the duration of the Plan, given the anticipated demand.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment AP.1C.13



Proposed Amendment AP.1C.14

Details of the amendment:

Amend the quantum of the employment generating land use zonings to reflect the OPR comments and the findings of the Infrastructural Assessment Report (IAR) as indicated in the revised zoning maps.

See Edgeworthstown: Proposed Material Amendment Map - Area A:

Land parcel no. 1, 2, 13 - no zoning.

See Edgeworthstown: Proposed Material Amendment Map - Area B:

Land parcel no. 25 – no zoning.

Submission(s) Received: Sub-30

Summary of the Issues raised in the Submission(s):

Sub-30 zoning Parcel requests а change of land on 2 to "Industrial/Commercial/Warehousing" Zoning" from "No lands at on Edgeworthstown in the Draft Longford County Development Plan 2021-2027.

Edgeworthstown is a Key Employment Centre and designated 'Self Sustaining Town'. Edgeworthstown commands a strategic location at the intersection of the N4 and N55 making it a valuable commercial location from a national transport infrastructure point of view. The submission contends that there is a current shortage of industrial units along the N55 corridor. The combination of population growth, employment requirements, proximity to key transport corridors and the shortage of industrial units requires Edgeworthstown to have a significant amount of zoned commercial development land available to attract potential commercial developers.

Parcel 2 is a significant asset in the future development of Edgeworth town's commercial base towards becoming a more Self-sustaining Town and Key Employment Centre. It is an ideal location to extend the Business Park,

The submission is supported by letters from Edgeworthstown Traders Association and C&D Foods.

Chief Executive's Response:

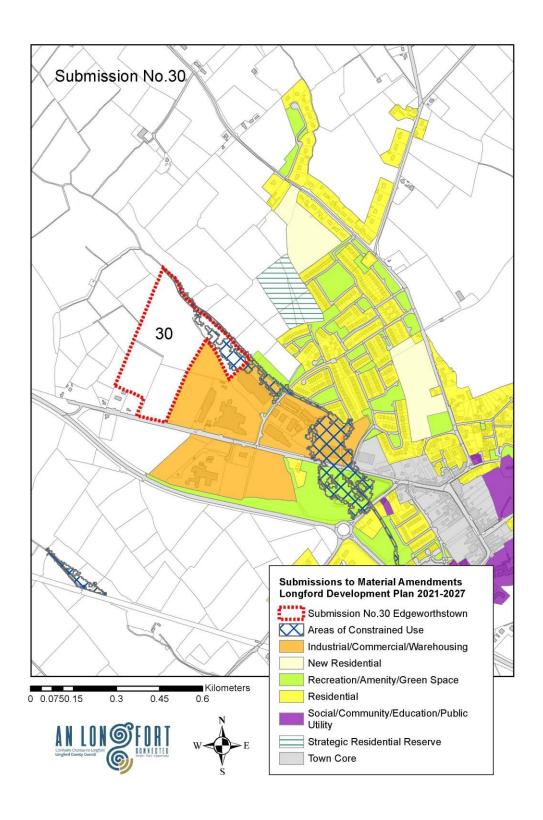
The OPR submission on the Draft Plan commented on the varying employment land use typologies presented in the Draft Plan, as well as the quantum of employment land use zonings. Having regard to this and the overarching principle of compact growth introduced through NPF and RSES, the planning authority has sought to proactively address the legacy of over zoning in the county, by proposing a number of material amendments which significantly reduce the extent of such land uses, particularly in relation to the settlements of Longford Town, Granard, Edgeworthstown, Ballymahon and Drumlish.

It is noted that subject site lies outside the CSO boundary area for the settlement, on the periphery of Edgeworthstown. It is an objective of the Plan to zone lands within the envelope of existing settlements as defined in the settlement hierarchy which seek to promote the consolidation of existing settlements and provide more compact forms of urban growth. Futhermore, the OPR in their submission on the Material Alterations further note that 'it is necessary that a 'plan led' approach to development is considered in the first instance and consideration is given to the location of such sites within settlement boundaries on suitably zoned land.'

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional "Industrial/Commercial/Warehousing" zoning to be included as part of the Plan at this time. It is considered that there are sufficient lands provided for in the Draft Plan for employment land uses for the duration of the Plan, given the anticipated demand.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment AP.1C.14



4.3 Appendix 1D: Towns and Villages

4.3.1 Ballinalee

Proposed Amendment AP.1D.8

Details of the amendment:

Amend the Land Use Zoning map to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for each settlement incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Ballinalee: Proposed Material Amendment Map

Residential Related:

Land parcel no. 12, 20 - 'New Residential' zoning;

Land parcel no. 16, 18, 21, 23 – 'Residential' zoning;

Land parcel no. 14, 15, 19, 22, 24, 25 - No zoning;

Land parcel no. 17 - 'Light Industrial/Commercial/Servicing' zoning;

Other Uses:

Land parcel no. 1, 2, 3, 4, 5, 6, 7,8, 9, 10, 11, 13 – No zoning;

Parcel 10 and 11 - Change from "recreational/amenity/green space" to 'no zoning'

Submission(s) Received: Sub-23, Sub-25, Sub-56, Sub 57

Summary of the Issues raised in the Submission(s):

Sub-23 requests a change of land zoning on Parcel 10 and 11 to "Strategic Residential Reserve" from "No Zoning" on lands at Ballinalee in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

- The site can be easily serviced with foul sewer, surface water and watermain networks all of which are located in the adjoining public road on to which the lands front onto and whereby the existing newly installed wastewater treatment plant which services the Town of Ballinalee has adequate capacity for this proposed change of Zoning
- Both vehicular and pedestrian access can be provided to the subject lands in question via either the road frontage that the subject lands has or alternatively through the internal access roads and footpaths that service the

estate known as St. John's which the subject lands surround and which has been taken in charge by Longford County Council.

Sub-56 and Sub-57 requests a change of land zoning on Parcel 12 to "Residential" from "Strategic Residential Reserve" on parcel 12, at Ballinalee in the Draft Longford County Development Plan 2021-2027.

Sub-25 requests a change of land zoning on Parcel 2 to 'Industrial/Commercial/Warehousing" from "No Zoning" on lands at Ballinalee in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

- The lands in question has substantial road frontage with excellent sightlines in each direction.
- The lands are located within the speed limits that service the village of Ballinalee

The lands are located opposite the wastewater treatment system that services the village where there is ample capacity to service any potential development.

With regard to Parcel B as referenced in Sub-56 and Sub-57, this is not an issue that can be considered as it does not relate to a Material Alteration.

The rationale supporting this submission includes:

- The parcel set fully within the well-established Shantobar housing development and as such all required services including foul sewer, surface water and watermain are available via connection to the existing services within the Shantobar development and without the need to disturb any public highways.
- The parcel of land represents incomplete elements of the Shantobar housing development, and their completion will greatly enhance the development itself, the environment for the residents of the development and the village of Ballinalee in general. Furthermore, the development of the parcel will help to prevent ongoing illegal dumping and other anti-social behaviour, which has been noted recently in the area. The parcel of land is ideally placed to deliver on the stated objective of the current government to prioritise the building of residential housing to cater for a growing population.
- Parcel 12 currently has an active planning permission for the construction of 8 houses (4 sets of 3 bed semi-detached houses). Planning reference 19/290.

It is noted that there is an inconsistency within the document, where under Proposed Amendment AP.1D.8 it is listed as changing to 'New Residential' zoning, while the map shows that the site will change from 'Residential' to 'Strategic Residential Reserve'

Chief Executive's Response:

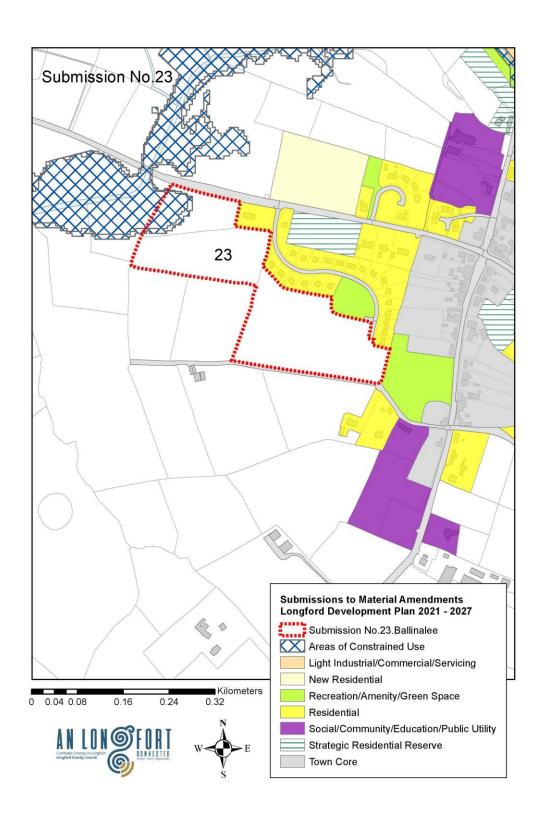
With regard to Parcel 10 and 11, the OPR submission on the Draft Plan noted that there was a significant quantity of land zoned as 'Strategic Residential Reserve' in the Draft Plan. In the preparation of the Material Alterations to the Draft Plan the planning authority has sought to proactively address the legacy of over zoning in the county, by proposing a number of material amendments which significantly reduce the extent of residential and strategic reserve land, along with consideration of the required quantity in accordance with the core strategy and a sequential approach to the zoning of lands. Therefore, it would not be appropriate to zone Parcel 10 and 11 to "Strategic Residential Reserve".

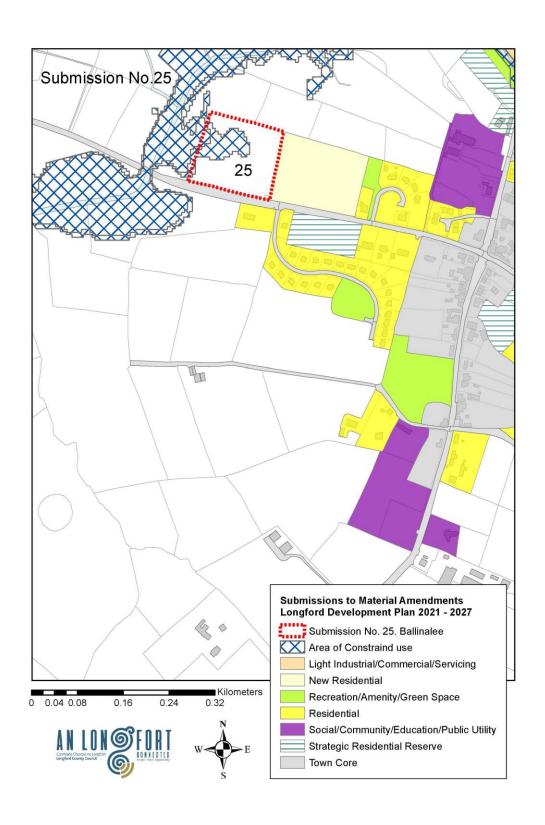
With regard to Parcel 2, the subject lands are located are located along the R194 road, outside of the town envelope boundary of Ballinalee. It is an objective of the Council to zone lands within the envelope of existing settlements as defined in the settlement hierarchy which seek to promote the consolidation of existing settlements and provide more compact forms of urban growth. Furthermore, it is noted that the subject lands are on lands zoned 'Constrained Land Use'. It is an objective of the draft plan to omit land zoned for employment, where such land is deemed to be of moderate or high flood risk, unless such land is sequentially preferable and could contribute to compact growth and such provision has been examined in the SFRA. Therefore, it would be considered inappropriate to amend the zoning.

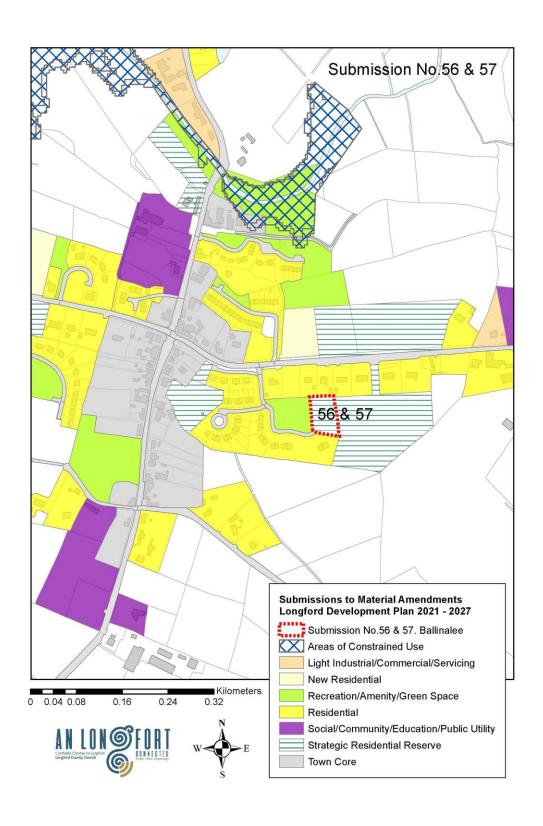
With regard to Parcel 12, the Proposed Material Amendments Map correctly shows the proposed change for the site from 'Residential' to 'Strategic Residential Reserve'. It is noted that Parcel 12 has an existing permission for 8 no. houses under Planning Ref: 19/290. While the permission has been granted the proposed development has yet to commence. It is considered that there are sufficient lands zoned in Ballinalee to cater for the population and housing provision during this Plan period. Notwithstanding the extant permission, it is considered appropriate for the sustainable development of the settlement that the site be zoned for 'Strategic Residential Reserve'.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment AP.1D.8







4.3.2 Drumlish

Proposed Amendment AP.1D.12

Details of the amendment:

Amend the quantum of the employment generating land use zonings to reflect the OPR comments and the findings of the Infrastructural Assessment Report (IAR) as indicated in the revised zoning map.

See Drumlish: Proposed Material Amendment Map - Area A:

Land Parcel No. 1, 2, 3, 28 - No Zoning

Land parcel no. 5, 51 - 'Light Industrial/Commercial/Servicing' zoning;

Submission(s) Received: Sub-20

Summary of the Issues raised in the Submission(s):

Sub-20 requests a change of land zoning on Parcel 1, 2 and 28 to "Industrial/Commercial/Warehousing" from "No Zoning" on lands at Drumlish in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes the enclosure of a previous grant of permission on the site for 11 no. Industrial/Commercial/Retail Units under PI Ref 07/358.

It is further contended that the lands currently proposed to be zoned "Industrial/Commercial/Warehousing" are not large enough to encourage a development of this type.

Chief Executive's Response:

The OPR submission on the Draft Plan commented on the varying employment land use typologies presented in the Draft Plan, as well as the quantum of employment land use zonings. Having regard to this and the overarching principle of compact growth introduced through NPF and RSES, the planning authority has sought to proactively address the legacy of over zoning in the county, by proposing a number of material amendments which significantly reduce the extent of such land uses, particularly in relation to the settlements of Longford Town, Granard, Edgeworthstown, Ballymahon and Drumlish.

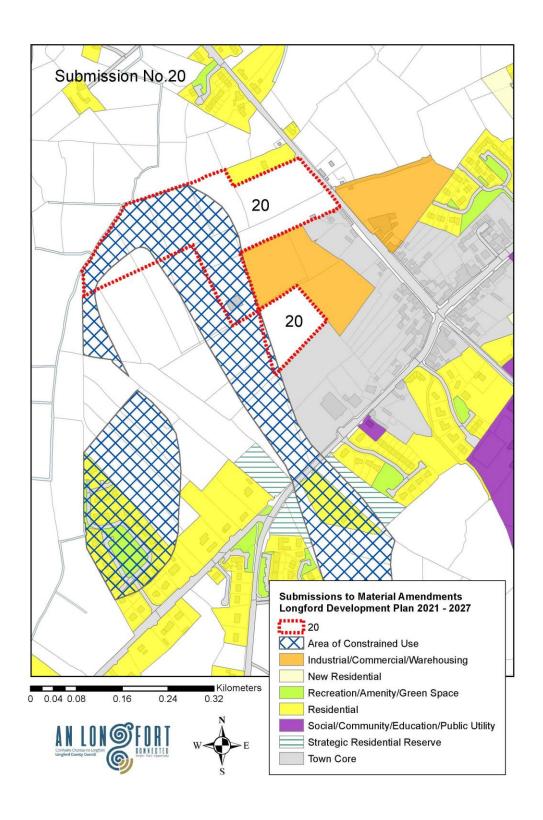
A specific recommendation was made by the OPR on the Draft Plan to omit zoned for employment generating purposes in Edgeworthstown and Drumlish, where such land is deemed to be of moderate or high flood risk, unless such land is sequentially preferable and could contribute to compact growth and such provision has been examined in the SFRA. As a result, a significant reduction in the overall quantum of Industrial/Commercial/Warehousing zoned lands to the east of the town core has been proposed in the amended Draft Plan.

The subject site lies primarily outside the CSO boundary area for the settlement, on the periphery of Drumlish. It is an objective of the Council to zone lands within the envelope of existing settlements as defined in the settlement hierarchy which seek to promote the consolidation of existing settlements and provide more compact forms of urban growth.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional "Industrial/Commercial/Warehousing" zoning to be included as part of the Plan at this time. It is considered that there are sufficient lands provided for in the Draft Plan for employment land uses for the duration of the Plan, given the anticipated demand.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment AP.1D.12



Proposed Amendment AP.1D.15

Details of the amendment:

Amend the Land Use Zoning map to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for each settlement incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Drumlish: Proposed Material Amendment Map – Area A:

Residential Related:

Land parcel no. 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 24, 27, 30, 32 – 'Residential' zoning:

Land parcel no. 25, 26, 29, 31 – No zoning;

Land parcel no. – 'Recreation/Amenity/Green Space' zoning;

Land parcel no. 35 – 'Light Industrial/Commercial/Servicing' zoning;

Land parcel no. 36 - 'Social/Community/Education/Public Utility' zoning;

Other Uses:

Land parcel no. 21, 22, 23 - No zoning;

See Drumlish: Proposed Material Amendment Map - Area B:

Residential Related:

Land parcel no. 42, 43, 48 - 'New Residential' zoning

Land parcel no. 33, 38, 46, 50 - 'Residential' zoning

Land parcel no. 34, 39, 40, 44, 45, 47, 49 - No zoning;

Land parcel no. 41 – 'Recreation/Amenity/Green Space' zoning;

Other Uses:

Land parcel no. 37 – No zoning;

Submission(s) Received: Sub-21, Sub-22, Sub-24, Sub-46

Summary of the Issues raised in the Submission(s):

Sub-21 requests a change of land zoning on Parcel 40 to "Strategic Residential Reserve" from "No Zoning" on lands at Drumlish in the Draft Longford County Development Plan 2021-2027. The rationale supporting this submission contends that the site had the benefit of full planning permission under PI Ref 05/364. It is further contended that the lands were zoned "Strategic Residential Reserve" on both the County Development Plan 2015-2021 and the Draft Plan 2021-2027 and should remain as so.

Sub-22 requests a change of land zoning on Parcel 34 to "New Residential" from "No Zoning" on lands at Drumlish in the Draft Longford County Development Plan 2021-2027. The rationale supporting this submission contends that the site is a natural extension of the field that is proposed to be zoned 'New Residential' immediately to the east of same both of which are easily accessed and serviced

via the existing internal access road together with foul sewer, surface water and watermain services that service the existing estate known as Esker Glen whish is also in the landowners ownership. It is further contended that the lands were zoned "Residential/New Residential" on both the County Development Plan 2015-2021 and the Draft Plan 2021-2027 and should remain as so.

Sub-24 requests a change of land zoning on Parcel 39 to "Strategic Residential Reserve" from "No Zoning" on lands at Drumlish in the Draft Longford County Development Plan 2021-2027. The rationale supporting this submission contends that the site had the benefit of full planning permission under PI Ref 07/333. It is further contended that the lands were zoned "Strategic Residential Reserve" on both the County Development Plan 2015-2021 and the Draft Plan 2021-2027 and should remain as so.

Sub-46 requests a change of land zoning on Parcel 47 to "Strategic Residential Reserve" from "No Zoning" on lands at Drumlish in the Draft Longford County Development Plan 2021-2027. The rationale supporting this submission contends that the lands were zoned "Strategic Residential Reserve" on both the County Development Plan 2015-2021 and the Draft Plan 2021-2027 and should remain as so.

Chief Executive's Response:

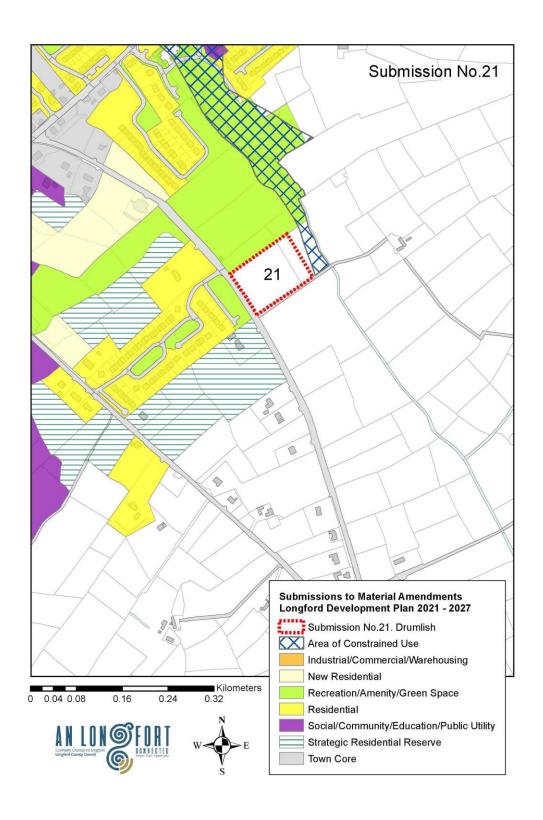
In the preparation of the Material Alterations to the Draft Plan the planning authority has sought to proactively address the legacy of over zoning in the county, by proposing a number of material amendments which significantly reduce the extent of residential and strategic reserve land, along with consideration of a sequential approach to the zoning of lands. Therefore, it would not be appropriate to amend the zoning of the parcels to "Strategic Residential Reserve' and 'New Residential'.

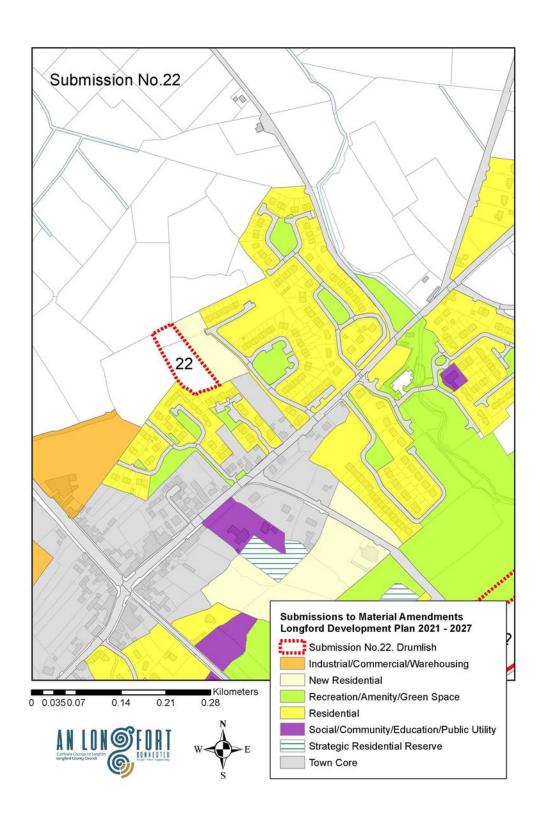
It is noted that all tfour of the above referenced sites lie outside the CSO boundary area for the settlement, on the periphery of Drumlish. It is an objective of the Council to zone lands within the envelope of existing settlements as defined in the settlement hierarchy which seek to promote the consolidation of existing settlements and provide more compact forms of urban growth.

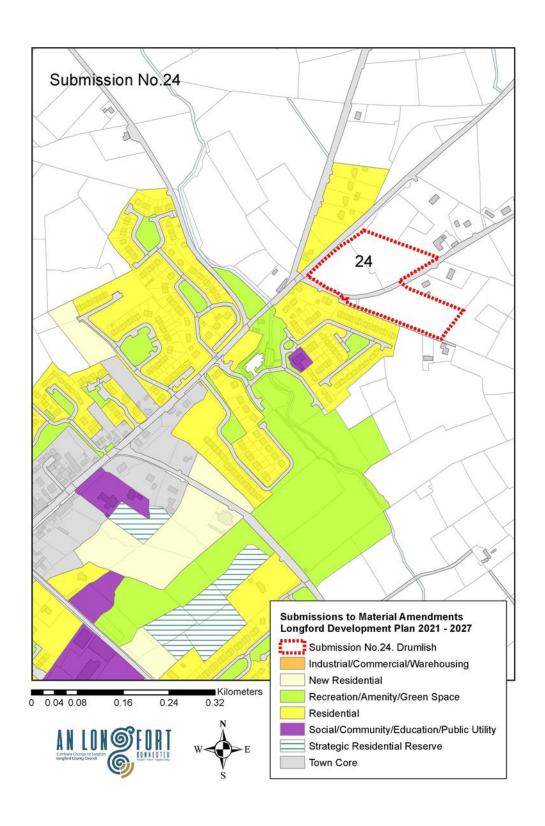
Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional "Strategic Residential Reserve" or 'New Residential' zoning to be included as part of the Plan at this time.

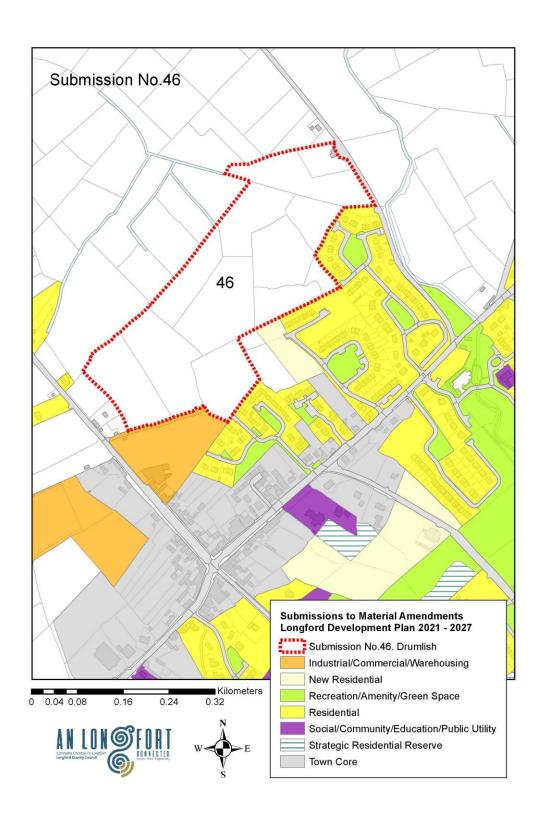
Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment AP.1D.15









4.3.3 Newtownforbes

Proposed Amendment AP.1D.27

Details of the amendment:

Amend the Land Use Zoning map to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for each settlement incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Newtownforbes: Proposed Material Amendment Map:

Residential Related:

Land parcel no. 5, 12 - 'New Residential' zoning;

Land parcel no. 8, 10 - 'Residential' zoning;

Land parcel no. 1, 6, 7, 9, 11 – No zoning;

Other Uses:

Land parcel no. 2, 4 - No zoning;

Land parcel no. 3 – 'Social/Community/Education/Public Utility' zoning;

Submission(s) Received: Sub-35

Summary of the Issues raised in the Submission(s):

Sub-35 contends that the land zoned "New Residential" Parcel 5 is too small to develop into a residential development and that the zoning should be extended southwards to include the land zoned "Social/Community/Educational/Public". The submission also requests a change of land zoning to "Strategic Residential Reserve" from "No Zoning" on Parcel 6.

The rationale supporting this submission includes:

- There is a disconnect between the portion of lands denoted "5" and the lands to the rear within the same landholding that are zoned "Strategic Residential Reserve"
- There are 4 no. of zonings within the applicant's total landholding of 4 acres.

Chief Executive's Response:

The land to the south of Parcel 5 zoned "Social/Community/Educational/Public" does not relate to a Material Alteration and therefore a change of zoning cannot be considered at this stage of the process as required under Section 12(7) of the Planning and Development Act 2000 (as amended).

With regard to the request to change the land zoning to "Strategic Residential Reserve" from "No Zoning" on Parcel 6, the OPR submission on the Draft Plan

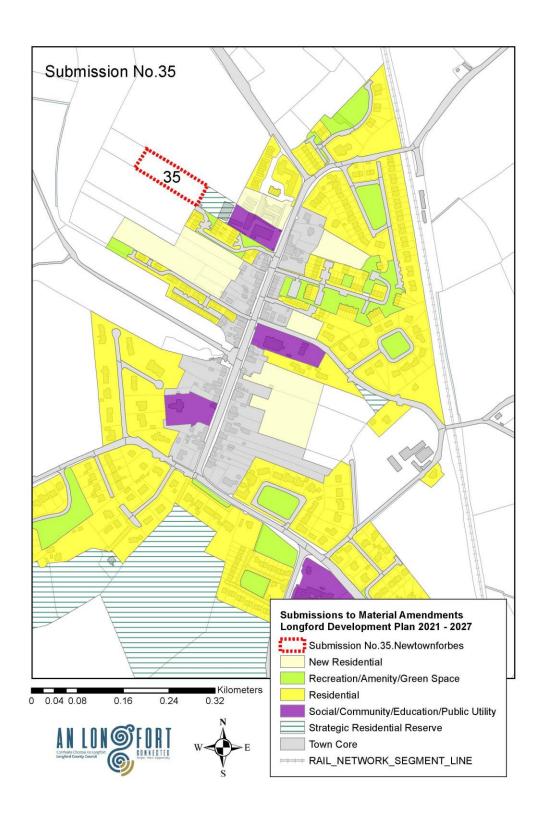
noted that there was a significant quantity of land zoned as 'Strategic Residential Reserve' in the Draft Plan. In the preparation of the Material Alterations to the Draft Plan the planning authority has sought to proactively address the legacy of over zoning in the county, by proposing a number of material amendments which significantly reduce the extent of residential and strategic reserve land, along with consideration of a sequential approach to the zoning of lands, particularly in the settlements of Edgeworthstown and Ballymahon.

The amount and location of zoned lands required was guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. It is noted that subject site lies outside the CSO boundary area for the settlement, on the periphery of Drumlish. The subject site has been amended from "Strategic Residential Reserve' to 'No Zoning' in order to comply with the national and regional policies and objectives to provide for compact growth.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional "Strategic Residential Reserve" zoning to be included as part of the Plan at this time. It is considered that there are sufficient lands provided for in the Draft Plan for residential uses for the duration of the Plan, given the anticipated demand.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment AP.1D.27



4.4 Appendix 1E: Serviced Rural Villages

4.4.1 Ardagh

Proposed Amendment Ref: AP.1E.8

Details of the Amendment(s):

Proposed Amendment AP.1E.8 consists of changes to the designation and land use of Ardagh House Demesne as previously set out under Appendix 1E (p104-105) of the Draft County Development Plan (DCDP).

Chief Executive Report Recommendation CE ZO-09 considered the request made during Second Stage Public Consolation of the Draft County Development Plan under Submission DCDP-40 and recommended the following in consideration of same:

- "Remove the 'Tourism Use' zoned lands in Ardagh and de-zone the identified lands to Agricultural use to reflect the existing use of the lands;
- To zone Ardagh House and the two gate houses as existing residential use;
- To zone lands to the south of the Ardagh House as recreation / amenity in order to protect the view of House from the centre of the village".

The subsequent Material Amendment (AP.1E.8) as detailed within the 'Proposed Material Amendment Map – Ardagh' of the 'Chief Executive Report on Material Alternations: Draft Plan, Vol.2: Appendices (p60)' proposed the following:

- Remove the 'Tourism Use' zoned lands in Ardagh and de-zone the identified lands to Agricultural use to reflect the existing use of the lands.
 - See Ardagh: Proposed Material Amendment Map Area B: Land parcel no. 18, 19, 20 No zoning
- Zone Ardagh House and the two gate houses as existing residential use.
 - See Ardagh: Proposed Material Amendment Map Area A: Land parcel no. 23 Residential.
 - See Ardagh: Proposed Material Amendment Map Area B: Land parcel no. 21, 26 Residential
- Zone lands to the south of the Ardagh House as recreation/amenity in order to protect the view of the House from the centre of the village.
 - See Ardagh: Proposed Material Amendment Map Area B: Land parcel no. 25 Recreation/Amenity/Greenspace.

Submission(s) Received: Sub-11-MA, Sub-13-MA, Sub-14-MA, Sub-15-MA, Sub-16-MA, Sub-17-MA, Sub-27-MA, Sub-28-MA, Sub-29-MA, Sub-31-MA, Sub-38-MA, Sub-40-MA, Sub-41-MA, Sub-42-MA, Sub-44-MA, Sub-45-MA, Sub-49-MA, Sub-50-MA, Sub-51-MA, Sub-52-MA, Sub-54-MA, Sub-55-MA, Sub-59-MA, Sub-60-MA, Sub-61-MA and Sub-62-MA

Summary of the Issues raised in the Submission(s):

Albeit frequent duplicates of one another, 26 no. submissions were received opposing the Material Amendment AP.1E.8 seeking the proposed land use changes within Ardagh House Demesne.

Opposition to the amendment was largely divided between the proposed de-zoning of land from 'Tourism' to that used for agricultural purposes, and against the rezoning of Ardagh House and Outbuildings and 2 no. Gate Lodges from 'Tourism' to 'Residential'.

A consolidated list of reasons referred to in submissions include the following:

- Unnecessary;
- Increased threat to integrity of Ardagh Demesne, "Ardagh Neighbourhood / Community Park" and award-winning, Ardagh Village;
- Built / Cultural / Social / Educational Heritage loss to Ardagh Village;
- Threat to Record of Protected Structure (RPS) status;
- Environmental implications (e.g. unsustainable agricultural use);
- Harmful to Ardagh Village's future tourism potential;
- Reversal of 'Recreation / Amenity and Green Space' zoning segments to 'Tourism'.

Chief Executive's Response:

The contents of the submissions referring to the protection and integrity of Ardagh House Demesne, including an area referred to in submission as 'Ardagh Neighbourhood / Community Park', are noted and welcomed by Longford County Council (Longford County Council).

The proposed Draft County Development Plan contains a variety of measures for the sole purpose of protecting the built and natural heritage of Ardagh Village and its amenities as set out as follows:

- Zoning Protection (Ardagh Neighbourhood Park)

Longford County Council fully recognise the intrinsic value Ardagh Neighbourhood Park provides Ardagh Village, and the past and current community efforts made in making it the success it is today.

In acknowledgement of this fact, Longford County Council wish to dispel any misinterpretations made under submission and has proposed the continued 'Recreational / Amenity and Green Space' zoning for Ardagh Neighbourhood Park as it has prospered in the past.

Ardagh Neighbourhood Park is currently zoned 'Recreation / Amenity and Green Spaces' (Fig. 1a), has remained as 'Recreation / Amenity and Green Spaces' in the previous revision of the current Draft County Development Plan 2021 – 2027 (Fig. 1b) and has continued as 'Recreation / Amenity and Green Spaces' under the Third Stage Public Consultation Draft County Development Plan 2021 – 2017 (Fig. 1c) as identified in the corresponding maps below.





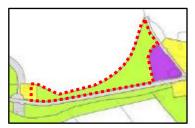


Fig. 1a: CDP 2015 – 2021 Fig. 1B: DCDP (2nd Stage) Fig. 1C: DCDP (3rd Stage)

Under the current Draft County Development Plan the 'Recreational / Amenity and Green Spaces' zoning applied to Ardagh Neighbourhood Park seeks "to primarily provide for recreational open space, environmental buffers and ancillary structures". Further detail on the scope of protection afforded to this sensitive parcel of land is outlined as follows:

"To preserve, provide for and improve active and passive recreational public and private open space, environmental buffers and ancillary structures. ... The Council will not normally permit development that would result in a loss of open space. ... The zoning also provides for the reservation of environmental buffers at strategic corridors throughout the town (incl. Ardagh) in order to provide a visual barrier between different land uses and ensure the protection of the town's (incl. Ardagh) watercourses, maintaining an important wildlife corridor and enhancing the aesthetics of the area.

The zoning further ... provide(s) for the passive and active recreational needs and provides for the use of such land or such facilities for games, educational and recreational purposes".

In recognition of the concerns raised in submission towards Ardagh Neighbourhood Park's continued protection, Longford County Council considers a further reinforcement of this protection to include all trees within the sensitive c.3.5 acre site to be added to the Draft County Development Plan, Appendix 7 'Important Stands of Trees'.

Under policy CPO12.65 of the Draft County Development Plan 2021 – 2027 Longford County Council is committed to "protecting the following important stands of trees identified in Appendix 7: Natural Heritage and Environment from inappropriate development and unmanaged tree felling not part of an overall plan to ensure their sustainability ...".

Separately, in response to a common reference under submission to a portion of land having been donated or offered under freehold to Ardagh Tidy Town's Committee which now accommodates the referred Ardagh Neighbourhood Park, such lands are without ownership distinction and form part of the larger Ardagh Demesne landholding (i.e. Folio LD17314F) under the freehold ownership to the current Ardagh Demesne owner. Other accounts refer to a long-term leasehold from the Sisters of Mercy but no evidence to support same has been noted.

- Zoning Protection (Ardagh Demesne)

The sensitives raised under submission relating to the changing of land use zoning within Ardagh Demesne from 'Tourism' to that of agricultural use is acknowledged.

It is considered necessary to establish that 'Agriculture' is not a specified land zoning within the Draft County Development Plan. Land under agricultural use is more correctly defined as 'un-zoned' land as opposed to 'Agricultural'. Un-zoned land does not encourage any form of development.

Longford County Council consider that development permitted under the 'Tourism/Culture and Events' zoning of the previous CDP and at the Second Stage of the Draft County Development Plan was intentionally broad but unintentionally placed Ardagh Demesne under threat of future exploitation, blanketly promoting "the realisation of the tourism potential of the area". "This objective provides for the development of the Arts, Culture and Entertainment facilities including activities that are accessible to all in both physical and economic terms. The zoning also provides for the facilitation of festivals and related events."

The then decision to de-zone the outer elements of Ardagh House Demesne (i.e. Land Parcel no. 18, 19 and 20 no.) seen in Figure 2, and rezone the remainder of the curtilage (Land Parcel no. 25, excluding Ardagh House as no. 26 and 2 no. Gate Lodges as no. 23 and 4) to 'Recreational, Amenity and Green Space' was seen as a means of protecting the integrity of the estate, and building upon land use zoning success that has applied to the neighbouring Ardagh Neighbourhood Park.

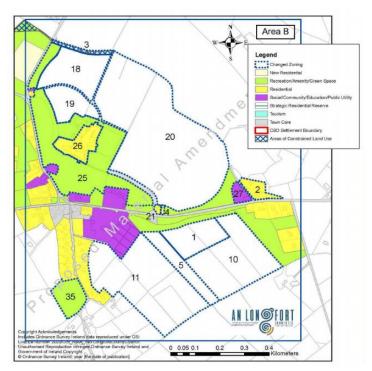


Fig. 2. Proposed Material Amendment Map (Ardagh) - Area B

As referred above, 'Recreational / Amenity and Green Spaces' zoning has been devised within the current Draft County Development Plan "to primarily provide for recreational open space, environmental buffers and ancillary structures", and by its

definition is considered more sympathetic than the previous 'Tourism' zoning in protecting the very elements perceived under threat (e.g. Loss of Heritage, threat to RPS status, etc).

Historical mapping can also reveal the prevalence of woodland occupying the north western half Land Parcel No. 25 currently proposed as 'Recreational / Amenity and Green Space' zoning. The extent of such a zoning is considered necessary to support any future amalgamation of historical woodland sites with that of the existing Ardagh Neighbourhood Park to it's east (Fig. 3).

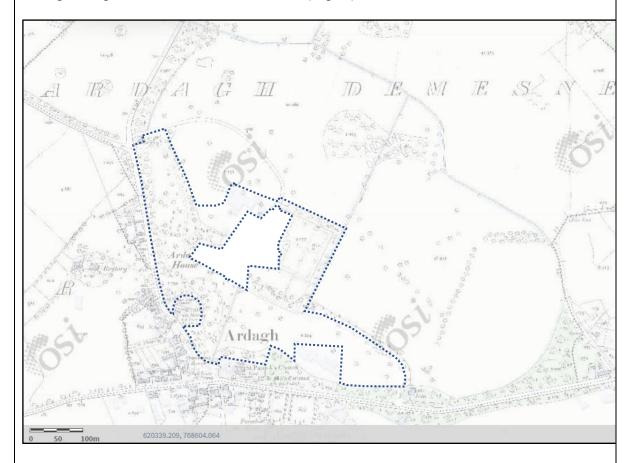


Fig. 3. Land Parcel No. 25 between dotted blue boundaries overlaid on Historic Mapping (25 Inch) 1888 – 1913 Ardagh Demesne

The de-zoning of lands on the outer fringes of Ardagh Village from 'Tourism' to 'de-zoned' lands for agricultural use is considered necessary to avoid the potential exploitation 'Tourism' zoning permits (e.g. Hotel / Hostel / Campsite / Caravan Park), and to align the historical and current use of the lands as was originally intended and laid out for, and free from the risk of undesirable development. Agricultural use has dominated Ardagh House Demesne for almost 300 years, generating its income and providing the facility to develop Ardagh House, Stables and Outhouses. Furthermore, the continued grazing of these lands is considered necessary to ensure the visual amenity of Ardagh House Demesne is preserved, and not reliant on landscape maintenance alone.

Any proposed development and extension of the agricultural / residential activities as suggested would need to be considered on its merits and in respect of the land

holding, the ownership of the prospective applicant, the protected status of the structures on site, and the Architectural Conservation Area (ACA) designation.

Longford County Council refers to Ardagh Village's 'Open Agricultural' categorisation in the Draft County Development Plan Chapter 14: Landscape Character assessment. This area has been identified as "containing the most versatile agricultural land in the county and is generally characterised by larger open fields, interspersed with mature trees".

Alternative 'Tourism' opportunities within Ardagh Village also remain and Longford County Council draws attention to policy CPO10.21 of the current Draft County Development Plan specifically referring to "support(ing) the development and promotion of ... Ardagh Heritage and Creativity Centre."

Of further protection, a considerable proportion of the front garden of Ardagh House falls under multiple Sites and Monuments Record (SMR) Zones of Notification (i.e. R166674 and R166679) typically preventing all forms of development therein (Fig. 4).



Fig. 4. SMR Zones of Notification – Ardagh House Demesne

Supporting Draft County Development Plan policy applicable to Ardagh House Demesne and to the above includes:

- CPO11.30 Encourage the protection and enhancement of heritage gardens and demesne landscapes, and to support, in consultation with the owners, the provision of public access to these sites as appropriate.
- CPO11.31 Discourage development that would adversely affect the character, the principal components of, or the setting of historic parks, gardens and demesnes of heritage significance.

 CPO11.32 Require that proposals for development in designated landscapes and demesnes include an appraisal of the landscape, designed views and vistas, including a tree survey, where relevant, in order to inform site appropriate design proposals and ensure the on-going and future sustainability of the estate.

The Local Authority notes a previous submission (Reference: DCDP-40) made during the Second Stage Public Consolation by agent 'Mark Cunningham Design and Planning' on behalf of Ardagh Demesne Limited (i.e. Ardagh House Demesne owner) requesting "that the wording for the 'Tourism' zoning should be changed to allow for agricultural development" in line with its current use.

The Local Authority's subsequent de-zoning and rezoning of 'Tourism' zoned lands to 'Recreational / Amenity and Green Space' has seen a further submission (Reference DCDP No. 38) by 'Mark Cunningham Design & Planning' on behalf of the owner at the Third Stage Public Consolation period requested the that the majority of proposed rezoning and rezoning measures be reversed.

Longford County Council considers the reversal of such zonings expressed within DCDP-38 would threaten the integrity and presentation of Ardagh House Demesne from its most sensitive aspect (i.e. from Ardagh Village). To maintain the 'Tourism' zoning to land parcel No. 25 would render such lands susceptible to the most disorderly forms for development (e.g. campsites)

- Zoning Protection (Ardagh House and 2 no. Gate Lodges)

The opposition to the rezoning of lands relating to Ardagh House and Outbuildings, and the 2 no. Gate Lodges to 'Residential' is noted.

Albeit altered in c.1826, Ardagh House was designed and built in c.1730 as a County House (i.e. Residential), and the 2 no. Gate Lodges of 'Villa Maria Gate Lodge' and the 'West Lodge' built in c.1863 for the sole purpose of residential use. Longford County Council therefore considers the rezoning of lands to 'Residential' accommodating such structures to more accurately reflect the originally intended, current and proposed use.

The proposed rezoning has also been made in light of Ardagh House having remained unoccupied for the past c.15 years while under 'Tourism' zoning and under increasing threat of further deterioration and vandalism. Longford County Council notes the Department of Arts, Heritage and the Gaeltacht's 'Architectural Heritage Protection – Guidelines for Planning Authorities under Section 17.1.1 citing "many protected structures may be particularly vulnerable … because of their remoteness or lack of occupancy".

The property has also been without development from the less restrictive 'development envelope' zoning of the 2009 – 2015 County Development Plan, post vacancy by the Sisters of Mercy in c.2006, and prior to its current 'Tourism' zoning.

Longford County Council considers the 'Residential' zoning applied to Ardagh House, Outhouses and the 2 no. Gate Lodges far exceeds in the heritage protection afforded to the structures when compared to the 'Tourism' zoning prior.

The rezoning of these structures to Residential follows a near 300-year-old use for that very purpose, albeit partially interrupted by the St. Brigit's Training College while in the ownership of the Sisters of Mercy. To maintain the 'Tourism' zoning would run contrary to the structures intended residential and agricultural use of such structures, and against best practice heritage guidelines.

- Architectural Conservation Area (ACA) - Ardagh Village

Ardagh Village is one of only two Architectural Conservation Areas (ACAs) designated and mapped in Appendix 6: Built and Cultural Heritage of the Draft County Development Plan (Fig. 5).

An Architectural Conservation Area (ACA) is a place, area, group of structures or townscape, taking account of building lines and heights, that is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest or that contributes to the appreciation of a protected structure, and whose character it is an objective of a development plan to preserve.

ACAs are protected under legislation contained in Chapter II of Part IV of the Planning and Development Act 2000 (As Amended). Specific policies supporting their protection are found in Chapter 11: Built and Cultural Heritage under CPO 11.25 to CPO11.28 inclusive. CPO11.26 seek to "protect the character of Architectural Conservation Areas in County Longford and ensure the preservation of the character of the Architectural Conservation Area". Specific ACA development management standards are also identified in Chapter 16 under DMS16.191 to DMS16.194 inclusive. Notably DMS16.194 outlines that "the Council will only normally permit development proposals in an ACA where the following criteria are met:

- a) The development preserves and enhances the character of the area.
- b) The development is in sympathy with the built form of the area.
- c) The form, scale, materials and detailing of the development respects the characteristics of the area.
- d) Where appropriate, views of importance, including within, into and out of the area are preserved.
- e) Landscape features of significance, including important strands of trees and hedgerows that contribute to the character of the area are protected.
- f) The development shall not result in any environmental problems such as noise or nuisance which would be detrimental to the particular character of the area."

The entirety of Ardagh Demesne, including Ardagh House and Outbuildings, 2 no. Gate Lodges and the area referred to as Ardagh Neighbourhood Park within the ACA envelope will continue to be afforded the above level of interrogation and protection.

Longford County Council considers Ardagh House Demesne's continued status within an ACA and extensive RPSs contained within to be the primary and most appropriate form of protection at the Local Authority's disposal.

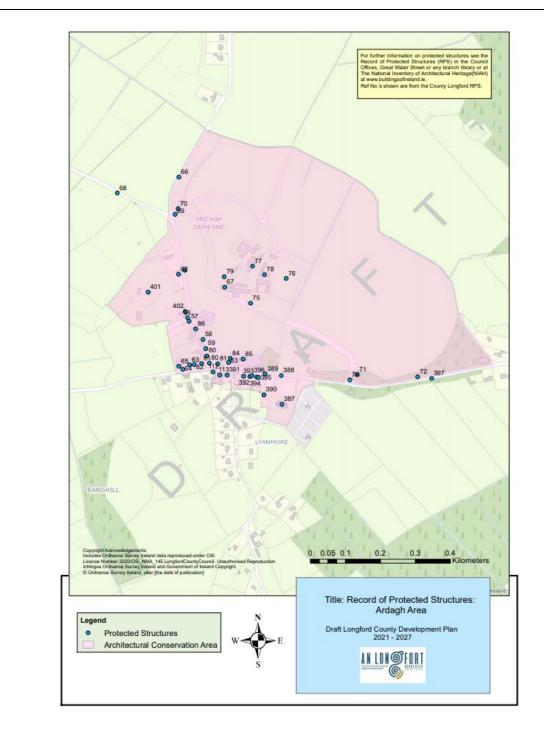


Fig. 5. Ardagh Village – Architectural Conservation Area (ACA) and Record of Protected Structures (RPSs)

- Record of Protected Structures (RPS)

The legal protection afforded to the RPSs and importantly extending to the lands within its curtilage is considered more than adequate in preventing undesirable and inappropriate development threatening the integrity of Ardagh Demesne and Village.

RPSs are protected under Part IV of the Planning and Development Act 2000 (As Amended). This means that owners and occupiers must ensure that the structure or any element of a protected structure is not endangered through harm, decay or damage, whether over a short of long period, through neglect or through direct or indirect means.

As per Part 1, S2, (b) of the Planning and Development Act 2000 Act, protection to protected structures also extends to:

- (i) the interior of the structure,
- (ii) the land lying within the curtilage of the structure,
- (iii) any other structures lying within that curtilage and their interiors, and
- (iv) all fixtures and features which form part of the interior or exterior of any structure or structures referred to in subparagraph (i) or (iii)

Ardagh Demesne benefits for 12 no. RPSs within the historical walled enclosure of Ardagh House Demesne (Fig. 9) as listed below and contained within the land folio LD17314F and in the ownership of Ardagh Demesne Limited.

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67 – Ardagh House (incl. Walls and Railings);
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69 - Entrance (incl. Boundary Railings and Gates);

70 - Gate Lodge (incl. Boundary Walls, Gates and Pillars);

71 – Gate Lodge (incl. Piers and Gates);

72 - Walls;

73 - Walls;

74 – Entrance:

75 – Stable Yard:

76 - Walled Garden;

77 - Dairy;

78 - Farm Buildings:

79 – Railings, Gateposts, Gates and Fencing (incl. Piers and Gates);

Of note and further to notified storm damage to a front elevation window of Ardagh House (winter 2017) and subsequent engagement with An Taisce, the current owner facilitated an open and lengthy Longford County Council visit to Ardagh House, Outbuildings and Grounds. The condition of Ardagh House was found to be in good order, weather-tight, and tidy, with no evidence of roof damage or leaks.

On foot of the inspection, Longford County Council required that a 'Conversation Management Plan' be submitted by a suitably qualified professional for the Planning Authority approval. In the Autumn of 2018 Longford County Council received such a request with 'Maintenance Checklist' from RIAI Conservation Architect, Jane Meade. Longford County Council continue to assess the condition and maintenance progress of Ardagh House against commitments made therein.

Policy CPO11.15 of the current Draft County Development Plan follows such measures applied by Longford County Council in "ensur(ing) the protection of structures included in the Record of Protected Structures" such as Ardagh House by:

- Controlling development which would alter the character of Protected Structures and proposed Protected Structures;
- Monitoring the condition of Protected Structures and proposed protected structures to identify those endangered by neglect, vandalism or unauthorised development and taking appropriate action;
- Preventing the endangerment of Protected Structures in the Council's ownership.

CPO11.20 of the Draft County Development Plan reinforces such measures at the disposal of Longford County Council in ensuring the protection of "setting of Protected Structures and (to) refuse permission for development within the curtilage or adjacent to a Protected Structure which would adversely impact on the character and special interest of the structure, where appropriate", irrespective of zoning.

Testimony to the architectural richness of Ardagh House Demesne, the Department of the Environment, Heritage and Local Government have also 16 no. National Inventory of Architectural Heritage (NIAH) structures registered within its confines. The inventory provides an invaluable source of information on the selected structures and to which Longford County Council refer to in all related planning applications.

Current Draft County Development Plan Policy CPO11.7 commits to "ensur(ing) that proposals for development to structures included as part of the National Inventory of Architectural Heritage (DoEHLG) and any updated version, maintain and enhance the character of these structures".

Chief Executive's Recommendation:

The contents of the submissions relating to Ardagh House Demesne are welcomed and concerns raised within recognised by Longford County Council.

Longford County Council considers Ardagh House Demesne's multiple RPS listings, it's Architecture Conservation Area (ACA) status and extensive policy provision within the Draft County Development Plan provide the most robust form of protection for Ardagh House Demesne and Village.

The zonings proposed within compliment such measures and objectives while culturing the most sensitive and appropriate forms of development.

Having considered the foregoing, it is recommended that the Development Plan be made with the proposed Material Amendment as displayed:

- Proposed Amendment

Addition of the area commonly referred to as 'Ardagh Neighbourhood / Community Park' onto the titled 'Longford County Important Stands of Trees' map as set out in Appendix 7 (Natural Heritage and Environment).

Proposed Amendment CH XX		
Section	Heading	Page no.
Appendix 7	Longford County Important Stands of Trees Map	237

4.4.2 Clondra

Proposed Amendment AP.1E.17

Details of the amendment:

Remove the 'Tourism/Mixed Use with Provision Marina" zoned lands in Clondra and de-zone the identified lands to Agricultural use

Submission(s) Received: Sub-68

Summary of the Issues raised in the Submission(s):

Sub-68 considers the change of land zoning from "Tourism" to "No Zoning" on lands at Clondra in the Draft Longford County Development Plan 2021-2027 to be unacceptable. The submission notes that there has been substantial investment into architects and hydrological consultants with regards to the lands.

Chief Executive's Response:

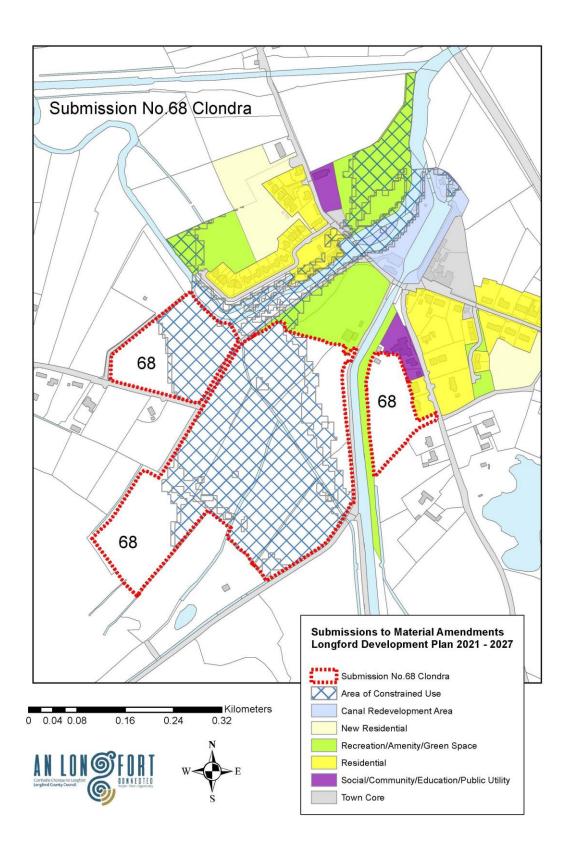
The comments from the OPR are noted in respect of the identified over zoning of lands within the settlements. It is also noted that much of this site is within Flood Risk Zone A/B. The previous zoning of Tourism/Mixed Use with Provision of Marina site provides for mixed use and marina development, including residential uses, compatible social and community facilities, local shopping and commercial facilities, recreational facilities, open spaces and supporting tourism development. Some of these developments are Highly Vulnerable and are considered inappropriate for Flood Zone A and B. Accordingly, it was recommended that any further development on these "Constrained Land Use" zoned lands will not be permitted and that no other land use zoning should be indicated on these lands.

As a consequence, it is considered appropriate to de-zone the lands to "No Zoning".

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional zoning to be included as part of the Plan at this time. It is considered that there are sufficient lands provided for in the Draft Plan for development for the duration of the Plan, given the anticipated demand.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment AP.1DE.17



Proposed Amendment AP.1E.18

Details of the amendment:

Amend the Land Use Zoning maps to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for each settlement incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Clondra: Proposed Material Amendment Map:

Land parcel no. 1, 2, - 'New Residential' zoning;

Land parcel no. 7 – 'Residential' zoning;

Submission(s) Received: No. 33

Summary of the Issues raised in the Submission(s):

The submission welcomes and supports the inclusion of the proposed additional policy objectives on nature conservation

However, the Department is concerned that the Draft Longford County Development Plan 2021-2027 Material Alterations Volume II Appendix-Material Amendment AP.IE.18 (pg 68-69) for Clondra includes an area with an elevated risk of flooding. Proposed Material Alteration AP.IE.18 would not be in compliance with The Planning System and Flood Risk Management Guidelines for Planning Authorities (DEHLG/OPW, 2009) and would provide for new vulnerable development on lands, some of which are at elevated risk from flooding.

Chief Executive's Response:

Please refer to the response to the Office of the Planning Regulator submission. There are significant overlaps between the OPR and DAU submission submissions relating to flood risk management. As per the OPR recommendation number 04, the Planning Authority is required to omit proposed rezoning of parcel 1 to 'New Residential' in Clondra which is proposed as part of Material Amendment AP.1E.18 as the land is located in an area that is at risk of flooding.

Chief Executive's Recommendation:

Amend Proposed Amendment AP.1E.18 and associated mapping, as indicated in green strikethrough and green to:

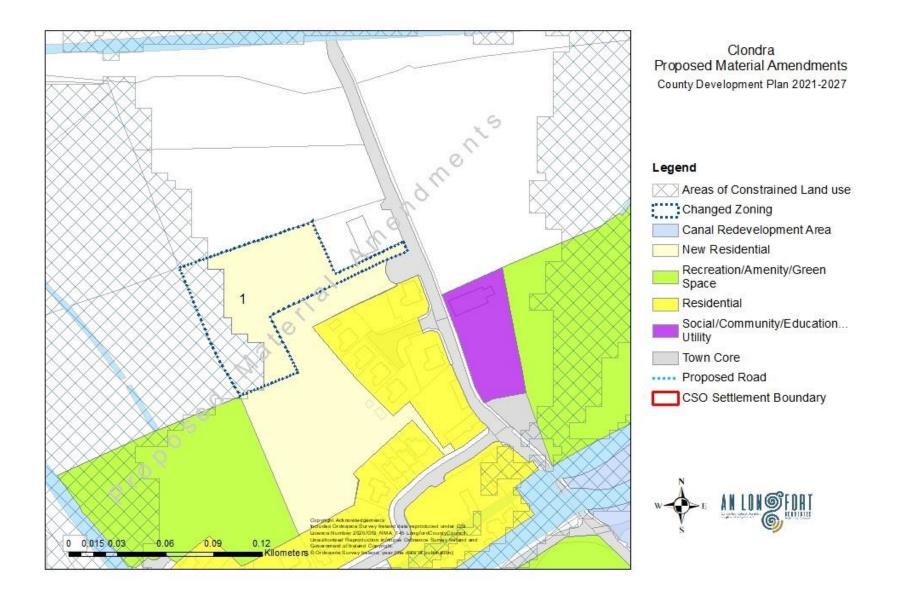
- (i) Omit the portion of the rezoning of parcel 1 to 'New Residential' in Clondra and change to 'No Zoning' which is affect by flood constraints (see map);
- (ii) Include the 'Constrained Land Use' zoning on the Clondra Material Alterations map.

Proposed Amendment AP.1E.18

Amend the Land Use Zoning maps to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for each settlement incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Clondra: Proposed Material Amendment Map: Land parcel no. 1 (part), 2, – 'New Residential' zoning; Land parcel no. 7 – 'Residential' zoning; Land parcel no. 1 (part) – 'No Zoning'.

Include the *Constrained Land Use* zoning on the revised map for Clondra (previously omitted by error on the Material Alterations map).



4.5 Appendix 8 Green Infrastructure

Proposed Amendment AP.8.1

Details of the amendment:

Include an additional map and list of the know rights of way in the County

Submission(s) Received: No. 32

Summary of the Issues raised in the Submission(s):

Sub-32 supports the proposed amendment.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment AP.8.1

5. Volume 3: Annexes

5.1 Annex 5: Infrastructure Assessment Report

Proposed Amendment ANN.5.1

Details of the amendment:

Insert the Infrastructure Assessment Report, used to identify the existing and projected level of infrastructure provision within settlements to accommodate additional development, into the amended Draft Plan.

Submission(s) Received: No. 66

Summary of the Issues raised in the Submission(s):

Sub-66 supports the Proposed Material Alterations to the Draft Plan. The submission notes the addition of a new Annex 5 – Infrastructural Assessment Report which has resulted in changes to the Core Strategy and agrees with the assessment with regard to these changes.

Chief Executive's Response:

The contents of the submission supporting the inclusion of the amendment are noted and welcomed.

Please also refer to the response to the Office of the Planning Regulator submission. The OPR raises concerns that the IAR does not classify the zoned lands in line with the methodology under Appendix 3 of the NPF and does not conclusively distinguish between zoned land that is available for development and zoned land that requires significant further investment in services for infrastructure for development to be realised. Given the extent of the work required to revise the existing IAR and the limited timeframe, the planning authority shall finalise the IAR and implement the Tiered Approach to Zoning through the local area plan preparation process, through the phasing and sequential development of those lands according to the availability or feasibility of delivering services.

Chief Executive's Recommendation:

It is recommended that the Plan be made with Material Amendment ANN.5.1, with the IAR subject to further update in accordance with the OPR requirements before the final adoption of the Plan (a copy of the revisions completed to date on the IAR are enclosed as per Appendix 3. As indicated this will be further updated prior to the final adoption of the Plan).

6. Volume 4: Environmental Reports

6.1 Strategic Environmental Assessment

Strategic Environmental Assessment

Details of the amendment: Strategic Environmental Assessment (live document update)

Submission(s) Received: No. 33

Summary of the Issues raised in the Submission(s):

Sub-34 from the Department of Agriculture, Food and the Marine note that once relevant environmental and planning regulations are met, DAFM has no comment at this stage of the consultation process.

Sub-01 by the EPA refers to a 'self-service approach' guidance document 'SEA of Local Authority Land Use Plans — EPA Recommendations and Resources'. This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority Land Use Plans. It is suggested that this guidance document is taken into account and incorporate the relevant recommendations, in finalising and implementing the Plan.

The submission advises that the Plan should be consistent with key relevant higher-level plans and programmes. Where further changes to the Draft Plan are proposed, these should be screened for likely significant effects in accordance with SEA regulations. They should be subject to the same method of assessment applied in the 'environmental assessment' of the draft plan.

The submission provides advice on the content of the SEA statement and also provides a list of Environmental Authorities that should be consulted with under the SEA regulations

Chief Executive's Response:

Strategic Environmental Assessment (SEA) is the formal, systematic evaluation of the likely significant environmental effects of implementing a plan or programme before a decision is made to adopt it. SEA is being undertaken for the Plan in order to comply with the 2001 SEA Directive, as transposed into Irish Regulations that have been in force since 2004. The SEA and County Development Plan process run in tandem with each other, sharing public consultation phases.

The EPA's 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' document has been and will be taken into account in undertaking the SEA and preparing the Plan.

The Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.

The SEA document will be updated for the adoption of the Plan to take account of decisions of the Members with regard to the Proposed Material Amendments and any further modifications.

Chief Executive's Recommendation:

Await decision on updates to Plan and update SFRA and SEA reports accordingly.

6.2 Strategic Flood Risk Assessment

Strategic Flood Risk Assessment

Details of the amendment: Strategic Flood Risk Assessment (live document update)

Submission(s) Received: No. 19

Summary of the Issues raised in the Submission(s):

Sequential Approach

The Guidelines highlight the need for a Sequential Approach to managing flood risk, using mapped flood zones alongside considerations of the vulnerability of different types of development to give priority to development in zones of low flood probability. Only if there are no reasonable sites available in zones of low flood probability should consideration be given to development in higher flood probability zones. Land use zoning within Flood Zones that would be considered inappropriate or require application of the Justification Test, in accordance with Table 3.2 of the Guidelines, has been proposed in a number of settlements. The 'Comments on Specific Settlements' section below, details those that are proposed in the Plan.

Plan Making Justification Tests

Lands that are predicted to be at risk from flooding are still zoned for development. The Chief Executive's Report states " This requirement did not arise as the levels offlood risk identified by the SFRA were a key informant of land uses in undeveloped areas in Flood Zones A and B. Only appropriate land uses are being proposed for previously undeveloped lands within Flood Zones A and B". Examples of lands zoned for highly vulnerable or less vulnerable in flood risk lands are provided in 'Comments on Specific Settlements' section below.

The Guidelines set out that, at the Plan-making stage, land use zoning be informed by the suitable level of FRA and if necessary a Justification test. Chapter 5 of the Guidelines set out that "most flood risk issues should be raised within strategic assessments undertaken by local authorities at the plan-making stage. Therefore, as more plans are reviewed and zoning reconsidered, there should be less need for development management processes to require detailed flood risk assessment".

As flood risk assessments are integrated with the SEA process, Section 3.10 of the Guidelines also highlights the need that FRA's be "undertaken as early as possible in the process so that the SEA is fully informed of the flood risks and impacts of the proposed zoning or development'.

Please note that the Justification Test applies only to the urban centre (i.e., the core area of a city, town or village which acts as a centre for a broad range of employment, retail, community, residential and transport functions), and would not be applicable to the periphery of urban areas.

If it is the case that these sites are already developed then Circular PL 2/2014 provides further advice and detail to planning authorities on older developed areas of towns and cities located in Flood Zone A and B. "Where the planning authority considers that the existing use zoning is still appropriate, the planning authority must specify the nature and design of structural or non- structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased, or if practicable, will be reduced'.

Proposed Amendment SFRA.1.2 proposes the addition of Table 6: Justification of the Constrained Land Use Approach for Previously Developed Lands. It appears that the table covers a settlement as opposed to a review of an existing zonings within the settlement. All five points to criteria 2 of the Justification Test do not appear to have been assessed, all points must be satisfied. The SFRA recommendation integrated into the Plan for management of risk notes the relevant policies and development management standards for Criteria 3.

Objective CPO 5.108 is referenced, which covers that the Constrained Land Use zoning provisions may apply. However, for these existing developed site I zoning the Constrained Land Use does apply and development is therefore limited to minor development, then this could be clearly stated here within this table with the reference to OMA 16.205 Structural and Non-Structural Risk Management Measures in Flood Vulnerable Zones. There is also a reference to OMS 16.204 Flood Zones and Appropriate Land Uses, which states that 'Where developments/land uses are proposed that are considered inappropriate to the Flood Zone, then a Development Management Justification Test and site-specific Flood Risk Assessment will be required. This objective is not in keeping with the Guidelines as it bypasses the requirement for a Plan-making Justification Test. Finally, there is no overall conclusion if the Justification Test has been satisfied.

For sites that are intended to be zoned for development following the application of a Justification Test, where only a small proportion of the site is at risk of flooding, a policy objective might be attached to such zoning. Such an objective might require that the sequential approach be applied in the site planning, whereby to ensure no encroachment onto, or loss of, the flood plain, only water compatible development such as Open Space would be permitted for the lands which are identified as being at risk of flooding within that site. Planning permission for these sites might then be subject to the sequential approach having been adopted and applied, following a detailed FRA.

Policy Objective

Proposed Amendment CH5.27, includes the addition of text that a site-specific Flood Risk Assessment may be required for Flood Zone C. It should be noted that the flood zones maps should not be used to suggest that any areas are free from flood risk, since they do not include the effects of other forms of flooding such as from groundwater or artificial drainage systems. All flood zones are subject to FRA of flood hazard from other sources, which should assess all potential sources of flooding that may affect the site - from rivers and the sea, streams, surface water run-off, sewers, groundwater, reservoirs, canals and other artificial sources or any combination of these

National Indicative Fluvial Mapping (NIFM)

The OPW acknowledge that National Indicative Fluvial Mapping outputs were not available at the time of development of this Plan. The outputs are now available on request to Local Authorities. While these maps are an improvement on PFRA mapping, they are still indicative maps and the same cautions and limitations as outlined in Circular PL 2/2014 for PFRA should be followed. Please note that NIFM mapping does not cover catchments that were smaller than 5km2.

Consideration of Climate Change Impacts

The OPW welcomes the inclusion of the CFRAM Mid-Range Future Scenario (MRFS) flood extent mapping for the County, however it would be more beneficial if maps were supplied for each settlement to allow the identification of sites/lands vulnerable to climate change. The CFRAM Programme and the NIFM Project produced mapping for the High-End Future Scenario (HEFS).

The OPW recommend that the Draft Plan details how climate change has been considered in the production of this development plan. The Guidelines state that a precautionary approach to climate change should be applied and a cautious approach to zoning in potential transitional areas. Planning authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives.

Arterial Drainage Schemes and Drainage Districts

The OPW had previously commented on the Draft Plan that applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The CE Report in relation to this notes the Council's policy to support the implementation of the Guidelines and Circular PL2/2014, as well as referencing Policy Objectives CPO 5.97 and CPO 5.98, which are the Council's policies to support these. However, Arterial Drainage Schemes and Drainage Districts datasets are not used in the production of flood zones and lands which are not in a flood zone may be in a benefitting land area. The location of Arterial Drainage Schemes and Drainage

Districts have been identified in the Historical Indicator maps in the SFRA and may also be viewed on www.floodinfo.ie.

SuDS and Natural Water Retention Measures

The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites, and also that the SFRA identifies where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

Specific Comments on Specific Settlements;

Longford

The OPW welcomes the proposed alterations to the settlement map to dezone flood risk lands.

Grandard

The OPW welcomes the proposed alterations to the settlement map to dezone flood risk lands. However, the proposed relief road still passes through Flood Zone A and a Plan- making Justification Test would still be required. Highly vulnerable development, including essential infrastructure, is not appropriate in Flood Zone A and B and less vulnerable development, including local transport infrastructure, is not appropriate in Flood Zone A, unless a Plan-making Justification Test completed by the local authority can be satisfied.

Ballymahon

The dezoning of Strategic Residential Reserve sites located within Flood Zone 8 is welcomed by the OPW.

Edgeworthstown

The OPW welcomes the rezoning of Strategic Residential Reserve zoning which was located partially within Flood Zone A as Recreational/ Amenity/ Green Space.

Lanesborough

The OPW welcomes the proposed alterations to the settlement map to dezone flood risk lands

Aughnacliff

The Constrained Land Use zoning with the Zoning Map has been supplied and the OPW welcomes that a portion of the New Residential zoning, which was at flood risk, is proposed to be dezoned.

Drumlish

The OPW welcomes the proposed alterations to the settlement map to dezone flood risk lands.

Legan

The dezoning of Strategic Residential Reserve partially located within Flood Zone A is welcomed by the OPW.

Abbeyshrule

The dezoning of potential sites within the established Residential area is welcomed by the OPW. It is proposed to rezone parcel no. 3 from Recreation/ Amenity/ Green Space to New Residential, it can be seen from the previous land use zoning map that this site is slightly within the Constrained Land Use zoning. Please note the 'Plan-making Justification Tests' section above in relation to sites where only a small proportion of the site is at risk of flooding Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A, unless a Plan-making Justification Test completed by the local authority can be satisfied.

Ballinamuck

There is still an area of undeveloped Town Centre lands partially located in Flood Zone A Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A, unless a Planmaking Justification Test completed by the local authority can be satisfied.

Clondra

Proposed Amendment SFRA.1.1 in Volume 4: Environmental & Flood Reports states "One Proposed Material Alteration (Residential extension northwards from Draft Plan Clondra plan area - refer to SEA Environmental Report on Proposed Material Alterations for more detail) would not be in compliance with the Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014. Further modification would be required to this change to avoid the Flood Zone". The detail provided in the SEA Environmental Report on Proposed Material Alterations is that " Proposed Material Alteration Reference AP.1E.18 does not comply with the Guidelines as it proposes incompatible New Residential Zoning in an area of elevated flood risk that would fail the Justification Test under the Guidelines". This appears to refer to parcel No. 1, which proposes extending the settlement boundary for New Residential zoning. The Constrained Land Use zoning was not updated on the revised map for Clondra. New Residential, classified as highly vulnerable development type, has been zoned in a flood risk area. Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A, unless a Plan-making Justification Test completed by the local authority can be satisfied. If all three criteria of the Planmaking Justification Test cannot be satisfied then the site should be rezoned as Open Space.

The OPW welcomes the dezoning of Tourism/Mixed Use with Provision of Marina sites, which had allowed for mixed use and marina developmen,t including residential uses, compatible social and community facilities, local shopping and commercial facilities, recreational facilities, open spaces and supporting tourism development. Some of these developments are classified as highly vulnerable and are considered inappropriate for Flood Zone A and B.

Chief Executive's Response:

Sequential approach

Responded to under Comments on Specific Settlements below – changes to Plan recommended as advised by OPW.

Plan making justification tests

The Plan-level Justification Test has been applied settlement by settlement and all previously developed lands within each settlement that have been zoned for what would be otherwise inappropriate uses are considered collectively under the 3 no. criteria identified on page 37 of the 2009 Guidelines.

The findings of the Justification Tests are provided on Table 6 as cited. The 3 no. criteria from the Guidelines form part of the first row of the table). Criterion no. 2 includes five points and these have been taken into account by the Justification Tests and are reproduced. All of the criteria are reproduced in full in Appendix I of the SFRA that accompanies the Draft Plan.

In response to the submission, it is considered that a finer granularity to the Justification Tests provided on Table 6 of the SFRA report can be provided, making more specific reference to the lands in question and to the five points under Criterion no. 2.

Future development on Constrained Land Use lands is limited to minor development where plan-making Justification Tests have not been undertaken and the Constrained Land Use applies. Refer also to amendment to CPO 5.108 identified in response to the OPR's submission.

DMS 16.204 is intended to be consistent with the Guidelines. It is recommended to further modify DMS 16.204 for clarity as follows;

DMS16.204 Flood Zones and Appropriate Land Uses

....Where developments/land uses are proposed that are considered inappropriate to the Flood Zone that may be identified in the future at project level following adoption of the Plan, then a Development Management Justification Test and site-specific Flood Risk Assessment will be required in accordance with The Planning System and Flood Risk Management Guidelines 2009 (and as updated).....

Policy Objective

Noted. It is recommended to further modify CPO 5.98 as follows (new text proposed in response to this part of the submission in **green**, new text proposed in response to other part of the submission in green <u>underline</u>):

CPO 5.98 Protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in DMS 16.204. Where a development/land use is proposed that is inappropriate within the Flood Zone, then the development proposal will need to be accompanied by a Development Management Justification Test and site-specific Flood Risk Assessment in accordance with the criteria set out under with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 and Circular PL2/2014 (as updated/superseded).

In Flood Zone C, (Please also refer to Development Management Standard, Development Management Standard, DMS 16.204, where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed. The County Plan SFRA datasets and the most up to date CFRAM Programme climate scenario mapping should be consulted by prospective applicants for developments in this regard and will be made available to lower-tier Development Management processes in the Council.

Flood Zone maps should not be used to suggest that any areas are free from flood risk as they do not include groundwater or artificial drainage system flood risk.

Applications for development on land identified as Benefitting Land (under Arterial Drainage Schemes /Drainage Districts) may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The Council will ensure that new developments proposed in Arterial Drainage Schemes and Drainage Districts do not result in a significant negative impact on the integrity, function and management of these areas.

National Indicative Fluvial Mapping (NIFM)

Noted. As detailed under the text to be added to under the Proposed Material Alterations:

"SFRA datasets will be made available to the lower-tier forward planning and Development Management and associated SFRA/FRA processes in the Council." (CPO 5.108)

"The County Plan SFRA datasets and the most up to date CFRAM Programme climate scenario mapping should be consulted by prospective applicants for

developments in this regard and will be made available to lower-tier Development Management processes in the Council." (CPO 5.98)

Consideration of Climate Change Impacts

Noted. These climate change considerations have been integrated into the Plan. The following text will be added to the Plan:

"Climate Change and Flooding

'The Planning System and Flood Risk Management Guidelines for Planning Authorities and Technical Appendices, 2009' recommends that a precautionary approach to climate change is adopted due to the level of uncertainty involved in the potential effects. In contributing towards compliance with the Guidelines, climate change scenario mapping has been added to the SFRA that accompanies the Plan.

The Plan requires that the SFRA mapping and the most up to date CFRAM Programme climate scenario mapping is consulted by prospective applicants for developments and that it is made available to lower-tier Development Management processes in the Council.

CPOs 5.97 and 5.99 require that any flood risk assessment includes an assessment of the potential impacts of climate change, such as an increase in the extent or probability of flooding, and any associated measures necessary to address these impacts. DMS16.205 requires applications for development in flood vulnerable zones to provide details of structural and non-structural risk management measures to include issues such as floor levels."

Arterial Drainage Schemes and Drainage Districts

Noted. It is recommended to further CPO 5.98 as follows (new text proposed in response to this part of the submission in green, new text proposed in response to other part of the submission in green <u>underline</u>):

CPO 5.98 Protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in DMS 16.204. Where a development/land use is proposed that is inappropriate within the Flood Zone, then the development proposal will need to be accompanied by a Development Management Justification Test and site-specific Flood Risk Assessment in accordance with the criteria set out under with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 and Circular PL2/2014 (as updated/superseded).

In Flood Zone C, (Please also refer to Development Management Standard, Development Management Standard, DMS 16.204, where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed. The County Plan SFRA datasets and the most up to date CFRAM Programme climate scenario mapping should be consulted by prospective applicants for developments in this regard and will be made available to lower-tier Development Management processes in the Council.

Flood Zone maps should not be used to suggest that any areas are free from flood risk as they do not include groundwater or artificial drainage system flood risk.

Applications for development on land identified as Benefitting Land (under Arterial Drainage Schemes /Drainage Districts) may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The Council will ensure that new developments proposed in Arterial Drainage Schemes and Drainage Districts do not result in a significant negative impact on the integrity, function and management of these areas.

SuDS and Natural Water Retention Measures

Noted

Longford

Noted.

Granard

It is proposed to replace the Transport and Utility Objective with a Reservation Objective as follows;

Transport and Utility Objective

To facilitate the provision of necessary road infrastructure

A strategic road corridor will be reserved to facilitate the provision of a relief road to bypass the town along the N55.

Reservation Objective

To reserve these lands free from development that would hinder the future sustainable development of the town.

A strategic corridor will be reserved. Future development within this corridor (such as a relief road to bypass the town along the N55) would need to be provided for and subject to a Plan-level SFRA.

Ballymahon

Noted.

Noted.
Lanesborough Noted.
Aughnacliff Noted.
Drumlish Noted.
Legan Noted.
Abbeyshrule Established Residential Comment:
Noted. Parcel 3: New Residential Comment: Agreed, New Residential Zoning needs to be amended so that flood area is omitted.
Ballinamuck Agreed. Town Centre Zoning needs to be amended so that flood area is omitted.
Clondra New Residential Comment: Agreed. New residential zoning needs to be amended so that flood area is omitted.
Marina/Tourism Comment: Noted.
Chief Executive's Recommendation:
Recommendation Await decision on updates to Plan and update SFRA and SEA reports accordingly.
Recommendation To provide a finer granularity to the Justification Tests provided on SFRA Table 6 (Proposed Material Alteration) of the SFRA report, including identifying both the

Edgeworthstown

lands in question and the five points under Criterion no. 2.

To also identify at SFRA Table 6 (Proposed Material Alteration) that:

"Future development on Constrained Land Use lands is limited to minor development where plan-making Justification Tests have not been undertaken and the Constrained Land Use applies."

Recommendation

It is recommended to further modify DMS 16.204 for clarity as follows;

DMS16.204 Flood Zones and Appropriate Land Uses

....Where developments/land uses are proposed that are considered inappropriate to the Flood Zone that may be identified in the future at project level following adoption of the Plan, then a Development Management Justification Test and site-specific Flood Risk Assessment will be required in accordance with The Planning System and Flood Risk Management Guidelines 2009 (and as updated).....

Recommendation:

It is recommended to further modify CPO 5.98 as follows:

CPO 5.98 Protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in DMS 16.204. Where a development/land use is proposed that is inappropriate within the Flood Zone, then the development proposal will need to be accompanied by a Development Management Justification Test and site-specific Flood Risk Assessment in accordance with the criteria set out under with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 and Circular PL2/2014 (as updated/superseded).

In Flood Zone C, (Please also refer to Development Management Standard, Development Management Standard, DMS 16.204, where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed. The County Plan SFRA datasets and the most up to date CFRAM Programme climate scenario mapping should be consulted by prospective applicants for developments in this regard and will be made available to lower-tier Development Management processes in the Council.

Flood Zone maps should not be used to suggest that any areas are free from flood risk as they do not include groundwater or artificial drainage system flood risk.

Applications for development on land identified as Benefitting Land (under Arterial Drainage Schemes /Drainage Districts) may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The Council will ensure that new developments proposed in Arterial Drainage Schemes and Drainage Districts do not result in a significant negative impact on the integrity, function and management of these areas.

Recommendation

The following text will be added to the Plan:

"Climate Change and Flooding

'The Planning System and Flood Risk Management Guidelines for Planning Authorities and Technical Appendices, 2009' recommends that a precautionary approach to climate change is adopted due to the level of uncertainty involved in the potential effects. In contributing towards compliance with the Guidelines, climate change scenario mapping has been added to the SFRA that accompanies the Plan.

The Plan requires that the SFRA mapping and the most up to date CFRAM Programme climate scenario mapping is consulted by prospective applicants for developments and that it is made available to lower-tier Development Management processes in the Council.

CPOs 5.97 and 5.99 require that any flood risk assessment includes an assessment of the potential impacts of climate change, such as an increase in the extent or probability of flooding, and any associated measures necessary to address these impacts. DMS16.205 requires applications for development in flood vulnerable zones to provide details of structural and non-structural risk management measures to include issues such as floor levels."

Recommendation

To insert the following text into the SFRA under a new subsection titled "Sustainable Drainage Systems":

Various provisions in the Plan address sustainable drainage systems and surface water management, including CPO 5.85, CPO 5.89, CPO 5.90, CPO 5.91, CPO 5.92, CPO 5.93 and CPO 5.94.

SuDS include devices such as swales, permeable pavements, filter drains, storage ponds, constructed wetlands, soakways and green roofs. In some exceptional cases, and at the discretion of the Council, where it is demonstrated that SuDS devices are not feasible, approval may be given to install underground attenuation tanks or enlarged pipes in conjunction with other devices to achieve the required water quality. Such alternative measures will only be considered as a last resort.

Proposals for surface water attenuation systems should include maintenance proposals and procedures.

Development proposals will be required to be accompanied by a comprehensive SuDS assessment that addresses run-off rate, run-off quality and its impact on the existing habitat and water quality.

This approach using SuDS offers a total solution to rainwater management and is applicable in both urban and rural situations. Current best practice guidance on

SuDS is available from the Guidance Documents produced by the Greater Dublin Strategic Drainage Study (GDSDS).

Recommendation

Granard

It is proposed to replace the Transport and Utility Objective with a Reservation Objective as follows;

Transport and Utility Objective

To facilitate the provision of necessary road infrastructure

A strategic road corridor will be reserved to facilitate the provision of a relief road to bypass the town along the N55.

Reservation Objective

To reserve these lands free from development that would hinder the future sustainable development of the town.

A strategic corridor will be reserved. Future development within this corridor (such as a relief road to bypass the town along the N55) would need to be provided for and subject to a Plan-level SFRA.

Abbeyshrule

Amend Proposed Amendment AP.1E.4 and associated mapping, as indicated in green strikethrough and green to:

- (i) Omit the portion of the rezoning of parcel 3 to 'New Residential' in Clondra and change to 'No Zoning' which is affect by flood constraints (see map);
- (ii) Include the 'Constrained Land Use' zoning on the Abbeyshrule Material Alterations map.

Proposed Amendment AP.1E.4

Amend the Land Use Zoning map of the Draft Plan to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for each settlement incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Abbeyshrule: Proposed Material Amendment Map:

Land parcel no. 1, 2, 3 – 'New Residential'.

Land parcel no. 4,5,6,7 - no zoning.

Ballinamuck

Omit the portion of the 'Town Centre' zoning which is affect by flood constraints (see map) in Ballinamuck and change to 'No Zoning'

Clondra

Amend Proposed Amendment AP.1E.18 and associated mapping, as indicated in green strikethrough and green to:

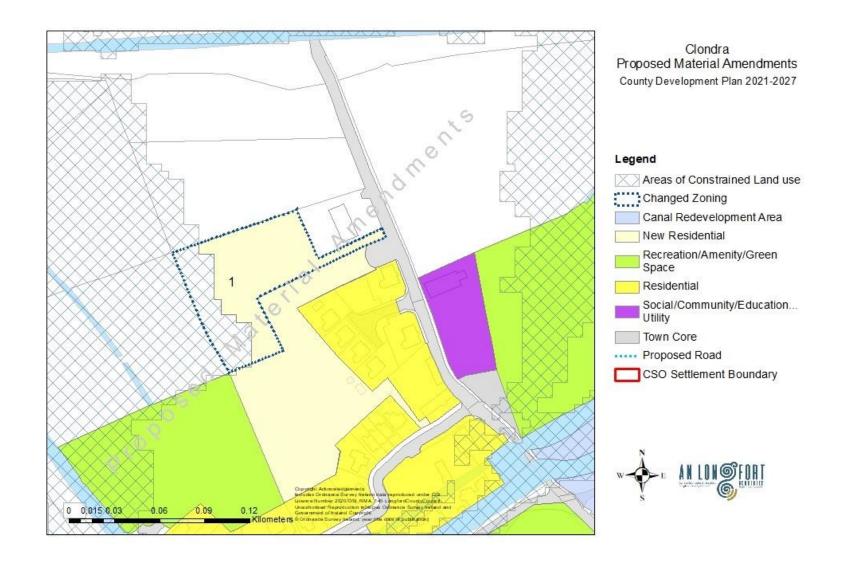
- (i) Omit the portion of the rezoning of parcel 1 to 'New Residential' in Clondra and change to 'No Zoning' which is affect by flood constraints (see map);
- (ii) Include the 'Constrained Land Use' zoning on the Clondra Material Alterations map.

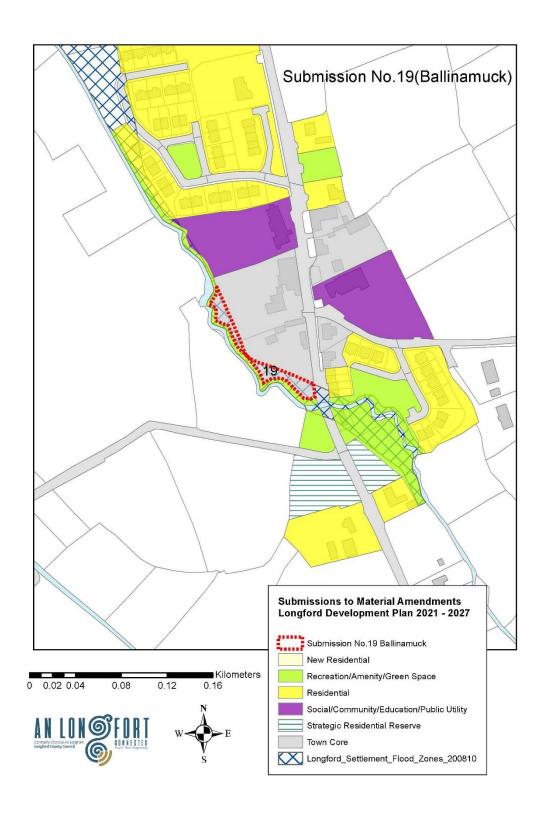
Proposed Amendment AP.1E.18

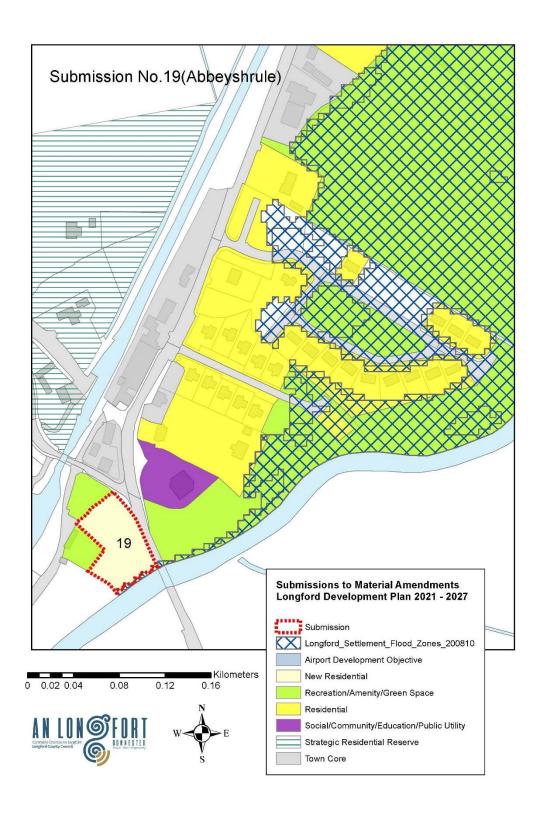
Amend the Land Use Zoning maps to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for each settlement incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Clondra: Proposed Material Amendment Map: Land parcel no. 1 (part), 2, – 'New Residential' zoning; Land parcel no. 7 – 'Residential' zoning; Land parcel no. 1 (part) – 'No Zoning'.

Include the *Constrained Land Use* zoning on the revised map for Clondra (previously omitted by error on the Material Alterations map).







Appendix 1: Submissions received within Timeframe - Material Amendments to Draft County Longford Development Plan 2021 - 2027

Reference No.	Person/Organisation						
SUB-01	EPA						
SUB-02	SERI						
SUB-03	Dept. Environment & Communications						
SUB-04	TII						
SUB-05	ESB						
SUB-06	Department of Transport						
SUB-07	Mary Ward						
SUB-08	Granardkille Residents						
SUB-09	Eirgrid						
SUB-10	Adaview Ltd						
SUB-11	Robert Dowds						
SUB-12	David and Desmond Mulvihill						
SUB-13	Ann Gerety Smyth						
SUB-14	Samantha Gavigan						
SUB-15	Ray O'Sullivan						
SUB-16 Creative Ardagh							
SUB-17 Joanna Pearman							
SUB-18	NWRA						
SUB-19	OPW						
SUB-20	Liam & Peter Davis						

SUB-21	Seamus McGovern						
SUB-22	LPJ Contractors Ltd						
SUB-23	Brian Gorman						
SUB-24	Eamon Crowe						
SUB-25	Camlim Partnership						
SUB-26	Brendan Quinn						
SUB-27	William Smyth						
SUB-28	Ardagh Preservation Society						
SUB-29	Francesca Pawelczyk						
SUB-30	Ray Yorke						
SUB-31	Christy Boylan						
SUB-32	Keep Ireland Open						
SUB-33	Department of Housing, Local Government and Heritage						
SUB-34	Department of Agriculture, Food and Marine						
SUB-35	Pat Faughan						
SUB-36	OPR						
SUB-37	Raymond Farrell						
SUB-38	Ardagh Demesne Limited						
SUB-39	John McCarthy						
SUB-40	Emer O'Meara						
SUB-41	Ardagh Girl Guides						
SUB-42	Patricia Hayes						
SUB-43	Longford Federation ICA						

SUB-44	James Howard						
SUB-45	Wallace Howard						
SUB-46	LPJ Contractors Ltd						
SUB-47	NTA						
SUB-48	Department of Education						
SUB-49	Harry Pearman-Howard						
SUB-50	Donna Reilly						
SUB-51	Deirdre Green						
SUB-52	Mary Smyth						
SUB-53	Wind Energy Ireland						
SUB-54	Deputy Sorcha Clarke						
SUB-55	Longford Green Earth						
SUB-56 Emmet McEvoy							
SUB-57 Gerry McEvoy							
SUB-58 Sean Kelly							
SUB-59 Richella Duggan							
SUB-60	Sr. Maura Brid McGarry						
SUB-61	Sr. Rosarii Beirne						
SUB-62	Sarah Jane Carr						
SUB-63	Bord na Mona						
SUB-64	Gas Networks Ireland						
SUB-65	County Longford Traveller Primary Health Care Project						
SUB-66	Irish Water						

SUB-67	Mid Shannon Wilderness Park Awareness Group
SUB-68	Ray Brogan

Appendix 2: Submissions received outside of Timeframe - Material Amendments to Draft Longford County Development Plan 2021 - 2027

Date Received	Name
07/07/2021	Frank Ennis Associates
12/08/2021	H2B Architects

APPENDIX 3

INFRASTRUCTURE ASSESSMENT REPORT – REVISIONS COMPLETED TO DATE (7TH SEPTEMBER 2021)

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This report has been developed in order to provide an assessment of available infrastructure to service the Settlements of County Longford and inform the County Development Plan and the land zoning assessment of the hierarchy of settlements in the Plan

The National Planning Framework (NPF) emphasises the requirement for better linkage between the zoning of land for development and the availability of or investment in infrastructure that is required to facilitate development. The following three National Policy Objectives (NPOs) are relevant:

NPO 72a: Planning authorities will be required to apply a standardised, tiered approach to differentiate between (i) zoned land that is serviced and (ii) zoned land that is serviceable within the life of the plan.

NPO 72b: When considering zoning land for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages.

NPO 72c: When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development.

The NPF further states that an Infrastructural Assessment must be aligned with the approved infrastructural investment programme(s) of the relevant delivery agency(ies), or be based on a written commitment by the relevant delivery agency to provide the identified infrastructure within a specified timescale (i.e. within the lifetime of the plan). The Planning Authority may also commit to the delivery of the required and identified infrastructure in its own infrastructural investment programme (i.e. Budgeted Capital Programme) in order to support certain lands for zoning. The Infrastructural Assessment must include a reasonable estimate of the full cost of delivery of the required infrastructure to the identified zoned lands.

Further guidance will be provided by the Department Housing, Planning and Local Government in respect of Infrastructural Assessments in updated Statutory Guidelines that will be issued under Section 28 of the Planning & Development Act 2000 (as amended).

The purpose of this report is therefore to:

- Identify potential sites for residential and employment zoning within the main settlement hierarchy of County Longford;
- Examine the suitability of a site for future development based on NPF objectives, the RSES and the Draft Longford County Development Plan 2021-2027 etc:
- Assess the infrastructure requirements to service each site;

- Assess and weight the planning and serviceability/infrastructural provision for each site to enable a Tier to be assigned, as may be applicable; and
- Where sites are identified as Tier 1 or Tier 2 lands, the assessment should clearly identify the likely development services required to support new development and where possible provide an indicative timeframe for delivery i.e. short to medium term or longer term.

It noted from the outset, in terms of reasonable estimate of costs, that Irish Water, has indicated that it does not have resources or capacity to carry out such an exercise and therefore no costings have been provided in terms of water services.

It should be noted that this report forms a working draft of the overall Infrastructure Assessment Report owing to recommended amendments to land use zonings arising from the public consultation process of the plan, as well as recommendations from prescribed bodies such as the office of the Planning Regulator (OPR), the Eastern and Midland Regional Assembly (EMRA) and the Office of Public Works, among others. Moreover, the Water Services Section and Environment Section of Longford County Council are currently undertaking an assessment of estimated costs for future infrastructure provisions with the aim of providing this estimated costing with the finalised Infrastructure Assessment Report to be inserted into the amended Draft Plan.

It is noted that Irish Water are proposing to undertake a detailed review and assessment of infrastructure capacity across the County and hope to produce their report within the next 3 years; as this more detailed information and assessments become available it is proposed that it will link into the review of the Longford Town Plan and the future review of the County Development Plan.

There have been a number of significant developments which will influence future land use zoning in County Development Plans and Local Area Plans In particular, the National Planning Framework (NPF) sets out a tiered approach for zoning lands as discussed in Section 1 of this report. The following National Policy Objectives are relevant:

- National Policy Objective 72a: 'Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan'.
- National Policy Objective 72b: 'When considering zoning lands for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages'.
- National Policy Objective 72c: 'When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development'.

The NPF places an emphasises on the need for compact, smart and sustainable growth and requires 30% of all new housing to be within existing urban footprints (outside of the five cities), thus reducing the amount of greenfield land required to meet future housing requirements.

Moreover, the NPF specifically discusses the prioritising of development lands and states that there are "<u>many other planning considerations relevant to land zoning beyond the provision of basic enabling infrastructure</u> including overall planned levels of growth, location, suitability for the type of development envisaged, availability of and proximity to amenities, schools, shops or employment, accessibility to transport services etc. Weighing up all of these factors, together with the availability of infrastructure, will assist planning authorities in determining an order of priority to deliver planned growth and development" (emphasis added).

The NPF further notes that Guidance will be issued under Section 28 of the Planning and Development Act 2000 (as amended) in relation to infrastructural assessments.

Appendix 3 of the NPF provides a methodology for a tiered approach to land zoning as referred to in NPO 72a. The implementation of this tiered approach allows for greater co-ordination between land use zoning and infrastructure availability. Appendix 3 of the NPF provides a description of Tier 1 (Serviced Zoned Land) and Tier 2 (Serviceable Zoned Land) as follows:

Tier 1: Serviced Zoned Land

Land that is able to connect to existing development services i.e. road and footpath access, public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available.

Tier 2: Serviceable Zoned Land

Land that is not currently sufficiently serviced to support new development but has the potential to become fully serviced within the life of the Plan. The potential for the delivery of the required services and / or capacity to support new development must be identified.

It is therefore appropriate that sustainable planning criteria are used to inform the assessment of each site, in addition to infrastructural criteria, in line with the NPF's requirement of the prioritisation of development land.

In this regard, lands have only been identified for development where they are able to connect to existing development services for which there is service capacity available or has the potential to become fully serviced within the life of the Plan.

	Settlement	Population 2016	NEW growth allocation 2016-27	NEW Population Growth to 2027	Remaining Wastewater Capacity (P.E.)	Water capacity (IW submission)	WWTP Future Investment	Connectivity – Transport Infrastructure
Key Town (Density 35-40 units/ha)	Longford Town	10,008	25%	2502	2392	Some headroom available		Very good – Train station, bus services, national road network with good inter-regional links
Self- Sustaining Growth Town (25 units/ha)	Granard	1,096	25%	274	208	Some headroom available		Local bus services, Bus stops x2 with national road network links
Self-	Ballymahon	1,877	15%	282	-316	-	IW indicate WWTP upgrade planned post- 2024	Local bus services, national road network and good regional links to Athlone and Mullingar
Sustaining Towns (25	Edgeworthstown	2,072	15%	311	-447	Some headroom available	IW indicate WWTP upgrade planned post- 2024	Very good- train station, bus services, national road network, good inter-regional links
units/ha)	Lanesborough	757	20%	151	-94	Some headroom available		Local bus services, national road network with good links to Longford, Ballymahon and Roscommon
	Aughnacliffe	177	18%	32	62	Some headroom available		Bus stop x1
	Ballinalee	347	18%	62	350	Some headroom available		Limited – no public transport provision
Towns and Villages	Drumlish	931	15%	140	-2	Some headroom available	IW indicate capacity of 150	Bus stop x1
(20 units/ha)	Keenagh	581	18%	105	436	Some headroom available		Bus stop x1
	Legan	215	16%	34	758	Some headroom available		Limited – no public transport provision
	Newtownforbes	778	18%	140	690	Some headroom available		Bus stop x1
	Abbeyshrule	224	15%	34	183	Some headroom available		Limited – no public transport provision
Serviced Rural Villages	Ardagh	210	15%	32	254	Some headroom available		Limited – no public transport provision
(15 units/ha)	Ballinamuck	232	15%	35	337	Some headroom available		Bus stop x1
	Clondra	449	15%	67	335	Some headroom available		Limited – no public transport provision
	Rural Settlement Clusters Open Countryside		3.5%	727				
Total	yside	40,873		4,927				

The table above distils the proposed growth strategy for the county in terms of settlement hierarchy, projected population and housing growth and allocation per settlements and settlement tier, as well identifying some of the critical infrastructural features pertaining to these settlements. Further details on specific infrastructural deficits and requirements for relevant settlements over the plan period will be furnished in the finalised draft Infrastructural Assessment Report, pending final agreement with internal departments and costing/budget requirements.

The table includes a green colour for Tier 1 areas, potential development, amber/yellow for Tier 2 areas with infrastructure constraints and a red/rose colour for areas with infrastructure deficiencies and constraints.

4. METHODOLOGY OF CRITERIA AND ASSESSMENT

In the absence of Departmental guidance, which is expected to issue under Section 28 of the Planning and Development Act 2000 (as amended) as referred to in the NPF, this Infrastructural Assessment has been developed in accordance with Appendix 3 of the NPF.

The Planning Department undertook a review of the available land supply within the defined study areas of the main settlements of Longford as defined in the Core Strategy. This included the following settlements as defined in the Settlement Hierarchy:

Key Town		Longford Town		
Self-Sustaining	Growth	Granard		
Towns				
Self-Sustaining Tow	/ns	Ballymahon		
		Edgeworthstown		
		Lanesborough		
Towns & Villages		Aughnacliffe Keenagh		
		Ballinalee Legan		
		Drumlish	Newtownforbes	
Villages &	Smaller	Abbeyshrule Ballinamuck		
settlements		Ardagh Clondra		

To inform the appropriate zoning of land, the Infrastructure Assessment comprises of quantitative and qualitative research analysis.

The qualitative analysis consists of a template of criteria to gather pertinent information from the relevant departments within Longford County Council. This method is to be used to gain an understanding of underlying conditions and provide insights into infrastructural issues.

The quantitative assessment comprises of an interactive assessment of the subject lands (residential – employment), combining existing and proposed zoning, overlaid with infrastructural mapping depicting key infrastructure elements such as foul sewer, water main, pumping station, roadway, pathway etc. in order to appropriately determine and allocate lands as Tier 1 ('Connected'), or Tier 2 ('Potential Development') and areas of 'No Development'.

This Infrastructural Assessment was conducted on an iterative basis, liaising with the Water Services and Roads Departments of the Council, with additional input from Irish Water in identifying potential shortfall in water supply and wastewater treatment capacities and where targeted investment in upgrading of such infrastructure may likely take place over the plan period, notwithstanding Irish Water's own Strategic Funding Plan.

A critical feature of this process was the overarching requirement to provide for more 'compact growth' forms of future development within our settlements, regardless of scale, whereby a town centre first approach in terms of sequential development was advocated in identifying primary land for development.

The following documents have been included in the IAR which includes the following:

Appendix A

Shows the mapping work undertaken at the pre-draft stage of the Development Plan Review and indicates the assessments undertaken of each settlement and included a review of the indicative amount of serviced lands available.

The maps for each settlement indicate the potential development capacities based on the following criteria using advice from Water Services and Irish Water:

- Opportunities for potential development
- Sites where no development is possible
- Connected sites

Appendix B

Shows the mapping work and the identification of potential sites following the initial work undertaken and presented in Appendix A. The maps show the identified potential Residential and Employment lands and includes the overlay of the constrained use layer (potential flooding). These maps were used to inform zoning selections and were then further used in the assessments by Water Services and Roads Section to score each site.

Appendix C

Shows the infrastructure assessment completed by the Roads Section and the scoring applied to each of the sites - New Residential and Employment Sites. The assessments include scores for roads as well as drainage.

Appendix D

includes the Infrastructure Assessment scoring for the main settlements provided by the Water Services Department and includes water supply and wastewater treatment capacity. This section of the assessment has gone into further detail and assesses the costs of providing the required and identified infrastructure.

Appendix E

Brings the infrastructure assessment reports together and shows the combined scores for the assessments from Roads and Water Services for each settlement

Appendix F

Shows the land zonings for each of the settlements

Whilst this approach is in accordance with the overarching principles espoused in the NPF, and particularly in accordance with NPO 3c, there are scenarios in some settlements where more peripheral lands are serviced and more centralised lands are

not. Whilst these incidences are infrequent, it remains prudent to develop out these serviced lands irrespective of their location given the levels of investment that have taken place in servicing such lands to begin with.

All selected sites within the settlements were identified and analysed against Infrastructure capacity in terms of:

- Water supply
- Wastewater capacity
- Drainage, extent of SuDS requirements and flood risk
- Roads and transportation
- Level of conformance to and ability to contribute to the achievement of Strategic Outcomes of the NPF (principally fulfilling compact growth); and
- Compliance with emerging/Draft Core Strategy with respect to settlement hierarchy and interrelated quantum of population and housing growth and resultant land requirements to accommodate projected growth.

The identified sites were afforded a planning and serviceability weighting (Score of 100 to 0) to assess the overall suitability for zoning within the Draft Longford County Development Plan 2021-2027. The weighting applied to the sites is represented by a traffic light system and ranges from:

Tier Determination Range					
High	Tier 1	100-67	Serviced		
Medium	Tier 2	66-33	Serviceable		
Low		32-0	No Development/Un-		
			serviced and		
			Unserviceable within Plan		
			lifetime		

In the case of lands identified as falling within the 'high' level of serviceability rating a green colour was applied which equates to Tier 1 lands in accordance with the NPF tiered approach to zoning. Such lands are serviced land, comprising of lands that are able to connect to existing development services for which there is service capacity available and therefore be able to accommodate new development. In such instances the site achieves sustainable planning criteria also.

Where lands were deemed to have a 'medium' level of serviceability rating an orange colour was applied. These lands can be described as serviceable land, comprising lands that are not currently sufficiently serviced to support new development but have the potential to become fully serviced within the life of the Plan or where there are planned infrastructure upgrades. In such instances the sites were considered to achieve a moderate status on sustainable planning criteria also.

In the event that lands demonstrated a 'low' level of serviceability they were excluded from consideration in forming the designation of zonings for the plan area. There are major infrastructural deficiencies and/or these sites achieved a poor status on

sustainable planning criteria. These lands would be classed as 'No Development' and excluded from further assessment.

The findings of both the qualitative and quantitative assessments have informed an evidence-based assessment of each site. As a result of this assessment it is clear that, for a range of infrastructural reasons, some sites are better placed to deliver employment and residential use in the short to medium term (Tier 1 lands).

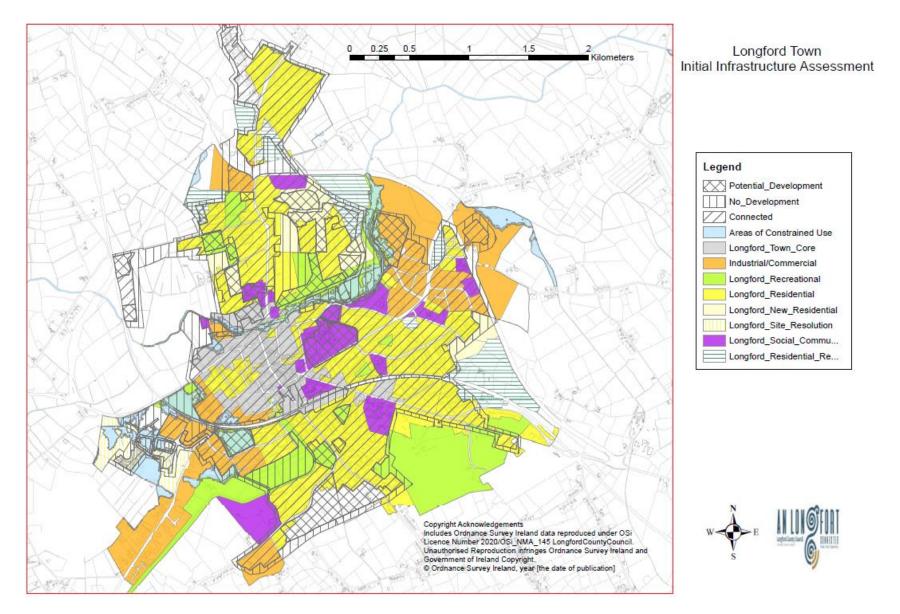
APPENDIX A - INITIAL SIEVE MAPPING EXERCISE

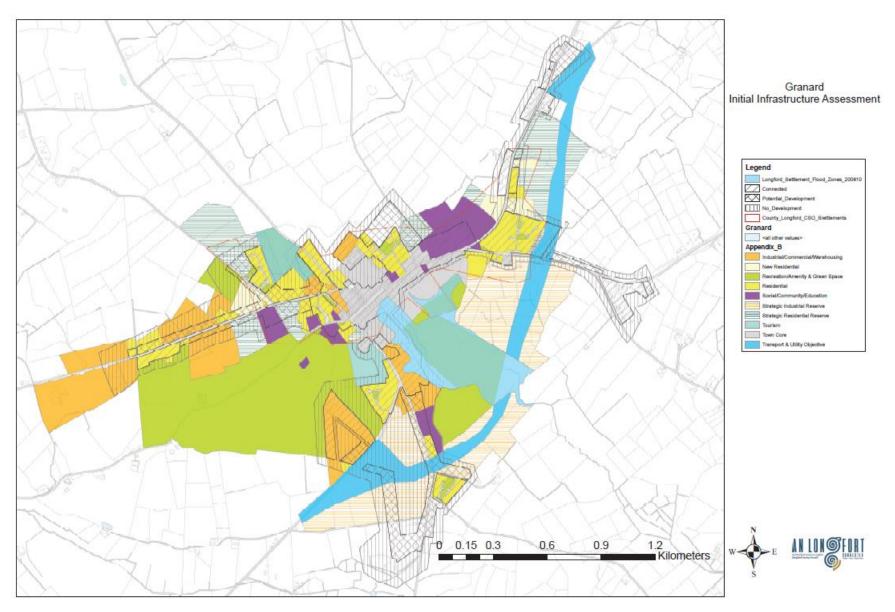
The maps presented in this section of the report are based on the previous County Development Plan 2015-2021 and show the land-use zonings and the areas identified for potential development.

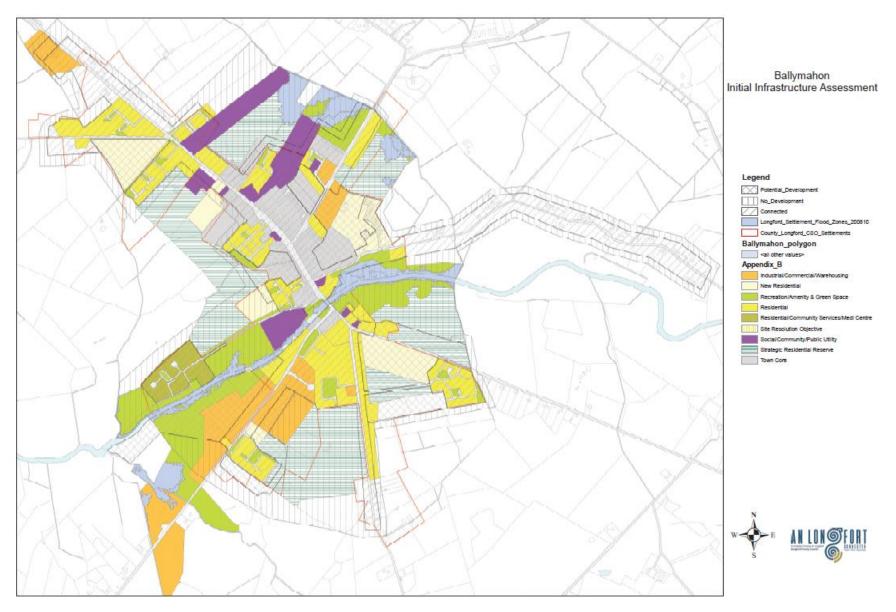
These assessments of the key settlements were undertaken in March 2020, with colleagues from Water Services and Irish Water and informed the drafting and development of the Draft County Development Plan 2021-2027 and the accompanying land-use zonings.

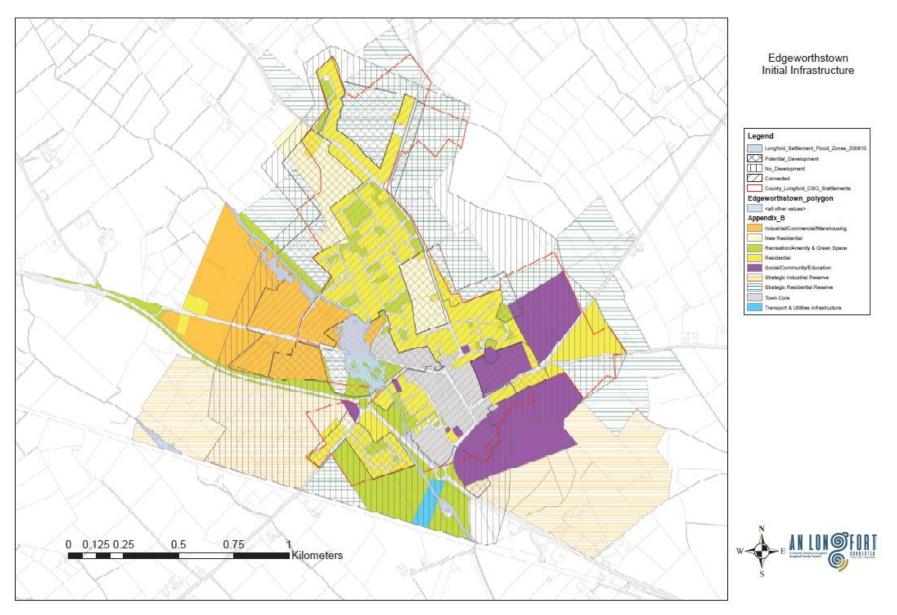
For each settlement the maps identify those areas:

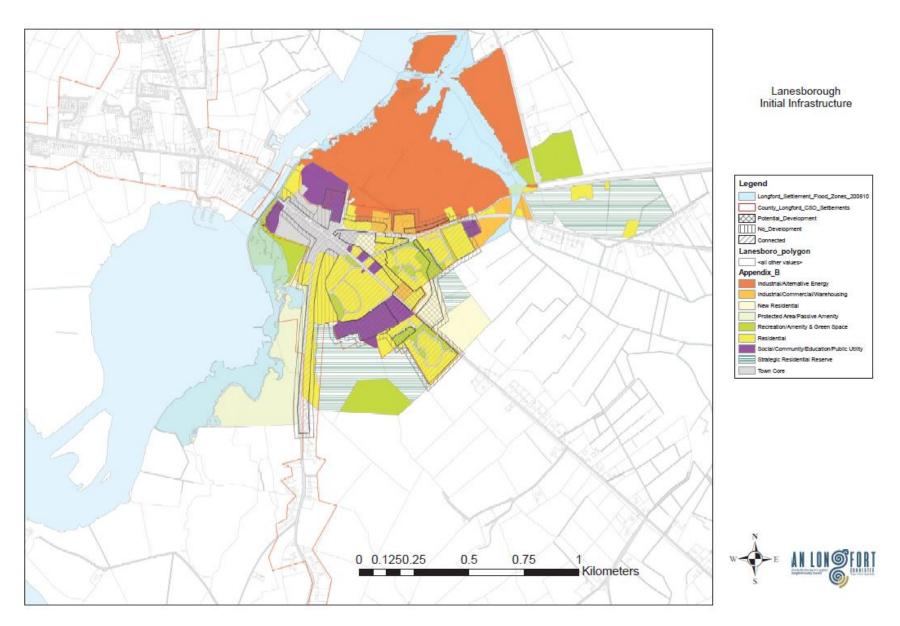
- Potential development
- No development
- Sites that are connected

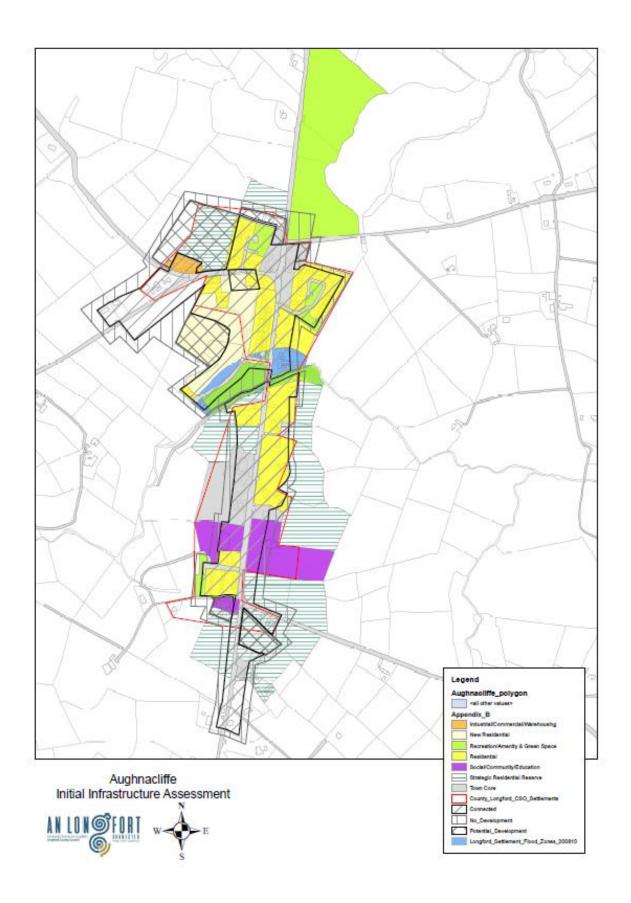


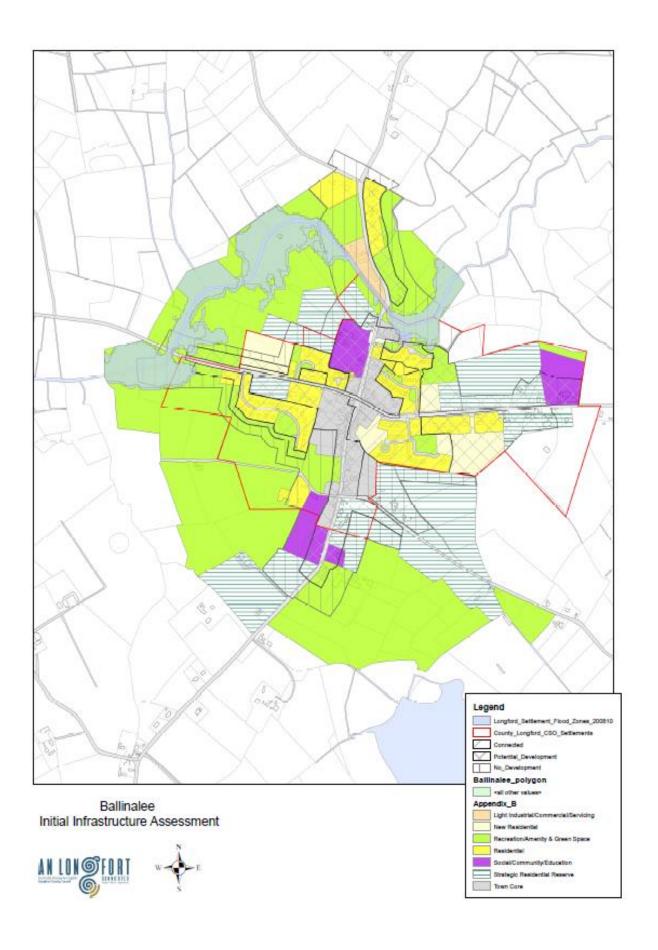


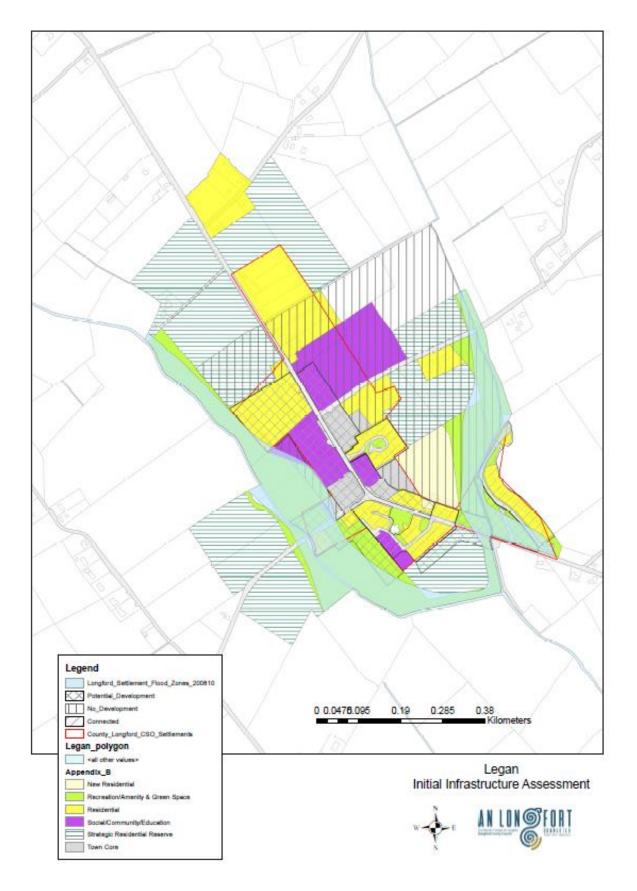


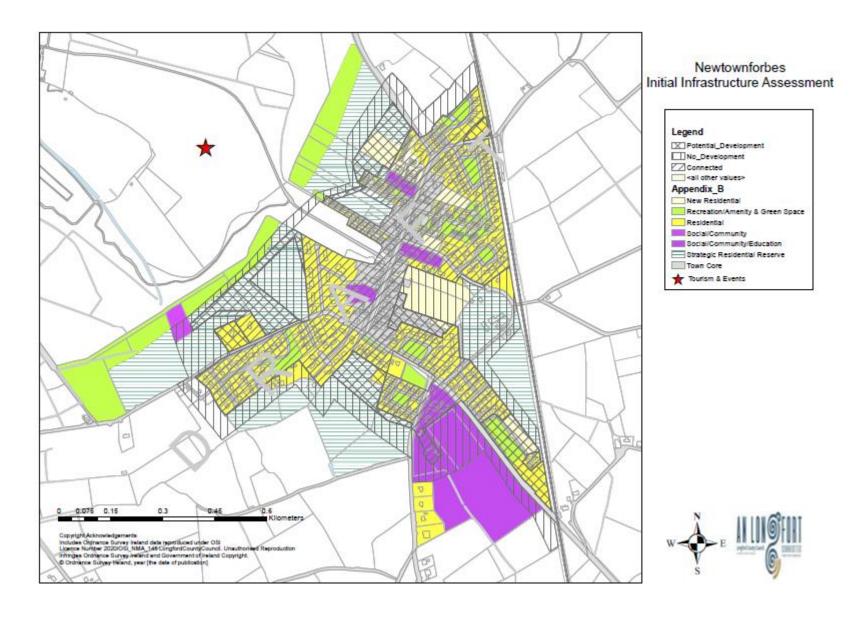












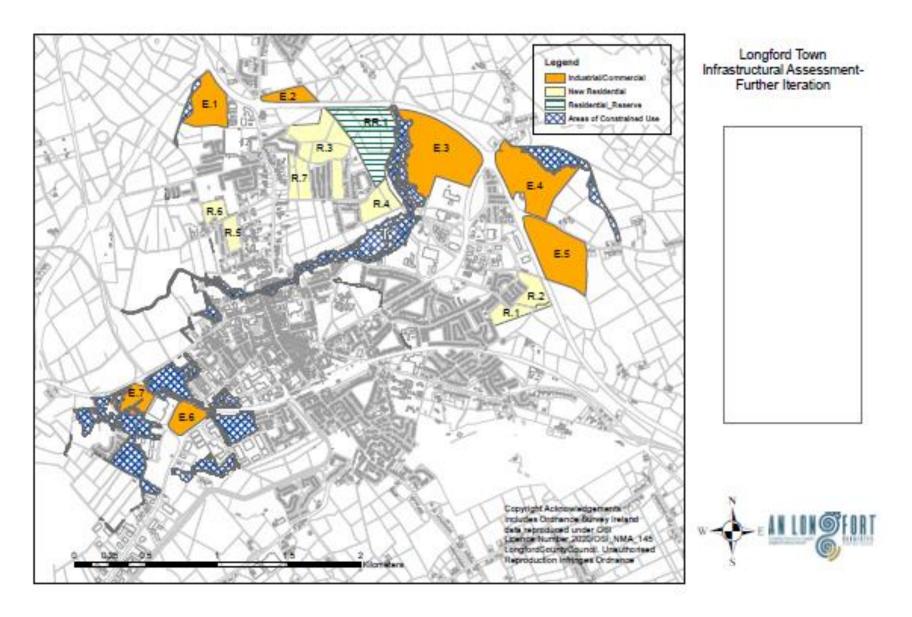
APPENDIX B – FURTHER ITERATIVE MAPPING

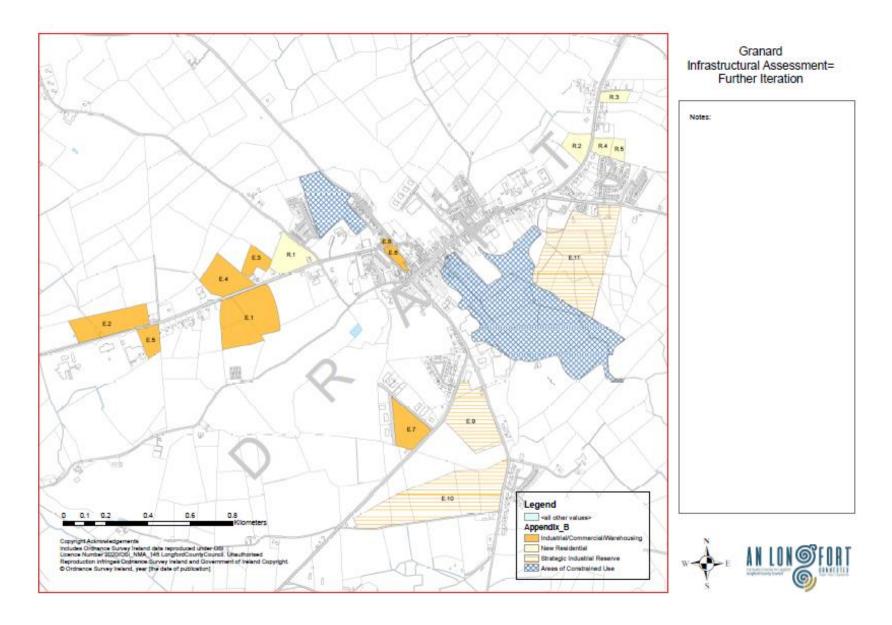
The following settlement maps show the proposed residential and employment lands proposed for inclusion in the Drat Plan and represent the zoned lands on which the Infrastructure Assessment is based.

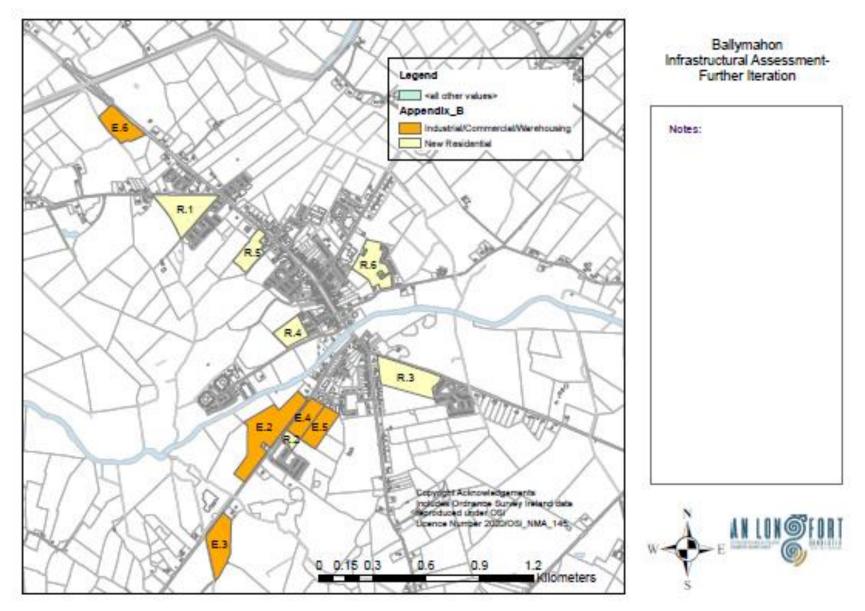
The settlement plans show the residential and employment lands and are coded with a reference number – R1, R2 etc for residential sites; E1, E2 etc for employment sites.

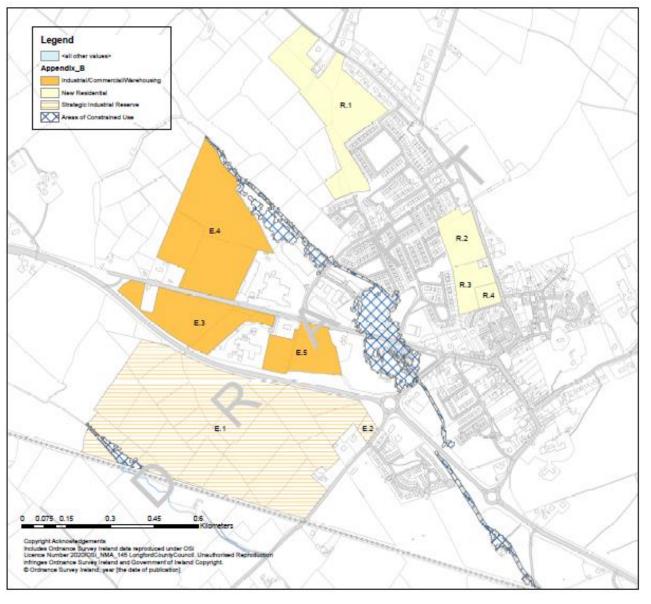
The coding is used in the following assessments provided by the Roads Section and Water Services.

The maps in addition also have constrained use mapped which highlights the areas of the settlements at risk of flooding.

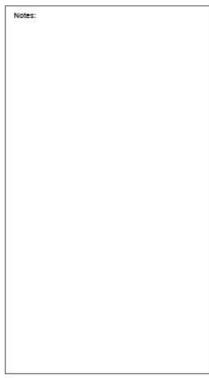






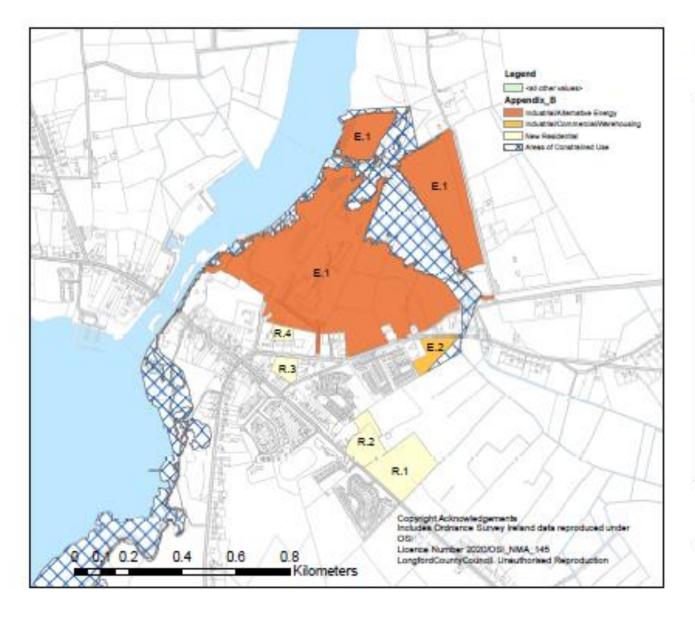


Edgeworthstown Infrastructural Assessment-Further Iteration





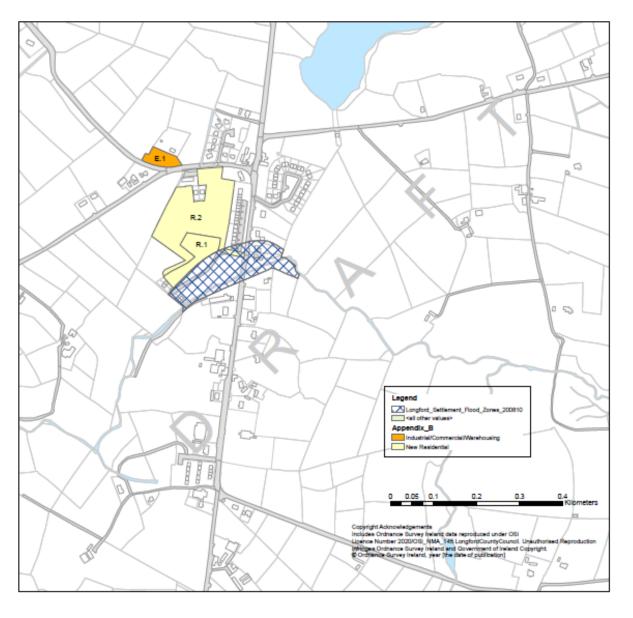




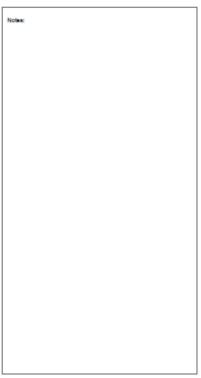
Lanesborough Infrastructural assessmentfurther Iteration



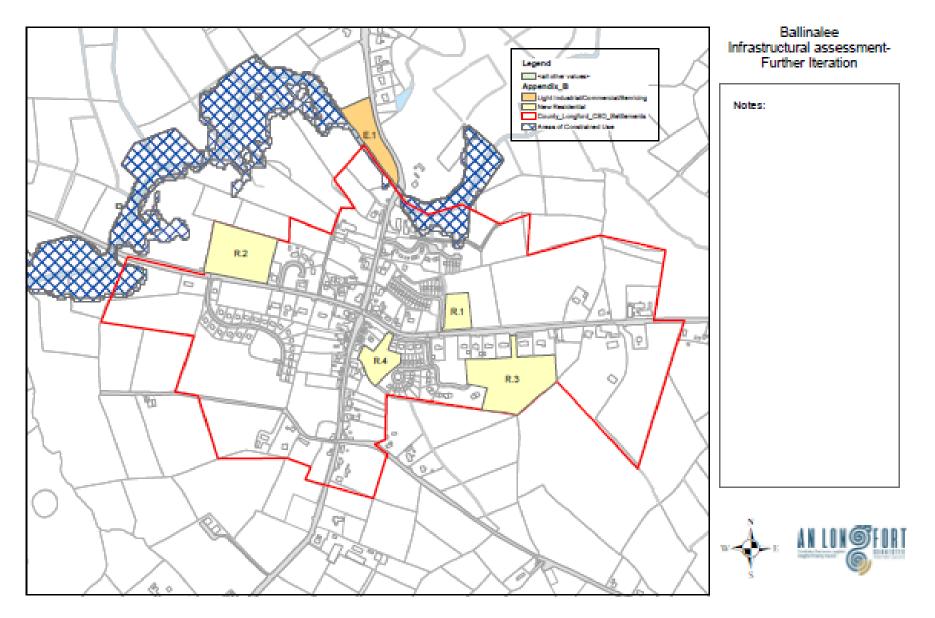


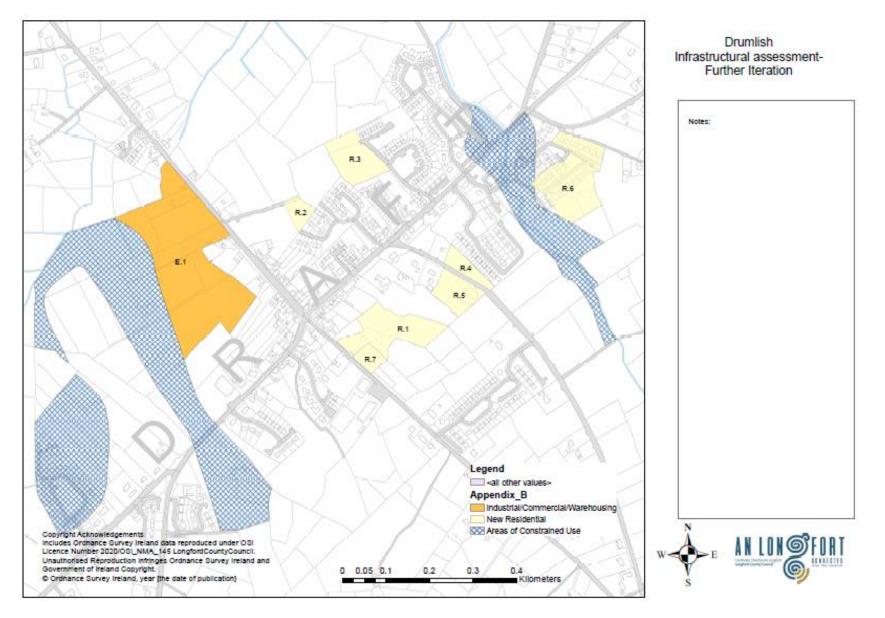


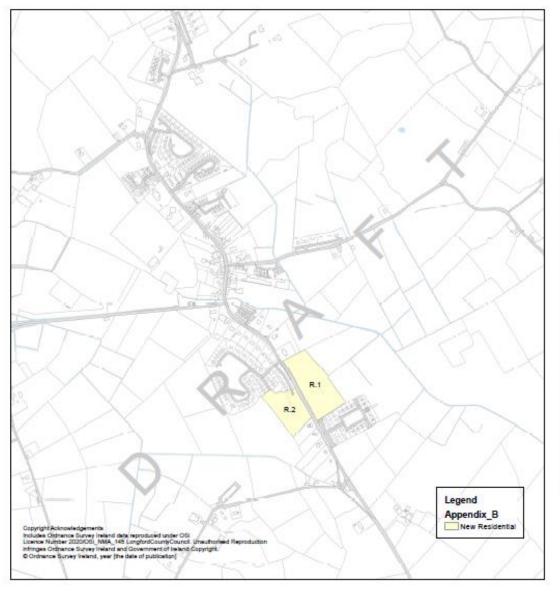
Aughnacliffe Infrastructural Assessment-Further Iteration



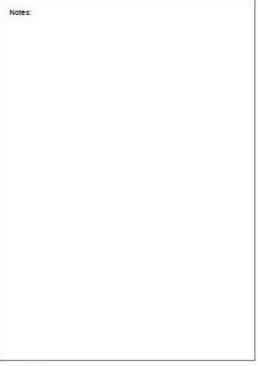






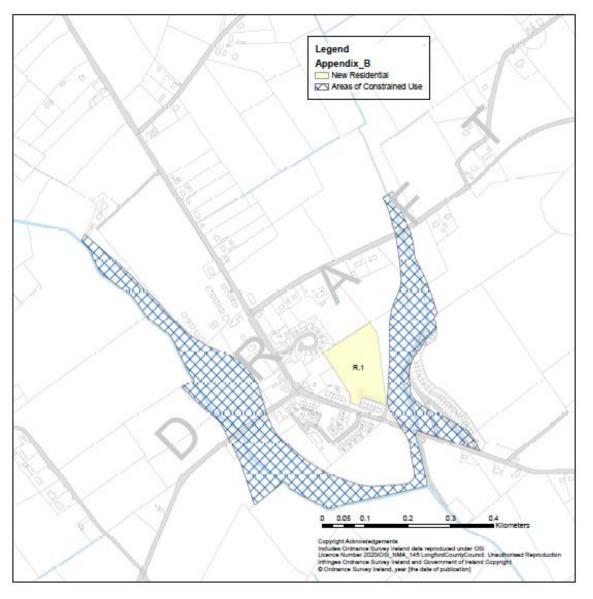


Keenagh Infrastructural Assessment-Further Iteration

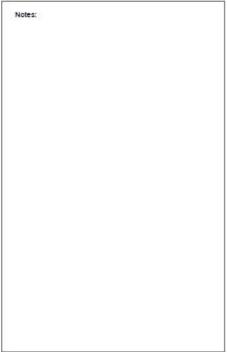




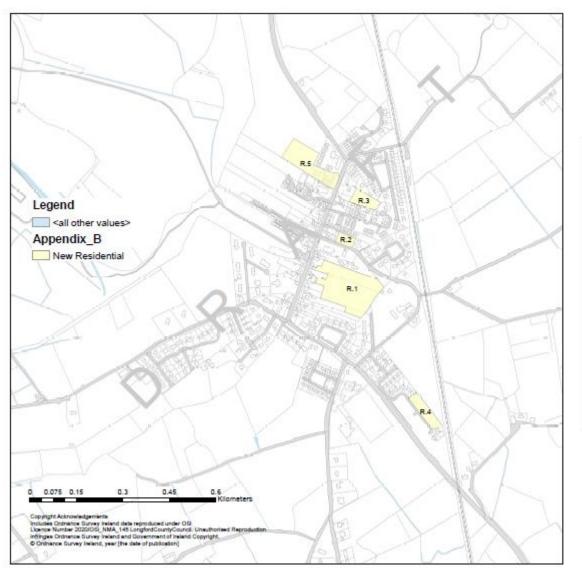




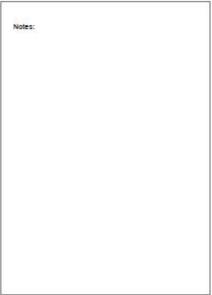
Legan Infrastructural assessment-Further Iteration







Newtownforbes Infrstructural Assessment-Further Iteration





APPENDIX C: ROADS DEPARTMENT INFRASTRUCTURAL SETTLEMENT EVALUATION

The following tables show the infrastructure assessment results for Roads, for each of the settlements including Longford Town, Granard, Ballymahon, Edgeworthstown, Lanesborough and Drumlish and the associated zoned lands.

The assessment is presented as a number indexed out of 100 and has been based on the available road network, pavements, lighting and other infrastructure in the locality. The assessment also includes an assessment of the zoned lands based on the drainage and flooding of the area.

The assessment has not included details about proposed road improvements, junction realignments and information concerning local road accidents and other matters

The review also does not include an assessment of the costs involved in servicing the zoned lands in respect of roads and drainage, rather it provides an indication of the serviceability of the lands as of December 2020 to March 2021.

LONGFORD TOWN

HOUSING LAN	DS	R1	R2	R3	R4	R5	R6	R7	RR1
CRITERIA	WEIGHTING								
ROADS	100	100	90	50	100	90	80	80	50
DRAINAGE	100	80	80	90	90	90	80	90	60

EMPLOYMENT	LANDS	E1	E2	E3	E4	E5	E6	E7
CRITERIA	WEIGHTING							
ROADS	100	50	50	50	50	50	100	100
DRAINAGE	100	50	50	80	80	50	70	70

GRANARD TOWN

HOUSING LANDS		R1	R2	R3	R4	R5
CRITERIA	WEIGHTING					
ROADS	100	100	100	100	100	70
DRAINAGE	100	50	50	50	50	50

EMPLOYMENT	LANDS	E1	E2	E3	E4	E5	E6	E7	E8	SIR -	SIR -	SIR -
CRITERIA	WEIGHTING									E9	E10	E11
ROADS	100	100	100	100	100	100	100	100	100	100	100	100
DRAINAGE	100	50	50	50	50	50	30	100	30	50	50	80

BALLYMAHON

HOUSING LAND	OS	R1	R2	R3	R4	R5	R6
CRITERIA	WEIGHTING						
ROADS	100	100	100	100	100	100	60
DRAINAGE	100	80	50	10	50	50	80

EMPLOYMENT I	LANDS	E1	E2	E3	E4	E5	E6
CRITERIA	WEIGHTING						
ROADS	100	100	100	100	100	100	100
DRAIANGE	100	50	50	50	50	50	50

EDGEWORTHSTOWN

HOUSING LAND	HOUSING LANDS		R2	R3	R4
CRITERIA	WEIGHTING				
ROADS	100	100	100	100	100
DRAINAGE	100	50	50	50	50

EMPLOYMENT LANDS		SIR - E1	SIR - E2	E3	E4	E5
CRITERIA	WEIGHTING					
ROADS	100	0	50	100	100	100
DRAINAGE	100	50	50	50	50	50

LANESBOROUGH

HOUSING LANDS		R1	R2	R3	R4
CRITERIA	WEIGHTING				
ROADS	100	100	100	65	65
DRAINAGE	100	50	50	30	40

EMPLOYMENT I	.ANDS	E1	E2
CRITERIA	WEIGHTING		
ROADS	100	100	70
DRAINAGE	100	50	50

DRUMLISH

HOUSING LAND	S	R1	R2	R3	R4	R5	R6	R7
CRITERIA	WEIGHTING							
ROADS	100	100	100	100	100	100	80	100
DRAINAGE	100	50	50	50	50	50	80	75

EMPLOYMENT I	E1			
CRITERIA	WEIGHTING			
ROADS	100	100		
DRAINAGE	DRAINAGE 100			

APPENDIX D: WATER SERVICES INFRASTRUCTURAL SETTLEMENT ASSESSMENT

The following tables show the infrastructure assessment results produced by the Water Services Section of the Council, for each of the settlements and the associated zoned lands.

The assessment is presented as a number indexed out of 100 and has been based on the available capacity within the wastewater treatment network of each settlement. The assessment provides an indicative assessment given the available information as of December 2020 to March 2021.

The assessment has sought to identify the estimates of costs for servicing sites within the settlements, these costs are rough estimates and indicative only given available information at the time of the assessment and should not be used for any other purposes except for as to give an estimate of costs for servicing the sites only.

The assessment identifies specific settlements with known capacity constraints which includes the settlements of Ballymahon, Edgeworthstown, Lanesborough and Drumlish.

WASTEWATER INFRASTRUCTURE

Wastewater treatment infrastructure headroom assessment.

The following overview details the designed treatment plants in the key settlements with the PE (person equivalent) Design, the actual PE currently using the facility and the calculated PE available capacity and headroom allowing for a 10% variation.

The identified headroom is therefore presented with figures highlighted in green showing available headroom, or – no capacity and constraints highlighted in red.

The following table is correct as of December 2020 to March 2021

Infrastructure assessment

Wastewater infrastructure

							% range	
		PE design	source	PE actual		PE available	10	Headroom
1	Longford Town	20000	EPA license	15,608	PE 2020 AER	4392	2,000	2392
2	Granard	3200	EPA license	2,672	PE 2020 AER	528	320	208
3	Ballymahon	2125	EPA license	2,359	PE 2020 AER	-234	213	-447
4	Edgeworthstown	2700	EPA license	2,746	PE 2020 AER	-46	270	-316
5	Lanesborough	1600	EPA license	1,534	DBO Dec2020 report	66	160	-94
6	Aughnacliffe	400	EPA COA	298	DBO Dec2020 report	102	40	62
7	Ballinalee	600	EPA COA	190	DBO Dec2020 report	410	60	350
8	Drumlish	1200	EPA COA	1,082	PE 2020 AER	118	120	-2
9	Keenagh	1000	EPA COA	464	LD 2020 records	536	100	436
10	Legan	1000	EPA COA	142	LD 2020 records	858	100	758
11	Newtownforbes	1800	EPA license	930	PE 2020 AER	870	180	690
12	Abbeyshrule	300	EPA COA	87	DBO Dec2020 report	213	30	183
13	Ardagh	300	EPA COA to be applied for	17	DBO Dec2020 report	284	30	254
14	Ballinamuck	500	EPA COA	113	LD 2020 records	387	50	337
15	Clondra	600	EPA COA	206	DBO Dec2020 report	395	60	335

WASTEWATER INFRASTRUCTURE SUMMARY BY SETTLEMENT AND LANDS ZONED

The following table provides a summary of the scores for each of the settlements and the identified residential/housing lands and the employment/industrial lands. The tables is derived from the following tables for each settlement:

	Domestic	R1	R2	R3	R4	R5	R6	R7	R8			
	LONGFORD TOWN	89	89	88	86	69	29	48	32			
	GRANARD	72	72	72	68	58				1		
	BALLYMAHON	13	48	25	38	41	40			1		
	EDGEWORTHSTOWN	40	38	38	35							
	LANESBOROUGH	46	50	38								
	AUGHNACLIFFE	80	79									
	BALLINALEE	82	84	76	66							
HOUSING	DRUMLISH	61	29	59	66	87	16	61				
	KEENAGH	91	86									
	LEGAN	94										
	NEWTOWNFORBES	86	70	70	73	83						
	ABBEYSHRULE		33	4								
	ARDAGH	98										
	BALLINAMUCK											
	CLONDRA	20	69									
										Test		T =
	Non-Domestic LONGFORD TOWN	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	E1:
		31	44	54	43	39	47	45	40		40	_
	GRANARD	39	24	39	43	18	18	43	18		43	_
	BALLYMAHON		24	9	34	34	13			\square		-
	EDGEWORTHSTOWN	21	29	28	28	28				\sqcup		_
	LANESBOROUGH	3	19							\sqcup		_
	AUGHNACLIFFE	97								\sqcup		_
	BALLINALEE	96								Ш		_
EMPLOYM	DRUMLISH	24								Ш		
	KEENAGH									Ш		
	LEGAN											
	NEWTOWNFORBES											
	ABBEYSHRULE											
	ARDAGH											
	BALLINAMUCK									\Box		
	CLONDRA											1

Wastewater Cost Assessments for each settlement:

The following table(s) presented are considered (calculated) and provide a reasonable estimate for the full cost of delivery of the wastewater services and the amount is provided as a per unit cost with reference to:

- The headroom capacity in the existing network, pump stations and the wastewater treatment plant (from data currently available as of March 2021).
- Distance to the connection point on the existing service network.
- Potential number of units (housing or commercial (wet or dry)).

For each settlement area the zoned lands (residential or employment) have been assigned a percentage score. The percentage score should be applied to the cost figure and the range –

- Residential lands sites at 100% = low cost estimated at €4,000 per unit, which ranges to 0% = a high cost at €16,000.
 Certain zoned lands may be assigned an <u>expensive</u> cost, where the amount is determined to be far greater than €16,000; in such circumstance's development could still proceed, but Developers are advised to consult with Irish Water and Water Services.
- Employment lands sites scored at 100% are considered low cost estimated at €4,000, which ranges to 0% and considered a high cost at €100,000.
 Certain zoned lands may be assigned an <u>expensive</u> cost, where the amount is determined to be far greater than €100,000; in such circumstance's development could take place but Developers are advised to consult with Irish Water and Water Services.

In all circumstances the figures are given as broad estimates of potential costs. For any potential development a detailed assessment of available services and estimated costs should be undertaken by the Developer in consultation with Irish Water in respect of wastewater and water supply, prior to any potential development and at the pre-application stage.

The cost estimates were calculated during December 2020 to March 2021.

LONGFORD TOWN:

	LONGFORD TOWN		d D0060				5 11 11		1
Residential lands	R1	R2	R3	R4	R5	=	Residential	lands	l
good %		96 50m road		93 9	3 63		100%	4,000	
	30m road new 100m	new 100	380 green	200 green	580 green				l
network	upgrade	upgrade	380 upgrad	le 200 upgrade	PS possible		0%	16,000	
SPS		0	0	0	0 300		expensive	>16,000	l
WWTP		0	0	0	0 0)			
Employment lands	E1	E2	E3	E4	E5	E6	_	Employmen	t lands
ready %		30	51	50 3	1 34	4:	1	100%	4,00
		no public	200m road	connect 1/2	200m				
network	400 m green	road con	nect upgrade	only	upgrade road PS 500 rising	280m road		0%	100,00
SPS	PS 400rising		0	0 PS 300 rising	N4		0	expensive	>100,000
	WWTP UPGRADE 300m								
WWTP	main upgrade		0	0	0 0)	0		

GRANARD

	GRANARD	Granard	D0187									
Residential lands	R1		R3	R4	R5							
good %		50 30m road	51 10m ro	52 ad 60m road	48 80m r	45 oad						
network	50m upgrade road	new	new	new	new							
SPS		0	0	0	0	0						
	wwtp upgrade 200m											
WWTP	upgrade green		0	0	0	0						
Employment lands	E1	E2	E3	E4	E5	E6	E7	E8	E9 E	10	E11	
ready %		30 300m nev	18 w 60m roa	29 ad	30 conne	20 ect 1/2 30	6 0 upgrade	30 expensive 300 upgrade	27 400 upgrade		31 400 upgra	20 ade
network	connect 1/2	road	new	road cross	ing only	net	twork connect	network	network co	onnect	network	
SPS	wwtp upgrade 200m	0 SPS 300 r	ising		A A	XX	VIII		XXX7	1	0 PS 800 ris	sing
WWTP	upgrade green		0	3	(X	The !		XXX	79	1	0	

BALLYMAHON

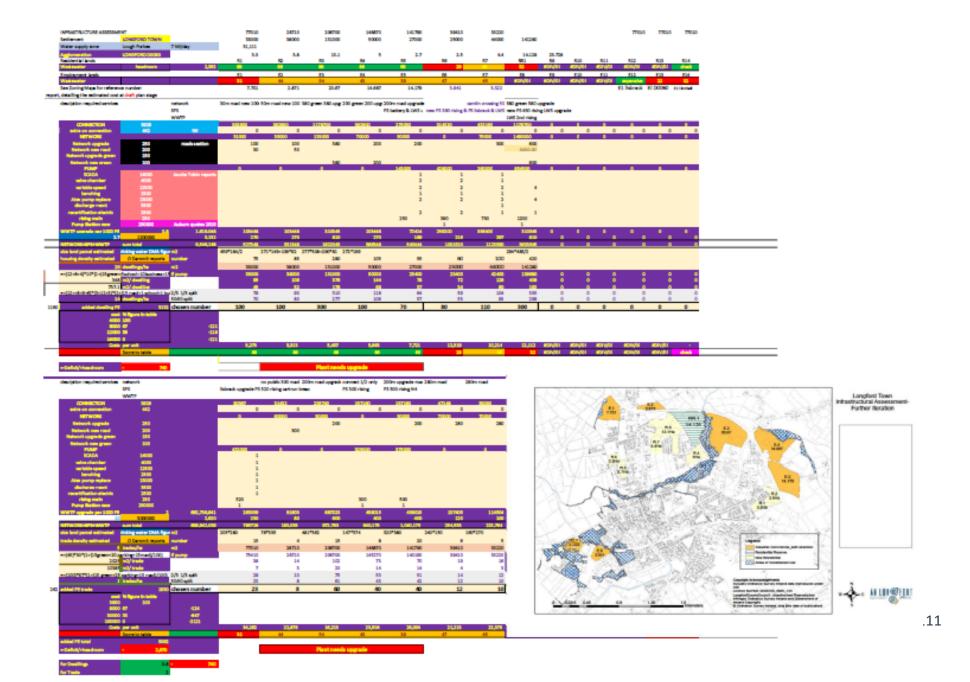
Residential lands	D1	 		00096	D/I		DE		D.C	D7	DO	
	R1	R2		R3	R4		R5		R6	R7	R8	
good %	expensive		15 (expensive		7		8	1	13	12	10
				200m net								
	75m network upgrade 75m		U	upgrade, 35	0		180m new			60m new		
network	new road			new road athlone PS		0	road			0 road	next to Re	6
				upgrade,							ballymulv	/ey
	new pump station /900		2	250m new	auburn				ballymulvey		upgrade 3	30m
SPS	gravity		0 1	road	upgrade			0	upgrade		0 green	
	wwtp upgrade 150m											
WWTP	network upgrade		0		0	0		0		0	0	
Employment lands	E1	E2		E3	E4		E5		E6	_		
ready %	1		2 (expensive		8		8		7		
							no public					
		200m new					access 100 i	m				
network	350m new road	road new	1	new 750	0 road crossin	g	new green		connect			
		+upgrade	+	+upgrade	upgrade		upgrade					
	new +upgrade athlone rd	athlone rd	ō	athlone rd	athlone rd		athlone rd					
SPS	sps 300 wwtp upgrade 150m	sps 300	5	sps	sps		sps			0		
WWTP	network upgrade		0		0	0		0		0		

EDGEWORTHSTOWN

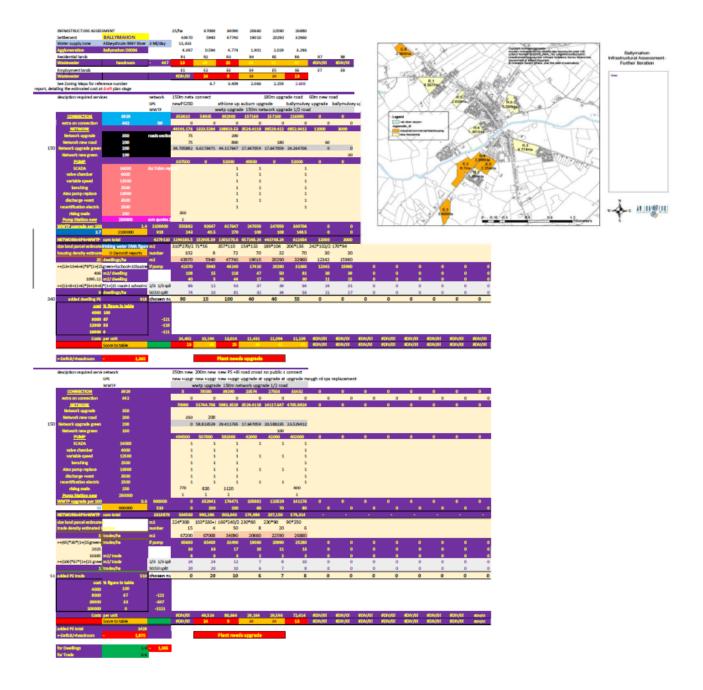
	EDGEWORTHSTOWI	N E	Edgeworthst	own D009	8			_			
Residential lands	R1	F	R2	R3		R4	_	F	<u>Residential l</u> ands		1
good %		19	17 2*20m road	1 120m		expensive 150m			100%	4,000	
network	45m new green	ι	ıpgrade	upgrade		upgrade		0)%	16,000	l
SPS	wwtp upgrade 600m gro upgrade network 100m		0		0		0	6	expensive >16,	000	I
WWTP	road crossing		0		0		0				
Employment lands	E1	E	E 2	E3		E4	E5		Emp	loymen	t lands
ready %		11	20	2	21	2	1	21	1009	%	4,000
network		0	0		0		0	0	0%		100,000
SPS		0	0		0		0	0	expe	nsive	>100,000
	wwtp upgrade 600m gre upgrade network 750 ro										
WWTP	crossing		0		0		0	0			

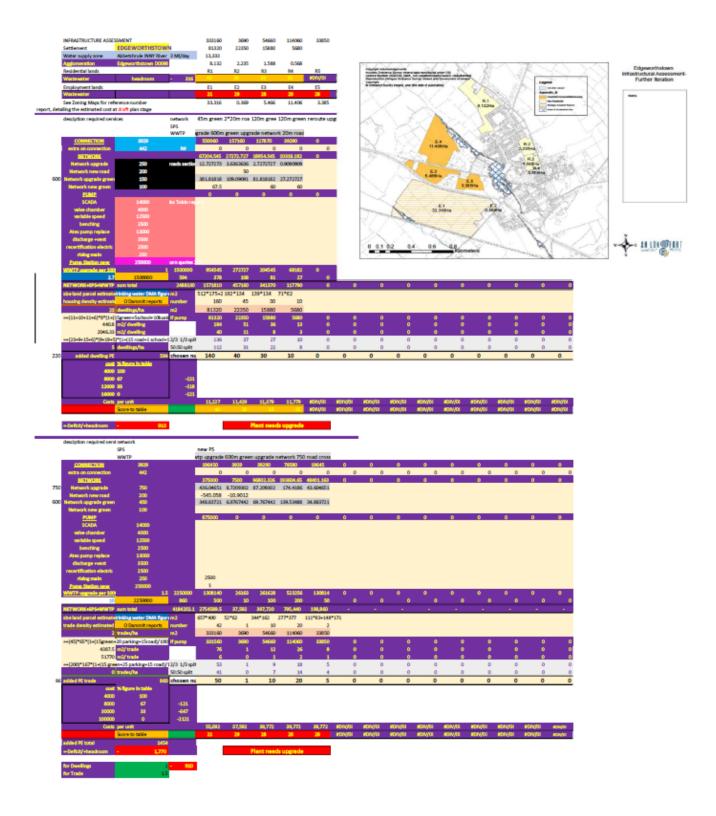
LANESBOROUGH

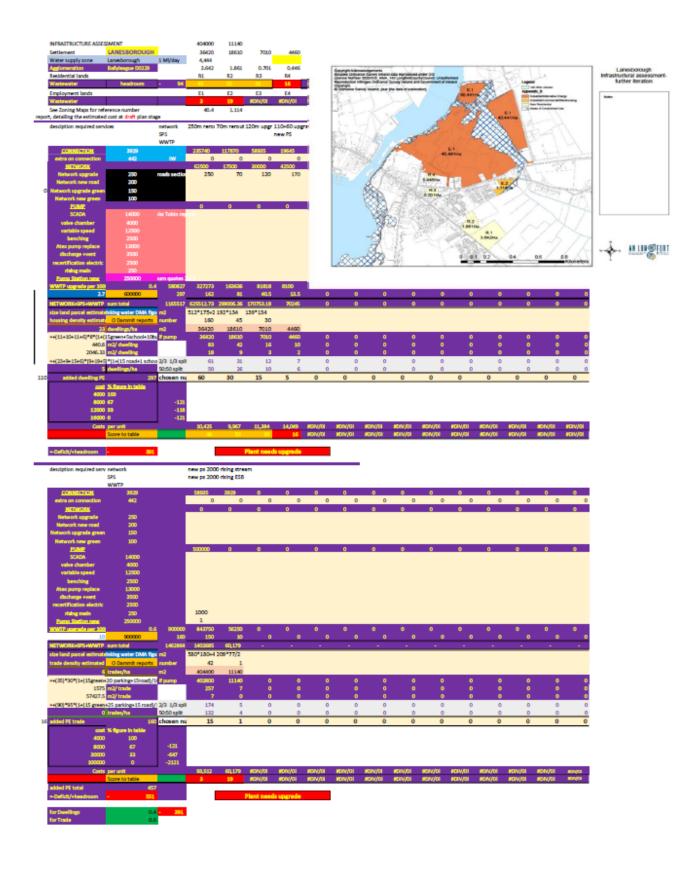
	LANESBORO	B	allyleague	D0220		
Residential lands	R1	R	2	R3	_	Residential
good %		20 70	20 Om reroute	120m	14	100%
network	250m network upgrade	up	pgrade	upgrade		0%
SPS	wwtp upgrade 750m	0	0		0	expensive
WWTP	network upgrade		0		0	
Employment lands	E1	E	2			
ready %		3	27			
network	new ps required stream	10	00 new road			
SPS	new ps required ESB wwtp upgrade 750m		0			
WWTP	network upgrade		0			

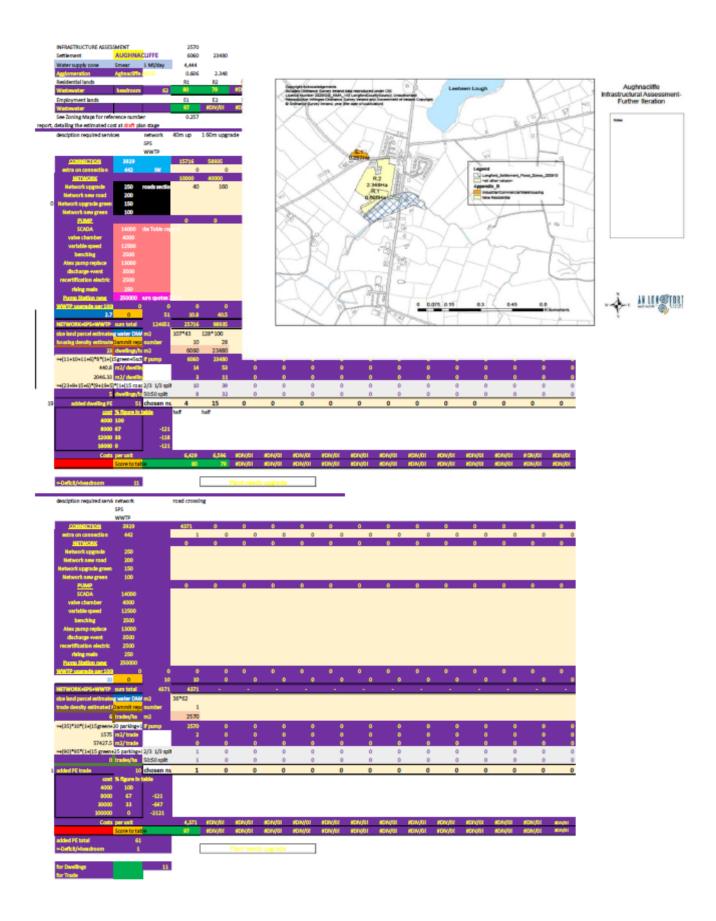


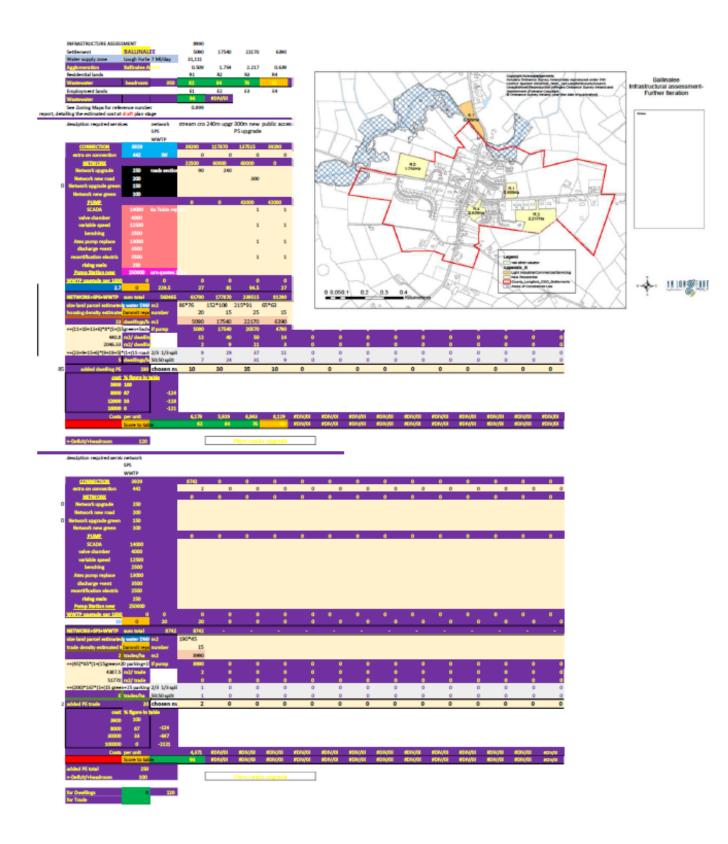




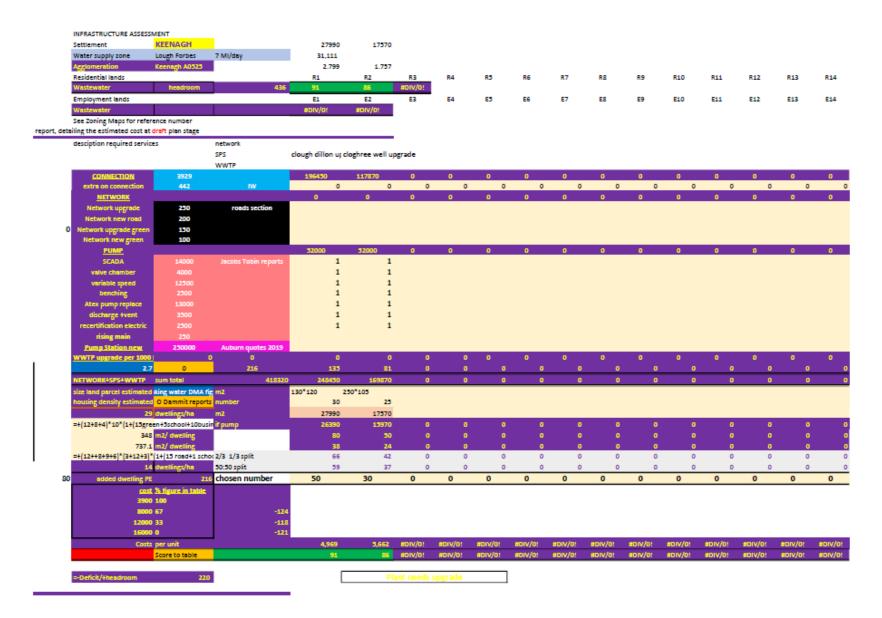


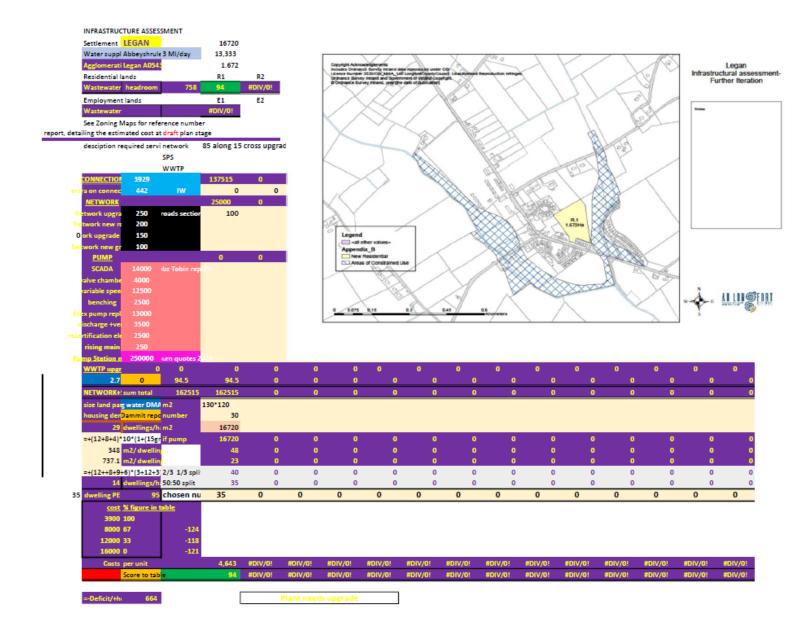




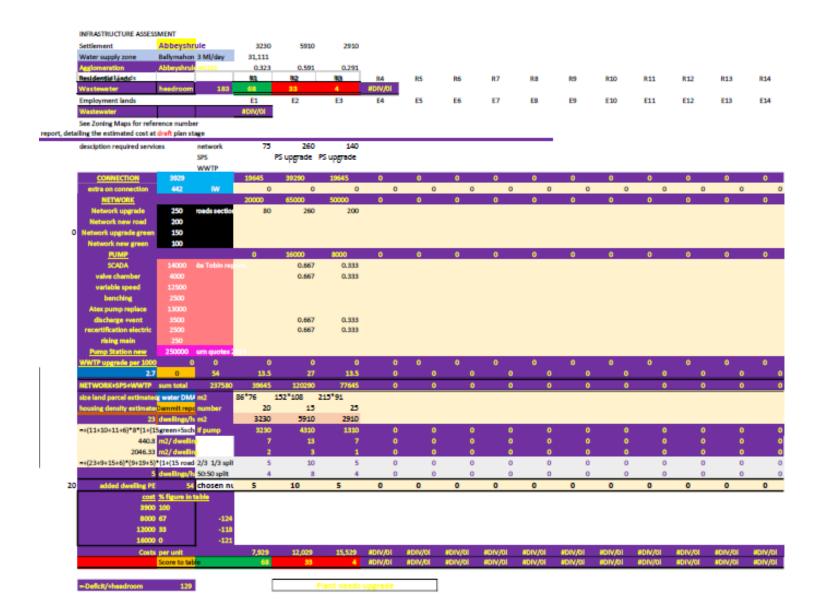








	INFRASTRUCTURE ASSE	SSMENT															
	Settlement	NEWTOWNFORBES		23010	1940	3490	4470	7720									
	Water supply zone	Lough Forbes	7 MI/day	31,111													
	Agglomeration	Newtownfobes D 0317		2.301	0.194	0.349	0.447	0.772									
	Residential lands			R1	R2	R3	R4	R5	R6	R7	R8	R9	R10	R11	R12	R13	R14
	Wastewater	headroom	690	86	70	70	73	83	#DIV/01								
	Employment lands			E1	E2	В	E4	ES	E6	E7	E8	E9	E10	E11	E12	E13	E14
	Wastewater			#DIV/OI													
	See Zoning Maps for re	ference number															
repo	rt, detailing the estimated	d cost at draft plan stage															
	desciption required ser	vices	network	180m new 6	Om road u 5	0 new + 50	upgrade 8	Om reroute	80 upgrade								
			SPS			c	luain doire2	upgrade									
			WWTP														
	CONNECTION	3929		157160	15716	23574	31432	58935	0	0	0	0	0	0	0	0	0
	extra on connection	442	W	0	0	0	0	0	0	0	0	0	0	_			
	NETWORK			66000	15000	22500	0	32000	0	0	0	0	0	0	0	0	0
	Network upgrade	250	roads section	120	60	50		80									
	Network new road	200		180		50											
80	Network upgrade green	150						80									
	Network new green	100			0	0	26500	0			0					0	
	PUMP SCADA			0	0		- Control of the Cont	U	0	0	U	0	0	0	0	0	0
	valve chamber	14000 4000	Jacobs Tobin reports				1										
	variable speed	12500					-										
	benching	2500					1										
	Atex pump replace	13000					•										
	discharge event	3500					1										
	recertification electric	2500					1										
	rising main																
	Pump Station new	250000	Auburn quotes 2019														
	WWTP upgrade per 10	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0
1	2.7	0	197.1	108	10.8	16.2	21.6	40.5					0				0
1	NETWORK+SPS+WWTF	sum total	448817	223160	30716	46074	57932	90935	0	0	0	0	0	0	0	0	0
1	size land parcel estimat	drinking water DMA figures	m2	193*120 5	8*33 8	0*39 1	35*32 2	00"46+93"	33								
1	housing density estimate	O Dammit reports	number	60	5	8	10	36									
1	32	dwellings/ha	m2	23010	1940	3490	4470	7720									
1	-+(11+10+4+6)*7*(1+(1	Sgreen+5school+10busines	If pump	23010	1940	3490	2870	7720									0
1	315	m2/ dwelling		73		11	14	25									0
1	1832	m2/ dwelling		13	1	2	2	4	0	0	0	0	0	0	0	0	0
1		+13+4+8)*(1+(15 road+1 sch		53	4	8	10	18	0	0	0	0	0		0	0	
	5	dwellings/ha	50:50 split	43	4	6	8	14	0	0	0	0	0	0	0	0	
73	added dwelling PE	197	chosen number	40	4	6	8	15	0	0	0	0	0	0	0	0	0
		% figure in table															
	3900																
	8000		-124														
	12000		-118														
	16000		-121														
		per unit		5,579	7,679	7,679	7,242	6,062	#DIV/01	#DIV/OI	#DIV/01	#DIV/01	#DIV/08	#DIV/OI	#DIV/01	#DIV/01	#DIV/01
		Score to table		85	70	70	73	83	#DIV/01	#DIV/OI	#DIV/01	#DIV/0I	#DIV/0I	#DIV/01	#DIV/01	#DIV/01	#DIV/0I
	-Deficit/+headroom	493		L	P	ant needs	upgrade										



APPENDIX E - COMBINED ASSESSMENTS AND MAPPING OF THE SETTLEMENTS

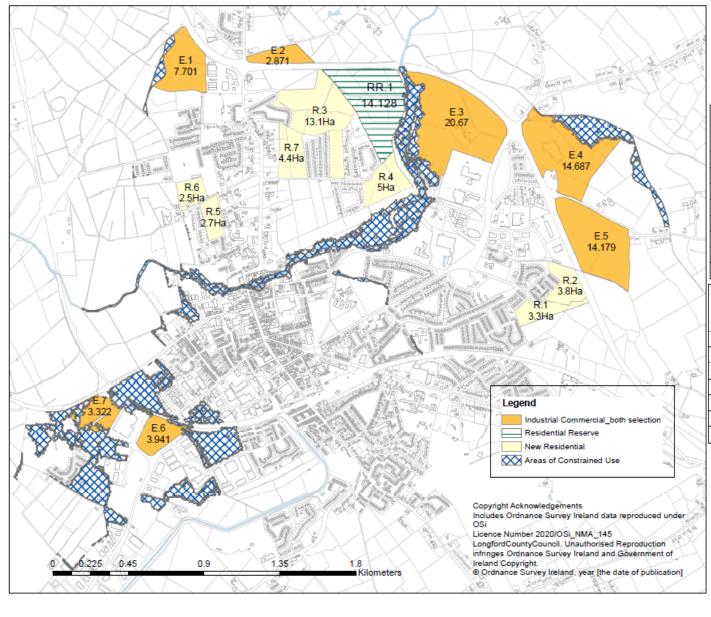
The following maps show the lands zoned and include a table providing the combined assessment and appropriate tiering and colour coding of the zoned sites in each of the settlements.

This appendix assessment has sought to combine the assessments that have been undertaken from Water Services in respect of wastewater treatment following the further iteration and Roads Section in respect of the roading infrastructure and identified areas of drainage and flooding.

The assessment identifies the lands according to a colour coding using a simplified traffic light system. The assessments have combined the previous into a combined overview for the settlement. This summary of the Infrastructure Assessment scores was undertaken In August 2021.

Sites are coded:

LAND ZONING CODING	COLOUR / TIER
Tier 1 - Green with a score in the range 100-67 (Tier 1 Sites);	
Amber with a score 66-34 (Tier 2 Sites), and;	
Red with a score 33-0 (No Development).	



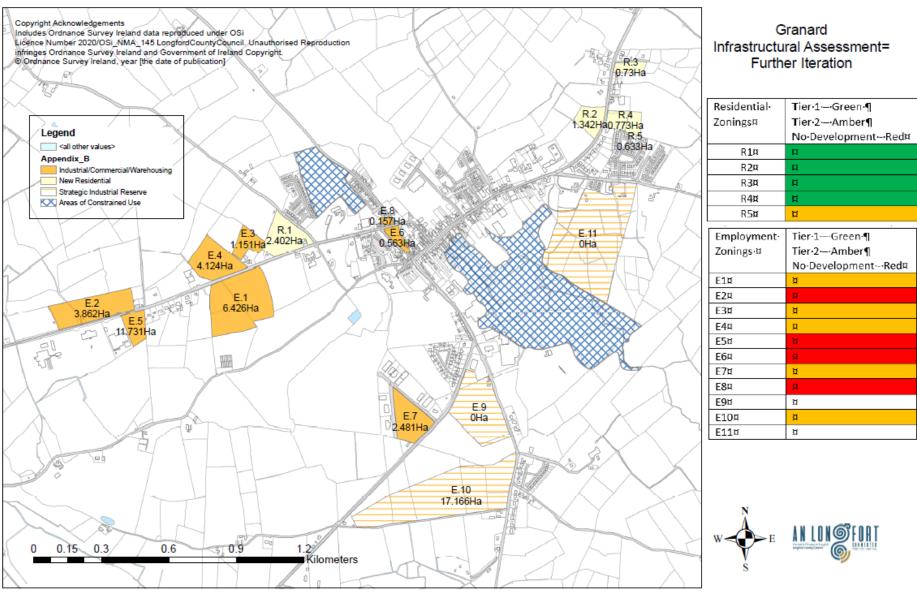
Longford Town Infrastructural Assessment-Further Iteration

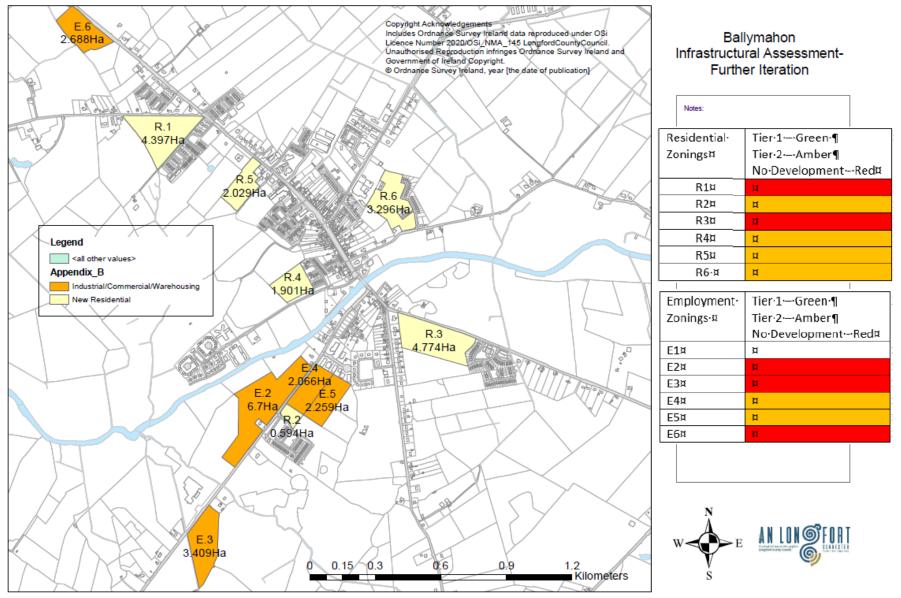
н		
×	Residential-	Tier·1·—·Green·¶
1	Zonings¤	Tier-2Amber¶
1		No•Development⊷Red¤
	R1¤	Д
	R2¤	Д
	R3¤	Д
	R4¤	Д
	R5¤	Д
1	R6¤	п
1	R7¤	Д
1	RR1¤	п

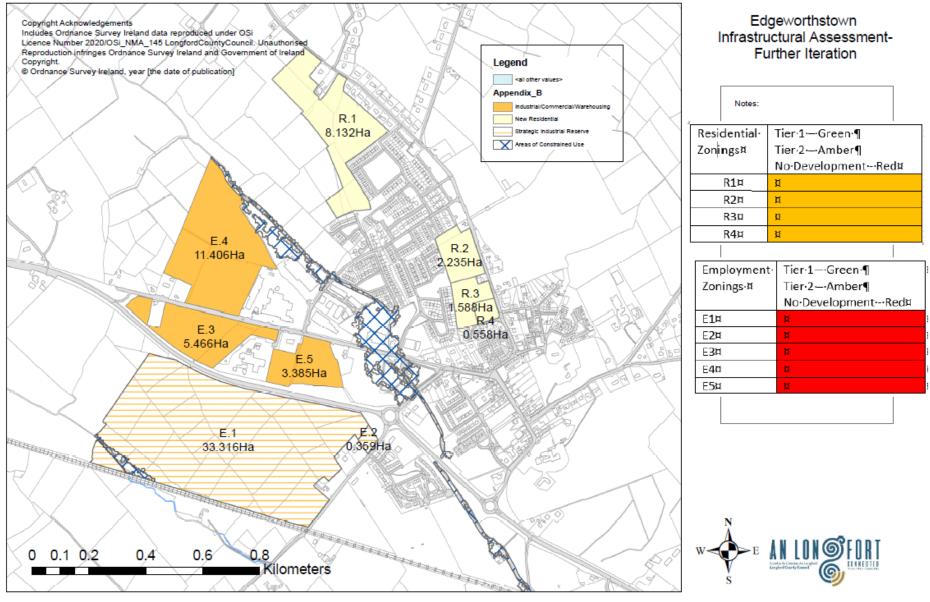
1		
١	Employment-	Tier·1 · Green · ¶
l	Zonings∙¤	Tier-2Amber¶
1		No∙Development·Red¤
l	E1¤	Д
1	E2¤	Д
	E3¤	д
l	E4¤	Д
	E5¤	Д
١	E6¤	Д
	E7¤	Д

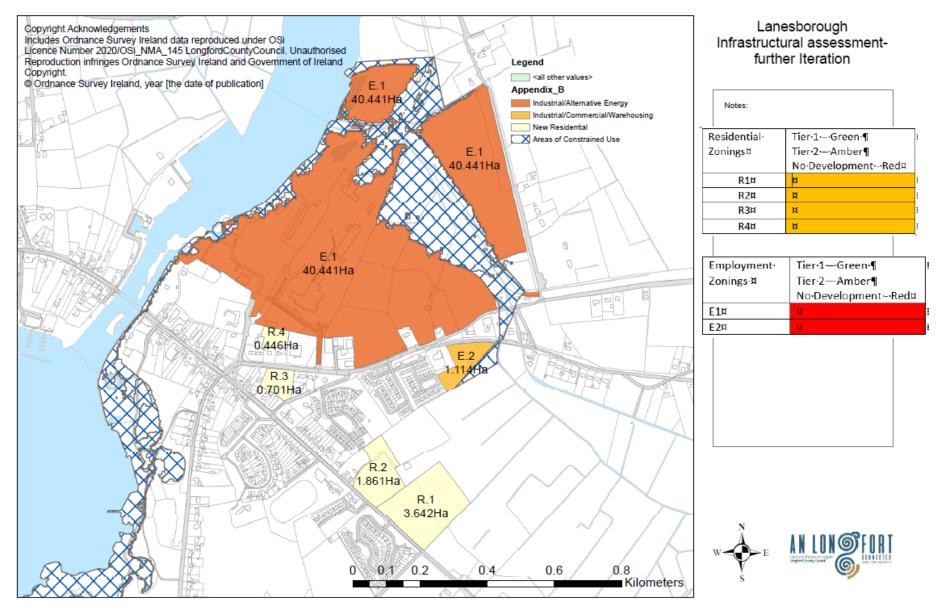


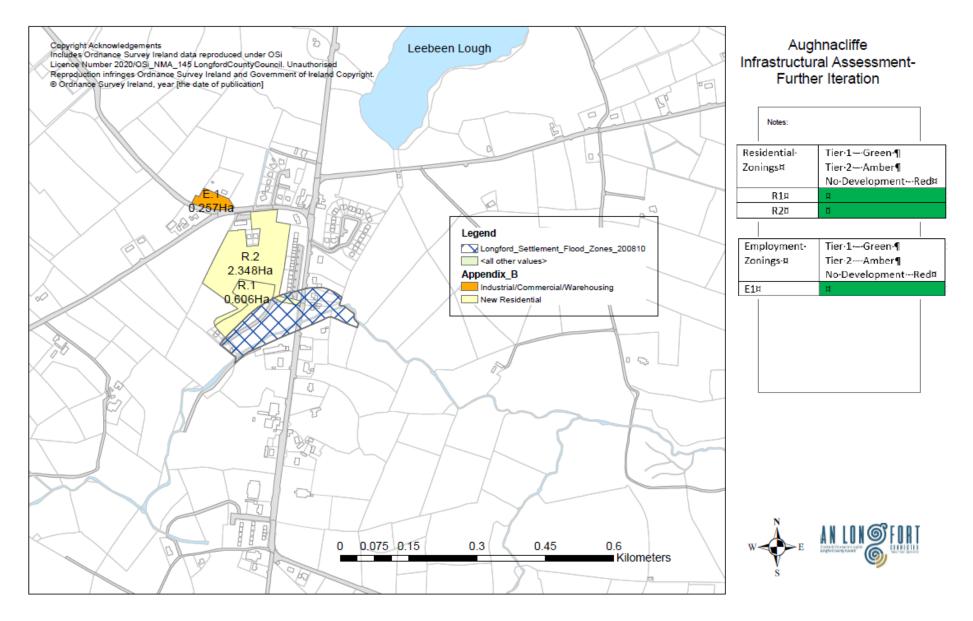


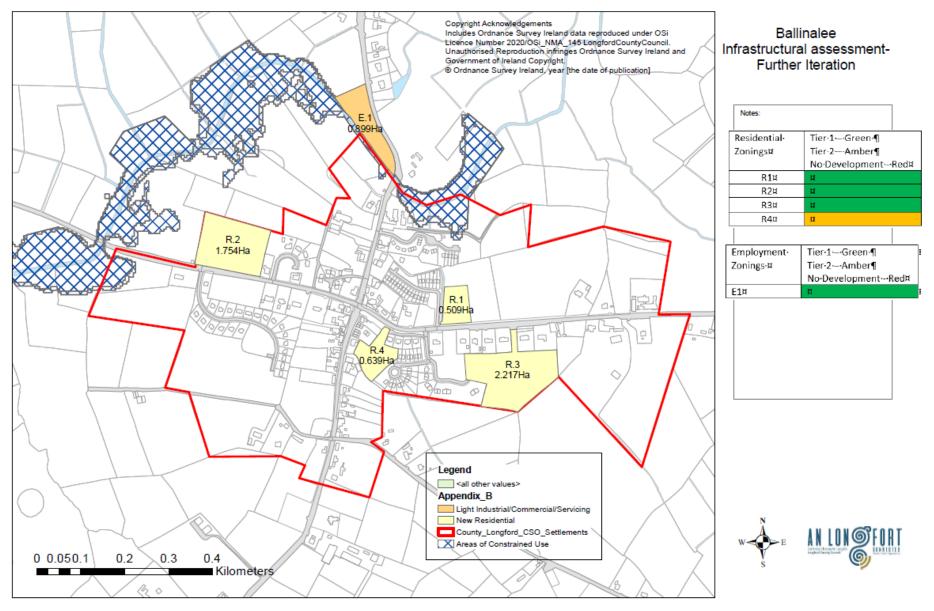


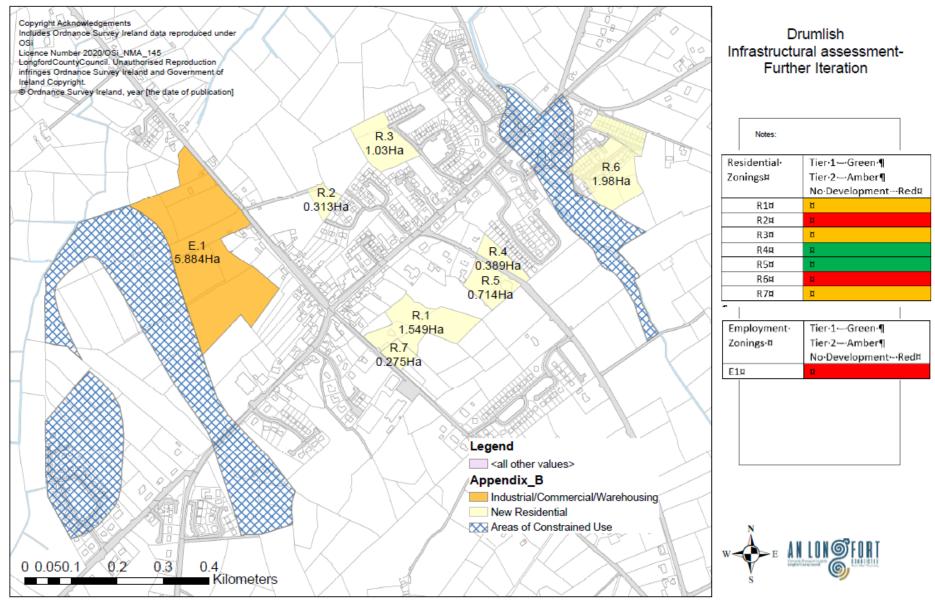


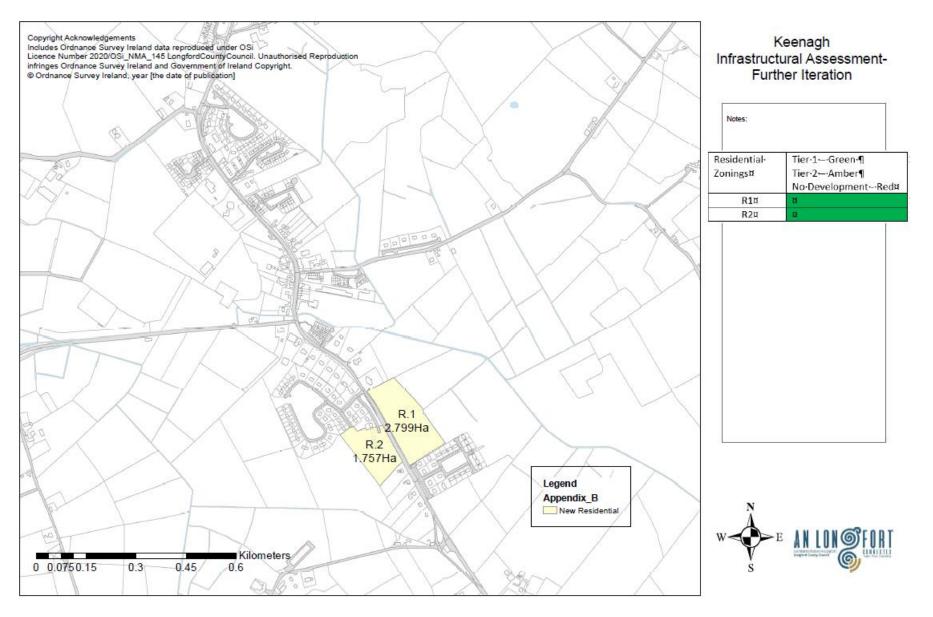


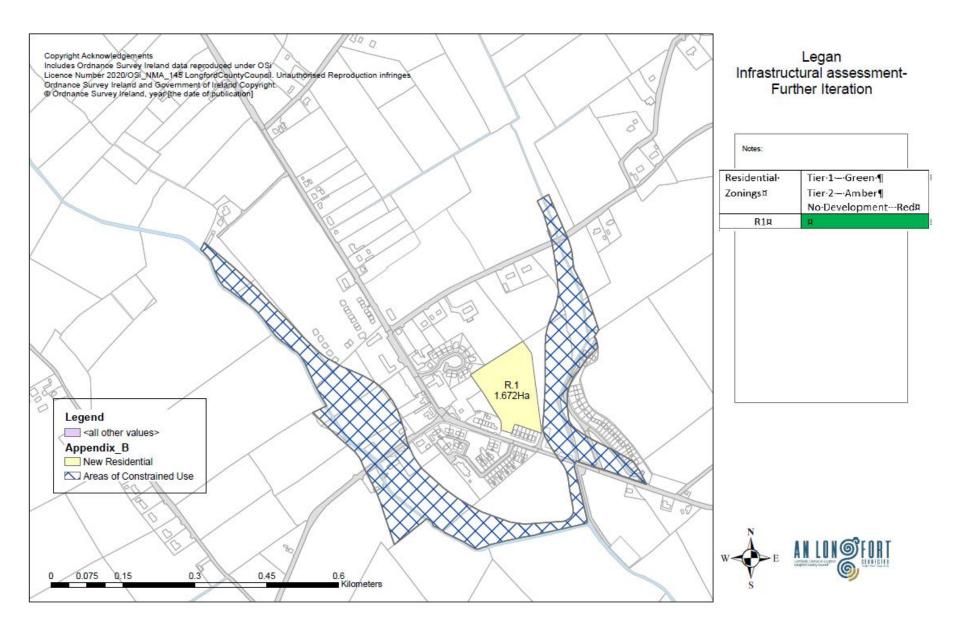


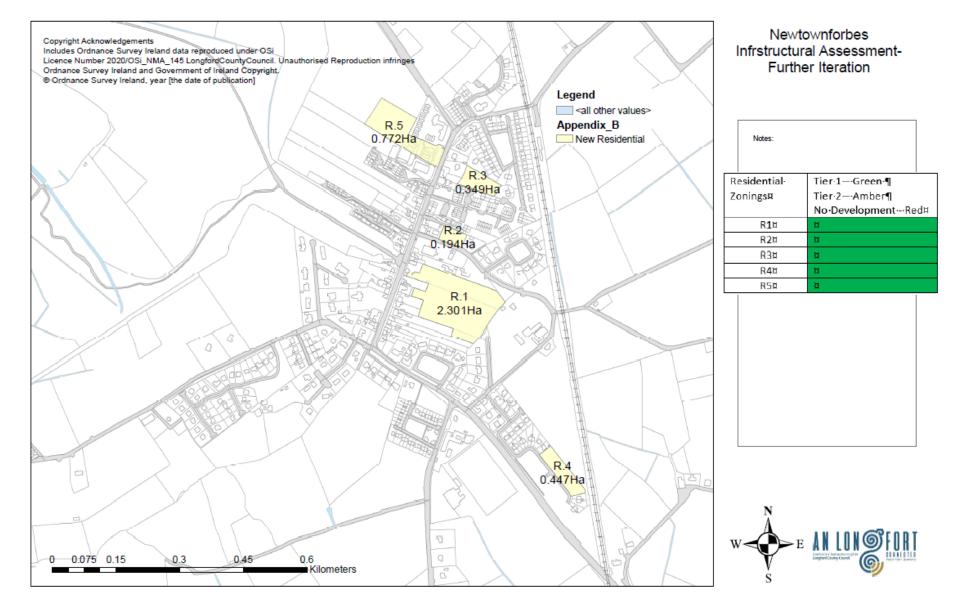


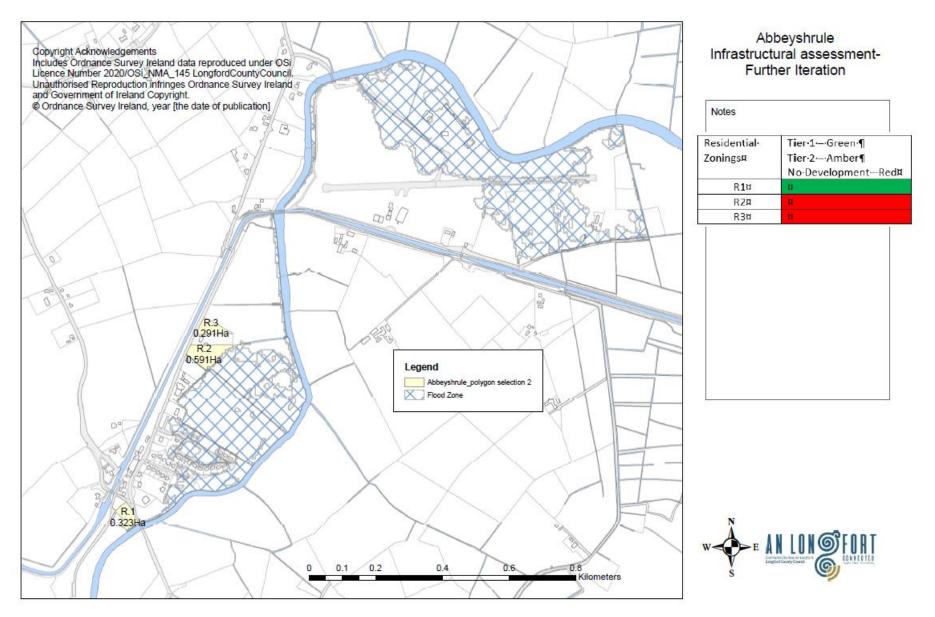












ARDAGH

Residential	Tier 1 – Green
Zonings	Tier 2 – Amber
	No Development - Red
R1	

BALLINAMUCK

Residential	Tier 1 – Green
Zonings	Tier 2 – Amber
	No Development - Red
R1	

CLONDRA

Residential	Tier 1 – Green
Zonings	Tier 2 – Amber
	No Development - Red
R1	
R2	

APPENDIX F – SETTLEMENT ZONINGS - RESIDENTIAL & EMPLOYMENT LANDS

The lands zoned for residential and employment lands have been assessed according to the infrastructure available to service the sites. The lands identified as being serviced are identified in the following settlement plans.

The background and preliminary background information used in the iterative process of assessing the settlements and the identified sites are included in the preceding appendices.

The revised settlement land-use zonings have been informed by the Submission from the OPR and EMRA which requested that the zoning of lands be informed by an Infrastructure Assessment, flood zonings, and alignment with and consideration of National Planning Policy especially in respect of compact growth and the aim of delivering growth within establishment settlements and within their defined CSO settlement boundaries. The settlements are presented according to the settlement hierarchy.

Key Town	Longford Town	
Self-Sustaining Growth	Granard	
Towns		
Self-Sustaining Towns	Ballymahon	
	Edgeworthstown	
	Lanesborough	
Towns & Villages	Aughnacliffe	Keenagh
	Ballinalee	Legan
	Drumlish	Newtownforbes
Villages & Smaller	Abbeyshrule	Ballinamuck
settlements	Ardagh	Clondra

The following maps and plans show the proposed land-use zoning changes for the main settlements and these should be read in conjunction with the previous appendices and assessments:

Appendix –F1 Key Town Longford Town

The land-use zonings for Longford Town have been revised in accordance with this Infrastructure Assessment framework and the resulting land-use zoning plan for Longford is presented below.

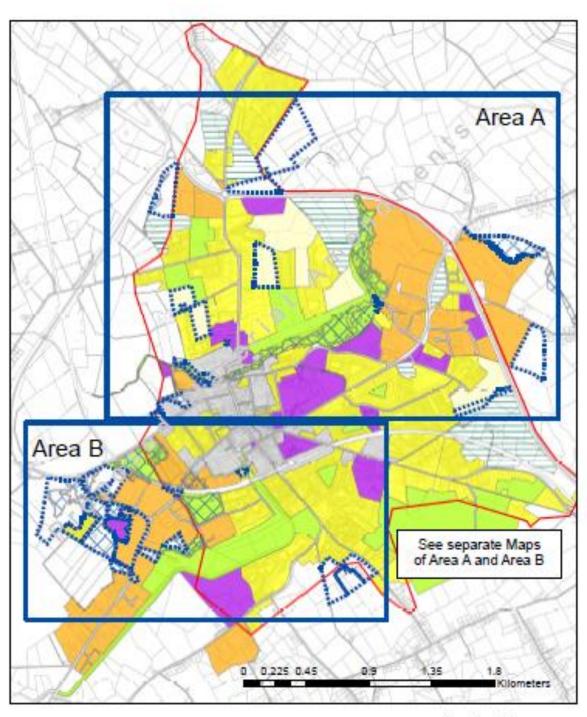
The settlement maps presented in the initial Draft County Development Plan 2021-2027 were based on the current County Development Plan 2015-2021 and the initial infrastructure assessment undertaken in early 2020 (January to April) and informed the review of the land-use zonings for the key settlements and the drafting of the County Development Plan 2021-2027.

Following the Public Consultation on the Draft Longford County Development Plan 2021-2027 and the review of Submissions and Observations received during the consultation period (27th October 2020 until 18th January 2021) the land use zoning plans for the settlements were revised and the Further Iteration Plans are included in this report under Appendix B (produced during the period December 2020 to March 2021).

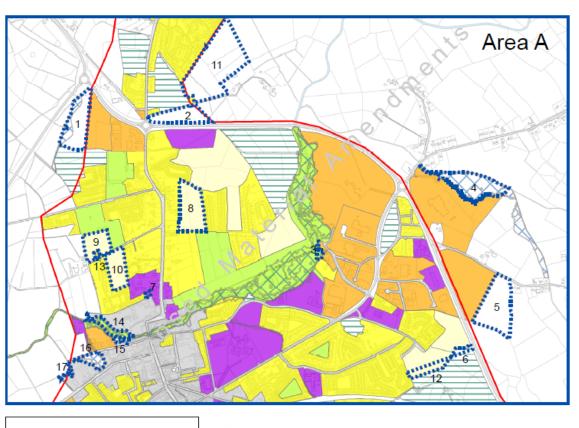
This additional review of the Infrastructure Assessment Report was undertaken following the development of the Chief Executive's Report on the Submissions received, specifically the submissions from the OPR and EMRA as well as other thematic and area specific submissions. Therefore, the quantum of lands zoned new residential and industrial / commercial / warehousing have been reduced. The revised zoning map identifies and presents a more sustainable and compact form of development reflecting the CSO boundary of the town and core principle of the NPF.

The (further iteration of the) Infrastructure Assessment, the inclusion of the flood risk zonings and the CSO settlement boundary has highlighted specific areas that are subsequently identified as undevelopable and or constrained, lacking the infrastructure required to the service the lands, or lands at high risk of flooding. The subsequent settlement plan Longford Proposed Material Amendments (June 2021) identifies those sites where land-use zonings have been amended/revised and the changes identified.

Of specific note are the amendments to the zonings to the north and east of the Longford town and the N4 national road. Additional changes are located along the river Camlin in the centre of Longford, as well as lands to the south-west and south of the town. Part of these lands are identified to be constrained uses and impacted by flood issues.







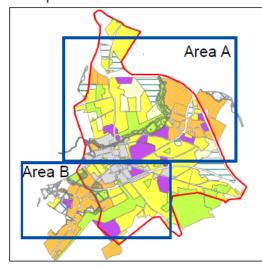




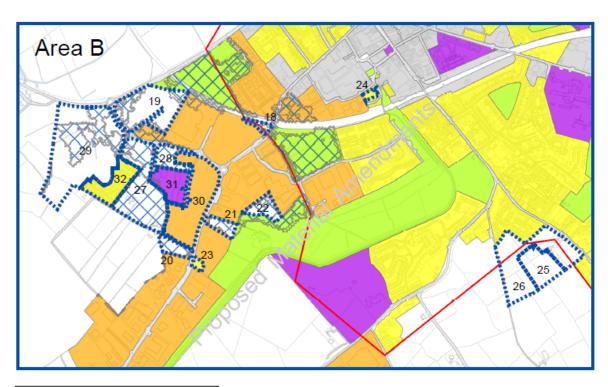
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Longford Town Proposed Material Amendments



	Zoning Changes - Area A	
Draft Plan: Zoning in Draft Plan	Alteration: Amended Zoning	Parcel No: Area on Map
Industrial/Commercia	I/Warehousing	
	No Zoning	1
	No Zoning	2
	Recreational/Amenity/Green Space	3
	No Zoning	4
	No Zoning	5
New Residential		
	Residential Reserve	6
Residential		
	Social/Community/Education/Public Utility	7
Residential Reserve		
	New Residential	8
	New Residential	9
	New Residential	10
	No Zoning	11
	New Residential	12
	Residential	13
Town Core		
	No Zoning	14
	No Zoning	15
	No Zoning	16
	No Zoning	17



Legend Changed Zoning Areas of Constrained Land Use CSO_Settlement Boundary Town Core Industrial/Commercial/Warehousing Recreational/Amenity/Green Space New Residential Residential Social/Community/Education/Public Utility Strategic Residential Reserve

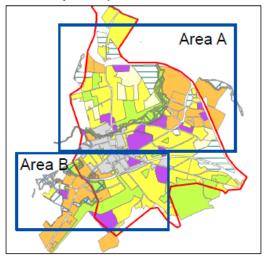


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Longford Town Proposed Material Amendments



Zonin	g Changes - Area B	
Draft Plan: Zoning in Draft Plan	Alteration: Amended Zoning	Parcel No: Area on Map
Industrial/Commercial	/Warehousing	
No	Zoning	18
No	Zoning	19
No	Zoning	20
No	Zoning	21
	Zoning	22
	sidential	23
Re	sidential	24
Recreation/Amenity/G	reen Space	
No	Zoning	25
Residential Reserve		
No	Zoning	26
Site Resolution Objectiv	re	
No	Zoning	27
No	Zoning	28
No	Zoning	29
Inc	fustrial/Commercial/Warehousing	30
So	cial/Community/Education/Public Utility	31
Re	sidential	32

Appendix – F2 Self-Sustaining Growth Towns Granard

The land-use zonings for Granard Town have been revised in accordance with the Infrastructure Assessment framework and the resulting land-use plan for the settlement is presented below.

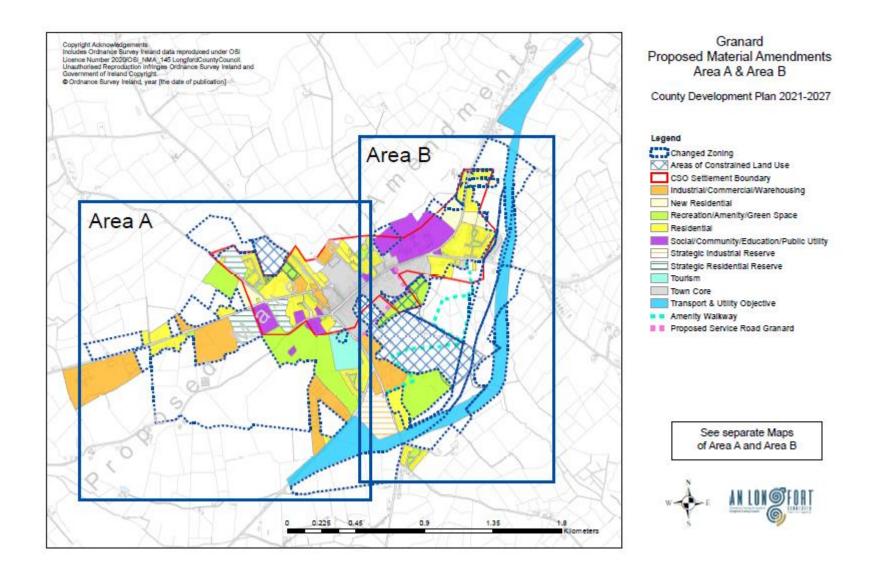
The settlement maps presented in the initial Draft County Development Plan 2021-2027 were based on the current County Development Plan 2015-2021 and the initial infrastructure assessment undertaken in early 2020 and informed the review of the land-use zonings for the key settlements and the drafting of the County Development Plan 2021-2027.

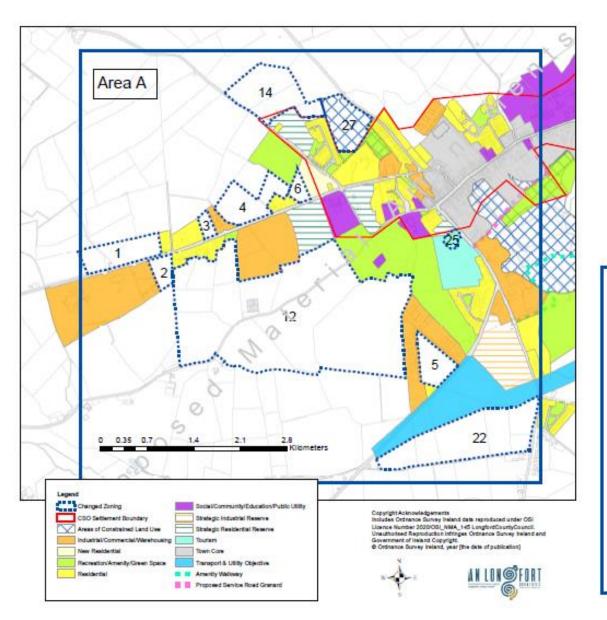
Following the Public Consultation on the Draft Longford County Development Plan 2021-2027 and the review of Submissions and Observations received during the consultation period (27th October 2020 until 18th January 2021) the land use zoning plans for the settlements were revised and the Further Iteration Plans are included in this report under Appendix B (produced during the period December 2020 to March 2021). An additional review of the Infrastructure Assessment Report was undertaken following the development of the Chief Executive's Report on the Submissions received, specifically the submissions from the OPR and EMRA as well as other thematic and area specific submissions.

The Infrastructure Assessment, the inclusion of the flood risk zonings and the CSO settlement boundary highlighted specific areas that are subsequently identified as undevelopable and or constrained, lacking the infrastructure required to the service the lands, or lands at high risk of flooding. The subsequent settlement plan identifies those sites where land-use zonings have been amended/revised and the changes identified. The revised zoning map for Granard identifies a more sustainable and compact form of development reflecting the CSO boundary of the town and core principle of the NPF, the EMRA RSES and Submission of the OPR on the Draft Plan.

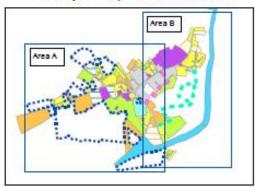
The quantum of lands zoned new residential and industrial/commercial/warehousing have been reduced within Granard. Within Granard significant areas of land have been revised and the land-use maps showing zone 'A' west of the town and zone 'B' east present the proposed amendments.

In the Granard area 'A' large areas of land have been de-zoned from industrial/commercial/warehousing, in particular those areas outside of the CSO settlement boundary and along the regional and national roads. The revised zoning plan presents a more compact form of development. Granard Area 'B' to the east of the town a significant number of amendments are indicated reflecting the constrained land-use (flooding) issues and the identified CSO boundary. Lands beyond this boundary have been de-zoned accordingly.

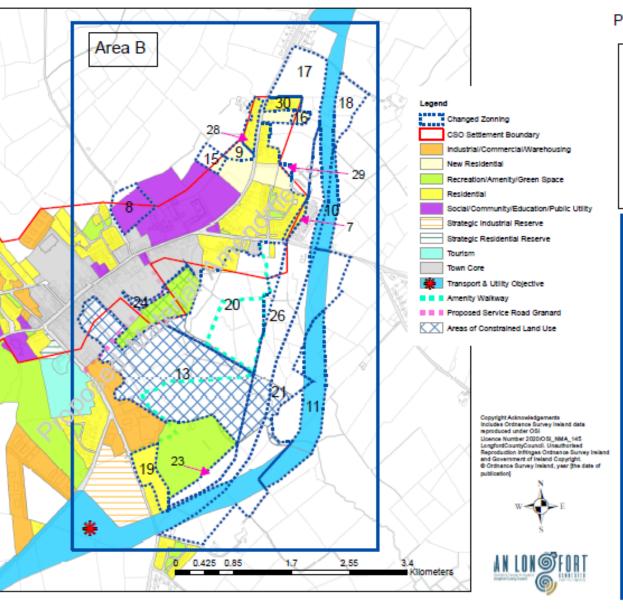




Granard Proposed Material Amendments County Development Plan 2021-2027



	Zoning Changes	
Draft Plan: Zoning in Draft Plan	Alteration: Amended Zoning	Parcel No: Area on Map
Industrial/Commercial	/Warehousing	
	No Desiring	3.8
	No Dolling	2
	No Facility	3
	No Dorling	4
	No Daving	5
New Residential		
	No Zoring	6
Recreation/Amenity/G	reen Space	
	National	27
Recreational/Amenity/	Green Space	
	No During	12
Residential Reserve		
	No Desiry	14
Strategic Industrial Res	erve	
	No.Doning	22
Town Core		
	Souten.	25



Granard Proposed Material Amendments - Area B County Development Plan 2021-2027



	Zoning (Changes - Area B	
Draft Plan: Zoning in Draft	Plan	Alteration: Amended Zoning	Parcel No: Area on Map
New Residential			
	Residential		7
	No Zoning		29
No Zoning			
	New Resident	ial	9
	Transport & U	Mility Objective	10
	Transport & U	Hilty Objective	11
	Residential		28
Recreational/To-	wnCore/Indus	trial	
	No Zoning		13
Social/Communi	ty/Education	/Public Utility	
	Residential		19
Strategic Industr	ial Reserve		
	Social/Commi	unity/Education/Public Util+No Zoning	8
	No Zoning &	Residential	20
	No Zoning &	Transport & Utility Objective	21
	No Zoning		23
Strategic Resider	ntial Reserve		
	New Resident	fal & No Zoning	15
	New Resident	tal	16
	No Zoning		17
	No Zoning		18
	Residential		30
Town Core			
	No Zoning		24
Transport & Utili	ty Objective		
	No Zoning		26
	Amenity Wa	alkway - New	
*		Utility Objectives - New position	for proposed

Appendix – F3 Self-Sustaining Towns Ballymahon

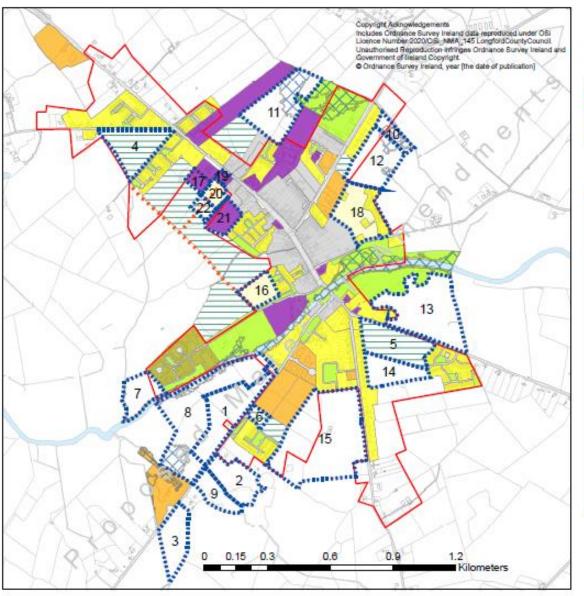
The land-use zonings for Ballymahon has been revised in accordance with the Infrastructure Assessment framework and the resulting land-use plan for the settlement is presented below.

The settlement maps presented in the initial Draft County Development Plan 2021-2027 were based on the current County Development Plan 2015-2021 and the preliminary infrastructure assessment undertaken in early 2020 which informed the review of the land-use zonings for the key settlements and the drafting of the County Development Plan 2021-2027.

Following the Public Consultation on the Draft Longford County Development Plan 2021-2027 and the review of Submissions and Observations received during the consultation period (27th October 2020 until 18th January 2021) the land use zoning plans for the settlements were revised and the Further Iteration Plans are included in this report under Appendix B (produced during the period December 2020 to March 2021). An additional review of the Infrastructure Assessment Report was undertaken following the development of the Chief Executive's Report on the Submissions received, specifically the submissions from the OPR and EMRA as well as other thematic and area specific submissions.

The Infrastructure Assessment, the inclusion of the flood risk zonings and the CSO settlement boundary highlighted specific areas that are subsequently identified as undevelopable and or constrained, lacking the infrastructure required to the service the lands, or lands at high risk of flooding. The revised settlement plan identifies those sites where land-use zonings have been amended/revised and the changes identified. The subsequent zoning map for Ballymahon identifies a more sustainable and compact form of development reflecting the CSO boundary of the town and core principle of the NPF, the EMRA RSES and Submission of the OPR on the Draft Plan.

The quantum of lands zoned new residential and industrial/commercial/warehousing have been reduced within Ballymahon significant areas of land have been revised and lands re-zoned. The settlement has significant infrastructure capacity issues which have been identified and as a consequence the quantum of residential and industrial/commercial/warehousing lands zoned within the town settlement have been significantly reduced. The revised zoning plan presents a more compact form of development, with proposed new residential development located within the defined CSO settlement boundary following the principle of compact growth and sustainable urban development. Significant areas to the south of the town, the north and east of the town have been de-zoned.



Ballymahon Proposed Material Amendments



	Zoning Changes	
Draft Plan: Zoning in Draft Plan Industrial/Commi	Alteration: Amended Zoning ercial/Warehousing	Parcel No: Area on Map
	No Zoning	148
New Residential		
	Strategic Residential Reserve	4-6
Recreation/Amen	ity/Green Space	
	No Zoning	7-10
Residential Reserv	-	
	No Zoning	11 - 15
	New Residential	16
	Social/Community/Education/Public Utility	17
Site Resolution Ob	ojective	
	Residential & New Residential	16
Town Core		
	Social/Community/Education/Public Utility	19, 21
	New Residential	20
	Strategic Residential Reserve	22
	Proposed Roadway	





Appendix – F4 Self-Sustaining Towns Edgeworthstown

The land-use zonings for Edgeworthstown has been revised in accordance with the Infrastructure Assessment framework and the resulting land-use plan for the settlement is presented below.

The settlement maps presented in the initial Draft County Development Plan 2021-2027 were based on the current County Development Plan 2015-2021 and the preliminary infrastructure assessment undertaken in early 2020 which informed the review of the land-use zonings for the key settlements and the drafting of the County Development Plan 2021-2027.

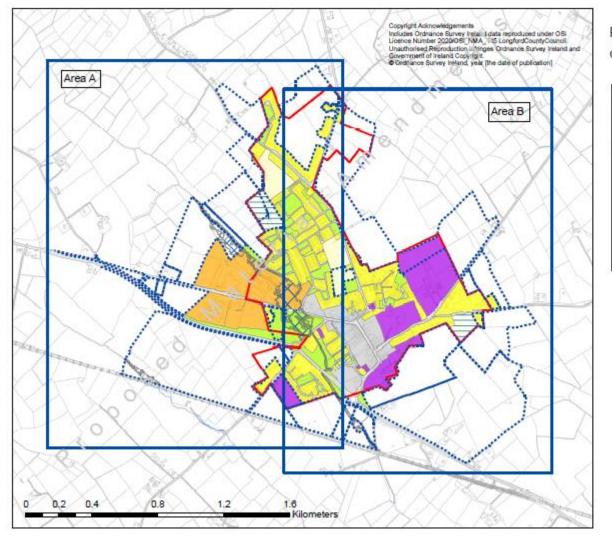
Following the Public Consultation on the Draft Longford County Development Plan 2021-2027 and the review of Submissions and Observations received during the consultation period (27th October 2020 until 18th January 2021) the land use zoning plans for the settlements were revised and the Further Iteration Plans are included in this report under Appendix B (produced during the period December 2020 to March 2021). An additional review of the Infrastructure Assessment Report was undertaken following the development of the Chief Executive's Report on the Submissions received, specifically the submissions from the OPR and EMRA as well as other thematic and area specific submissions.

The Infrastructure Assessment, the inclusion of the flood risk zonings and the CSO settlement boundary have identified areas that are constrained and lacking the infrastructure required to the service the lands, or lands at high risk of flooding. The subsequent settlement plans (Area A west and Area B east) identifies those sites where land-use zonings have been amended/revised and the changes identified.

The quantum of lands zoned new residential and industrial/commercial/warehousing have been reduced. The revised zoning map identifies a more sustainable and compact form of development reflecting the CSO boundary of the town and core principle of the NPF, the EMRA RSES and Submission of the OPR on the Draft Plan.

Within Edgeworthstown significant areas of land have been revised and lands rezoned. The settlement has significant infrastructure capacity issues, especially in relation to wastewater which have been identified and as a consequence the quantum of residential, residential reserve and industrial/commercial/warehousing and reserve lands zoned within the town settlement have been significantly reduced.

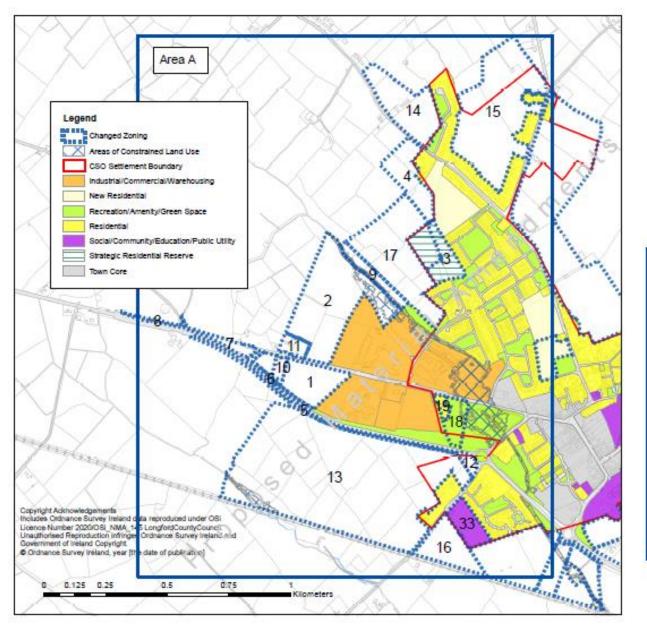
Significant areas within Area A to the north, west and south of the town have been dezoned. Significant lands within the Area B (east) have also been re-zoned including lands to the north, east and south of the town



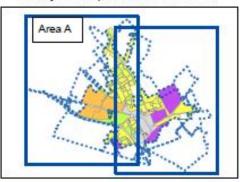
Edgeworthstown Proposed Material Amendments







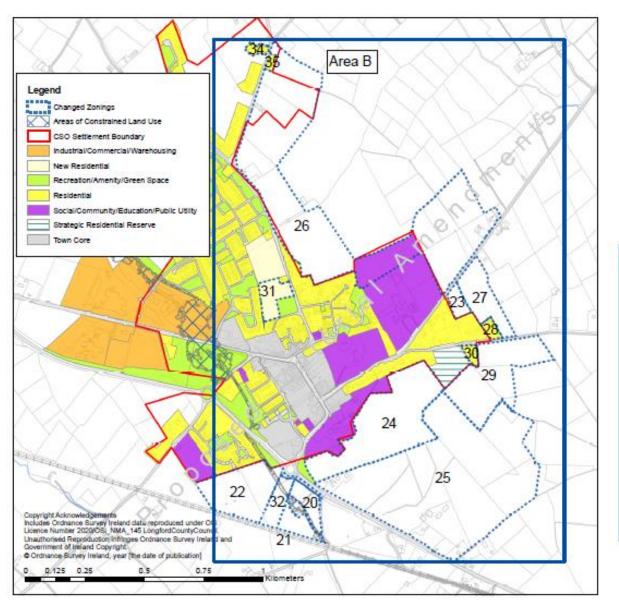
Edgeworthstown Proposed Material Amendments



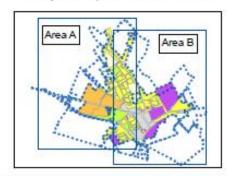
	Changed Zoning	
Draft Planc		Parcel No.1
Zuning in Draft Plan	Amended Zoning	Area on Map
Industrial/Commercial	/Warehousing	
	No Zoring	1,2
New Residential		
	Strategic Residential Reserve	- 1
	No Zoring	4
Recreational/Amenity/	Seven Source	
STATE OF THE STATE	No Zoning	5-9
	Social/Community/Sduarton/Public Utility	13
Residential		
	No Zoring	10,11
Social/Community/Edu	scation/Public Utility	
	No Zoring	-12
Strategic Industrial Res	arve.	
	No Zoring	13
Strategic Residential Re	nerve	
and the second second	No Zoning	14-17
	Recreations//Amenity/Green Space	16
	Recidental	19







Edgeworthstown Proposed Material Amendments County Development Plan 2021-2027



	Changed Zoning	
Draft Plan: Zoning in Draft Plan	Alteration: Amended Zoning	Parcel No.: Area on Map
Recreational/Amenity/C	ireer Space	
	No Zoning	20 - 22
Recidential		
	No Zoning	23
Social/Community/Edu	cation	
	No Zoring	24
Strategic Industrial Ress	rve	
	No Zoning	25
Strategic Residential Re-	serve	
	Residental	34, 20, 30, 35
	Sodal/Community/Education/Public Util+No Zoning	36
	No Zoning	27, 29
	New Recidential	31
Transport and Utilities h	ofractructure	
minimum de la companion de la	No Zoning	32





Appendix – F5 Self-Sustaining Towns Lanesborough

The land-use zonings for Lanesborough has been revised in accordance with the Infrastructure Assessment framework and the resulting land-use plan for the settlement is presented below.

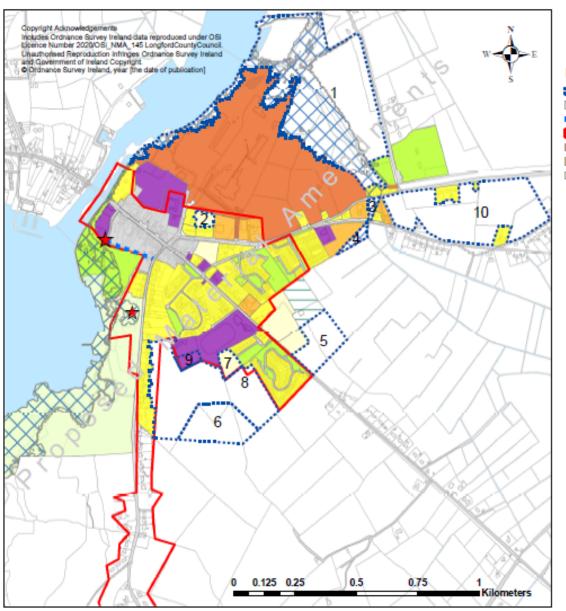
The settlement maps presented in the initial Draft County Development Plan 2021-2027 were based on the current County Development Plan 2015-2021 and the preliminary infrastructure assessment undertaken in early 2020 which informed the review of the land-use zonings for the key settlements and the drafting of the County Development Plan 2021-2027.

Following the Public Consultation on the Draft Longford County Development Plan 2021-2027 and the review of Submissions and Observations received during the consultation period (27th October 2020 until 18th January 2021) the land use zoning plans for the settlements were revised and the Further Iteration Plans are included in this report under Appendix B (produced during the period December 2020 to March 2021). An additional review of the Infrastructure Assessment Report was undertaken following the development of the Chief Executive's Report on the Submissions received, specifically the submissions from the OPR and EMRA as well as other thematic and area specific submissions.

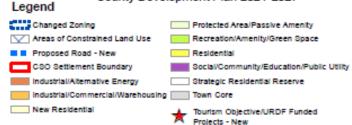
The Infrastructure Assessment, the inclusion of the flood risk zonings and the CSO settlement boundary have identified areas that are constrained and lacking the infrastructure required to the service the lands, or lands at high risk of flooding. The subsequent settlement plan identifies those sites where land-use zonings have been amended/revised and the changes identified.

The quantum of lands zoned new residential and industrial/commercial/warehousing have been reduced. The revised zoning map identifies a more sustainable and compact form of development reflecting the CSO boundary of the town and core principle of the NPF, the EMRA RSES and Submission of the OPR on the Draft Plan.

Within Lanesborough significant areas of land have been revised and lands re-zoned and or de-zoned. Significant areas to the north, east and south of the town have been de-zoned in particular lands which were zoned Strategic Residential Reserve. Proposed new residential lands are now located within the existing CSO boundary.



Lanesborough Proposed Material Amendments



	Zoning Changes	
Draft Plan: Zoning in Draft Plan	Alteration: Amended Zoning	Parcel No: Area on Map
Industrial/Alternative	Energy	
	No Zoning	1
	New Residential	2
Industrial/Commercia	I/Warehousing	
	No Zoning	3
	No Zoning	4
New Residential		
	No Zoning	5
Recreational/Amenity	/Green Space	
	No Zoning	6
Residential		
RESIDENTIAL	New Residential	7
Strategic Residential F	leserve	
and the second	No Zoning	8
	Social/Community/Education/Publi Utility	k 9
	No Zoning	10
	sm Objective/URDF led Projects - New	
Prop	osed Road - New	- (Q)

Appendix – F6 Towns & Villages Aughnacliffe

The land-use zonings for Aughnacliffe has been revised in accordance with the Infrastructure Assessment framework and the resulting land-use plan for the settlement is presented below.

The settlement maps presented in the initial Draft County Development Plan 2021-2027 were based on the current County Development Plan 2015-2021 and the preliminary infrastructure assessment undertaken in early 2020 which informed the review of the land-use zonings for the key settlements and the drafting of the County Development Plan 2021-2027.

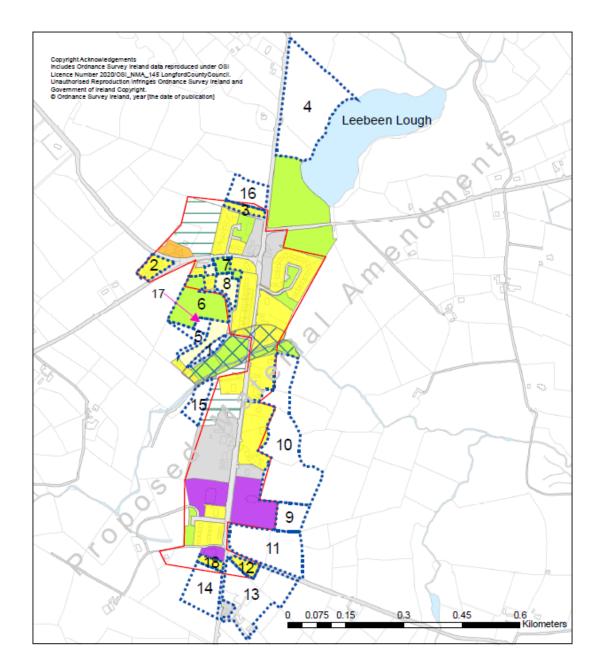
Following the Public Consultation on the Draft Longford County Development Plan 2021-2027 and the review of Submissions and Observations received during the consultation period (27th October 2020 until 18th January 2021) the land use zoning plans for the settlements were revised and the Further Iteration Plans are included in this report under Appendix B (produced during the period December 2020 to March 2021). An additional review of the Infrastructure Assessment Report was undertaken following the development of the Chief Executive's Report on the Submissions received, specifically the submissions from the OPR and EMRA as well as other thematic and area specific submissions.

The Infrastructure Assessment, the inclusion of the flood risk zonings and the CSO settlement boundary have identified areas that are constrained and lacking the infrastructure required to the service the lands, or lands at high risk of flooding. The subsequent settlement plan identifies those sites where land-use zonings have been amended/revised and the changes identified

The quantum of lands zoned new residential and industrial/commercial/warehousing have been reduced. The revised zoning map identifies a more sustainable and compact form of development reflecting the CSO boundary of the town and core principle of the NPF, the EMRA RSES and Submission of the OPR on the Draft Plan.

Within Aughnacliffe large areas of land have been revised and lands re-zoned and or de-zoned. The revised zoning plans presents a more compact form of development, with proposed new residential development located within the defined CSO settlement boundary following the principle of compact growth and sustainable urban development.

Significant areas to the north, lands to the west, the east and the south of the town have been revised. The amount of lands zoned Strategic Residential Reserve have been reduced.



Aughnacliffe Proposed Material Amendments

Legend	
Changed Zoning	Recreation/Amenity/Green Space
CSO Settlement Boundary	Residential
Areas of Constrained Land Use	Social/Community/Education/Public Utility
Industrial/Commercial/Warehousing	Strategic Residential Reserve
New Residential	Town Core

	61 17 :	
	Changed Zoning	
Draft Plan: Zoning in Draft Plan	Alteration: Amended Zoning	Parcel No.: Area on Map
New Residential		
	No Zoning	1, 17
No Zoning		
	Residential	2, 3
Recreational/Amenity/	Green Space	
	No Zoning	4
Site Resolution Objective		
	No Zoning	5
	Recreational/Amenity/Green Space	6, 7
	New Residential	8
Social/Community/Edu	cation/Public Utility	
	No Zoning	9
Strategic Residential Re	serve	
	No Zoning	10, 11, 13, 14, 15, 16
	Residential	12
	110210011001	





Appendix – F7 Towns & Villages Ballinalee

The land-use zonings for Ballinalee has been revised in accordance with the Infrastructure Assessment framework and the resulting land-use plan for the settlement is presented below.

The settlement maps presented in the initial Draft County Development Plan 2021-2027 were based on the current County Development Plan 2015-2021 and the preliminary infrastructure assessment undertaken in early 2020 which informed the review of the land-use zonings for the key settlements and the drafting of the County Development Plan 2021-2027.

Following the Public Consultation on the Draft Longford County Development Plan 2021-2027 and the review of Submissions and Observations received during the consultation period (27th October 2020 until 18th January 2021) the land use zoning plans for the settlements were revised and the Further Iteration Plans are included in this report under Appendix B (produced during the period December 2020 to March 2021). An additional review of the Infrastructure Assessment Report was undertaken following the development of the Chief Executive's Report on the Submissions received, specifically the submissions from the OPR and EMRA as well as other thematic and area specific submissions.

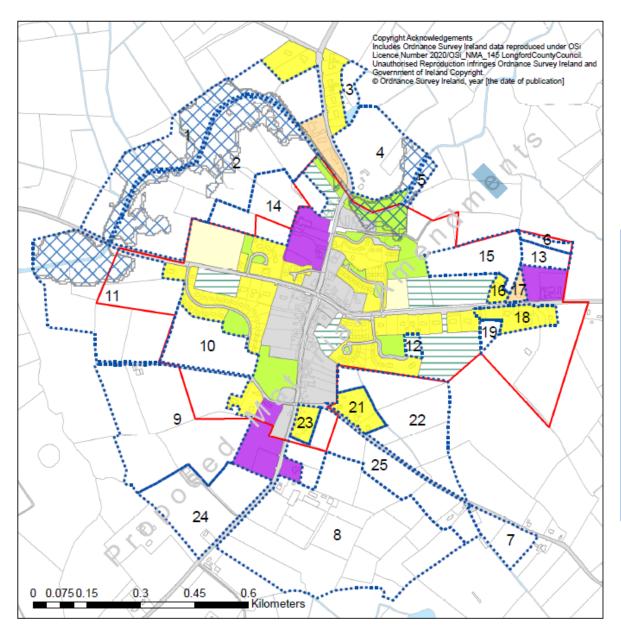
The Infrastructure Assessment, the inclusion of the flood risk zonings and the CSO settlement boundary have identified areas that are constrained and lacking the infrastructure required to the service the lands, or lands at high risk of flooding. The subsequent settlement plan identifies those sites where land-use zonings have been amended/revised and the changes identified.

The quantum of lands zoned new residential and industrial/commercial/warehousing have been reduced. The revised zoning map identifies a more sustainable and compact form of development reflecting the CSO boundary of the town and core principle of the NPF, the EMRA RSES and Submission of the OPR on the Draft Plan.

Within Ballinalee significant areas of land have been revised and lands re-zoned and or de-zoned. The revised zoning plan presents a more compact form of development, with proposed new residential development located within the defined CSO settlement boundary following the principle of compact growth and sustainable urban development.

Significant areas to the north identified as constrained use have been de-zoned, further lands to the west and east and to the south have also been revised. The quantum of lands zoned as Strategic Residential Reserve and Recreation/Amenity/Green Space lands have been de-zoned.

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Ballinalee Proposed Material Amendments

Legend	
Changed Zoning	Recreation/Amenity/Green Space
Areas of Constrained Land Use	Residential
CSO Settlement Boundary	Social/Community/Education/Public Utility
Light Industrial/Commercial/Servicing	Strategic Residential Reserve
New Residential	Town Core

Changed Zoning				
Draft Plan: Zoning in Draft Plan	Alteration: Amended Zoning	Parcel No.: Area on Map		
Recreational/Amenity/Green Space				
	No Zoning	1-11		
Residential				
	Strategic Residential Reserve	12		
Social/Community/Education/Public Utility				
	No Zoning	13		
Strategic Residential Re	eserve			
	No Zoning	14, 15, 19, 22, 24, 25		
	Residential	16, 18, 21, 23		
	Light Industrial/Commercial/Servicing	17		





Appendix – F8 Towns & Villages Drumlish

The land-use zonings for Drumlish has been revised in accordance with the Infrastructure Assessment framework and the resulting land-use plan for the settlement is presented below.

The settlement maps presented in the initial Draft County Development Plan 2021-2027 were based on the current County Development Plan 2015-2021 and the preliminary infrastructure assessment undertaken in early 2020 which informed the review of the land-use zonings for the key settlements and the drafting of the County Development Plan 2021-2027.

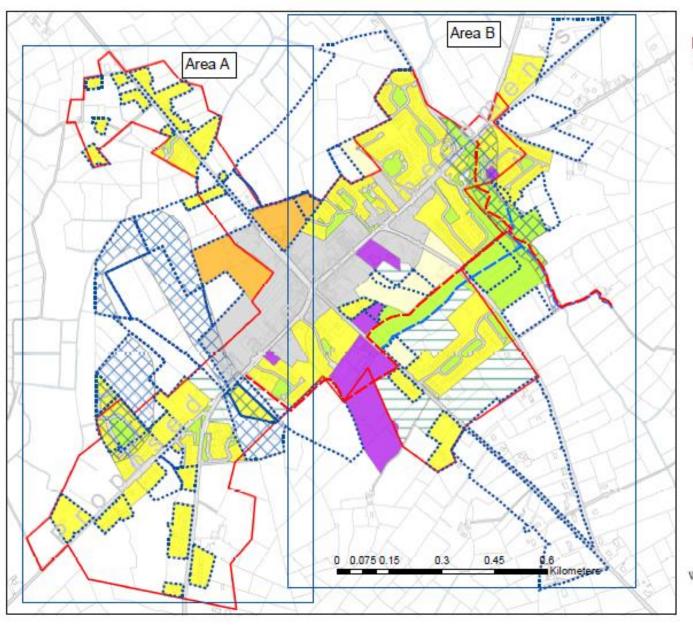
Following the Public Consultation on the Draft Longford County Development Plan 2021-2027 and the review of Submissions and Observations received during the consultation period (27th October 2020 until 18th January 2021) the land use zoning plans for the settlements were revised and the Further Iteration Plans are included in this report under Appendix B (produced during the period December 2020 to March 2021). An additional review of the Infrastructure Assessment Report was undertaken following the development of the Chief Executive's Report on the Submissions received, specifically the submissions from the OPR and EMRA as well as other thematic and area specific submissions.

The Infrastructure Assessment, the inclusion of the flood risk zonings and the CSO settlement boundary have identified areas that are constrained and lacking the infrastructure required to the service the lands, or lands at high risk of flooding. The subsequent settlement plan identifies those sites where land-use zonings have been amended/revised and the changes identified.

The quantum of lands zoned new residential and industrial/commercial/warehousing have been reduced. The revised zoning maps identifies a more sustainable and compact form of development reflecting the CSO boundary of the town and core principle of the NPF, the EMRA RSES and Submission of the OPR on the Draft Plan.

Within Drumlish significant areas of land have been revised and lands re-zoned and or de-zoned. The revised zoning plans (Area A – west) (Area B- east) presents a more compact form of development, with proposed new residential development located within the defined CSO settlement boundary following the principle of compact growth and sustainable urban development.

<u>Map zoned Area A (west)</u> identifies significant areas to the north identified as constrained use have been de-zoned, further lands to the west and east and to the south have also been revised. Additional existing residential lands have been included. <u>Map zoned Area B (east)</u> identifies large areas as constrained use, and significant lands have been de-zoned which had been previously zoned as Strategic Residential Reserve; in particular those located around the periphery of the settlement and outside of the CSO boundary.



Drumlish Proposed Material Amendments County Development Plan 2021-2027

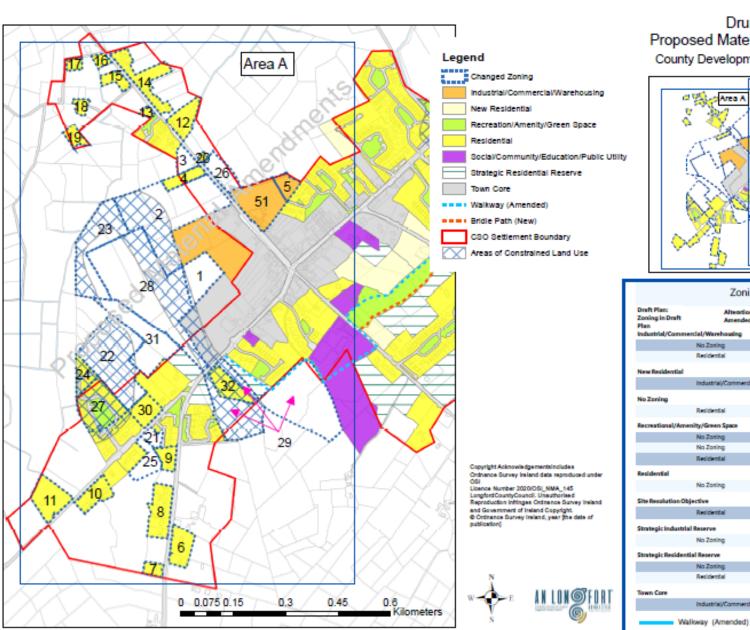


See separate Maps of Area A and Area B

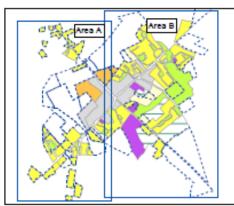
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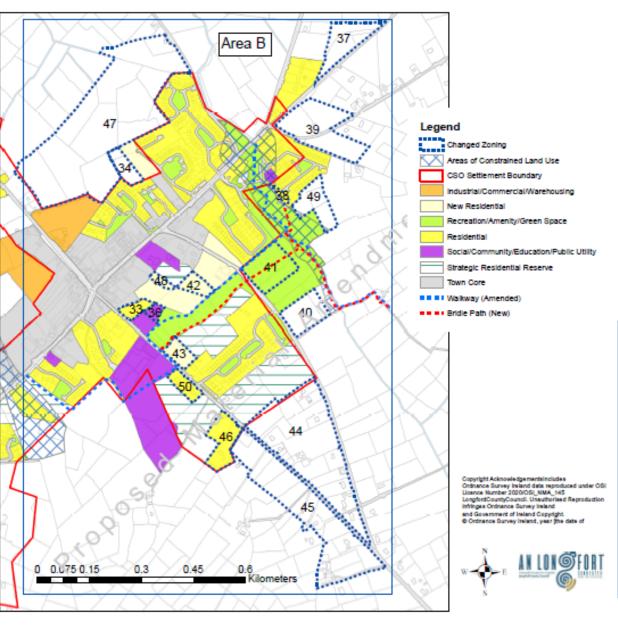




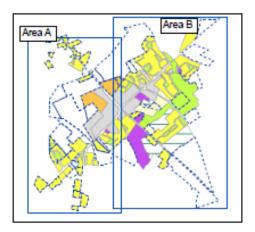
Drumlish Proposed Material Amendments County Development Plan 2021-2027



	Zoning Changes	
Draft Plan: Zoning in Draft Plan Industrial/Comm-	Alteration: Amended Zoning ercial/Warehousing	Parcel No: Area on Map
	No Zoning	1-3
	Residential	4
New Residential		
	Industrial/Commercial/Warehousing	5
No Zoning		
	Residential	6-20
Recreational/Ame	enity/Green Space	
	No Zoning	21
	No Zoning	22 - 23
	Residential	24
Residential		
	No Zoning	25 - 26
Site Resolution Ob	jective	
	Residential	27
Strategic Industri	al Reserve	
	No Zoning	28
Strategic Resident	tial Reserve	
	No Zoning	29, 31
	Residential	30, 32
Town Core		
	Industrial/Commercial/Warehousing	51
Wa	alikway (Amended)	Bridle Path (New)



Drumlish Proposed Material Amendments



	Zoning Changes - Area	D
Draft Plan:		Parcel No:
Zoning in Draft Plan New Residential	Alteration: Amended Zoning	Area on Map
New Kesidensal	Residential	33
	No Zoning	34
	Social/Community/Education/Public Utility	36
Recreational/Ame	enity/Green Space	
	No Zoning	37
	Residential	38
Strategic Resident	tial Reserve	
	No Zoning	39, 40, 44, 45, 47, 49
	Recreational/Amenity/Green Space	41
	New Residential	42, 43, 48
	Residential	46,50
	Walkway (Amended) Bridle Path (New)	

Appendix – F9 Towns & Villages Keenagh

The land-use zonings for Keenagh has been revised in accordance with the Infrastructure Assessment framework and the resulting land-use plan for the settlement is presented below.

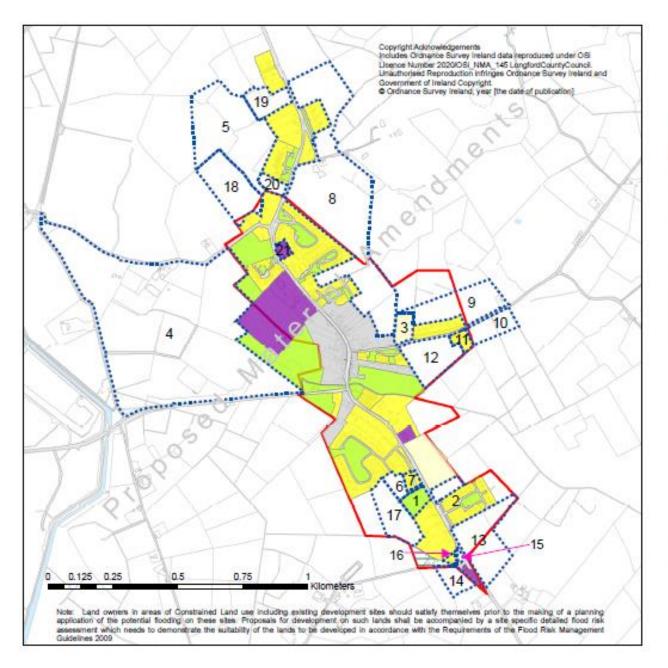
The settlement maps presented in the initial Draft County Development Plan 2021-2027 were based on the current County Development Plan 2015-2021 and the preliminary infrastructure assessment undertaken in early 2020 which informed the review of the land-use zonings for the key settlements and the drafting of the County Development Plan 2021-2027.

Following the Public Consultation on the Draft Longford County Development Plan 2021-2027 and the review of Submissions and Observations received during the consultation period (27th October 2020 until 18th January 2021) the land use zoning plans for the settlements were revised and the Further Iteration Plans are included in this report under Appendix B (produced during the period December 2020 to March 2021). An additional review of the Infrastructure Assessment Report was undertaken following the development of the Chief Executive's Report on the Submissions received, specifically the submissions from the OPR and EMRA as well as other thematic and area specific submissions.

The Infrastructure Assessment, the inclusion of the flood risk zonings and the CSO settlement boundary have identified areas that are constrained and lacking the infrastructure required to the service the lands, or lands at high risk of flooding. The subsequent settlement plan identifies those sites where land-use zonings have been amended/revised and the changes identified.

Within Keenagh the quantum of lands zoned new residential and industrial/commercial/warehousing have been reduced, large areas of land have been revised and lands re-zoned and or de-zoned. The revised zoning plan presents a more compact form of development, with proposed new residential development located within the defined CSO settlement boundary following the principle of compact growth and sustainable urban development.

Significant areas to the north, to the south west and east have been revised and lands de-zoned identified as constrained use have been de-zoned, further lands to the west and east and to the south have also been revised. The quantum of lands zoned for Strategic Residential Reserve zoned lands have been de-zoned and New Residential lands zoned within the CSO boundary.



Keenagh Proposed Material Amendments

Leg	end
	Changed Zoning
N.	Areas of Constrained Land Use
	CSO Settlement Boundary
	New Residential
	Recreation/Amenity & Green Space
	Residential
	Social/Community/Education/Public Utility
	Strategic Residential Reserve
12	Town Core

	Zoning Changes		
Draft Plan: Zoning in Draft Plan New Residential	Alteration: Amended Zonling	Parcel No: Area on Map	
	No Zaning	2	
Recreational/Ame	nity/Green Space		
	No Zoning	4	
	No Zoning	5.	
Residential			
	Social/Community/Education/Public Utility	21	
Site Resolution Ob	jective		
	Recreation/Amenity/Green Space	1	
	No Zoning	6	
	Residential	7	
Strategic Resident	ial Reserve		
	New Recidential	3	
	No Zoring	8 - 10, 12 - 19	
	Residential	11,16	
Town Core			
TOTAL PROPERTY.	No Zaning	20	





Appendix – F10 Towns & Villages Legan

The land-use zonings for Legan has been revised in accordance with the Infrastructure Assessment framework and the resulting land-use plan for the settlement is presented below.

The settlement maps presented in the initial Draft County Development Plan 2021-2027 were based on the current County Development Plan 2015-2021 and the preliminary infrastructure assessment undertaken in early 2020 which informed the review of the land-use zonings for the key settlements and the drafting of the County Development Plan 2021-2027.

Following the Public Consultation on the Draft Longford County Development Plan 2021-2027 and the review of Submissions and Observations received during the consultation period (27th October 2020 until 18th January 2021) the land use zoning plans for the settlements were revised and the Further Iteration Plans are included in this report under Appendix B (produced during the period December 2020 to March 2021). An additional review of the Infrastructure Assessment Report was undertaken following the development of the Chief Executive's Report on the Submissions received, specifically the submissions from the OPR and EMRA as well as other thematic and area specific submissions.

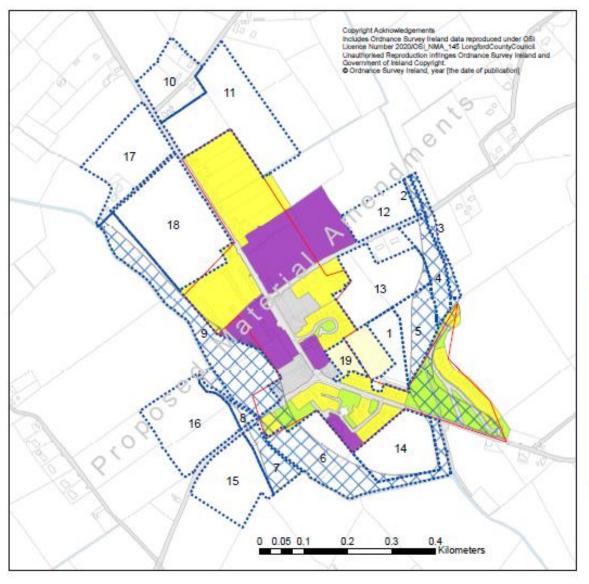
The Infrastructure Assessment, the inclusion of the flood risk zonings and the CSO settlement boundary have identified areas that are constrained and lacking the infrastructure required to the service the lands, or lands at high risk of flooding. The subsequent settlement plan identifies those sites where land-use zonings have been amended/revised and the changes identified.

The quantum of lands zoned new residential and industrial/commercial/warehousing have been reduced. The revised zoning maps identifies a more sustainable and compact form of development reflecting the CSO boundary of the town and core principle of the NPF, the EMRA RSES and Submission of the OPR on the Draft Plan.

Within Legan significant areas of land have been revised and lands re-zoned and or de-zoned. The revised zoning plan presents a more compact form of development, with proposed new residential development located within the defined CSO settlement boundary following the principle of compact growth and sustainable urban development.

Significant areas to the north, to the south west and east have been revised and lands de-zoned identified as constrained use have been de-zoned, further lands to the west and east and to the south have also been revised. The quantum of the lands zoned Strategic Residential Reserve have been de-zoned.

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Legan Proposed Material Amendments

Leg	gend
	Changed Zoning
	CSO Settlement Boundary
5	Areas of Constrained Land Use
App	pendix_B
	New Residential
	Recreation/Amenity/Green Space
	Residential
	Social/Community/Education/Public Utility
	Town Core

	Zoning Changes	
Draft Plan: Zoning in Draft Plan New Residential	Alteration: Amended Zoning	Parcel No: Area on Map
	No Zoring	- 1
Recreation/Amenity	Green Space	
	No Zoning	2 - 9
Strategic Residential	Reserve	
	No Zoring	11 - 18
Town Core		
9	New Residential	19





Appendix – F11 Towns & Villages Newtownforbes

The land-use zonings for Newtownforbes has been revised in accordance with the Infrastructure Assessment framework and the resulting land-use plan for the settlement is presented below.

The settlement maps presented in the initial Draft County Development Plan 2021-2027 were based on the current County Development Plan 2015-2021 and the preliminary infrastructure assessment undertaken in early 2020 which informed the review of the land-use zonings for the key settlements and the drafting of the County Development Plan 2021-2027.

Following the Public Consultation on the Draft Longford County Development Plan 2021-2027 and the review of Submissions and Observations received during the consultation period (27th October 2020 until 18th January 2021) the land use zoning plans for the settlements were revised and the Further Iteration Plans are included in this report under Appendix B (produced during the period December 2020 to March 2021). An additional review of the Infrastructure Assessment Report was undertaken following the development of the Chief Executive's Report on the Submissions received, specifically the submissions from the OPR and EMRA as well as other thematic and area specific submissions.

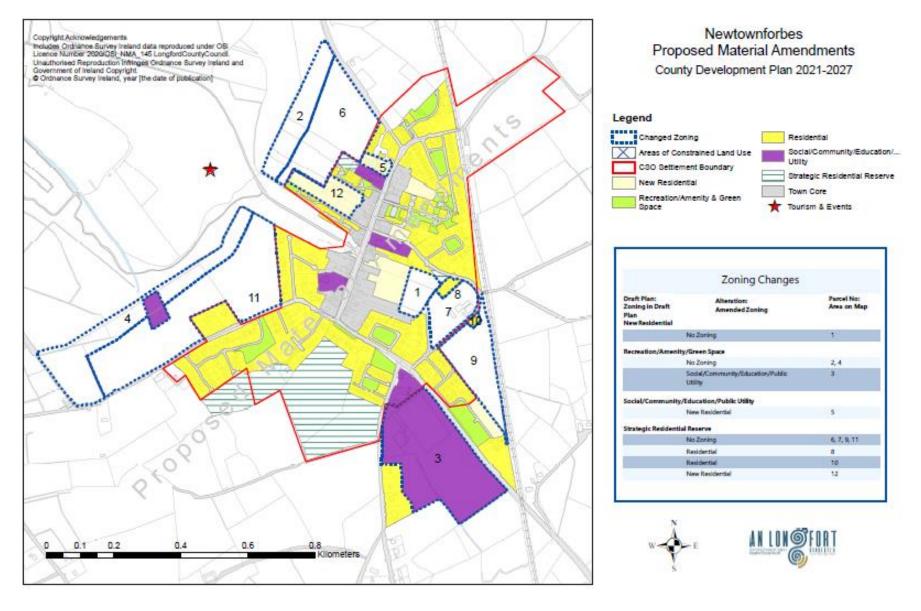
The Infrastructure Assessment, the inclusion of the flood risk zonings and the CSO settlement boundary have identified areas that are constrained and lacking the infrastructure required to the service the lands, or lands at high risk of flooding. The subsequent settlement plan identifies those sites where land-use zonings have been amended/revised and the changes identified.

The quantum of lands zoned new residential and industrial/commercial/warehousing have been reduced. The revised zoning maps identifies a more sustainable and compact form of development reflecting the CSO boundary of the town and core principle of the NPF, the EMRA RSES and Submission of the OPR on the Draft Plan.

Within Newtownforbes significant areas of land have been revised and lands re-zoned and or de-zoned. The revised zoning plan presents a more compact form of development, with proposed new residential development located within the defined CSO settlement boundary following the principle of compact growth and sustainable urban development.

Significant areas to the north, to the west and east have been revised and lands dezoned identified as constrained use have been de-zoned, further lands to the west and east and to the south have also been revised. The quantum of lands zoned Strategic Residential Reserve have been de-zoned. New residential development sites have been reduced and located within the defined CSO boundary.

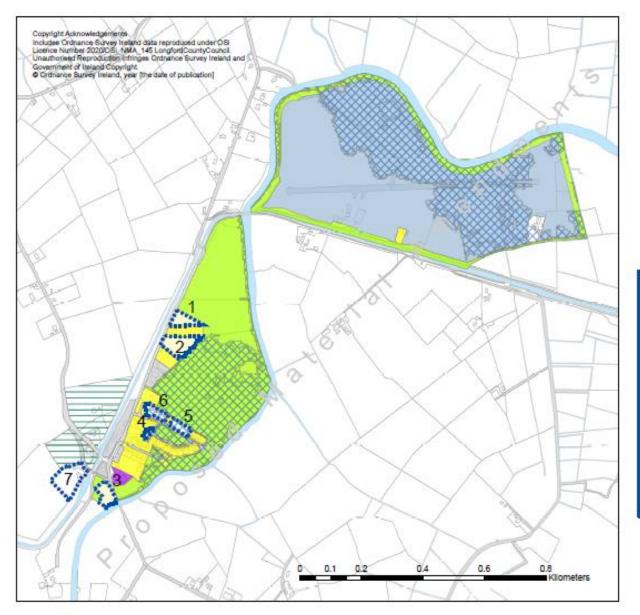
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Appendix – F12 Smaller Villages & Settlements Abbeyshrule, Ardagh, Ballinamuck & Clondra

The following settlements and their land-use zonings have been reviewed an revised according to the CSO boundary, constrained land use and the submissions from the OPR and EMRA requesting more compact growth.

- Abbeyshrule
- Ardagh
- Ballinamuck
- Clondra



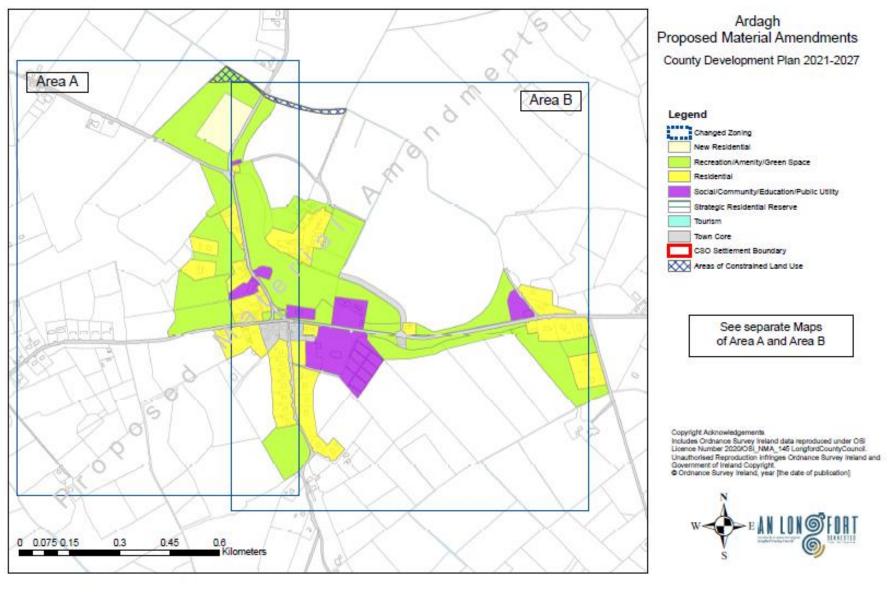
Abbeyshrule Proposed Material Amendments County Development Plan 2021-2027

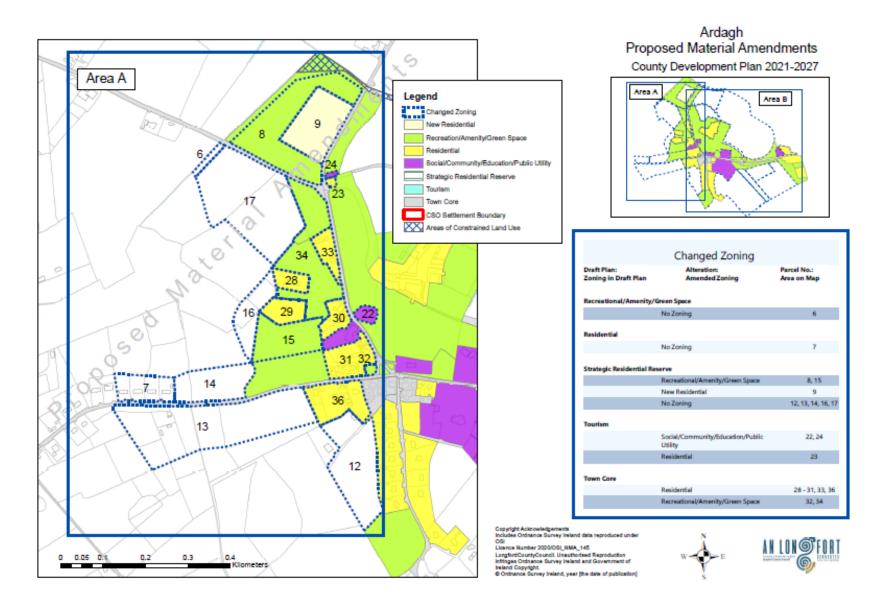


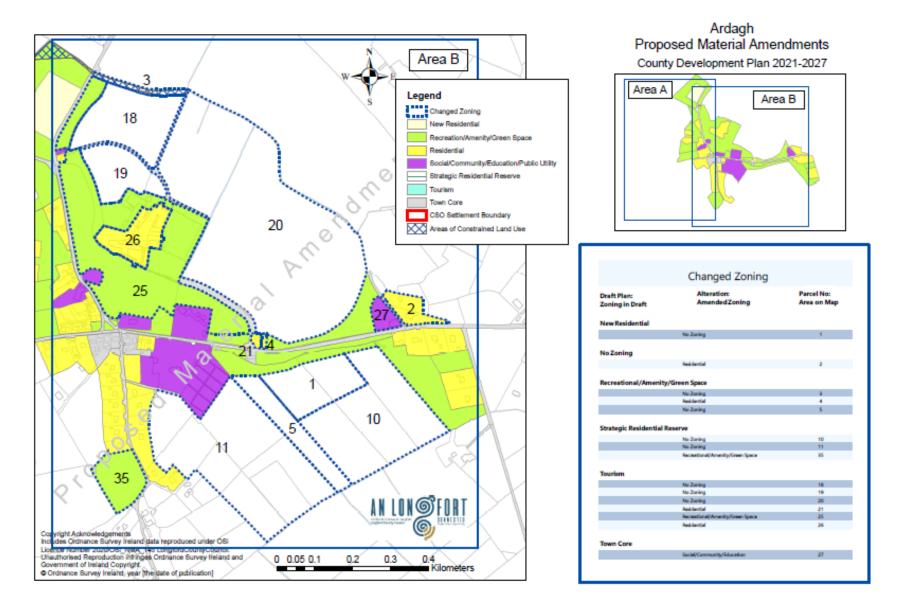
	Zoning Changes	
Draft Plan: Zoning in Draft Plan	Alteration: AmendedZoning	Parcel No: Area on Map
Recreation/Amenity/G	reen Space	
	New Residential	1
	New Residential	2
	New Residential	3
Residential		
	No Zoning	4
	No Zoning	- 5
	No Zoning	6
Strategic Residential Re	serve .	
-	No Zoning	7

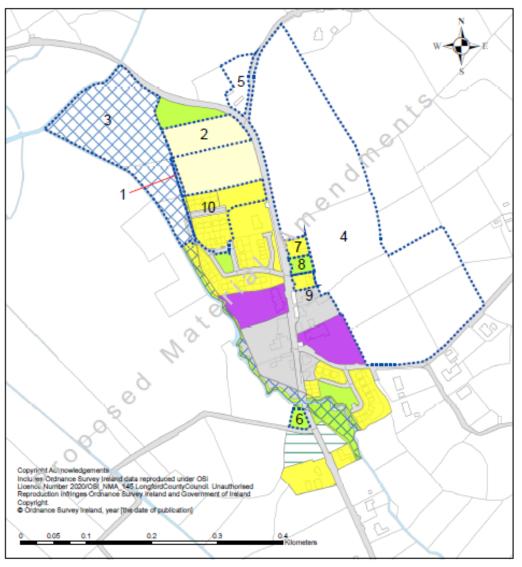












Ballinamuck Proposed Material Amendments

Legend	
Changed Zoning	Social/Community/Education/Public Utility
New Residential	Strategic Residential Reserve
Recreation/Amenity/Green Space	Town Core
Residential	CSO Settlement Boundary
	Areas of Constrained Land Use

	Zoning Changes	
Draft Plan: Zoning in Draft	Alteration: Amended Zoning	Parcel No: Area on Map
New Residential		
	No Zoning	1
	Residential	10
Recreational/Ame	nity/Green Space	
	New Residential	2
	No Zoning	3
Strategic Resident	ial Reserve	
	No Zoning	4
	No Zoning	5
	Recreational/Amenity/Green Space	6
Town Core		
	Residential	7
	Recreational/Amenity/Green Space	8
	Residential	9



