

CHIEF EXECUTIVE'S REPORT ON SUBMISSIONS RECEIVED ON THE DRAFT LONGFORD COUNTY DEVELOPMENT PLAN 2021 - 2027



PART 1 CONTEXT, OPR, EMRA AND OTHER SUBMISSIONS ON DRAFT PLAN WRITTEN STATEMENT

PART 1: CONTEXT, OPR, EMRA AND OTHER SUBMISSIONS ON WRITTEN STATEMENT

CONTENTS

	Page No.
Glossary of Abbreviations	2
1.0 Context of Chief Executive Report	3
2.0 Draft Longford County Development Plan	5
3.0 Overview of the Public Consultation undertaken and Next Steps	7
4.0 Office of the Planning Regulator Submission	10
5.0 Eastern and Midland Regional Assembly Submission	64
6.0 Other Submissions to the Draft Plan by Chapter Topic	102
6.1 Introduction and Strategic Context	103
6.2 County Profile	107
6.3 Climate Change	108
6.4 Core Strategy, Settlement and Housing Strategies	110
6.5 Infrastructure, Transport, Energy and Communications	116
6.6 Regeneration	162
6.7 Placemaking	182
6.8 Economic Development	201
6.9. Rural Economy	205
6.10 Tourism	212
6.11 Built and Cultural Heritage	219
6.12 Natural Heritage and Environment	232
6.13 Green Infrastructure	245
6.14 Landscape Character	252
6.15 Implementation Monitoring and Review	255
6.16 Development Management Standards	257
6.17 Format / Miscellaneous	270

NOTE: THIS REPORT IS SUBMITTED TO COUNCIL MEMBERS FOR THEIR CONSIDERATION

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

1.0 Context of Chief Executive Report

This section outlines the context of the Chief Executive Report on the Draft County Longford Development Plan 2021.

1.1 Purpose of the Chief Executive Report on Draft Development Plan

The purpose of the Chief Executive's Report is to report on the outcome of the consultation process on the Draft Longford County Development Plan, set out the Chief Executive's response to the issues raised in the submissions, and to make recommendations on changes to the Draft Plan. The report forms part of the statutory procedure for the preparation of a new Development Plan.

1.2 Statutory Context of the Chief Executive's Report

The requirement to undertake this Chief Executive's Report is part of the wider development plan making process as set out in the Act. Under Section 12 (4) (a) of the Act the Chief Executive is required to prepare a report on any submissions and observations received and submit the report to the Members of the authority for their consideration. The Chief Executive's Report is required to be published on the website of the planning authority as soon as practicable following its preparation. Not later than 22 weeks after the notice of the Draft going on display (30th March), the Chief Executive is required to produce a report which lists the submissions received, summarises the issues raised, and sets out a responses and recommendations accordingly.

1.3 Required Content of the Chief Executive's Report

The following requirements in relation to the Chief Executive Report are set out under Section 12 (4) (b) of the Act:

- List the persons or bodies who made submissions or observations, as well as any persons or bodies consulted by the planning authority;
- Summarise the recommendations, submissions and observations made by the Office of the Planning Regulator;
- Summarise the submissions and observations made by any other persons in relation to the draft development plan;
- Summarise the issues raised, and recommendations made by the relevant regional assembly and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the draft development plan;
- Give the response of the Chief Executive on the issues raised taking account of any directions of the members of the authority or the committee under section 11(4), the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives of the Government or of any Minister of the Government and, if appropriate, any observations made by the Minister for Arts, Heritage, Gaeltacht and the Islands under subsection (3)(b)(iv);

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

1.4 Layout of Chief Executive Report

The Chief Executive Report consists of 3 no. elements (separate documents):

Part 1 of the Chief Executive Report sets out

- the next steps in making the new Longford County Development Plan 2021-2027;
- an outline of the consultation undertaken for the Draft Plan (which resulted in 94 no. submissions during this statutory public consultation stage;
- an analysis of the **Office of the Planning Regulator (OPR)** submission followed by the Chief Executive's response to these issues and associated recommendations;
- an analysis of the **Eastern and Midland Regional Authority (ERMA)** submission followed by the Chief Executive's response to these issues and associated recommendations;
- an analysis of the remaining submissions received relevant to Volume 1: Written Statement and associated chapter of the Draft Plan, followed by the Chief Executive's response to these issues and associated recommendations.

Part 2 of the Chief Executive Report (separate document) deals with the submissions which relate to the Draft Plan support documents:

- Volume 2: Appendices;
- Volume 4: Environmental and Flood Reports;
- Land Use Zonings.

Part 3 of the Chief Executive Report (separate document) contains the appendices which support this Chief Executive Report.

2.0 Draft Longford County Development Plan 2021-2027

This section outlines the review process of the current County Development Plan 2014-2021; the statutory context and purpose of the Chief Executive's report; and the legislative background for the preparation of the new County Development Plan 2021-2027.

2.1 Statutory Context of Draft Longford County Development Plan 2021-2027

The Planning and Development Acts 2000 (as amended), requires planning authorities to make a Development Plan for its functional area every 6 years. In accordance with Section 11 of the Planning and Development Act 2000 (as amended) (the Act), Longford County Council gave notice on 26th September 2019 of its intention to commence the review of the existing County Development Plan and to prepare a new County Development Plan.

In accordance with Section 11 (1)(a) of the Planning & Development Act 2000 (as amended), the review of the existing Development Plan and preparation of a new Development Plan is required to be strategic in nature for the purposes of developing;

- a) the objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area of the Development Plan
- b) the core strategy, and
- c) shall take account of the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

The prescribed process for a County Development Plan is set out in the Act. The Act sets out mandatory objectives which must be included in a Development Plan. These include, inter alia, objectives for; the zoning of land; the provision of infrastructure; the conservation and protection of the environment; and the integration of the planning and sustainable development of the area with the social, community and cultural requirements of the area and its population. Other non-mandatory objectives are also referred to in the Act. There is also a requirement for a Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) of the new Development Plan. In accordance with Article 13A of the *Planning and Development (Strategic Environmental Assessment) Regulations 2004* (S.I. 436 of 2004), the Council must carry out an SEA before the Plan may be adopted.

Ministerial Guidelines issued to Planning Authorities regarding their functions under the Act have been considered in the making of the Draft Plan and have been implemented in the various chapters, in accordance with Section 28 of the Act.

In accordance with European and National legislation, the Council carried out a SEA and an AA) under the Habitats Directive, which informed the preparation of the Draft Plan. These assessments are undertaken so the impact of the proposed Draft Plan objectives on the environment can be evaluated and used to inform the direction of the Draft Plan to ensure that our built environment responds to the sensitivities and requirements of the wider national environment.

A Strategic Flood Risk Assessment (SFRA) was also undertaken for the plan area having regard to the ministerial planning guidelines on *The Planning System and Flood Risk Management*. Flood Risk Assessment has integrated into the SEA process.

2.2 Draft Longford County Development Plan 2021-2027

The Draft Development Plan consists of 4 no. volumes which contain a written statement, appendices, maps and accompanying documents.

Volume 1 consists of the Written Statement, which is divided into 16 separate chapters, listed below:

1. Introduction and Strategic Context
2. County Profile
3. Climate Change
4. Core Strategy, Settlement and Housing Strategies
5. Infrastructure, Transport, Energy and Communications
6. Regeneration
7. Placemaking
8. Economic Development
9. Rural Economy
10. Tourism
11. Built and Cultural Heritage
12. Natural Heritage and Environment
13. Green Infrastructure
14. Landscape Character
15. Implementation Monitoring and Review
16. Development Management Standards
17. Format / Miscellaneous

Volume 2 consists of appendices in the form of largely mapping and visual content, with some associated written content (land use zoning, various designations). The maps which accompany this written document aim to show what the Plan facilitates, the types of development that may be considered and areas of opportunity and prospect within the Town and County.

Volume 3 is an Annex which contains reference to specific reports and individual support studies (Housing Strategy, Retail Strategy, Shopfront Design Guidelines etc.) and other written support studies and material.

Volume 4 consists of a SEA Environmental Report, Natura Impact Report and Strategic Flood Risk Assessment.

3.0 Overview of the Public Consultation undertaken to date and Next Stages

This section includes an overview of the consultation process carried out for the preparation of the Development Plan to date, including the Draft stage of the Development Plan process which is the focus of this report.

3.1 Preliminary Consultation Process: Pre-Draft Plan

The Pre-Draft consultation stage was undertaken from 26th September 2019 until 22nd November 2019. In total 30 no. submissions were received during the pre-Draft consultation period, of which 4 were related to zoning submissions and could not be considered as part of this Chief Executive Report, therefore resulting in the consideration of 26 no. submissions in the Chief Executive report. The Responses and views set out in the written submissions, and of those expressed and recorded at the public consultation events/stakeholder meetings, were considered and a Chief Executive Report issued on 24th January 2020 set out the response of the Chief Executive to the issues raised together with recommendation for the preparation of the Draft Plan.

3.2 Current Consultation Process: Draft Plan

The Draft Plan consultation stage took place from 27th October 2020 until 18th January 2021 (both dates inclusive). The consultation process comprised a number of elements:

- In accordance with statutory requirements prescribed bodies were informed of the Draft Development Plan public consultation (Appendix 1).
- Relevant Stakeholders were informed of the Draft Development Plan public consultation (Appendix 2).
- Notice advising of public consultation on the Draft Plan was placed in the Longford Leader dated 23rd October 2020. The notice provided details of where the Draft Plan was available for inspection and directed the public to a dedicated online Consultation Portal. Details of the duration of the formal consultation period were also set out. Details of consultations were also advertised on all Council social media platforms. A reminder advertisement was placed in the Longford Leader on Friday 11th December 2021 and this was also advertised on all Council social media platforms (Appendix 3: Press Notices/Publications/Social Media Posts).
- The Draft Plan was made available in all public libraries and on the dedicated Development Plan review webpage, and forwarded to all Elected Members, prescribed bodies, stakeholder groups and the Public Participation Network (PPN) groups (461 groups) within the County.
- Copies of the Draft Plan and associated documentation was made available for viewing at local libraries and at Council Offices. Plans were also available for purchase from the Planning Department. No 'Public Information Drop-In Sessions' were held during the consultation period due to the ongoing COVID-19 pandemic and associated government requirement to restrict movements.
- A dedicated webpage and a specific Public Consultation Portal were created to keep members of the public up to date with the process of the preparation

of the Development Plan. During the public consultation period this received 1,516 views.

- Regular notifications relating to the Plan review were issued through the Council's social media feeds. During the consultation period, on Twitter there was a total reach of 4,759 people with 87 engagements; and via Facebook a total reach of 3,917 persons and 199 engagements.

A total of 94 no. submissions were received during this Draft Plan consultation period (Appendix 4). The majority of submissions received were via email (62 no.), followed by the online portal (18 no.), and hardcopy (14 no.). Longford County Council wishes to express its appreciation to those who made submissions/observations. The extent and detail of the submissions and observations received highlights the significant level of public interest in the plan making process.

3.3 Consideration of Submissions

Following the initial recording of all 94 submissions (Appendix 4), each submission was categorised in line with the appropriate chapter or zoning maps to of the Development Plan to which the submission relates. Some submissions received included issues not relevant to the Development Plan.

A high number of submissions that raised more than one issue or policies for one area. Submissions were received relating to the Written Statement or Accompanying documents. These submissions are dealt with in detail in the proceeding sections of this report as follows:

Part 1 of the Chief Executive Report sets out

- **Section 4** - an analysis of the **Office of the Planning Regulator (OPR)** submission followed by the Chief Executive's response to these issues and associated recommendations;
- **Section 5** - an analysis of the **Eastern and Midland Regional Authority (ERMA)** submission followed by the Chief Executive's response to these issues and associated recommendations;
- **Section 6** - an analysis of the remaining submissions received relevant to Volume 1: Written Statement and associated chapter of the Draft Plan, followed by the Chief Executive's response to these issues and associated recommendations.

Part 2 of the Chief Executive Report (separate document) deals with the submissions which relate to the Draft Plan support documents:

- **Section 7 and 8** - Volume 2: Appendices; an analysis of the remaining submissions received relevant to the Draft Plan Volume 2: Appendices followed by the Chief Executive's response to these issues and associated recommendations.
- **Section 9** - an analysis of the remaining submissions received relevant to the Draft Plan Environmental and Flood Reports), followed by the Chief Executive's response to these issues and associated recommendations.
- **Section 10** – An analysis of Land Use Zoning submissions.

Part 3 of the Chief Executive Report (separate document) contains the overall appendices which support this Chief Executive Report.

3.4 Next Stages

Not later than 22 weeks after the notice of the Draft going on display (30th March), the Chief Executive is required to produce a report which lists the submissions received, summarises the issues raised, and sets out a response and recommendations accordingly.

- Not later than 12 weeks (21st June), following the consideration of the Draft Plan and the Chief Executive's Report, where it appears to the Members that the Draft Plan should be accepted or amended, they may, by resolution, accept or amend the Draft and make the Development Plan accordingly.
- Where a proposed amendment would, if made, be a material alteration of the Draft Plan, notice of the proposed amendment must be published in inviting submissions from the public. Should amendments be made which would constitute material alterations to the Draft Plan, not later than 3 weeks (12th July) there is a further public display period giving people an opportunity to comment on the proposed amendments only.
- This is followed by the preparation of a further Chief Executive's Report on any submissions or observations received on the proposed amendments. Members may then make the Development Plan with or without the proposed amendments or with modifications of a minor nature to the proposed amendments as they consider appropriate.

4. Office of the Planning Regulator Submission

Submission Ref. No. DCDP-80

4.1 Summary of Issues Raised and Response of the Chief Executive

The OPR's submission is welcomed and the issues raised are acknowledged with consideration of each individual issue set out hereunder:

4.1.1 Recent Revisions to Policy Context

(OPR Recommendation 1)

The OPR commends the preparation of a Housing Need Demand Assessment (HNDA) to inform the Core Strategy and Housing Strategy of the Draft Plan against the backdrop of an evolving national and regional planning policy and regulatory context. The OPR acknowledges that subsequent to the publication of the Draft Plan, the guidelines, *Housing Supply Target Methodology for Development Planning*, have been issued under Section 28 of the Planning and Development Act 2000. Accordingly, the Planning Authority is required to review the proposed Core Strategy and HNDA and to revise as necessary to comply with the requirements of the Section 28 Guidelines: *Housing Supply Target Methodology for Development Planning* and Appendix 1 of the accompanying Ministerial Circular.

4.1.2 Chief Executive Response

It should be noted that the Draft Plan has been prepared in the absence of any revision to the Section 28 guidelines, *Development Plan Guidelines for Planning Authorities*. Moreover, it should also be noted that the HNDA presented in the Draft Plan was prepared in the absence of the anticipated HNDA Toolkit, which is expected to be published by the Department imminently. The imposition of further Section 28 guidance in the form of the *Housing Supply Target Methodology for Development Planning* at this advanced stage of the Development Plan review is unfortunate, particularly as such guidelines do not provide sufficient clarity on the mechanisms of using the derived housing supply targets to comply with the Council's legal obligations to prepare a Housing Strategy under Section 94 of the Planning and Development Act 2000, as amended.

Notwithstanding, the Draft Plan, including the Core Strategy and Housing Strategy shall be amended to take account of the adjusted housing supply targets derived for County Longford from the *Housing Supply Target Methodology for Development Planning* guidelines. A revised Core Strategy Table, which takes account of the housing supply targets for County Longford in the aforementioned guidelines, as well as other recommendations from the OPR and the EMRA submissions, is provided in Appendix 5 of this report.

The revised Core Strategy Table provided in Appendix 5 of this report maintains consistency with the population projections outlined in the NPF Implementation Roadmap document for the County, albeit with recommended revisions to the distribution of the projected overall County population target for the plan period owing to recommended changes to the Settlement Hierarchy as outlined below in Section 4.2.2.

It should be noted that the introduction of the *Housing Supply Target Methodology for Development Planning* guidelines, marks a significant change in how a Planning Authority projects the amount of housing required to cater for the projected population growth of its area over the plan period. Previously, this approach relied solely on projected demographic analysis such as forecasted population growth and trends in average household size to determine the required number of new residential units to accommodate additional growth in population over a plan period. Prior to the publication of the aforementioned guidelines, this was the approach utilised in the context of the Draft Plan, using the population projections outlined in the NPF Implementation Roadmap document for the County which generated an additional housing requirement of 1,169 residential units.

In complying with the Section 28 guidelines, *Housing Supply Target Methodology for Development Planning*, the Planning Authority is required to significantly revise upwards its housing supply forecast for the county over the forthcoming plan period to ensure consistency with the housing supply targets for County Longford as established in the aforementioned guidelines. As a result, the recommended new housing supply target for County Longford over the plan period is 2,568 additional residential units. This revised housing supply target follows additional modelling by the Economic and Social Research Institute (ESRI) into structural housing demand nationally and at county level, with the projection model now the definitive source for central Government in terms of projected housing demand.

Notwithstanding the apparent dichotomy between the projected population figures derived from the NPF Implementation Roadmap and the housing supply targets for the County, as established by the *Housing Supply Target Methodology for Development Planning* guidelines, compliance is required with both datasets in the context of the Draft Plan. Accordingly, the recommended revised Core Strategy Table, provided for in Appendix 5 of this report, retains the population projection for the County and allocates the overall housing supply target for the County to the various settlements and settlement tiers of the hierarchy to reflect the corresponding rate of population growth in proportion to the overall County.

In the absence of specific guidelines to ensure consistency with both the projection population requirements for the County (provided for in the NPF Implementation Roadmap) and the derived housing supply target for the County (as established in the *Housing Supply Target Methodology for Development Planning* guidelines), it is considered that this approach meets the legal requirements of the Planning Authority in respect of the Core Strategy.

The subsequent revised Draft Longford Housing Strategy 2021-2027, following incorporation of the revised housing supply targets, is provided in Appendix 6 of this report.

4.1.3 Chief Executive Recommendation

CE OPR 1.1

To insert a new Section comprising of the following text after Section 4.3.2 of the Draft Development Plan:

Housing Supply Target Methodology for Development Planning (2020)

In order to strengthen the relationship between national and regional population projections and their integration into the development planning process at local authority level, the Department commissioned the ESRI to further develop work previously undertaken for the NPF. The findings of the ESRI work were published as a research paper on Structural Housing Demand at County Level in December 2020. Following publication of this, the Housing Supply Target Methodology for Development Planning: Guidelines for Planning Authorities, issued under Section 28 of the Planning and Development Act 2000, as amended, was published.

This ESRI research applies the projection model to four different development scenarios:

- Baseline – projecting a ‘business as usual’ scenario which is based on current trends and medium-term projections for the Irish economy;*
- NPF 50:50 City – consistent with the NPF strategy;*
- High Migration – incorporating assumptions around high international migration flows into Ireland based on higher economic growth than the baseline; and*
- Low Migration – incorporating assumptions around lower international migration flows into Ireland based on lower economic growth than the baseline.*

The ESRI research model is intended to enable structural household demand levels for each local authority area to be set out under the four different scenarios for each year to 2040. The Section 28 Guidelines state that “The NPF 50:50 City scenario is broadly consistent with the National Planning Framework strategy and consequently, the 2018 NPF ‘Roadmap’ document”. As such, the Section 28 Guidelines further indicate that this is the recommended housing demand scenario to be used by planning authorities in their planning functions in order to plan for the provision of housing to meet projected levels of demand in their administrative area, in accordance with the NPF strategy.

Thus, planning authorities must now demonstrate the manner in which their core strategy and other elements of the plan are consistent with the NPF 50:50 City housing demand projection scenario identified by the ESRI. Deviation from this scenario, the Guidelines state, must be evidence-based and consistent with these guidelines.

The Guidelines set a methodology for the application of population and housing projections into Local Authority plan processes.

As set out below, Longford County Council have finalised the following calculation of housing demand for the plan period. Longford County Council will not pursue optional

adjustments ('E' or 'F'), and therefore will pursue **a total housing supply target of 2,568** for the Longford County Development Plan over a plan period¹ anticipated to cover approximately Q1 2022 – Q4 2027 inclusive.

Table 4.2: Calculation of Housing Supply Targets for County Longford over the plan period²

Longford County Council		Annual Average Households	Total Households
A	ESRI NPF scenario projected new household demand 2017 to end Q4 2027	277	3,042
B	Actual new housing supply 2017 to end Q3 2021 (Source: CSO to Q4 2020, pro-rata of 2020 data for remainder)	103	517
C	Homeless households and unmet need ³	-	43
D	Plan Housing Demand = Total (A-B+C) For plan period Q1 2022 – Q4 2027 (6 years)	428	2,568
E	Potential Adjustment 1 to end 2026 portion of plan period – not pursued		
F	Potential adjustment 2 to end 2026 portion of plan period to facilitate convergence to NPF strategy, applicable where B exceeds or is close to D (where justified) – not pursued		

CE OPR 1.2

To replace the Core Strategy Table (Table 4.12) in the Draft Plan with the recommended revised Core Strategy Table provided in Appendix 5 of this report.

4.2.1 Settlement Hierarchy

(OPR Recommendation 2)

The OPR acknowledges that the NPF and RSES only identifies Longford Town as a designated Key Town in the RSES, with the lower tiers to be defined in the Draft Plan. In this regard, the Draft Plan details a significant change in the existing settlement hierarchy, namely the reversal repositioning of the current Tier 2 settlement of Granard with the current Tier 3 settlements of Edgeworthstown and Ballymahon. Having regard to the spatial service and infrastructure attributes of Granard, the RSES Retail Hierarchy, Table 4.2 (Settlement Hierarchy) and Table 4.3 (Settlement Typologies and Policy Responses) of the RSES and the settlement strategy objectives set out under Regional Policy Objectives 4.1 and 4.2, the planning authority is required to:

- Re-designate Granard as a Self-Sustaining Growth Town having regard to its current designation as a Tier 2 Key Service Town, its designation in the regional

¹ For calculation purposes, the plan period has been rounded to whole quarters.

² Following 'Housing Supply Target Methodology for Development Planning' (DHLGH, December 2020)

³ Homeless households as of January 2021, plus unmet need as of Census 2016; source: DHLGH, February 2021.

retail hierarchy in the RSES as the only Level 3 Sub County Town, its high ratio of jobs to resident workers and geographic location within the county;

- Reconsider the positioning of Ballymahon and Edgeworthstown in the settlement hierarchy and the justification for designating these settlements as Self Sustaining Growth Towns (Tier 2) rather than Self Sustaining Towns (Tier 3).

4.2.2 Chief Executive Response

In developing the Settlement Hierarchy for the Draft Plan, regard was had to RPO 4.1 of the RSES which details that local authorities shall “*determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES*”. Accordingly, the Settlement Hierarchy for the Draft Plan was informed by the asset-based criteria approach to growth strategy outlined in Table 3.1 of the RSES to identify those settlements which have the greatest capacity and potential for growth within the county and sets out the qualitative and quantitative evidence base for the social, economic and natural assets that exist within the settlements of the county.

In devising the Settlement Hierarchy for the Draft Plan, it was noted that there were no discernible weighting criteria applied to the eight asset-based criteria advocated in Table 3.1 of the RSES. Moreover, the descriptions of settlement attributes afforded to Self-Sustaining Growth Towns and Self-Sustaining Towns settlement typologies detailed in Tables 4.2 and 4.3 of the RSES provide minimal distinction between these settlement typologies when viewed through the prism of the asset-based criteria. Indeed, the policy responses provided in Table 4.3 of the RSES provide no distinction at all between these settlement typologies with both conflated under one typology category.

It is acknowledged that the Settlement Hierarchy detailed in the Draft Plan marks a departure from previous settlement hierarchies, namely the replacement of the previous Tier 2 settlement of Granard with the previous Tier 3 settlements of Edgeworthstown and Ballymahon. Notwithstanding, the Settlement Hierarchy devised for the Draft Plan takes into account the high levels of population growth experienced in Edgeworthstown and Ballymahon in recent years, as well as the longstanding population stagnation and even decline in respect of Granard over a similar period.

Consideration was also given to the supporting role of Ballymahon to the Regional Growth Centre of Athlone, given its proximity to this settlement.

Whilst Granard performs extremely impressively in the context of a high jobs to resident workers ratio (2.35) based on the 2016 Census data, there remains a very high unemployment rate within the town. Similarly, the 2016 Census data does not capture the change in employment rates in the settlements of Ballymahon and Edgeworthstown since the establishment of Longford Forest Center Parcs resort in 2019, which has seen the creation of over 1,000 direct jobs in the area, with a number of indirect jobs undoubtedly created since its establishment to cater for increased demand in tourism and service sectors.

Moreover, regard was also had to the physical constraints within the settlements in the context of achieving the overarching principle of compact growth in the future development of settlements, with large areas designated Flood Zone A within the core of Granard, as opposed to Ballymahon and Edgeworthstown which have considerably less constraints in this regard.

Notwithstanding, it is acknowledged that the capacity constraints associated with the wastewater treatment plants (WWTPs) in Edgeworthstown and Ballymahon in accommodating additional growth are significant impediments. This is despite commitments from Irish Water to upgrade these plants within the lifetime of the forthcoming Plan, but not before 2024, and the inclusion of CPO 5.84 in the Draft Plan, which seeks to have regard to the capacities of these plants with any further growth contingent on their upgrade or suitable temporary engineering solutions for individual developments, reflects the guarded policy nature for accommodating future development in these settlements. In contrast, Granard has sufficient capacity to cater for additional growth.

While it remains regional policy that the designation of settlements below the Key Town of Longford Town is the reserve of the County Development Plan, it would seem that significant policy weight has been attached to the designation of Granard as a Level 3 retail centre in the retail hierarchy detailed in the RSES on the basis of the submissions from the OPR and the EMRA. This designation, as one of only two settlements in the county (the other being Longford Town) recognised in the retail hierarchy for the region, necessitated the recognition of Granard as a level 2 *Key Service Centre* in the subsequent retail hierarchy for the County.

In light of the recommendation from the OPR, and the need for ‘catch up’ investment to address the aforementioned constraints to WWTP capacities in Edgeworthstown and Ballymahon, it is recommended that the Settlement Hierarchy be revised to position Granard as a Tier 2 settlement (Self-Sustaining Growth Town), with Edgeworthstown, Ballymahon and Lanesboro comprising of Tier 3 settlements (Self-Sustaining Towns) within the revised Settlement Hierarchy. Accordingly, Table 4.1 below, sets out the recommended revised Settlement Hierarchy for Draft Plan.

Table 4.1: Recommended Revised Settlement Hierarchy for Draft Longford County Development Plan 2021-2027

SETTLEMENT HIERARCHY	
Key Town	Longford Town
Self-Sustaining Growth Town	Granard
Self-Sustaining Towns	Edgeworthstown Ballymahon Lanesborough
Towns and Villages	Aughnaccliffe

	Ballinalee Drumlish Keenagh Legan Newtownforbes	
Rural	Serviced Rural Villages	Abbeyshrute Ardagh Ballinamuck Clondra
	Rural Settlement Clusters & Open Countryside	

4.2.3 Chief Executive Recommendation

CE OPR 1.3

To amend the Settlement Hierarchy, as depicted in Table 4.11 of the Draft Plan, to reflect the following:

Settlement Typology	Description	Settlements
Key Town	<i>Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres</i>	<i>Longford Town</i>
Self-Sustaining Growth Town	<i>i) Self-Sustaining Growth 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.</i>	<i>Granard</i>
Self-Sustaining Towns	<i>ii) Self-Sustaining Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self-sustaining.</i>	<i>Edgeworthstown</i>
		<i>Ballymahon</i>
		<i>Lanesboro</i>
Towns and Villages	<i>Towns and villages with local service and employment functions.</i>	<i>Aughnaccliffe</i>
		<i>Ballinalee</i>
		<i>Drumlish</i>
		<i>Keenagh</i>
		<i>Legan</i>
		<i>Newtownforbes</i>

Settlement Typology	Description	Settlements
Rural	Serviced Rural Villages and Rural Settlement Clusters with a limited level of services and the wider open countryside.	<u>Serviced Rural Villages</u> Abbeyshrule, Ardagh, Ballinamuck, Clondra
	The open countryside provides for rural economies and rural communities, based on agriculture, forestry, tourism and rural enterprise. This should be facilitated while avoiding over-spill development from urban areas and urban generated housing. The sustainable development of the open countryside will be supported.	<u>Rural Settlement Clusters</u> Abbeylara, Ballycloughan, Ballywillan, Barry, Bunlahy Carrickboy, Carriglass, Colehill, Coolarty, Cullyfad, Derraghan, Dring, Drumhaldry , Enybegs, Forgney, Killashee, Kilnatraun, Legga, Lisryan, Melview, Moydow, Moyne, Mullinalaghta, Newtowncashel, Ratharney, Stonepark, Taghshinny.
		<u>Open Countryside</u>

CE OPR 1.4

To amend Section 4.8.8 as follows:

4.8.98 Self-Sustaining ~~Growth~~ Towns – Edgeworthstown, Ballymahon and Lanesboro

The RSES defines ‘Self Sustaining ~~Growth~~ Towns’ as towns with high levels of population growth and a weak employment base, which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self-sustaining. ~~“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.”~~

~~Edgeworthstown and Ballymahon form this tier of the Settlement Hierarchy.~~

Both ~~Edgeworthstown and Ballymahon~~ have seen significant growth over the twenty-year period between 1996 and 2016, with their populations increasing by approximately 181% and 138% respectively over this period. More recently, the 2016 Census recorded the populations of Edgeworthstown and Ballymahon as being 2,072 and 1,877 respectively, with both settlements firmly established as the second most populated towns in the county. Given their populations exceed 1,500, both settlements are considered ‘urban’ areas under the CSO definition. Edgeworthstown and Ballymahon also command robust jobs to resident workers ratios (0.817 and 0.734 respectively).

Edgeworthstown has a long-established manufacturing and light-industrial base, with particular focus on agri-food and the service sector and also has excellent transports links owing to its proximity to key transport corridors in the form of the N4 and the Sligo-Dublin InterCity rail line. Similarly, Ballymahon has a strong manufacturing and light-industrial base, with a key retail and service-sector standing within the county, with significant growth in tourism-orientated services such as food and drink,

hostelries, and tourist accommodation which has coincided with the opening of the nearby Longford Forest Center Parcs resort in 2019.

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, Edgeworthstown and Ballymahon are categorised as 'Self-Sustaining Towns'.

Lanesborough has also seen a steady increase in its population over the intercensal period, with the CSO defined settlement of Lanesborough-Ballyleague recording a population of 1,454 in 2016; a 6% increase on the equivalent 2011 census figure. In 2016, the Lanesborough-Ballyleague settlement recorded 543 resident workers with 351 jobs in the settlement (jobs to resident workers ratio of 0.64). Lanesborough is currently in a state of structural economic change, with the closure of the Lough Ree power station having a direct impact on ESB employees and indirectly on Bord na Móna employees with peat harvesting the main source of fuel for the plant.

Lanesborough has also been identified for regeneration purposes and has already secured funding for targeted regeneration schemes through the Rural Regeneration Development Fund and other funding streams. In addition, the roll out of the 'Just Transition' Fund will have significant positive impacts on a variety of sectors within the Lanesborough community, ranging from agri-food to tourism, to alternative energy sectors. It is anticipated that such targeted investment will provide the stimulus for further 'catch-up' investment to grow Lanesborough in a sustainable manner and enhance its self-sustaining attributes further.

~~Accordingly both settlements are designated as a "Self-Sustaining Growth Towns" under this Settlement Hierarchy on account of their performance as centres of important retail, residential, service and amenity functions for their respective centres and surrounding rural hinterlands, as well as their ability to support the Key Town of Longford Town and the Regional Growth Centre of Athlone.~~

CE OPR 1.5

To amend Section 4.8.9 as follows:

4.8.89 Self-Sustaining Growth Towns – Granard and Lanesborough

Self-Sustaining Growth Towns, according to the RSES, are 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'. high levels of population growth and a weak employment base, which are reliant on other areas for employment and/or services and which require targeted "catch-up" investment to become more self-sustaining.~~

Granard

~~In contrast~~ Granard has a robust employment base, with a particular focus on manufacturing in the food and agricultural sectors, with the Pat the Baker food

manufacturing company and Kiernan Milling both significant employers. In 2016, there were a total of 269 resident workers within Granard, however 633 total jobs were recorded, giving a jobs to resident workers ratio of 2.35; the highest recorded ratio within the regional area.

These statistics also reveal a low level of resident workers within the town, with a reliance on workers from outside the settlement. In addition, the settlement has experienced population growth stagnation and decline between 1996-2016 (1,221 – 1,096 respectively⁹), in comparison to other settlements within the county.

Granard also acts as an important retail centre to its inhabitants and wider hinterland, as reflected in its designation in the RSES as a Level 3 retail centre (Town and/or District Centres & Sub-County Town Centres (Key Service Centres)). Moreover, given its proximity to the Longford-Cavan border, Granard performs as a key service provider and retail centre for a broad hinterland which extends beyond the County boundary.

Granard also has sufficient capacity in its physical infrastructure (e.g. wastewater plant) to accommodate additional development commensurate with its position within the Settlement Hierarchy. Furthermore, Granard has been identified for significant regeneration in its town core which will act as a further catalyst in sustaining its existing population and robust employment base whilst enhancing further opportunities for residential development and employment.

~~*Accordingly, targeted “catch up” investment in terms of social infrastructure, housing and improved amenity facilities is required to build upon the established employment base and physical infrastructure (e.g. wastewater) capacity within the settlement in order to enhance its self-sustaining attributes.*~~

~~*Consequently, Granard has been identified for regeneration purposes within this plan, to act as a catalyst to address these issues whilst further enhancing employment opportunities within Granard (see Chapter 6: Regeneration)*~~

CE OPR 1.6

To amend Figure 4.5 of the Draft Plan - *Rural Typology Map* to reflect recommended revised Settlement Hierarchy.

CE OPR 1.7

To amend Figure 4.6 of the Draft Plan - *Core Strategy Map* to reflect recommended revised Settlement Hierarchy.

4.3.1 Distribution of Population Growth

(OPR Recommendation 3)

The OPR contends that the distribution of population growth across the settlement hierarchy does not provide a strategy that sufficiently reflects the policies and objectives of the NPF and RSES on compact growth and reversal of rural decline in villages, as set out in NPOs 9, 16, 18a and RPOs 4.63, 4.77 and 4.78.

Having regard to Recommendation 2 and the National Policy Objectives (NPOs) for Planning for the Future Growth of and Development of Rural Areas of the NPF, in particular NPOs 15, 16 and 20, the Planning Authority is required to review the overall

allocation of population growth across the settlement hierarchy to achieve a more appropriate balance and distribution of growth, including to:

- a) Increase the proportion of growth to Longford Town to facilitate a higher rate of population growth in line with its designation as a Key Town and the objectives set out in Section 4.6 and RPO 4.63 of the Regional Spatial and Economic Strategy.
- b) Consider a modest increase in the growth allocation to Granard on the basis that it should be designated as a Tier 2 Self Sustaining Growth Town as detailed under Recommendation 2 and having regard to NPO9.
- c) Reduce the population growth rate of 38.5% provided to Lanesborough over the plan period to a level commensurate with the town's services, infrastructure and position in the settlement hierarchy, and to ensure consistency with NPO 9 of the NPF to limit population growth to 2040 to 30% above the 2016 population baseline figure.
- d) Consider providing aggregate figures in the (revised) Core Strategy for Tier 4 individual villages and smaller towns, rather than detailed figures for each settlement.
- e) Provide a clear evidence-based approach to determine the demand for one off rural housing in the open countryside over the plan period as required under NPO 20 and under the Sustainable Rural Housing Guidelines for Planning Authorities (2005).

4.3.2 Chief Executive Response

The distribution of population growth was informed by a demographic analysis of historical growth rates of individual settlements comparative with Longford Town, given its dominant role within the county in accounting for approximately 25% of the overall county population consistently over the inter-censal period between 1991-2016. As detailed in Section 4.8.6 of the Draft Plan, a key principle of the Settlement Strategy is the need for a more balanced network of higher order towns in the Settlement Hierarchy to support the role and function of Longford Town as the principal economic driver and focus of investment for the county. In addition, the demographic analysis illustrated a clear requirement to address the disparity in growth rates amongst the four other main settlements in the county and in particular to arrest the stagnation in growth experienced in Granard.

Accordingly, it was initially decided to grow these four settlements (i.e. Edgeworthstown, Ballymahon, Lanesborough and Granard) in proportion to the overall growth of Longford Town, with Edgeworthstown and Ballymahon, both denoted as Self-Sustaining Growth Towns in the Settlement Hierarchy, each growing in population terms by 25% of Longford Town's equivalent population growth up to 2027. Lanesborough and Granard, both initially designated as Self-Sustaining Towns in the Settlement Hierarchy, would each grow by 15% of Longford Town's population growth over the same period.

The aim of this interventionist approach in relation to the population allocations for the Self-Sustaining Growth Towns and Self-Sustaining Towns, was to provide for more balanced growth across the county, whilst recognising the geographic spread of each settlement across the county and the role each settlement can play in supporting the 'Key Town' of Longford Town, which would remain the dominant settlement in the

county. Moreover, this approach also provided assurance that no lower order settlement will outgrow a higher order settlement.

Having regard to the above recommendation, and in the context of Recommendations 1 (compliance with the Housing Supply Target Methodology for Development Planning guidelines which will entail accommodating additional housing growth than that previously allocated in the Draft Plan) and 2 (revised Settlement Hierarchy) of the OPR submission, it is recommended that the population and corresponding housing target allocations are amended to take account of the recommended actions outlined in points a-e of Recommendation 3 above.

To inform the recommended revised Settlement Hierarchy and, by association, the revised allocation of projected population and housing targets for the relevant settlements, a further iteration of the asset based approach outlined in Table 3.1 of the RSES to identify the level of growth settlements in the County could accommodate over the lifetime of the Plan. Details of this further refinement to the asset based approach, identifying the various criteria and assimilative capacities for the respective settlements is provided in Appendix 7 of this report.

The revised Core Strategy Table provided in Appendix 5 of this report illustrates the recommended distribution of the population and housing supply targets across the relevant settlements and settlement tiers for the plan period.

As regards the recommendation for a clear evidence-based approach to determine the demand for one off rural housing in the open countryside over the plan period, Section 4.4.3 of the revised Longford Housing Strategy 2021-2027 explores the likely future demand arising for single one-off dwellings as part of the HNDA's analysis of housing requirements in the County. The evidence basis is informed by a review of historic precedent in planning applications and housing commencement data. By doing so, it was observed that 40% of the total number of residential units granted planning have been for single one-off dwellings in recent years.

As detailed previously, Longford County has a total housing target of 2,568 units over the plan period.

If the total proportion of historic one-off granted planning permissions (40.4% of all granted units between 2006 and 2020) were applied to this target, this **would equate to 1,036 units delivered as one-off houses**.

However, it must be noted that this is a projection based on historic trends and the baseline conditions and factors that have enabled recent single rural dwelling delivery. It is a 'policy-off' forecast that may not reflect future policy decisions at national and local level or future market conditions. It is also based on data from some years when the housing market was frequently operating abnormally and following unsustainable cycles of boom and bust. Absolute numbers of one-off homes delivered since 2011 have remained relatively stable, while proportions have tended to decline as overall housing delivery increases. This may be the case over the plan period 2021-2027 if overall housing delivery meets targets and delivers greater housing affordability and housing options for rural communities within towns and villages.

Furthermore, there is now a clear impetus in planning policy through the NPF to direct more housing delivery towards existing settlements with a target of delivering at least 30% of all new homes in County Longford delivered within the built-up footprint of existing settlements.

It therefore will be appropriate for the Longford County Development Plan 2021-2027 to balance potential demand for single rural dwellings (as informed by historic trends) against broader planning goals in allocating new housing for rural areas through the Core Strategy.

CE OPR 1.8

To replace the Core Strategy Table (Table 4.12 in the Draft Plan) with the recommended revised Core Strategy Table provided in Appendix 5 of this report which illustrates the recommended revised population and housing supply allocations and recommended residential densities to be applied at settlements and settlement tiers, where relevant.

4.4.1 Quantity of Zoned Land

(OPR Recommendations 4 and 5 and Observations 1 and 2)

The submission from the OPR acknowledges and supports the clear effort of the Draft Plan in addressing the historical legacy of excessive land use zoning, particularly in relation to residential zoned lands. Notwithstanding, the OPR is of the view that the quantity of land zoned for residential use, or a mixture of residential and other uses, remains in excess of the population and housing targets set out in the Core Strategy. As per Recommendation 1, the quantity of land zoned for development purposes in the Draft Plan will need to be reviewed (and possibly reduced) in light of the revised Core Strategy arising from the *Housing Supply Target Methodology for Development Planning* Section 28 guidelines. Moreover, further information regarding the potential quantity of land required to meet the housing supply targets in each settlement to demonstrate consistency with Section 10(2A) of the Act and the provisions of the NPF and RSES for compact growth and sequential development.

Accordingly, the OPR has recommended (under Recommendation 4) that the planning authority provide the following information in Table 4.12 of the revised Core Strategy:

- a) The Housing Supply Targets for each settlement over the plan period.
- b) The quantity in hectares of proposed residential zoned land and land zoned for a mix of residential and other uses including an appropriate proportion of Site Resolution Objective areas which are permitted to accommodate residential use in the Draft Plan for each settlement.
- c) The density assumptions used to estimate the quantity of zoned land arising from NPF housing supply targets in the revised Core Strategy. These densities should comply with the recommended residential densities for large towns, small towns and villages in the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* (2009).

Similarly, the OPR notes that there is a significant quantity of land zoned as 'Strategic Residential Reserve' in the Draft Plan which "seeks to provide for the longer-term

housing requirements of the town” and which exceed the quantity of land zoned for new residential development. Whilst the OPR has acknowledged that this arises for the most part from the legacy of over-zoning, the location of such land at remote locations on the fringes of towns and villages, in most instances, is contrary to national and regional objectives to provide for compact growth (NPO3c; NSO1 and RSO2).

Accordingly, the OPR has recommended (under Recommendation 5) that the Planning Authority:

- a) Reconsider and appropriately reduce the provision of all zoned residential land, and land zoned for a mix of residential and other uses, to align with the quantify of land necessary to accommodate housing supply targets in the (revised) Core Strategy.
- b) Review the quantity of land zoned strategic residential reserve to reflect the longer term NPF population targets to 2040, with all land zoned ‘*Strategic Residential Reserve*’ located in an area subject to flooding omitted in accordance with the provisions of The Planning System and Flood Risk Management Guidelines for Planning Authorities.
- c) Adopt a sequential approach to the zoning of lands in accordance with RPO 4.2, such that lands in proximity to the town core are zoned for new residential use, with particular emphasis on lands in Edgeworthstown and Ballymahon, where land in proximity to the town core has been identified as Strategic Residential Reserve and land further removed has been zoned as new residential.

Given the extent, nature and location of these lands, the OPR considers that the wording supporting the Strategic Residential Reserve objective in Volume 2 Appendix of the Draft Plan be clarified to ensure 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 County Development Plan 2021-2027 (Observation 1).

4.4.2 Chief Executive Response

(OPR Recommendation 4)

The Council welcomes the recognition of the OPR in addressing the historical legacy of excessive land use zoning, particularly in relation to residential zoned lands. Section 4.10 of the Draft Plan outlines the approach used in quantifying the zoning of residential lands.

In relation to the issues raised in the submission by the OPR, it should be noted that the Core Strategy has been guided by the Department of Environment Heritage and Local Government publication, ‘*Guidance Note on Core Strategies*’ (2010), taking into account relevant changes brought about through the publication of the NPF and RSES and in particular, the requirement to prepare a Housing Needs Demand Assessment (HNDA).

Given the limited quantum of the minimum land requirements to accommodate future residential development in certain settlements of the county, there is a justifiable concern that the Key Aims and County Policy Objectives of the Core and Settlement

Strategies would be undermined if future residential development in settlements were limited to the minimum quantum of land requirements for residential development and in the absence of any flexibility or alternative lands for residential development within respective settlements.

Accordingly, the approach adopted to deliberately exceed the minimum zoning requirement sought to provide sufficient flexibility to prevent any land banking and address any potential issues of intransigence from landowners which could undermine the delivery of residential development in such settlements and the Settlement Strategy advocated in the Draft Plan. This approach is also in line with that advocated in Department of Environment, Heritage and Local Government Guidance Note on Core Strategies (2010), where consideration of market choice is a requirement in relation to the quantum, location and phasing of development.

It should be noted that the Planning Authority is required to meet their statutory obligations by ensuring that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the Housing Strategy and to ensure that a scarcity of such land does not occur at any time during the period of the County Development Plan. Such an approach will negate the need for unplanned material contravention scenarios due to the absence of suitable lands for development.

In relation to the application of residential densities within the Draft Plan, Section 4.14.7 refers, with higher densities applied to the Key Town of Longford Town (30 units per hectare), with a reduction in residential densities for Self-Sustaining Growth Towns and Self-Sustaining Towns, and other towns and villages (12 units per hectare). These densities are a continuation of the densities afforded in the current CDP and were considered to be commensurate to the existing built environment of these settlements and subject to good design and Development Management Standards (see Chapter 16).

Notwithstanding, it is acknowledged that higher densities in line with those advocated in the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* (2009) will be necessary in order to give effect to more compact development patterns, particularly in the context of brownfield development and town centre first sequential development approaches. In devising amended residential densities, regard is had to the existing character of settlements within the county and its predominantly rural settlements. In this context, the NPF provides a guiding principle:

“Rural town living requires a proportionate and tailored approach to residential development. This means that it is necessary to tailor the scale, design and layout of housing in rural towns to ensure that a suburban or high-density urban approach is not applied to a rural setting and that development responds to the character, scale and density of the town”, (pp. 73, NPF (2018)).

Accordingly, it is recommended that the Council amend the Draft Plan to provide for a graded reduction in revised residential densities, in keeping with the densities ranges

advocated in the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* (2009), in accordance with the revised Settlement Hierarchy as opposed to a blanket application of density across the settlement tiers outside of Longford Town.

In addition, it is recommended that the Core Strategy Table (Table 4.12 in the Draft Plan) shall be amended to include housing supply targets for each settlement over the plan period, as well as the quantity (in hectares) of proposed residential zoned land and associated densities for respective settlements used to estimate the quantity of zoned land arising from the adjusted housing supply targets for the county as informed by the *Housing Supply Target Methodology for Development Planning* guidelines. Accordingly, Table 4.2 below sets out the recommended residential densities to be applied by settlement tier of the recommended revised Settlement Hierarchy.

Table 4.2: Recommended Revised Residential Densities and Settlement Hierarchy for Draft Longford County Development Plan 2021-2027

SETTLEMENT HIERARCHY		
Key Town (35-40 units/ha)	Longford Town	
Self-Sustaining Growth Town (25 units/ha)	Granard	
Self-Sustaining Towns (25 units/ha)	Edgeworthstown Ballymahon Lanesborough	
Towns and Villages (20 units/ha)	Aughnaccliffe Ballinalee Drumlish Keenagh Legan Newtownforbes	
Rural	Serviced Rural Villages (15 units/ha)	Abbeyshrule Ardagh Ballinamuck Clondra
	Rural Settlement Clusters & Open Countryside	

(OPR Recommendation 5)

As stated previously, the quantum of land zoned for residential purposes is recommended to be revised to reflect the housing supply targets for each of the respective settlements, as informed by *Housing Supply Target Methodology for Development Planning* guidelines, as well as the recommended revised residential densities to be applied in accordance with the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* (2009).

The quantity of land zoned Strategic Residential Reserve is also recommended to be reduced, where relevant, to reflect longer term NPF population targets to 2040 and

likely infrastructure investment into the future to service such lands. Any Strategic Residential Reserve zoned lands coinciding with areas subject to flooding shall be omitted.

In relation to the item raised by the OPR in respect of adopting a sequential approach to the zoning of lands in accordance with RPO 4.2 (under Recommendation 5 c), the overall review and subsequent amendment to the zoning of lands for residential purposes has regard to RPO 4.2 as well as CPO 4.3 of the Draft Plan wherein it is the County Policy Objective to:

“Reinforce the centres of settlements through the increased focus on the development of infill sites, brownfield lands, under-utilised land/buildings, vacant sites, and derelict sites within the existing built-up footprint of the settlements and develop outwards from the centre in a sequential manner”.

Appendix 8 of this report details the recommended changes to the zoning maps of each settlement, reflecting the revised population and housing targets for the County, the reductions to the quantum of residentially zoned lands (including Strategic Residential Reserve), where relevant, as well as recommended reductions to the quantum of employment land where relevant also.

(OPR Observation 1)

The Council is amenable to this clarification and recommends amending the Land Use Zoning Objective for Strategic Residential Reserve to clarify that no residential development proposals will be considered by the Planning Authority, on such lands until after the period of the County Development Plan 2021-2027.

4.4.3 Chief Executive Recommendation

(OPR Recommendation 4, 5 and 7)

CE OPR 1.9

To amend the Land Use Zoning maps detailed in Appendix 1 of the Draft Plan 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. The recommended revised Land Use Zoning maps are provided in Appendix 8 of this report.

(OPR Observation 1)

CE OPR 1.10

To amend the *Strategic Residential Reserve* land use zoning objective as follows:

To provide for the longer-term ~~housing-residential land~~ requirements of the ~~town~~ settlement with such lands not to be considered for development purposes during the current plan period.

4.5.1 Tiered Approach to Zoning

(OPR Recommendation 6)

The OPR has recommended that the Planning Authority demonstrate that the tiered approach to zoning required under the NPF (policies NPO 72a, NPO72b and NPO72c

refer) has been applied which has 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.

4.5.2 Chief Executive Response

In the absence of updated Development Plan Guidelines, the Planning Authority engaged comprehensively with Irish Water and the Council's Water Services and Roads departments, with the infrastructural assessment advice from these sectors used to inform zoning decisions relating to the Draft Plan.

This assessment process was underpinned by the standardised methodology approach advocated in the NPF to 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 Tier 1: Serviced Zoned Land and Tier 2: Serviceable Zoned Land.

This assessment utilised a sieve mapping approach over infrastructure provisions over an iterative basis to identify lands for development or where there is an ability to connect to existing infrastructural provisions, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development. This assessment also identified lands in need of further infrastructure provision and an estimation of the level of provision required i.e. additional pumping stations for foul sewer, roads and footpaths etc.

On the basis of the recommended actions in respect of the revised housing targets accrued from the *Housing Supply Target Methodology for Development Planning* guidelines and the application of revised densities, a further iteration on the infrastructural assessment of settlements has been conducted, with the resultant report to be included in the amended Draft Plan. This further iteration has more clearly identified lands fully serviced and available for development and other sites that are in need of more infrastructural investment prior to development. Taking into consideration the OPR comments in this regards the zoning of certain sites has been altered to reflect the findings of the Infrastructural Assessment Report (IAR).

4.5.3 Chief Executive Recommendation

CE OPR 1.11

To insert the Infrastructure Assessment Report (IAR), used to identify the existing and projected level of infrastructure provision within settlements and the subsequent amendments to the zoning maps as a result of further iteration of the IAR to accommodate additional development, into the amended Draft Plan. A working draft of the Infrastructure Assessment Report is provided in Appendix 10 of this report.

4.6.1 Compact Growth and Regeneration

(OPR Recommendation 7)

The OPR welcomes the strong policy commitment to the regeneration and renewal of towns and villages in the County and commends the Draft Plan for appropriately supporting a range of site activation measures. The OPR recognises that the Core

Strategy Table (Table 4.12) in the Draft Plan individually allocates 30% of future housing requirements within the top four tiers to land within the existing built up footprint in accordance with NPO 3c and RPO 3.2. However, further details in terms of the identification and quantum of brownfield/infill lands to contribute to the policy requirements of NPO 3c and RPO 3.2 is deemed necessary. To this end, the OPR recommends that the Planning Authority:

- a) Define those areas of settlements which will contribute to the cumulative delivery of 30% of all new homes within the built-up footprint of existing settlements, inclusive of land zoned as '*Site Resolution Objective*'.
- b) Evaluate the extent and location of lands identified as '*Site Resolution Objective*' and demonstrate consistency with the housing and population requirements set out in the Core Strategy and policy promoting compact growth through application of the brownfield definition as set out in the Sustainable Residential Development in Urban Area Guidelines.

This may necessitate a reduction in the Site Resolution Objective boundary applied to individual sites, particularly in instances where extensive greenfield land is included within the zoning objective.

The Planning Authority is also advised to review the Strategic Flood Risk Assessment (SFRA) to ensure consistency with the *Planning System and Flood Risk Assessment Guidelines* and Circular PL 2/2014 (Observation 2).

In relation to standards and guidelines, the submission from the OPR highlights a number of concerns relating to specific conformance with the *Urban Development and Building Heights Guidelines for Planning Authorities (2018)*, proposed plot ratio standards, and car and cycle parking standards. Accordingly, the OPR advises the Planning Authority to:

- a) Provide relevant information to show that the Draft Plan and Housing Strategy are consistent with the specific planning policy requirements (SPPRs) specified in the '*Urban Development and Building Heights Guidelines for Planning Authorities*' (2018) by more fully demonstrating consistency with SPPR 1 and explicitly addressing SPPR 2, SPPR 3 and SPPR 4;
- b) Amend the Draft Plan's policies on apartment development to be fully consistent with the relevant SPPRs in the '*Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities*' (2018). In this regard, policy DMS16.5 should be deleted and policy DMS16.58 amended to ensure consistency with SPPR3, and adequate reference to one bed apartments included.
- c) Review the car parking standards promoted in the Draft Plan to ensure that appropriate maximum standards are included for both residential and commercial developments in urban areas in accordance with NPO 13.
- d) Remove the plot ratios promoted in Section 16.4.5.4 of the Draft Plan and instead state that individual development proposals will be assessed on performance based criteria dependent on location and individual site characteristics in accordance with the provisions of NPO 13.
- e) Remove Amend the bicycle parking requirement in the Draft Plan to ensure compliance with the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, which requires one space per apartment bedroom.

4.6.2 Chief Executive Response

The recommended revised zoning maps (as provided for in Appendix 8 of this report) include the CSO defined urban settlement boundary, which defines development within this boundary as brownfield and development outside of the boundary as greenfield.

This will be applied on the zoning maps for those settlements that are subject to this CSO Settlement definition, namely a minimum of 50 occupied dwellings, with a maximum distance between any dwelling and the building closest to it, of 100 metres, and where there was evidence of an urban centre (shop, school etc) and in accordance with UN criteria as referred to in Reference 17 of Appendix 4 of the NPF.

The application of this boundary will define those residentially zoned lands of the settlements which will contribute to the cumulative delivery of 30% of all new homes within the built-up footprint of existing settlements.

In relation to the comments of the OPR in respect of the Site Resolution Objective zoning, it is acknowledged that this zoning is an objective carried over from the current County Development Plan (CDP), principally in relation to the targeted regeneration and remediation of lands associated with the legacy of previous unfinished residential developments.

Since the adoption of the current CDP, significant progress has been achieved in remediating and regenerating many of the lands designated under this Site Resolution Objective zoning. Moreover, it is noted that the locations of these lands vary by settlement, with some lands centrally located and other lands on the periphery of settlements. Therefore, following a re-appraisal of this zoning objective in the context of achieving compact forms of residential growth, and the significant progress in fulfilling the objective of the zoning since the adoption of the current Plan, it is recommended that the Site Resolution Objective is omitted from the amended Draft Plan, with lands currently subject to this zoning either de-zoned or re-zoned for more appropriate land uses, such as residential where such lands can make a positive contribution to the achievement of more compact forms of development growth in settlements.

(OPR Observation 2)

The recommended amendments to the land use zoning maps were informed by the Draft Strategic Flood Risk Assessment (SFRA), with the amended Draft Plan to include a revised SFRA to underpin the recommended amendments. Any revisions to the SFRA will be conducted in consultation with the Office of Public Works (OPW).

(OPR Observation 3)

Having considered the existing commitment in the Draft Plan (under DMS 16.54) to employing the guidance as set out under the *Urban Development and Building Heights Guidelines for Planning Authorities* (2018) and the *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities* (2018), it was not considered necessary to reiterate individual Specific Planning Policy Requirements

(SPPRs) throughout the Plan; however, there is no objection to the suggestion of the OPR that such specific policy be included in the Plan in order to demonstrate consistency with SPPR 1 and explicitly address SPPR 2, SPPR 3 and SPPR 4.

The Planning Authority does not raise any concerns in amending the Draft Plan's policies on apartment development to be fully consistent with the relevant SPPRs in the *'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities'* (2018), principally in respect of DMS16.58.

Similarly, car parking standards shall be amended to ensure that appropriate maximum standards are included for both residential and commercial developments in urban areas in accordance with NPO 13.

Furthermore, plot ratio standards promoted in Section 16.4.5.4 of the Draft Plan shall be removed, with such standards to be assessed on performance based criteria dependent on location and individual site characteristics in accordance with the provisions of NPO 13.

In addition, bicycle parking standards in the Draft Plan shall be amended to ensure compliance with the *'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities'* (2018), which requires one space per apartment bedroom.

4.6.3 Chief Executive Recommendation

(OPR Recommendation 7, Observations 2 and 3)

CE OPR 1.12

To insert the CSO defined Urban Settlement Boundary, which defines development within this boundary as brownfield and development outside of the boundary as greenfield, on the recommended revised Land Use Zoning maps for the Draft Plan. The application of this boundary will define those residentially zoned lands of the settlements which will contribute to the cumulative delivery of 30% of all new homes within the built-up footprint of existing settlements. The recommended revised Land Use Zoning maps provided in Appendix 8 of this report detail the CSO Urban Settlement Boundary for those relevant settlements.

CE OPR 1.13

To remove the following Land Use Zoning Objective from the Draft Plan:

~~*Site Resolution Objective – To provide a mix of uses for the sustainable regeneration of the area.*~~

CE OPR 1.14

To review the Draft Strategic Flood Risk Assessment (SFRA) in the context of the recommended amendments to the land use zoning maps and to ensure consistency with the *Planning System and Flood Risk Assessment* Guidelines and Circular PL 2/2014 in the amended Draft Plan.

CE OPR 1.15

To insert the following Section after Section 4.14.8 of the Draft Plan:

Apartment Development

The 2016 Census indicates that 1-2 person households now comprise a majority of households and this trend is set continue, yet Ireland has only one-quarter the EU average of apartments as a proportion of housing stock. (Department of Housing, Planning and Local Government, 2018). In Longford, 4.2% of households lived in apartments in 2016, substantially lower than the national rate of 12%.

As with housing generally, the scale and extent of apartment development should increase in relation to proximity to core urban centres and other relevant factors in line with the standards, principles and any specific planning policy requirements (SPPRs) set out in the Urban Development and Building Heights Guidelines for Planning Authorities' (2018) and the 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' (2018)

CE OPR 1.16

To insert the following CPO in Section 4.15 of the Draft Plan:

To support the development of quality residential schemes with a range of housing options having regard to the standards, principles and any specific planning policy requirements (SPPRs) set out in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009); Urban Development and Building Heights Guidelines for Planning Authorities' (2018) and the 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' (2018)

CE OPR 1.17

To insert the following CPO in Section 4.10 of the Draft Plan:

Facilitate higher and increased building heights at suitable locations and in accordance with settlement hierarchy in line with Specific Planning Policy Requirement (SSPR) 1 of the Urban Development and Building Heights Guidelines for Planning Authorities' (2018)

CE OPR 1.18

To insert the following CPO in Section 4.10 of the Draft Plan:

Achieve the delivery of high-quality built environments ensuring that development is designed to a high standard in line with the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities and Best Practice Urban Design Manual (DoECLG 2009), the 'Urban Development and Building Heights Guidelines for Planning Authorities' (2018) and Specific Planning Policy Requirements (SPPRs) 1 – 4 (inclusive), the core strategy for the county and other planning considerations.

CE OPR 1.19

To amend CPO 6.4 as follows:

Promote increased urban densities and building heights at suitable locations in accordance with the settlement hierarchy, in accordance with Urban Development and Building Heights Guidelines for Planning Authorities (2018), or any future amendments or updates of the same.

CE OPR 1.20

To amend DMS16.20 as follows:

Development proposals that include building heights that are greater than the prevailing building height in the area should be supported by a strong urban design rationale (as part of a Design Statement) and in accordance with the principles of Urban Development and Building Heights Guidelines for Planning Authorities (2018), or any future amendments or updates of the same.

CE OPR 1.21

To amend DMS16.21 as follows:

The appropriate maximum or minimum height of any building will be determined by compliance with Urban Development and Building Heights Guidelines for Planning Authorities (2018), or any future amendments or updates of the same, and:

- *The prevailing building height in the surrounding area.*
- *The proximity of existing housing.*
- *The formation of a cohesive streetscape pattern, including height and scale of proposed development relative to width of street or area of open space.*
- *The impact on any Protected Structures, Architectural Conservation Areas and/or other sensitive sites*

CE OPR 1.23

To amend DMS16.58 as follows:

A detailed design statement is required to be submitted with any development containing multiple apartment and/or duplex units, including private and communal amenity space, as per the minimum apartment design standards requirements detailed in the Urban Development and Building Heights Guidelines for Planning Authorities (2018) SPPR3.

Minimum Apartment Floor Areas	Floor Area	Private space	Open space
<i>Studio apartment (1 person)</i>	<i>37 sq.m</i>	<i>4 sq.m</i>	
<i>1-bedroom apartment (2 persons)</i>	<i>45 sq.m</i>	<i>5 sq.m</i>	
<i>2-bedroom apartment (4 persons)</i>	<i>73 sq.m</i>	<i>7 sq.m</i>	
<i>3-bedroom apartment (5 persons)</i>	<i>90 sq.m</i>	<i>9 sq.m</i>	

CE OPR 1.24

To amend DMS16.24 as follows:

~~Plot ratio will apply to both new buildings and extensions to existing buildings as follows:~~

~~Town Centre / Brownfield Inner Suburban area 1.0 to 2.0~~

~~Outer Suburban—close proximity to public transport 0.5 to 1.0~~

~~Outer Suburban—remote from public transport 0.35 to 0.5~~

~~Higher plot ratio coverage may be permissible in certain limited circumstances such as adjacent to public transport corridors; to facilitate areas identified for regeneration purposes; and in specific areas where an appropriate mix of both residential and commercial uses is proposed.~~

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

CE OPR 1.25

To amend the car parking requirements for residential developments, as prescribed in Table 16.1 of the Draft Plan, as follows:

LAND USE	CAR PARKING SPACE REQUIREMENT
HOUSES (outside town centres)	2 per dwelling
HOUSES (town and village centre location)	1 space per unit in Longford Town 1.5 space per unit in all other settlements
APARTMENTS / FLATS	1 space per unit + 1 visitor space per 4 apartments in suburban locations, towns and villages

CE OPR 1.26

To amend the cycle parking requirements for residential developments, as prescribed in Table 16.2 of the Draft Plan, as follows:

Land Use	Cycle Parking Space Requirement
HOUSES	1 space per dwelling
APARTMENTS	1 stand per bedroom and 1 visitor stand per 2 units
STUDIO FLATS	1 stand per unit and 1 visitor stand per 2 units

4.7.1 Rural Housing and Rural Regeneration

(OPR Recommendation 8 and Observation 4)

The OPR submission acknowledges that the Draft Plan seeks to manage and negate the pressure for overspill urban generated rural housing particularly in locations in proximity to the principle larger towns such as Longford Town, consistent with national and regional policy objectives.

The OPR particularly welcomes the policy emphasis on housing within Serviced Rural Villages and the promotion of serviced sites as a viable and attractive alternative to housing in the open countryside (CPO4.15 and CPO 4.19).

Notwithstanding the fact that the Draft Plan identifies three rural housing types based upon Section 3.2 of the *'Sustainable Rural Housing Guidelines for Planning Authorities'* (2005), *in addition to the proposed Broad Zone Rural Area* designated on amenity value, the OPR notes that NPO 19 makes a distinction between only two types of areas for rural housing: (i) areas under urban influence and (ii) rural areas elsewhere, and recommends a policy approach for each area. Moreover, the OPR considers the applicant qualification criteria not consistent with the core consideration of demonstrable economic or social need to live in a rural area as required under NPO 19. Accordingly, the OPR recommend the planning authority revise the Draft Plan's policy in respect of *Housing in the Open Countryside* (sections 4.8.11 and 4.8.12) to ensure consistency with NP019 including:

- a) To revise the rural typologies including mapping (Figures 4.5 and 4.6) to comply with NPO 19. The identification of areas under urban influence should be based on clear criteria including realistic commuter catchments of the larger towns and centres of employment (both inside and beyond the county boundaries) and main commuting routes including the N4, N5, and N55.
- b) Amend the rural housing policy objectives and the specific criterion demonstrating social or economic need to reside in that area in Chapter 4, such that policy measures for rural one-off housing in *'Rural Areas Under Strong Influence'* are distinct and separate to other defined areas including *'Stronger Rural Areas'*, in compliance with NPO19.
- c) Revise the policy framework for *'Rural Areas Under Strong Urban Influence'* and delete aspects, including references to bloodline/family ties, that are not consistent and 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 as set out in NPO 19.

The OPR submission also welcomes the identification of development boundaries for the rural clusters within the county, however, advises that development boundaries applied to un-serviced rural clusters should be reviewed to reflect the extent of the established settlement; and promote a sequential approach to development to ensure compact growth and avoid ribbon development consistent with the guidance in *Sustainable Rural Housing Guidelines for Planning Authorities* (2005). The submission also advises that provision for monitoring residential development permitted as single rural houses as is proposed for individual settlements should also be provided for under CPO 4.47 (*Observation 4*).

4.7.2 Chief Executive Response (OPR Recommendation 8)

The Council acknowledges that the rural typology mapping, provided for in Figures 4.5 and 4.6 of the Draft Plan, places a greater weighting criterion on population changes, whether longstanding stagnation or decline in rural areas or similarly longstanding increases in population levels in rural Electoral Divisions, than on commuting patterns.

Accordingly, the Planning Authority is amenable to the recommendation of the OPR in revising the rural typologies and associated mapping to incorporate more balanced criteria, including realistic commuter catchments of larger towns and centres of employment, both inside and beyond the county boundary, as well as main commuting routes including the N4, N5 and N55.

Any revisions to the rural typology mapping will again be informed by the uses of the CSO POWSCAR dataset, as well as other CSO datasets such as the daytime population dataset on Workplace Zones as well as the methodology prescribed in Appendix E of the RSES for defining Functional Urban Areas (FUAs) to discern the demographic, socio-economic and commuting characteristics of workers and to inform implications for rural settlement patterns.

Moreover, it is recommended that the revised rural typology mapping be amended to comply with NPO 19 in identifying two categories of rural typology: (1.) *Rural Areas Under Urban Influence*; and (2.) *Rural Areas Elsewhere*. A copy of the recommended revised Rural Typology Map is included as Appendix 9 of this report.

In relation to the areas designated 'Broad Zone Rural Areas' in the rural typology mapping and rural housing policy framework presented in the Draft Plan, these lands were designated on the basis of their high amenity value, rather than as a result of a rural housing need requirement. As a result, 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) are recommended to be removed from the rural housing policy framework detailed in Section 4.8.12 *Rural Settlement Strategy* of the Draft Plan.

In relation to the recommendations from the OPR to amend and revise the rural housing policy framework contained within the Draft Plan, 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”*.

It is anticipated that the replacement guidelines will be published prior to the publication of the amended Draft Plan and therefore recommended actions in relation to the rural housing policies contained within the Draft Plan provided in this report may be subject to change on foot of these updated guidelines.

Notwithstanding, there is an apparent inconsistency in the approach of the OPR to its interpretation of local need criteria given the conflict between NPO 19 and Circular Letter PL 2/2017, where the OPR submission in respect of the Draft Offaly County Development Plan 2021-2027 does not raise similar concerns in relation to local need criteria contained therein, which is largely identical to that contained within the Draft Longford CDP, as the OPR submission has in respect of its item under Recommendation 8 (c).

Accordingly, having regard to Circular Letter PL 2/2017 and the absence of any updated guidance on rural housing framed by the provisions of the NPF, it is considered that the local need criteria set out in the Draft Plan should be amended to reflect that as set out in the current Plan until such time as appropriate guidance is issued and that a policy objective be included to review rural housing policy in line with Development Plan or other Guidelines in the area having regard to NPO 19.

(OPR Observation 4)

The Planning Authority acknowledges that the boundaries of the defined *Rural Settlement Clusters* remain unchanged from those settlements presented as *Rural Service Settlements* in the current Plan.

Accordingly, the recommended revisions to the zoning maps provided in Appendix 8 of this report also provide for recommended revisions to the boundaries of the defined *Rural Settlement Clusters* to more appropriately define their built footprint. CPOs 4.15, 4.17 and 4.20 also provide sufficient policy coverage to promote sequential and consolidated development forms within the *Rural Settlement Clusters*.

In response to the observation by the OPR to include the monitoring of single rural housing in the overall permitted residential development monitoring policy objective contained in CPO 4.47, the Planning Authority shall amend the policy to include single rural housing also.

4.7.3 Chief Executive Recommendation

(OPR Recommendation 8 and OPR Observation 4)

CE OPR 1.27

To amend the Rural Typology Map and Core Strategy Map, Figures 4.5 and 4.6 respectively of the Draft Plan) to reflect the recommended revised Rural Typology Map presented in Appendix 9 of this report.

CE OPR 1.28

To amend the text provided in Section 4.8.12 – *Rural Settlement Strategy* of the Draft Plan as follows:

A key principle underpinning the Settlement Strategy is the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid overdevelopment, while sustaining vibrant rural communities.

The NPF prescribes national policy in relation to the development of rural housing and requires that a distinction is made between areas under urban influence and rural areas elsewhere (NPO 19). The RSES sets out regional policy that requires Local Authorities to ‘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’.

Having regard to this, rural typology mapping has been undertaken for County Longford which is consistent with national and regional policy and guidance. This typology map is based on the following 23 no. categories of rural areas:

- ***Rural Areas under Strong Urban Influence*** – areas which exhibit characteristics such as proximity to the immediate environs or close commuting catchment of large towns within the county with evidence of considerable pressure for development of housing owing to their proximity to such settlements.

The policy in these areas is to facilitate housing development by people who have strong links to the particular rural area, who are an intrinsic part of the rural community.

Such persons would normally have spent substantial periods of their lives living in the rural area as part of the established rural community, e.g. people employed in the rural area including farmers and their sons and daughters, people originally from the rural area and wishing to return, people wishing to reside near elderly parents to provide security and care, elderly parents wishing to live near other family members, people who would have grown up in rural

areas seeking to build their home close to other family members, people working in rural areas such as teachers in rural schools.

- ~~Stronger Rural Areas~~ **Rural Areas Elsewhere** – these areas are the residual rural areas of the county not under Strong Urban Influence which can range from strong rural areas where population levels are generally stable within a well-developed town and village and in the wider rural areas around them to structurally weaker rural areas which exhibit characteristics such as persistent and significant population decline as well as a weaker economic structure based on indices of income, employment and economic growth. ~~This stability is supported by a traditionally strong agricultural economic base and the level of individual housing development activity in these areas tends to be relatively low and confined to certain areas.~~
- ~~Structurally Weak Areas~~ – areas which exhibit characteristics such as persistent and significant population decline as well as a weaker economic structure based on indices of income, employment and economic growth. ~~The policy in these areas is to accommodate demand from individuals for permanent residential development subject to good planning practice. This policy will facilitate the expansion of the rural population and the maintenance of essential local services.~~

The Council will manage sustainable growth in designated 'Rural Areas Under Strong Urban Influence' ~~"Stronger Rural Areas"~~ 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 well as compliance with siting and design criteria for rural housing and with statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.

In respect of ~~"Structurally Weak Rural Area"~~ **'Rural Areas Elsewhere'** typologies, the Council aims to accommodate rural housing demand from individuals for permanent residential development, subject to good planning practice by applying a more flexible approach in the assessment of planning applications which are primarily based on sustainable planning principles (appropriate siting and design and negligible impacts to existing amenities or sensitive environments). The requirement to demonstrate local housing need will not apply to applications within ~~these~~ this designated areas.

~~This approach will assist in revitalising and sustaining these more fragile, rural communities, by way of facilitating the expansion of the rural population and the maintenance of essential local services within these structurally weak rural areas.~~

~~In addition, "Broad Zone" areas in County Longford are a further spatial planning policy consideration for rural housing. Broad Zone areas are designated areas of high amenity value and recreational potential associated with the major rivers and lakes in the county, the Royal Canal and areas of outstanding landscape quality in the northern fringes of the county. The Council aims to protect against residential developments which are urban generated or speculative in "Broad Zone" areas.~~

Dwellings and structures in the countryside need to be sited and designed to impact minimally on their setting. The utilisation of existing features, natural and manmade, can assist in integrating new development into its established setting.

Design standards are outlined in Chapter 16: Development Management Standards and Annex 5: Rural Design Guidelines for Residential Developments in Rural County Longford. Furthermore, the Landscape Character Assessment (Chapter 14, Annex 9 and Appendix 9) assess the sensitivity and capacity of the different character areas ability to absorb and facilitate rural residential development.

CE OPR 1.29

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

CPO 4.22 - 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:

- = ~~(a) 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)~~*
- = ~~e) 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.~~*

CE OPR 1.30

Amend CPO 4.23 as follows:

CPO 4.23 - 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).

CE OPR 1.31

Amend CPO 4.25 as follows:

CPO 4.25 - 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.

CE OPR 1.32

Amend CPO 4.39 as follows:

CPO 4.39 – 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.

CE OPR 1.33

Insert new 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.

CE OPR 1.34

To amend the boundaries of the Rural Settlement Clusters to reflect the recommended revised boundaries provided in Appendix 8 of this report.

CE OPR 1.35

To amend County Policy Objective 4.47 as follows:

CPO 4.47 - Monitor and manage the delivery of residential development in County Longford through the development management process to ensure it is in line with the Core Strategy. In this respect, the Planning Authority shall maintain a record of residential development permitted in individual settlements, as well as residential development permitted as single rural housing, in order to ensure compliance with the population allocations defined by the Core Strategy Table.

4.8.1 Quantity and Location of Employment Zoned Land

(OPR Recommendation 9)

The OPR submission comments on the varying employment land use typologies presented in the Draft Plan, as well as the quantum of employment land use zonings (including lands identified as ‘*Strategic Industrial Reserve*’), particularly in the settlements of Longford Town, Edgeworthstown, Ballymahon, Granard and Drumlish. On this subject, the OPR submission recommends that the Planning Authority:

- a) Provide an evidenced-based justification for the quantity and location of all employment generating land use zonings (or for the inclusion of a very significantly reduced area) and reconsider the location and appropriately reduce the provision of all zoned employment generating land uses, in particular where:
 - i. A sequential approach to the zoning of such lands has been undertaken such that there are other more suitable lands in proximity to the town core which could accommodate new employment generating uses.
 - ii. Conflicts arise with Section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) concerning potential adverse impacts on the capacity of national roads and associated junctions, with specific reference to the location of land adjacent or close to existing, new or planned national roads/motorways.
 - iii. Conflicts arise with the ‘*The Planning System and Flood Risk Management Guidelines for Planning Authorities*’, where land deemed to be of moderate or high flood risk and has been zoned for employment generating purposes (see also Observation 2), unless such land is sequentially preferable and could contribute to compact growth, in which case it will be necessary to undertake a Justification Test within the context of the Strategic Flood Risk Assessment (SFRA).
- b) Omit all land zoned as Strategic Industrial Reserve where such land is deemed to be of moderate or high flood risk.
- c) Omit land 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.

- d) Refine and further clarify the land use zoning objectives and associated permitted uses for the 'Airport Development Objective' land in Abbeyshrule and ensure that only appropriate employment uses, (exclusive of any retail, hotel or showroom use) are permitted to locate on such land.
- e) Reduce and standardise the employment land use typologies contained in the Draft Plan, in the interest of transparency and clarity.

4.8.2 Chief Executive Response

The Planning Authority acknowledges that the quantum of additional employment generating land use zonings provided for in the Draft Plan is a legacy of previous employment generating land use zonings detailed in the current Plan being retained in the Draft Plan.

Whilst it was considered prudent to retain these zonings in the Draft Plan, taking account of the level of existing industrial and commercial activity in proximity to such zonings and serviced land, the re-framing of such lands in the context of the overarching principle of compact growth introduced through NPF and RSES policy is acknowledged. Accordingly, the Planning Authority has no objection to the recommendation of the OPR in revising and reducing the provision of such land uses, particularly in relation to the settlements of Longford Town, Granard, Edgeworthstown, Ballymahon and Drumlish.

Particular regard is had to a sequential approach in the revised zoning of such lands where appropriate, although it should be acknowledged that a balance needs to be struck in facilitating such land uses in closer proximity to the town core and guarding against potential impacts on existing and future residential developments given the focus of national and regional planning policy in delivering future residential development in more compact urban forms.

Similarly, it should be acknowledged that some industrial or commercial developments and practices will be unsuitable and impractical in close proximity to a town core and more suited to peripheral locations, albeit where existing services and infrastructure are in place to accommodate such development.

Moreover, the revisions to the quantum and location of employment-generating land uses has regard to Section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) in guarding against potential adverse impacts on the capacity of national roads and associated junctions. This includes lands in proximity to the Route Corridor Options associated with the N4 Mullingar – Rooskey realignment schemes. This has particular relevance in the context of the settlements of Longford Town, Edgeworthstown, Ballymahon and Granard where such lands are adjacent to the N4, N55 and N63 national routes, however, the majority of such lands accommodate existing industrial or commercial development.

In this regard, it should be noted that neither Transport Infrastructure Ireland (TII) nor the National Transport Authority (NTA) have raised any objections to the proposed employment generating land use zonings provided for in the Draft Plan, with TII welcoming the integrated approach to land use and transportation and associated policy objective framework provided for in Section 5.2.2 of the Draft Plan. Moreover, any suggested policy changes by TII in its submission have been recommended in the relevant sections of this report.

Regard is also had to the provisions of the guidelines, *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) in the recommended revised zonings of employment generating lands uses for the amended Draft Plan, which any such lands zoned accordingly being de-zoned or re-zoned to a less vulnerable land use subject to the undertaking of a Justification Test within the context of a revised Strategic Flood Risk Assessment where necessary. Furthermore, the Planning Authority accedes to the recommendation of the OPR in omitting all land zoned Strategic Industrial where such land is deemed to be of moderate or high flood risk.

In relation to the recommendation of the OPR in respect of the omission of lands zoned for employment generating purposes in Edgeworthstown and Drumlish, the Planning Authority has no objection to this in respect of the subject lands in Drumlish, where a significant reduction in the overall quantum of *Industrial/Commercial/Warehousing* zoned lands to the east of the town core is to be recommended in the amended Draft Plan. In relation to the *Industrial/Commercial/Warehousing* zoned lands in Edgeworthstown which coincide with lands high (Flood Zone A) or moderate (Flood Zone B) flood risk (to the east of the town core), it should be noted that these subject lands accommodate existing industrial and commercial developments, with the areas subject to flood risk largely ancillary to these existing developments.

In this regard, it is proposed to retain the *Industrial/Commercial/Warehousing* zoning for the Kane Autos dealership site (the majority of which is subject to flood risk) given the established nature of development on the site, however, any future development on this site will be subject to 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). Policy support in this regard is provided for in CPO's 5.97, 5.98 and 5.100, as well as DMS 16.204 of the Draft Plan.

Furthermore, it is proposed to retain the *Industrial/Commercial/Warehousing* land use zoning in respect of the C&D Foods logistics building and its curtilage given the established nature of development on the site, however, any future development on this site will similarly be subject to 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 respect of the adjacent lands to the northwest of this site, it is proposed that these be omitted owing to their undeveloped status and location within an area of moderate flood risk (Flood Zone B).

It should be noted also that the Office of Public Works (OPW) did not raise any concerns in relation to these lands in Edgeworthstown in its submission on the Draft Plan, however, the OPW did reference the subject *Industrial / Commercial / Warehousing* zoned lands in Drumlish, as well as lands zoned *Strategic Residential Reserve, Site Resolution Objective and Strategic Industrial Reserve*, citing that some of these developments are highly vulnerable and considered inappropriate for Flood Zones A and B. Subsequently, it is recommended that these zonings within the referenced Flood Zone A and B areas be omitted in the amended Draft Plan.

Overall, the effect of the recommended amendments to the quantum of employment generating lands (combining existing and proposed new lands) in those settlements where such zonings exist is illustrated in Table 4.3 below.

Table 4.3: Effect of Recommended Amendments to Quantum of Employment Generating Lands by Settlement Where Relevant

Settlement	Quantum of Employment Generating Lands in Draft Plan (Ha)	Quantum of Employment Generating Lands after Recommended Amendments (Ha)
Aughnaccliffe	0.3	0.257
Ballinalee	1	1.195
Ballymahon	24.8	14.718
Drumlish	8.1	2.533
Edgeworthstown	35.6	21.292
Granard	50.7	31.417
Lanesboro (incl. Alternative Energy)	4.7 (55.2)	4.1 (30.5)
Longford	169.1	140.2
Total (not incl. Alternative Energy)	294.3	215.6

In respect of the recommendation from the OPR to refine and clarify the land use zoning objectives and associated permitted uses for the *Airport Development Objective* land in Abbeyshrule, the Planning Authority has no objection to amending this land use zoning objective to provide for only appropriate employment uses on such lands and exclusive of any retail, hotel or showroom uses.

The Planning Authority notes the recommendation from the OPR to reduce and standardise the employment land use typologies contained in the Draft Plan. Accordingly, the amended Draft Plan shall contain a reduction in employment land use zonings to this effect and standardised across the various settlement zoning maps.

4.8.3 Chief Executive Recommendation CE OPR 1.36

To amend the quantum of the employment generating land use zonings within the respective settlement zoning maps to reflect the recommended revised zoning maps provided in Appendix 8 of this report, with particular emphasis on the amendments to

lands in Longford Town, Edgeworthstown, Ballymahon, Granard and Drumlish in this regard.

CE OPR 1.37

To amend the Land Use Zoning Objective *Airport Development Objective* as follows:
To provide for Airport related activities and the expansion of existing Air Facilities to provide for appropriate employment uses directly related to such activities and operations only.

CE OPR 1.38

To amend the Land Use Zoning Matrix provided in Appendix 1 of the Draft Plan to state that retail, hotel and showroom type development will be '*Not Normally Permitted*' in respect of lands zoned *Airport Development Objective*.

4.9.1 Retail Development

(OPR Recommendation 10)

The submission from the OPR on the retail development elements of the Draft Plan addresses a number of items regarding retail hierarchy having regard to the recommended changes to the proposed Settlement Hierarchy, quantum of additional retail floorspace, land use zoning objectives which support retail development and the need to prioritise retail provision within town centres. Accordingly, the OPR recommend the planning authority:

- a) Review and amend the quantity of additional retail floorspace, having regard to the (revised) Core Strategy and the level of vacant retail floorspace available.
- b) Ensure that the position of Granard within both the Settlement Hierarchy and the Retail Hierarchy align, with specific reference to Table 6.1 of the RSES. In consideration of this recommendation, regard should be had to Recommendation 2 above.
- c) Review and omit the provision of comparison and convenience retail uses within all employment generating land uses on edge and out of centre sites, including '*Industrial/Commercial*' land use; '*Industrial/Commercial/Warehousing*' land use and '*Light Industrial/Commercial/Servicing*' land use, unless such land is sequentially preferable and could contribute to compact growth and such provision has been justified in the Longford Retail Strategy.
- d) Provide a new policy objective in the Plan to reference the explicit presumption against out of town retail centres located adjacent or close to existing, new or planned national roads/motorways in accordance with the provisions of the *Retail Planning Guidelines*, 2012.

Chief Executive Response

It should be noted that the Draft County Longford Retail Strategy 2021-2027 has been prepared in accordance with the provisions set out in the '*Retail Planning Guidelines for Planning Authorities*', (Department of Environment, Community and Local Government, 2012). The preparation of the Draft Retail Strategy considered retail floorspace vacancy in detail and was informed by a survey of existing floorspace in the county was undertaken (between October 2018 and September 2019), which identified a cumulative total of 10,066m² of vacancy across convenience, comparison and bulky retail categories. This equates to 16.5% of the total retail floorspace in the County. Based on market insights, a frictional vacancy rate of 10% was held across the respective categories to foster competition in the market and the residual total was a factor in the calculated demand model. Identified demand over the plan period was subsequently rationalised on the basis of this vacancy to determine adjusted floorspace requirements. The modelled outputs illustrate that there is an identified need for additional retail floorspace from the beginning of the Plan period in 2021, across convenience, comparison and bulky retail categories.

In undertaking the preparation of this Draft Retail Strategy, Longford County Council has sought to take a proactive approach to addressing the issue of retail floorspace vacancy, while remaining cognisant of its responsibility to facilitate growth in retail and general economic activity within the County. The Retail Strategy has taken a cumulative approach to depleting vacant floorspace, while accommodating additional floorspace where it is required.

Whilst concerns are expressed in the submission of the OPR on the projected retail floorspace requirements over the plan period, it should be noted that the Longford Retail Strategy 2007-2015 identified an additional convenience floorspace requirement of between 3,000 and 7,000 sqm over this period, with an additional comparison floor space requirement of between 7,000 and 16,000 sq m during the same period. At the time, this estimate was considered conservative; however, the pronounced nature of the economic downturn that followed ultimately meant that the quantum of envisaged floorspace was not delivered by the market.

The current Longford County Retail Strategy 2015-2021 identified a requirement for at least an additional 2,000, sq m of convenience, 1,500 sq m comparison and 4,500 sq m of bulky goods retail floorspace between 2015 and 2021, whilst also identifying a total vacant floorspace of approximately 10,745 sq m. In line with national trends, Longford has experienced a stagnation in retail construction activity since 2013 and even before this, particularly in comparison and bulky retail floorspace provision. Only a small quantum of actual additional retail development has commenced since 2013 (approximately 246.5 sq m). It is also worth noting that the majority of retail floorspace commenced/delivered since 2013 has been in the convenience category (approximately 84% of total retail development since 2013). As a result, there has been little change in the baseline figure for total retail floorspace within the County over and above that which was used in the formulation of the existing retail strategy for the County.

Whilst the projected retail floorspace requirements have been undertaken in accordance with the methodology adopted in the current Retail Strategy, and in line with the approach advocated in the *Retail Planning Guidelines* (2012), it is acknowledged that critical inputs to the projected floorspace methodology, such as economic growth patterns and levels of disposable income, can produce highly variable outcomes. This is particularly apt in the case of the Draft Retail Strategy which was prepared prior to the COvid-19 pandemic and based on previously economic growth projections which are now unrealistic given the economic impact of the pandemic.

Assumptions on the rates of inflow and outflow retail activity into the county has a significant effect also in projecting future floorspace requirements. Such assumptions used in the Draft Retail Strategy were based on historic trends which may no longer accurately reflect actual retail patterns, particularly during and, undoubtedly, following the Covid-19 pandemic.

Furthermore, the impact of the pandemic on retail vacancy levels and overall vitality and viability of our town centres is a further concern for the Planning Authority. In this regard, such impacts will go beyond retail activity and have the potential for profound adverse effects on more overarching planning policy, such as compact growth and more centralised residential environments, given their key town centre function.

As such, a more holistic review of the Draft Retail Strategy, rather than a review of the projected retail floorspace requirements, may be required in light of the evident impacts from the Covid-19 pandemic. However, given the advanced stage of the Development Plan process and limited resources within the Planning Authority, such a holistic review may need to be conducted after the adoption of the Draft Plan. Notwithstanding, the Planning Authority shall conduct an interim review of projected floorspace requirements to provide an evidence-based quantum of retail floorspace requirements for the Draft Plan period.

In respect of the recommendation of the OPR to review and omit the provision of comparison and convenience retail uses within all employment generating land uses on edge and out of centre sites, the Planning Authority shall recommend the inclusion of a policy objective to prohibit the provision of comparison and convenience retail uses within all employment generating land uses on edge and out of edge centres unless such land is sequentially preferable and could contribute to compact growth. It shall be recommended that the Land Use Zoning Matrix, provided in Appendix 1 of the Draft Plan be amended to state that retail uses will be '*Not Normally Permitted*' within employment generating land uses. Furthermore, it shall be recommended to include a policy objective with an explicit presumption against the provision of out of town retail centres located adjacent or close to existing, new or planned national roads in accordance with the provisions of the *Retail Planning Guidelines* (2012).

4.9.3 Chief Executive Recommendation

CE OPR 1.39

Conduct an interim review of projected floorspace requirements to provide an evidence-based quantum of retail floorspace requirements for the Draft Plan period.

CE OPR 1.40

Insert new CPO 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.

CE OPR 1.41

Insert new CPO after CPO 8.68 as follows:

Prohibit the provision of comparison and convenience retail uses within all employment generating land uses on edge and out of edge centres unless such land is sequentially preferable and could contribute to compact growth.

CE OPR 1.42

To amend the Land Use Zoning Matrix provided in Appendix 1 of the Draft Plan to state that retail uses will be 'Not Normally Permitted' within employment generating land uses.

CE OPR 1.43

Insert new CPO after CPO 8.68 as follows:

Impose a presumption against the provision of large scale out of town retail development located adjacent or close to existing, new or planned national roads in accordance with the provisions of the Retail Planning Guidelines (2012).

4.10.0 Transport and Accessibility

The Office welcomes promotion in the Draft Plan of the need to pursue integrated land use and transportation to facilitate compact growth and particularly acknowledges the objectives of the Draft Plan to contribute towards a low carbon society in tandem with public transit improvements as an alternative modal choice to the private car in line with Governments transport policy, Smarter Travel:

A Sustainable Transport Future, A New Transport Policy for Ireland 2009-2020. However, it is unclear from the settlement hierarchy and zoning strategy or from the generalised policies set out in Chapter 5 of the Draft Plan, how the proposed settlement strategy or any specific measures will reduce travel demand or maximise the efficiency of the transport networks and public transit systems, in the manner envisaged under the Government's Smarter Travel policy.

4.10.1 Settlement Hierarchy and Sustainable Transport

The Office notes that a key priority for the Draft Plan (Section 5.2) is the development of a sustainable transport system and promoting measures to increase the use of public transport while also increasing the modal share for walking and cycling in towns and villages across the County. However, the Draft Plan does not provide baseline figures for the existing modal split for existing settlements. Including baseline figures would enable the setting of achievable targets for modal change for individual settlements (e.g. Longford, including as part of the Local Transport Plans) and/or by settlement type (self-sustaining growth towns, etc.).

Relevant baseline data is available through the Census POWSCAR. Modal share targets should be provided on an individual basis for higher order growth towns. An aggregated level might be more appropriate for the 'Towns and Villages' and, for the Rural Area' (inclusive of Service Rural Villages and Clusters) as defined in the settlement hierarchy. This is particularly important in the context of Longford where Census 2016 data reveals a higher car dependency for commuting than the national average, and where the Plan acknowledges that just 1.7% of work commuters availing of public transport compared to 9.3% nationally.

It is noted that a Local Area Plan for Longford Town (CPO 4.8 and CPO 5.9) will be prepared within two years of adoption of the Development Plan and that such preparation will be informed by a Local transport Plan.

In addition to the LTP for Longford Town, the integrated land use and transport planning in higher order settlements, should consider pursuing sustainable transport patterns such as the '10 minute' neighbourhood (promoted in the RSES) where community services and facilities are encouraged and facilitated within accessible walking and cycling distances in order to achieve modal shifts and greater use of walking and cycling.

As outlined in recommendations 4, 9 and 10, the quantity of lands zoned for residential and employment/industrial uses including strategic reserve and the locations of same at the edge of settlements may undermine other policy objectives to achieve compact and sequential growth with lower transport demands in the plan.

In the absence of clear direction as to what the planning authority intends to achieve in terms of sustainable transport for urban and rural areas over the plan period, including the setting of targeted objectives and associated policies and measures, it is considered that the Plan does not contain a sufficiently clear, sustainable transport strategy consistent with the requirements of section 10(2)(n) of the Act, and which endeavours to contribute to the Governments Smarter Travel Policy of reducing car commuting from 65% - 45% whilst promoting modal shifts to public transport, walking and/or cycling.

Recommendation 11:

The Planning Authority is required to review its approach to sustainable movement and accessibility under Chapter 5 of the Draft Plan to provide for sustainable transport strategies for the county's urban and rural areas, consistent with section 10(2)(n) of the Act and in light of the recommendations made relating to the quantity and location of zoned land (Recommendations 4, 9 & 10). The Draft Plan should include targeted objectives of what the plan intends to achieve in terms of sustainable transport over the plan period, in respect of the various transport modes and the priorities for same under Government transport policy including setting modal share targets.

4.10.2 Chief Executive Response

It is accepted that the Planning Authority should review its approach to sustainable movement and accessibility under Chapter 5 of the Draft Plan to provide for sustainable transport strategies for the county's urban and rural areas, consistent with

section 10(2)(n) of the Act and in light of the recommendations made relating to the quantity and location of zoned land (Recommendations 4, 9 & 10).

Most settlements in Longford are of the '10 minute' neighbourhood type (promoted in the RSES), with the exception of Longford Town, which increases to a '15 minute' neighbourhood type. Typical of a small rural county in central Ireland, public transport is practically non-existent which results in higher levels of car transport. The National Transport Authority are currently preparing plans for more investment in public transport in Longford. In addition, the Council has invested in substantial inter-urban greenway developments over the last five years and is currently working on the provision of urban greenways.

The Planning Authority engaged in discussions with the National Transport Authority (NTA) and it was agreed that given the level of investment and delivery of sustainable transport projects by both in recent years and in the immediate future that the setting of targets for modal change was not the recommended approach, but the setting of key principles.

In line with the recommendations of the OPR that the Draft Plan should include targeted objectives of what the plan intends to achieve in terms of sustainable transport over the plan period, in respect of the various transport modes and the priorities for same under Government transport policy, accordingly key principles for sustainable transport should be included in the Plan.

4.10.3 Chief Executive Recommendation

CE OPR 1.44

The Draft Plan will be amended to include the following text in Chapter 5 in terms of 'Sustainable Transport'.

Sustainable Transport

The promotion of use and increased delivery of sustainable modes of transport is fundamental to achieving Ireland and Longford'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 and the Draft Longford County Development Plan 2021 – 2027.

⁴ https://ec.europa.eu/clima/policies/strategies/progress_en

⁵ <https://www.gov.ie/en/policy/e9ec84-transport/>

Principles:

The following principles have been developed in association with the National Transport Authority and are considered to constitute the key principles underlying future sustainable transport in the County:

- 1) Favour a hierarchy of 'putting the pedestrian first' followed by the provision of cycling and public transport in more urban and residential areas, over developments that prove more favourable 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) Support the development of high-quality public space that contain small blocks / small streets, urban parks and dense, mixed-use, people-orientated design;*
- 4) 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;*
- 5) Target transport investment that first seeks to enhance the efficiency of the existing network through the application of Intelligent Transportation Systems (ITS) in delivering increased information, service, travel modes, and telecommunication;*
- 6) 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;*
- 7) Facilitate the efficient movement of goods and people in the interest of commerce and enterprise;*
- 8) 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 any future updated version or similar national guidance;*
- 9) Approach sustainable transport comprehensively and agree to undertake regular monitoring to include trip profiles (number, duration, modal use) and emissions, and at critical junctions. This will facilitate improved benchmarking and better inform future Urban Mobility, Permeability, Local Traffic and Climate Change Action Plans.*

4.11.1 DMURS

Specific reference in the Draft Plan is noted and welcomed relating to street and road design and the Design Manual for Urban Roads and Streets (DMURS) to; 'ensure the sustainable efficient movement of people and goods within the County', However, it is noted that Policy Objective CP07.6 states that it is an objective to only 'have regard to} DMURS. Such an approach is considered inconsistent with the objective of RPO 9.10 to support a shift to sustainable modes of transport and use of innovative design solutions to reduce car dependency.

Observation 5

The Planning Authority is advised to review Policy Objective CPO 7.6 (and/or the provisions of Chapter 7 generally) and Development Management Standards DMS

16.5, DMS 16.7 and DMS16.112, so to comply with the provisions and application of the Design Manual for Urban Roads and Streets (DMURS) for new development.

4.11.2 Chief Executive Response

Chapter 7: Placemaking

The OPR reference to and attention drawn to RPO 9.10 is noted. In this regard it is noted that as per the EMRA RSES, RPO 9.10 which relates to 'Healthy Placemaking' is as follows:

In planning for the creation of healthy and attractive places, there is a need to provide alternatives to the car and to prioritise and promote cycling and walking in the design of streets and public spaces.

Local authorities shall have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the RSES and to national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'.

In the Draft Plan as per section '7.4.1 Healthy Placemaking' it is stated that 'a key element of healthy placemaking is the need to ensure the provision of alternatives to the car in the design of streets and public spaces, and to prioritise and promote cycling and walking as active means of transport.

The provision of high-quality public transport, greenways and cycleways can enhance areas, contributing to more attractive places and creating opportunities to be physically active, and reduce the negative consequences of car-based commuting... It is also recognised that in accordance with Regional Policy Objective (RPO 9.10), there is a need to provide alternatives to the car, and to prioritise and promote cycling and walking in the design of streets and public spaces. Regard has been given to both the 'Guiding Principles for Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the RSES and to national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'.

In terms of 'Healthy Placemaking' County Policy objectives CPO 7.6 is noted as follows:

Have regard to national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'.

In relation to the OPR concern that Policy Objective CPO7.6 is only 'have regard to' DMURS, as the relevant RPO 9.10 in the EMRA RSES only requires the local authority to 'have regard to' this is considered sufficient.

Chapter 16: Development Management Standards

In relation to DMS16.5, DMS 16.7 and DMS16.112 and the request they comply with the provisions and application of the Design Manual for Urban Roads and Streets (DMURS) for new development it is noted that the DMURS document has not been referenced in DM Standard 16.5 and DMS 16.7. As such it is considered that a reference to DMURS should be included. In relation to DMS 16.112 an appropriate reference to DMURS has been included.

4.11.3 Chief Executive Recommendation CE OPR 1.45

Amend DMS 16.5 to include the following additional text as indicated in red:

Require all developments to adequately address the 12 no. best practice principles as indicated in the Urban Design of the Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities (DoECLG, 2009) and to comply with the provisions and application of the Design Manual for Urban Roads and Streets (DMURS) for new development.

CE OPR 1.46

Amend DMS 16.7 to include the following additional text as indicated in red:

Require a detailed Design Statement to be submitted in respect of residential schemes comprising 10 or more units, large scale developments over 350sqm (e.g. commercial, business & enterprise buildings, office, retail, educational facilities etc) and any other development proposed on key strategic or sensitive sites within the urban areas, as determined by the Planning Authority.

The Design Statement shall:

- a) Describe the design concept;*
- b) Clearly demonstrate how the urban design criteria have been taken into account when designing schemes in urban area, as per the 'Urban Design Manual - A Best Practice Guide';*
- c) Clearly demonstrate how the development will comply with the provisions and application of the Design Manual for Urban Roads and Streets (DMURS) for new development.*
- c) Set out how the development meets the relevant Development Plan Objectives, Local Area Plan, Masterplan, Public Realm Strategy etc;*
- d) Provide site photographs;*
- e) Provide an open space/landscape strategy which identifies any areas of ecological interest and sets out proposals for same.*
- f) Set out how energy efficiency measures have been incorporated into the project design process.*

4.12.1 Spatial Planning and National Roads Guidelines for Planning Authorities (2012)

The Office acknowledges the policy objectives for national roads contained in Chapter 5 of the Draft Plan. Specifically, Policy Objective CP05.17 seeks to protect routes of strategic importance within the county. However, having regard to the *Spatial Planning and National Roads - Guidelines for Planning Authorities 2012*, it is considered that there is scope to strengthen and expand on the policy objectives for national roads, particularly in relation to avoiding the creation of new accesses and the intensification of existing accesses to national roads where a speed limit greater than 50 kph applies.

Observation 6:

The Planning Authority is advised to review and strengthen the policy objectives for national roads (CP05.17, CP05.15, CP05.16, CP05.59) to ensure that adequate policy is in place to maintain the strategic function, capacity and safety of the county's national roads network in accordance with national policy and guidance including the Strategic Investment Framework For Land Transport (DTTaS, 2014), Smarter Travel (DTTaS, 2009) and the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). In this regard, the planning authority should consult with Transport Infrastructure Ireland.

4.12.2 Chief Executive Response

The Planning Authority has taken on board the recommendations of the TII where feasible. This is detailed in the response to the TII submission in relation to Chapter 5 and associated content. In terms of overlap with the OPR submission, CPO 5.15, 5.16 and 5.17 have been amended as much as possible taking into account the recommendations of the TII and also the future development of the County as discussed with the Roads Department of the Council.

In addition the Council has included an additional policy objective in respect of protecting the national roads as detailed below:

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

The reference to CPO 5.29 relates to public transport and not the national road network and as such is considered to have been made in error.

4.12.3 Chief Executive Recommendation**CE OPR 1.47**

Amend CPO 5.15, 5.16 and 5.17 as indicated in the section relating to Chapter 5: Transport, Infrastructure, Energy and Communications of this report.

CE OPR 1.48

To insert an additional policy objective after existing CPO 5.14 as follows:

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

4.13.1 Climate Action and Renewable Energy

The OPR acknowledge and commend the Planning Authority for the work on Climate Action including the policies and objectives detailed. The OPR identify that the Planning Authority have identified climate change as a cross-cutting theme across all chapters of the Draft Plan.

OPR Observation 7

The submission notes the importance attributed to climate action by Government and accordingly advises the planning authority to include an objective in relation to a variation of the development plan to ensure the Plan will be consistent with the approach to climate action recommended in any future Development Plan Guidelines.

4.13.2 Chief Executive Response

The comments received in respect of Climate Action, including the dedicated chapter and the work highlighted in identifying the cross-cutting nature of the issue in the Draft Plan are acknowledged and appreciated.

The absence of revised Development Plan Guidelines to support the preparation of the Draft Plan should be noted and in this regard, it is considered 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 on foot of this.

4.13.3 Chief Executive Recommendation CE OPR 1.49

The Council will include reference to the Draft Revised Wind Energy Development Guidelines, December 2019 (and the 2006 Wind Energy Guidelines) and that the Draft Plan should be amended accordingly once the Draft Guidelines are finally approved and issued.

4.14.1 Renewable Energy

The OPR acknowledge the provisions and the policies and objectives supporting renewable energy development within Chapter 5 Transport, Infrastructure, Energy and Communications of the Draft Plan. It is identified that the Draft Plan does not contain separate renewable energy strategy or wind strategy, however the OPR notes that the Draft Plan does have a policy objective stating that a renewable energy strategy for the County will be prepared within the lifetime of the Plan (CPO-5.129).

The OPR identifies that the Draft Plan does not identify how the County will contribute to realising national climate change and renewable energy targets – including specific targets in megawatts for wind energy potential in the County as required by Specific Planning Policy Requirement (SPPR) in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017). The OPR states further that ‘in identifying the potential contribution of your County, it is considered that further scope for renewable energy, and in particular wind energy, may be possible in Longford’.

The OPR states that it is important that consistency is achieved across county boundaries when identifying areas for wind energy potential. In relation to the Draft Plan, it is noted by the OPR that lands identified in the Draft Plan identified as 'Non-Preferable Areas' for wind farm potential to the north of the settlement of Lanesborough are identified as 'most favoured' areas for wind energy development potential in the Roscommon County Development Plan 2014-2021.

OPR Recommendation 12:

In accordance with the provisions of section 28(1C) of the Act, the planning authority is required to amend the Draft Plan in order to fully implement the

Specific Planning Policy Requirement contained in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change. This will require the planning authority to indicate how the designation of areas for renewables development under the policies and objectives of the plan will contribute to meeting national renewable energy targets including specific targets in megawatts for wind energy potential in the county.

In the absence of any nationally determined targets for County Longford specifically, you are advised to demonstrate appropriate metrics in this regard, which could include Longford's share of estimates of additional national renewable electricity target (4gw) as defined by the % of national land area represented by the county, linked back to the cumulative renewable energy production potential of the areas designated for renewables development.

4.14.2 Chief Executive Response

The Council are committed to the development of a Renewable Energy Strategy, which it is intended to include a Wind Energy Strategy during the lifetime of the County Development Plan. In the absence of defined national guidelines the Council will attempt to undertake an assessment as specified in the second part of the Submission and will include this within the section on renewable energy in order to give an indicative metric for the quantum of lands for the County and the contribution of the lands to the meet the national target for renewable electricity production target.

The Council acknowledge the comments made in respect of the section of lands to the north of the Lanesborough settlement as Non-preferable Areas. It is important to state that the specific area of land identified in Longford to the north of Lanesborough as 'Non-Preferable Areas' is a very narrow strip of land along the River Shannon bank. The consideration of the Planning Authority in this regard is two-fold. One is to protect the visual amenity value of the River particularly for tourism navigation purposes. The second is the Shannon River and adjoining lands at this location is a link between two Special Area of Conservation at both Lough Ree and Lough Forbes used by wintering fowl who navigate between the two. Furthermore, Knappogue Bog south of Clondra has developed into a lake for over wintering Whooper Swan and other protected species since the ending of peat harvesting. The identification of this strip of land for as 'Non -Preferable Areas' for wind farm potential has been carefully and responsibly considered by Longford County Council in order to protect the environment and biodiversity of the area. As such no change is proposed to the Draft Plan in respect of these identified lands.

4.14.3 Chief Executive Recommendation

CE OPR 1.50

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

4.15.1 Environment, Heritage and Amenities

The OPR Submission states that the Draft Plan and Chapter 12 addresses the mandatory objectives relating to the protection and conservation of the natural environment. The Draft Plan also provides a framework for identification, assessment, protection, management and planning of landscapes having regard to the European Landscape Convention. The Office considers these provisions to be satisfactory.

OPR Observation 8:

To ensure compliance with Section 10(2)(o) of the Act, the planning authority is required to include a list and provide the location of public rights of way in the county.

4.15.2 Chief Executive Response

The Council will undertake an assessment of the known and identified public rights of way and provide a detailed list of the same in accordance with Section 10(2)(o) of the Planning and Development Act 2000 (as amended). The Council will also prepare both a list of the identified Public Rights of Way and a map showing these routes across the County and include and insert these within the Draft Plan.

4.15.3 Chief Executive Recommendation

CE OPR 1.51

Insert a list and map/plan of the identified Rights of Way – see Part 3, Appendix 13.

4.16.1 General and Procedural Matters

Observation 9:

In accordance with section 28 (1B) of the Act, the Planning Authority is required to provide a Statement of Compliance with Ministerial Guidelines to demonstrate how the planning authority has implemented the policies and objectives of the Minister contained in the guidelines or if applicable, that the planning authority has formed the Response that it is not possible, because of the nature and characteristics of the area or part of the area of the development plan, to implement certain policies and objectives of the Minister contained in the guidelines.

4.16.2 Chief Executive Response

In Chapter 1: Introduction and Strategic Context as per section '1.2 Vision and Aims' it is stated that '*the County Development Plan has the following aims to implement relevant national and regional development policy provisions at a County level*'. Furthermore, as per section '1.13 Other Relevant National and Regional Guidelines, Plans and Strategies' it is stated that a large number of other national and regional plans and strategies have also been taken into consideration in the preparation of the Development Plan. These are listed in Volume 3: Annex 2. In Chapter 1 among those of particular significance highlighted are as per section 1.13.1 *National Ministerial Guidelines* whereby it is stated that '*in making Development Plans, Planning Authorities are required to have regard to any guidelines issued by the Minister. Accordingly, Guidelines issued to Planning Authorities regarding their functions under the Planning Acts have been considered in the making of this Plan in accordance with Section 28 of the Planning and Development Act, 2000 (as*

amended) (See Annex 1)'. Annex 1 contains the list of relevant supplementary guidance which informed the preparation of the Development Plan. It is the Response of the Planning Authority that every effort has been made to substantially take account of same.

A statement of compliance that the planning authority has and will continue to make every reasonable effort to implement the policies and objectives of the Minister contained in the guidelines or if applicable will be included.

4.16.3 Chief Executives Recommendation CE OPR 1.52

Include the following text into Chapter 1:

Statement of Compliance with Ministerial Guidelines

In accordance with section 28 (1B) of the Act, the Planning Authority has made and will continue to make every reasonable effort to implement the policies and objectives of the Minister in the relevant guidelines.

Where this is not possible, because of the nature and characteristics of the area or part of the area of the development plan, to implement certain policies and objectives of the Minister contained in the guidelines, this has been highlighted in the relevant section and the justification and reasoning for same indicated.

4.17.1 Observation 10:

The Planning Authority is requested to address a number of inconsistencies in the Draft Plan including:

- a. *Section 4.8.10 of the Draft Plan in relation to Towns and Villages states that this tier of the Settlement Hierarchy comprises of eleven towns and villages, but the Core Strategy Table only lists six towns and villages whilst the Core Strategy Map identifies ten.*
- b. *There are inconsistencies between the Core Strategy map and table such that the villages of Ballinamuck, Carriglass, Ardagh, Clondra and Abbeyshrule are identified as Towns and Villages' on the Core Strategy Map but yet are identified in the Settlement Hierarchy in Table 4.11 under the Rural Tier as 'Serviced Rural Villages', save for Carriglass which is identified as a Rural Settlement Cluster.*
- c. *The Land use Zonings Categories and Objectives Table detailed in Volume 2 Appendices of the Draft Plan (pp. 2) contains a number of land use zoning categories which are not used in the zoning maps, It would appear that there are a number of zoning categories, for example Hi— Tech/ Light Industrial/Employment Generating, which are not allocated in the Draft Plan and therefore should be removed from the text. Further, there is an opportunity to rationalise and reduce the number of employment zonings in the Draft Plan thereby ensuring greater clarity and consistency (Recommendation 9(e)).*

4.17.2 Chief Executive Response

- a. Section 4.8.10 of the Draft Plan in relation to Towns and Villages states that this tier of the Settlement Hierarchy comprises of eleven towns and villages, but the Core Strategy Table only lists six towns and villages whilst the Core Strategy Map identifies ten. The Planning Authority will review same and ensure that the Core Strategy Table and Core Strategy Map are consistent with the revised Settlement Hierarchy.
- b. There are inconsistencies in the Draft Plan between the Core Strategy map and table such that the villages of Ballinamuck, Carriglass, Ardagh, Clondra and Abbeyshrule are identified as Towns and Villages' on the Core Strategy Map but yet are identified in the Settlement Hierarchy in Table 4.11 under the Rural Tier as 'Serviced Rural Villages', save for Carriglass which is identified as a Rural Settlement Cluster. The Planning Authority has reviewed same to ensure that the Core Strategy Table and Core Strategy Map are consistent with the revised Settlement Hierarchy.

The Revised Hierarchy Table shows the following:

- Longford Town as a Key Town;
 - Granard as a Self-Sustaining Growth Town;
 - Edgeworthstown, Ballymahon, Lanesborough as Self-Sustaining Towns;
 - Aughnacliffe, Ballinalee, Drumlish, Keenagh, Legan, Newtownforbes as Towns and Villages;
 - Abbeyshrule, Ardagh, Ballinamuck and Clondra as Serviced Rural Villages;
 - All the village envelopes are now Rural Settlement Clusters.
 - Carriglass has been changed to a Rural Settlement Cluster
 - Drumhaldry has been de-Zoned
- c. The Planning Authority will ensure that the Land use Zonings Categories and Objectives Table detailed in Volume 2 Appendices of the Draft Plan (pp. 2) and the matrix (page 6) is amended to correctly match the land use zoning categories which are used on the revised zoning maps.

4.17.3 Chief Executives Recommendation

CE OPR 1.53

- a. The Planning Authority will ensure that the Core Strategy Table, Core Strategy Map are consistent with the revised Settlement Hierarchy.

CE OPR 1.54

- b. The Planning Authority will ensure that the Core Strategy Table, Core Strategy Map are consistent with the Settlement Hierarchy and will be revised as appropriate.

CE OPR 1.55

- c. The Planning Authority will ensure that the Land use Zonings Categories and Objectives Table detailed in Volume 2 Appendices of the Draft Plan (page 2)

and matrix (page 6) is amended to correctly match the land use zoning categories which are used on the zoning maps.

CE OPR 1.56

- d. In Volume 2 Appendices of the Draft Plan delete the following land use zoning categories from the zoning matrix and text of all settlements:

~~—Pedestrian Bridge~~
~~—Tourism/Mixed use with Marina~~
~~—Social/Community~~
~~—Industrial/Commercial~~
~~—Industrial~~
~~—Hi-Tech/Light Industrial/Employment Generating~~
~~—Employment/Mixed Use~~
~~—Transport and Utilities Infrastructure~~
~~—Service Road Objective~~

4.18.1 Observation 11:

To enhance transparency and provide for greater consistency with commonly accepted practice, the Planning Authority is requested to:

- a. *Overlay the flood risk maps on the zoning maps for each settlement to provide for greater transparency regarding flood risk and the need for site specific flood risk assessments outlined in the SFRA.*
- b. *Use a standard colour for different land use zonings across all settlements thereby ensuring consistency for the user. For example, the town centre zoning in Granard is afforded a yellow colour whilst town centre zonings in other settlements are a grey colour.*

4.18.2 Chief Executive Response

- a. It is acknowledged that the overlay of flooding risk maps over the zoning map for each settlement would provide greater clarity and transparency. Whilst the flooding datasets are available on the zoning maps in the SFRA, the Planning Authority is committed to ensuring the finalised maps in Volume 2 Appendices will include same.
- b. The Planning Authority notes comments made in relation to use of a standard colour for different land use zonings across all settlements thereby ensuring consistency for the user, with the particular example of the inconsistency of town centre zoning colouring used in Granard as opposed to other settlements. The Planning Authority is committed to ensuring the finalised maps in Volume 2 will include zonings which are indicated in standard colours and used consistently throughout all relevant settlement zonings in the preparation of the final plan.

4.18.3 Chief Executives Recommendation

OPR Observation 11a

CE OPR 1.57

Insert as part of the final Volume 2 Appendix an overlay of the flood risk maps over the land use zoning map for each settlement.

OPR Observation 11b

CE OPR 1.58

Ensure the zoning colours uses are standard and consistent in all relevant zoning maps as part of the final Volume 2 Appendix for each settlement.

5.0 Eastern and Midland Regional Authority (EMRA)

Submission Ref. No: DCDP-57

5.1 Summary of Issues Raised and Response of the Chief Executive

EMRA's submission is welcomed and the issues raised are acknowledged with consideration of each individual issue as set out hereunder in the submission together with the response and recommendations of the Chief Executive under the following headings:

1. Introduction, Strategic Context and County Profile
2. Climate Change
3. Core, Settlement and Housing Strategies
4. Transport, Infrastructure, Energy and Communications
5. Regeneration
6. Placemaking
7. Economic Development
8. Rural Economy
9. Tourism
10. Built and Cultural Heritage
11. Natural Heritage and Environment
12. Green Infrastructure and Landscape Character
13. Monitoring, Evaluation and Implementation, and Development Management Standards
14. SEA, AA and SFRA
15. Other

5.1.1. Introduction, Strategic Context and County Profile

The Assembly welcomes the inclusion of the first and second chapters of the draft plan, which provide an overview of scene setting matters including the statutory context, planning context and county profile.

Section 1.8 of the draft plan identifies that the plan should be read in the hierarchical context of legislation and plans that exist at International, National and Regional level whilst referencing Figure 1.1. It is considered that Figure 1.1 should be amended to clearly demonstrate the planning policy hierarchy of the NPF, RSES and CDP etc., and that other nationally and regionally prepared documents inform this, rather than carry the same weight, which the current graphic as depicted could lead the reader to assume.

The inclusion of Section 1.12, which documents the EMRA RSES, is welcomed and in particular the statement that the County Development Plan has been aligned to the relevant Regional Strategic Outcomes (RSOs) and associated relevant Regional Policy Objectives (RPOs). This section could be strengthened by referencing the NPF and RSES in terms of the legislative context and planning policy hierarchy with which the County Development Plan is required to be consistent with.

5.1.2 Chief Executive Response

The comments which are largely positive in nature are welcomed and noted.

Figure 1.1: Strategic Policy Inputs into the Draft County Development Plan 2021-2027 contains a graphic which depicts the input cascading downwards from Global, European, National and Regional Level. As this is a cascading graphic going from global at the top down through the levels to local level it is considered that it adequately demonstrates the planning hierarchy.

In relation to the contention that other nationally and regionally prepared documents inform this, rather than carry the same weight, which the current graphic as depicted could lead the reader to assume, the graphic is to be amended to reflect this and their ancillary role to the RSES.

In relation to section 1.12 it is not considered necessary to include an additional reference to the NPF and RSES in terms of the legislative context and policy hierarchy with which the County Development Plan is required to be consistent with as this has already been set out in this section and also earlier in the chapter.

5.1.3 Chief Executive Recommendation:

CE CH EMRA 1.1

Amend Figure 1.1: Strategic Policy Inputs into the Draft County Development Plan 2021 to include the following text:

supported by other relevant ancillary national, regional and local documents.

5.2.1 Climate Change

The EMRA submission (DCDP-57) is positively disposed to the inclusion of a climate Change specific chapter within the draft County Development Plan. Much praise is also afforded to the conclusion of each chapter with subject specific climate change actions.

The submission chapter made two recommendations, the first relating to the revision of policy CPO3.9 to include reference to the 'Midlands Regional Transition Team' as the most current terminology. The second recommendation refers to the inclusion of policy support and identification of potential projects to best avail of the Climate Action Fund under the Department of Communication Climate Action and Environment.

5.2.2 Chief Executive Response

The Council welcomes the intention and the principle of the EMRA submission received in respect of Climate Change. The Council has taken a positive step in having a dedicated Climate Change chapter and including climate actions relevant to each chapter throughout the Draft Plan.

The Council recognises the importance of using the most current terminology and acknowledge within policy CPO3.9 the need to substitute the existing reference to 'Bord na Mona Transition Team' to that of the 'Midlands Regional Transition Team' and shall be updated accordingly.

As regard reference to the inclusion of policy supporting, and specific project, that could better avail of Climate Action Fund opportunities, the Council draws attention to the tangible, climate change specific projects identified within the Climate Actions – to include A10.3 that “*seek(s) funding for the responsible development of Biodiversity Interpretative Centre within The Commons area of Lanesborough Town*” and A10.5 towards “*invest(ing) in the development of the local sustainable tourism market with zero carbon impact*”. Furthermore, Action A6.3 sets out that “*Longford County Council shall: require an annual flagship Regeneration application, to exclude those relating to trails, exclusively for the benefit of climate change*”. It is considered that such wording requires the identification, preparation and application of proposals falling under the Climate Action Fund but is also not limited to same.

There are also many policy supports, proposed projects and initiatives throughout the Draft Plan such as sustainable transport initiatives and the proposed UNESCO Biosphere Reserve for the Lough Ree Mid Shannon area in Chapter 10 on Tourism which can avail of the Climate Action Fund.

5.2.3 Chief Executive Recommendation

CE EMRA 1.2

The reference to the ‘Bord na Mona Transition Team’ shall be replaced by the ‘Midlands Regional Transition Team’ within policy CPO3.9 of the draft CDP as follows:

*Support collaboration between local authorities, the ~~Bord na Mona Transition Team~~ **Midlands Regional Transition Team** and relevant stakeholders and the development of partnership approaches to integrated peatland management for a just transition that incorporates any relevant policies and strategies such as the Bord na Móna Biodiversity Plan 2016-2021 and the national Climate Mitigation and Adaptation Plans. This shall include support for the rehabilitation and/or re-wetting of suitable peatland habitats.*

In light of the recommendation to include policy that better avails of Climate Action Fund opportunities no changes were considered necessary.

5.3.1 Core, Settlement and Housing Strategies

Core Strategy

Statutory Requirements

The submission from EMRA acknowledges the work that has gone into the preparation of Chapter 4 which details the Core Strategy, Settlement Strategy and Housing Strategy and welcomes the inclusion of Section 4.3.3 which details the RSES, including Growth Enablers relevant to County Longford and reference to the Asset Based Approach used. The submission references the statutory requirements of the Council to prepare a Core Strategy in accordance with the provisions of Section 10 of the Act, with specific reference to Section 10 (2A), (2B) and (2C) of the Act and asks Longford County Council to ensure consistency in this regard.

Core Strategy Policy

The submission commends the Core Strategy Strategic Aims detailed in Section 4.6 of the Draft Plan, which are considered to provide a robust framework for the Core

Strategy that includes alignment with the NPF and the RSES and welcomes the inclusion of CPOs 4.43- 4.48, which aim to give effect to the strategic aims of the Core Strategy. The Assembly consider that a policy promoting the regeneration of underused town centre and brownfield/ infill lands in accordance with RPO 3.3 would be a positive addition to the Plan and is recommended to be included.

The inclusion of CPO 4.47 to maintain a record of residential development permitted in individual settlements in order to ensure compliance with the population allocations defined by the Core Strategy Table is welcomed. It is recommended that this should be amended to include the monitoring of residential development permitted as single rural houses.

Population Allocations

The level of overall population growth for the County, as indicated in the Core Strategy Table of the Draft Plan, is considered to be in keeping with the population prescribed for the County at Appendix 2 of the NPF Implementation Roadmap, which details a high-level population projection of 45,500 (high) to 2026 and 47,000 (high) to 2031. Notwithstanding, EMRA considers that further clarity is required detailing the percentage allocation of growth to each of the settlements identified as part of the Core Strategy Table. In particular, EMRA has expressed concerns that the chosen approach means that Longford Town is to grow at a lesser percentage rate, at 19.4%, of 2016 population levels than the settlements listed below Longford Town in the County's Settlement Hierarchy and comments that this has potential to undermine the role of Longford Town which is designated as a Key Town in the RSES. Moreover, concern is expressed in relation to the proposed population growth for Lanesborough being in excess of 30% (+39%) above 2016 population levels which is beyond the percentage growth rates projected for Longford Town, Edgeworthstown, Ballymahon and Granard and which has implications in regards to consistency with NPO 9 of the NPF to limit population growth to 2040 to 30% above the 2016 population baseline figure.

The submission recommends that a detailed and robust evidence based justification for the percentage allocation of growth to each of the settlements identified as part of the Core Strategy Table is included in the Draft Plan and that the allocation is revised, where appropriate, to ensure a sustainable settlement hierarchy that is consistent with the NPF and RSES, and which safeguards and promotes Longford Town's designated role as a Key Town.

Table Structure

Further clarity is needed to enhance the comprehensibility of the Core Strategy Table in the form of an additional column indicating the population growth envisaged during the plan period, to complement that shown from 2016, would be beneficial and enable readers to understand the basis of the remaining calculations shown. Moreover, the submission recommends the inclusion of footnotes explaining the calculations behind the figures presented in each column would also reduce ambiguity.

Further clarification is recommended to demonstrate the quantum of land that is zoned for residential purposes in each of the respective settlement categories, including all zoning categories that provide for residential development in accordance with the

provisions of Section 10 (2A) (c) and (d) of the Act. Moreover, it is recommended that Core Strategy Table be updated to indicate the quantum of new homes that will be delivered within the existing built up footprints of each of the respective settlement categories, where appropriate, based on the location and yield of lands zoned. The Assembly also bring your attention to the requirements of page six of the NPF Roadmap, whereby the Council are asked to include details of the infill/brownfield and greenfield capacity of the lands zoned as part of the Draft Plan.

5.3.2 Chief Executive Response

The Planning Authority welcomes the comments and recommendations made by the EMRA in its submission, and notes that many of the items raised in the submission are similar in nature to those raised by the OPR in its submission on the Core, Settlement and Housing Strategies detailed in the Draft Plan. Accordingly, in a bid to reduce repetition and volume of content within this report, where similar issues have been raised in both submissions, previous responses and proposed recommendations outlined in respect of the OPR submission shall be referenced where appropriate in the responses and proposed recommendations of the EMRA submission.

The Core Strategy has been prepared in accordance with the requirements of Section 10 (1) of the Planning & Development Act 2000 (as amended), the Department of Environment, Heritage & Local Government “Guidance Note on Core Strategies” 2010, taking into account relevant changes brought about through the publication of the NPF and RSES.

Core Strategy Policy

In relation to the recommendation of a policy promoting the regeneration of underused town centre and brownfield/infill lands in accordance with RPO 3.3 of the RSES, it should be noted that the Settlement Strategy outlines a series of Key Principles in Section 4.8.1 of the Draft Plan which were used to its preparation and to facilitate delivery on a strategic level. One such Key Principle (12) concerns the identification of *“targeted renewal and regeneration schemes within settlements to address areas of decline and to act as catalysts for future investment and development within specific settlements”*.

Moreover, Chapter 4 of the Draft Plan makes repeated policy reference to delivering targeted regeneration (CPO 4.11 in respect of Self-Sustaining Towns), with Section 4.15 outlines a series of CPOs which address the role of regeneration in delivering new homes within derelict and vacant sites and our town centres through the reuse of upper floors above commercial premises. More specifically, Chapter 6 of the Draft Plan provides a dedicated overview of the regeneration measures and policy objectives to facilitate regeneration development within the county.

Notwithstanding, the Planning Authority has no objection to the insertion of a new policy objective within the suite of Settlement Strategy County Policy Objectives provided for in Section 4.8.6 of the Draft Plan promoting the regeneration of underused town centre and brownfield/infill lands in accordance with RPO 3.3.

In response to the recommendation by the EMRA to include the monitoring of single rural housing in the overall permitted residential development monitoring policy

objective contained in CPO 4.47, the Planning Authority shall amend the policy to include single rural housing also.

Population Allocations

In relation to the comments made in respect of the proposed population allocations across the settlements of the county, the response provided to Recommendation 3 of the OPR submission refers.

The distribution of population growth was informed by a demographic analysis of historical growth rates of individual settlements comparative with Longford Town, given its dominant role within the county in accounting for approximately 25% of the overall county population consistently over the inter-censal period between 1991-2016. As detailed in Section 4.8.6 of the Draft Plan, a key principle of the Settlement Strategy is the need for a more balanced network of higher order towns in the Settlement Hierarchy to support the role and function of Longford Town as the principal economic driver and focus of investment for the county. In addition, the demographic analysis illustrated a clear requirement to address the disparity in growth rates amongst the four other main settlements in the county and in particular to arrest the stagnation in growth experienced in Granard.

The aim of this interventionist approach in relation to the population allocations for the Self-Sustaining Growth Towns and Self-Sustaining Towns, was to provide for more balanced growth across the county, whilst recognising the geographic spread of each settlement across the county and the role each settlement can play in supporting the 'Key Town' of Longford Town, which would remain the dominant settlement in the county. Moreover, this approach also provided assurance that no lower order settlement will outgrow a higher order settlement.

Having regard to the above recommendations of the OPR submission, and in the context of compliance with the *Housing Supply Target Methodology for Development Planning* guidelines, which will entail accommodating additional housing growth than that previously allocated in the Draft Plan and the recommended revised Settlement Hierarchy, a further iteration of the asset-based approach outlined in Table 3.1 of the RSES was carried out to identify the level of growth settlements in the County could accommodate over the lifetime of the Plan.

Details of this further refinement to the asset based approach, identifying the various criteria and assimilative capacities for the respective settlements is provided in Appendix 7 of this report.

This approach remains the fundamental evidence basis for the distribution of population and housing targets to the various settlements and settlement tiers throughout the county, as advocated by the RSES. Accordingly, it is to be recommended that the revised asset-based criteria assessment conducted to inform the revised Core Strategy Table, be included in the amended Draft Plan.

The revised Core Strategy Table provided in Appendix 5 of this report illustrates the recommended distribution of the population and housing supply targets across the relevant settlements and settlement tiers for the plan period.

Table Structure

Regarding the requested clarity to enhance the comprehension of the Core Strategy Table (Table 4.12 of the Draft Plan), it is proposed to amend this table to provide for an additional column indicating the population growth envisaged during the plan period, to complement that shown from 2016. Moreover, further amendments to the Core Strategy table are proposed to provide for:

- projected population increases over the plan period;
- projected population figures to 2027 for the relevant settlements;
- Quantum of housing supply targets for the relevant settlements derived from the guidelines, '*Housing Supply Target Methodology for Development Planning*' (2020) and associated department spreadsheet;
- Quantum of land in hectares zoned mixed use and town / village centre including Opportunity Sites that can accommodate an element of residential units and other uses;
- 20% of the quantum of land zoned mixed use and / town / village centre including Opportunity Sites that can accommodate residential units;
- Potential number of residential units to be delivered on mixed use and town / village centre zoning including Opportunity Sites (according to applicable densities);
- Residual number of residential units required 2021-2027;
- Quantum of land required to be zoned 'New Residential' for each relevant settlement/tier to cater for number of residential units required (according to applicable densities);
- Quantum of land zoned 'New Residential' in the Plan for each relevant settlement/tier;
- Number of residential units that can be accommodated on brownfield / infill sites for each relevant settlement; and
- Residential units that can be accommodated on brownfield / infill sites for each relevant settlement as a percentage of all proposed residential units in the settlement (in order to strive to satisfy 30% within built up footprint).

Regarding the reference in the EMRA submission to the provisions of Section 10 (2A) (c) and (d) of the Act, these elements of the act requires the following:

(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,*

Accordingly, the Core Strategy chapter shall be amended to address the area of any land already zoned (under the current Longford County Development Plan 2015-2021)

which accommodates residential units (as required under section 10 (2A) (c) of the act).

The provisions of Section 10 (2A) (d) have been met under the proposed amendments to the Core Strategy Table outlined above. The amended Core Strategy Table is provided in Appendix 5 of this report.

Settlement Strategy

The submission notes that the key principles of the settlement strategy which are listed in the Draft Plan are considered to provide a strong foundation for the basis of the Settlement Strategy including Key Principle 5 which seeks to give effect to the principle of 'compact growth' by targeting at least 30% of all new residential development to occur within the existing built-up footprints of towns and villages.

Settlement Hierarchy

The Assembly welcome the stated utilisation of an approach similar to the RSES's 'Asset Based Approach' in determining the Settlement Strategy for County Longford, as per Section 4.8.3 of the Draft Plan. Notwithstanding, further information is required to demonstrate consistency with the parameters of the NPF and RSES, including RPOs 4.1 and 4.2 which outline that the hierarchy of settlements in development plans shall be determined in accordance with the hierarchy, guiding principles and typology of settlements as set out in the RSES. The provision of a more robust and justified reasoning for the designation of settlements within each tier of the settlement hierarchy is recommended, with specific reference to Table 3.1 and Appendix A of the RSES in this regard.

The designation of Self-Sustaining Growth Towns and Self-Sustaining Towns in the Draft Plan should be considered with regard to Table 4.2 of the RSES, with particular reference applied to the designation of Granard as a Self-Sustaining Town in the context of its robust employment base and need for commensurate population growth and the designation of Lanesborough, having regard to towns of similar or larger population size in the lower tiers of the proposed settlement hierarchy.

Furthermore, it is recommended that the Draft Plan include a detailed and robust evidenced-based justification for the 'interventionist' approach undertaken in the Draft Plan with respect to the housing allocation for the 'Rural' settlement tier following the reallocation of 40 units from Longford Town and 15 units each from Edgeworthstown and Ballymahon to be distributed throughout the 'Rural' settlement tier.

Settlement Strategy Policy

The Settlement Strategy policies contained at Chapter 4 are welcomed, including policies CPOs 4.1- 4.5 which support strategic issues such as compact growth and arresting decline and stagnation.

It is considered that this policy framework for Longford Town (Section 4.87 of the Draft Plan) could be strengthened to reflect RPOs 4.59- 4.63 of the RSES that are specific to Longford.

Rural Settlement Strategy

The Assembly welcomes the intention of the Council to ensure the sustainable development of rural areas by encouraging growth and arresting decline in areas of low population growth or decline in recent decades and managing the growth of areas that are under strong urban influence to avoid overdevelopment, while sustaining vibrant rural communities.

it is recommended that prior to the finalisation of the Draft Plan, the Council ensure that related policy in this regard is consistent with RPOs 4.80 and 4.81, NPO 19 of the NPF and the content of Circular Letter PL 2/2017 “Sustainable Rural Housing Guidelines for Planning Authorities 2005 – Local Needs Criteria in Development Plans.” In addition, it is recommended that the methodology used to determine the extent of each rural typology presented in the rural typology mapping should be detailed as part of the Plan, with reference to the methodology for defining ‘Functional Urban Areas’ presented in Appendix E of the RSES.

Chief Executive Response

Settlement Hierarchy

In response to the comments from the EMRA on the proposed Settlement Hierarchy of the Draft Plan, reference should be had to similar comments and a recommendation to review the proposed hierarchy made by the OPR in its submission which is addressed in Section 4.2.2 of this report.

As stated previously the then proposed Settlement Hierarchy was developed having regard to RPO 4.1 of the RSES which details that local authorities shall “*determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES*” and an asset-based criteria approach to growth strategy outlined in Table 3.1 of the RSES to identify those settlements which have the greatest capacity and potential for growth within the county. This body of work compiled a series of quantitative and qualitative data on social, economic, infrastructural and natural assets for each respective settlement to identify their related assimilative capacity and potential for growth.

As stated previously, there is no discernible weighting criteria applied to the eight asset-based criteria advocated in Table 3.1 of the RSES. Moreover, the descriptions of settlement attributes afforded to Self-Sustaining Growth Towns and Self-Sustaining Towns settlement typologies detailed in Tables 4.2 and 4.3 of the RSES provide minimal distinction between these settlement typologies when viewed through the prism of the asset-based criteria. Indeed, the policy responses provided in Table 4.3 of the RSES provide no distinction at all between these settlement typologies with both conflated under one typology category.

It is acknowledged that the then proposed Settlement Hierarchy detailed in the Draft Plan marked a departure from settlement hierarchies detailed in previous County Development Plans, namely the replacement of the previous Tier 2 settlement of Granard with the previous Tier 3 settlements of Edgeworthstown and Ballymahon. Notwithstanding, the proposed Settlement Hierarchy devised for the Draft Plan took into account the high levels of population growth experienced in Edgeworthstown and

Ballymahon in recent years, as well as the longstanding population stagnation and even decline in respect of Granard.

Consideration was also given to the supporting role of Ballymahon to the Regional Growth Centre of Athlone, given its proximity to the settlement. Whilst Granard performs extremely impressively in the context of a high jobs to resident workers ratio (2.35) based on the 2016 Census data, there remains a very high unemployment rate within the town. Similarly, the 2016 Census data does not capture the change in employment rates in the settlements of Ballymahon and Edgeworthstown since the establishment of Longford Forest Center Parcs resort in 2019, which has seen the creation of over 1,000 direct jobs in the area with a number of indirect jobs undoubtedly created since its establishment to cater for increased demand in tourism and service sectors. Moreover, regard was also had to the physical constraints within the settlements in the context of achieving the overarching principle of compact growth in the future development of our settlements, with large areas designated Flood Zone A within the core of Granard, as opposed to Ballymahon and Edgeworthstown which have considerably less constraints in this regard.

Notwithstanding, it is acknowledged that the capacity constraints associated with the wastewater treatment plants (WWTPs) in Edgeworthstown and Ballymahon in accommodating additional growth are significant impediments. This is despite commitments from Irish Water to upgrade these plants within the lifetime of the forthcoming Plan, but not before 2024. The inclusion of CPO 5.84 in the Draft Plan, which seeks to have regard to the capacities of these plants with any further growth within these settlements contingent on their upgrade or suitable temporary engineering solutions for individual developments, reflects the guarded policy nature for accommodating future development in these settlements. In contrast, Granard has sufficient capacity to cater for additional growth.

Moreover, whilst it remains regional policy that the designation of settlements below the Key Town of Longford Town is the reserve of the County Development Plan, it would seem that significant policy weight has been attached to the designation of Granard as a Level 3 retail centre in the retail hierarchy detailed in the RSES on the basis of the submission from the OPR and the EMRA. This designation, as one of only two settlements in the county (the other being Longford Town) recognised in the retail hierarchy for the region necessitated the recognition of Granard as a level 2 *Key Service Centre* in the subsequent retail hierarchy for the County.

In light of the recommendation, and the need for ‘catch up’ investment to address the aforementioned constraints to WWTP capacities in Edgeworthstown and Ballymahon, it is considered that the Settlement Hierarchy shall be revised to position Granard as a Tier 2 settlement (Self-Sustaining Growth Town), with Edgeworthstown, Ballymahon and Lanesborough comprising of Tier 3 settlements (Self-Sustaining Towns) within the revised Settlement Hierarchy.

In relation to the designation of Lanesborough as a Self-Sustaining Town within the revised Settlement Hierarchy and the rationale for its primacy over lower order settlement, regard is had to the significant wastewater capacity in the settlement (1,338 population equivalent (P.E.) based on the latest Irish Water Annual

Environmental Report (2019) for its wastewater treatment plant (WWTP)), which is the third largest capacity provision for wastewater in the county after Longford Town (3,804 P.E. remaining) and Granard (1,411 P.E. remaining) based on the latest Irish Water data.

In addition, Lanesborough contains a number of key social and community infrastructure elements, such as two primary schools (one being in Ballyleague) and one post primary school, GP services and functions as a Level 4 Retail Centre within the current retail hierarchy which serve its immediate population and well as its broader hinterland which extends beyond the county boundary. Moreover, whilst the closure of the Lough Ree Power Station will undoubtedly have a significant economic impact on Lanesborough, at least in the short term, it is recognised that Lanesborough will feature prominently as a centre for more sustainable economic development and growth through targeted investment and employment diversification associated with the Just Transition Fund. Furthermore, Lanesborough contains a number of tourism-orientated assets, particularly given its strategic location beside Lough Ree and the Shannon and has benefitted from recent funding awards to further develop its tourism sector.

Appendix 7 of this report contains a table of the various quantitative and qualitative data for each respective settlement, which has informed the revised Settlement Hierarchy in accordance with the asset-based criteria approach to growth strategy outlined in Table 3.1 of the RSES. It is recommended that this table is included in the amended Draft Plan.

In relation to the recommendation contained in the EMRA submission regarding the evidenced-based justification for the reallocation of 40 units from Longford Town and 15 units each from Edgeworthstown and Ballymahon to be distributed throughout the 'Rural' settlement tier, whilst this interventionist approach is now a moot point in the context of the now revised Core Strategy Table, as outlined above, it is recognised that suitable context should be provided for this approach. The redistribution of 70 additional residential units to the 'Rural' settlement tier was informed by analysis of commencement notices for one-off single housing within the County based on available data collated between 2016 and 2020, where an annual average of 46 one-off dwellings were commenced within this period.

Extrapolating this annual average figure over the plan period would yield a one-off housing commencement total of 280 dwellings. In this context, the initial allocation of housing units over the plan period for the 'Rural' tier, which amounted to 192 units, did not fully reflect the historical trend of one-off housing development in the County, hence the rationale for the redistribution of the 70 additional unit to the 'Rural' tier as detailed above.

Settlement Strategy Policy

The Planning Authority acknowledges the suggestion from the EMRA in its submission that the policy framework relating to Longford Town, detailed in Section 4.87 of the Draft Plan, could be reinforced to reflect RPOs 4.59-4.63 of the RSES that are specific to Longford Town. Notwithstanding, the policy framework detailed in Section 4.87 is intended to provide high-level and strategic county policy objectives regarding the

function of Longford Town in the context of the proposed Settlement Strategy. It is noted that the policy framework specific to Longford Town contained within the RSES under RPOs 4.59-4.63 address a number of development themes that are reciprocated in CPOs throughout the Draft Plan. The following table provides an overview of the sufficient policy coverage within the Draft Plan which reflects the provisions of RPOs 4.59-4.63:

RSES Longford Town Regional Policy Objectives	Equivalent Draft Longford CDP 2021-2027 County Policy Objectives
<i>RPO 4.59: To enhance accessibility and sustainable mobility within the town centre by improving links between the core and surrounding areas through the further integration of public transport, walking and cycling facilities.</i>	CPOs 5.1, 5.3, and 5.9
RPO 4.60: Support the development of Longford as a tourism hub having regard to its accessibility to key tourist destinations in the Region including Center Parcs, and proximity to natural amenities, recreational opportunities and the town's location on the Rebel Longford Trail.	CPOs 6.66, and 10.18
RPO 4.61: Support social inclusion measures including the revitalisation of areas by physical regeneration, planning, investment and community development and measures to improve educational attainment levels, up skilling in key competencies and skills acquisition.	CPOs 6.17 and 6.67
RPO 4.62: Support the plan-led development and regeneration of publicly owned land banks in the town for residential, employment, education, community, cultural and recreational opportunities and the consolidation of the town centre and the enhancement and linking of brownfield and outlying sites to the town centre, with a focus on the regeneration of underused buildings and strategic sites.	CPOs 6.68 and 6.69
RPO 4.63: Support Longford Town as a strategic portal to the northwest and south in recognition of its location at the junction of the N55; M4/N4 Dublin/Sligo and N5; due to its proximity to the regional growth centre of	CPOs 4.7, 6.63, 6.65 and 8.25

Athlone; and support its role as a strategic employment centre.

Owing to this sufficient policy coverage within the Draft Plan, to reduce repetition and the strategic nature of the policy framework detailed in Section 4.87 of the Draft Plan, no changes are recommended.

Rural Settlement Strategy

In relation to the comments from the EMRA regarding the proposed rural settlement strategy, the response and associated recommendation to Recommendation 8 of the OPR submission refers. To reiterate, the rural typology mapping provided for in Figures 4.5 and 4.6 of the Draft Plan is recommended to be amended to comply with NPO 19 in identifying two categories of rural typology: (1.) *Rural Areas Under Urban Influence*; and (2.) *Rural Areas Elsewhere*. As a result, 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) shall be removed from the rural housing policy framework detailed in Section 4.8.12 *Rural Settlement Strategy* of the Draft Plan. The revised rural typology mapping is based on the Functional Urban Area methodology provided for in Appendix E of the RSES.

Regarding consistency with NPO 19 and the content of Circular Letter PL 2/2017 in respect of Local Needs Criteria, the response and recommendation to Recommendation 8 of the OPR submission highlights the apparent conflict between the provisions of NPO 19 and the aforementioned circular. As a result, having regard to Circular Letter PL 2/2017 and the absence of any updated guidance on rural housing framed by the provisions of the NPF, it is considered that the local need criteria set out in the Draft Plan should be amended to reflect that as set out in the current Plan until such time as appropriate guidance is issued and that a policy objective be included to review rural housing policy in line with Development Plan or other Guidelines in the area having regard to NPO 19 .

Housing Strategy

Future Housing Requirements and Housing Need Demand Assessment

It is acknowledged that the Council have undertaken a HNDA, as part of the Housing Strategy, in accordance with National Policy Objective (NPO) 37 and Regional Policy Objective (RPO) 9.5, during a time when the finalised HNDA guidance at national level was still to be confirmed. The initiative of the Council in this regard is extremely welcome. Notwithstanding this, it is recommended that this information, and where appropriate the associated Core Strategy Table, is updated to reflect the contents of the recent Section 28 guidance, '*Housing Supply Target Methodology for Development Planning*'.

The Assembly recommends that the Council give consideration to the inclusion of a clearly presented summary of the entire housing need in County Longford, which includes the housing need broken down across tenures, what is required in terms of new housing supply and why this is the case, including social and affordable needs, housing types and sizes. This will present a clear and concise guide as to what is required to successfully deliver the housing requirement for the County over the plan period.

The Assembly references the provisions of NPO 20 regarding the requirement to *'Project the need for single housing in the countryside through the local authority's overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes'*. The Assembly suggests the Council consider the inclusion of same as part of the Core Strategy Table.

Residential Densities

The Assembly welcome the inclusion of Section 4.14.7 in relation to residential density and acknowledges that the density of new development in towns and villages is reflective of the existing character and that growth is linked to infrastructural capacity. This is in keeping with the RSES and NPF, including for instance page 73 of the NPF which states *'Rural town living requires a proportionate and tailored approach to residential development. This means that it is necessary to tailor the scale, design and layout of housing in rural towns to ensure that a suburban or high-density urban approach is not applied to a rural setting and that development responds to the character, scale and density of the town'*.

The Assembly recognises the higher density is applied to the Key Town of Longford Town (30 units per hectare), with a reduction in residential densities for Self-Sustaining Growth Towns and Self-Sustaining Towns, and other towns and villages (12 units per hectare). The Assembly recommends the Council consider a graded reduction in residential densities in accordance with the settlement hierarchy as opposed to a blanket application of density across the settlement tiers outside of Longford Town.

Housing Strategy Policy

The inclusion of a number of CPOs to ensure the provision of housing needs (e.g. for the likes of the elderly, disabled, homeless, travellers etc.) within County Longford is welcomed.

Chief Executive Response

Future Housing Requirements and Housing Need Demand Assessment

Regarding the comments contained within the EMRA submission on the revision of the Core Strategy Table to reflect the contents of the recently published guidelines, *Housing Supply Target Methodology for Development Planning*, the response and associated recommendation to Recommendation 1 of the OPR submission applies.

To reiterate, notwithstanding the absence of the anticipated HNDA Toolkit, or guidance thereof, from the Department, as well as updated Development Plan guidelines, the Core Strategy Table shall be amended to take account of the adjusted housing supply targets derived for County Longford from the *Housing Supply Target Methodology for Development Planning* guidelines.

In response to the comments from the EMRA on a summary of the entire housing need in the county, addressing tenure, supply, social and affordable needs, housing type and sizes, the recommended revised Housing Strategy and HNDA provides an overview of these elements. A copy of the recommended revised Housing Strategy and HNDA is provided as Appendix 6 of this report.

In relation to the requirement to quantify the demand for single housing in the countryside, in accordance with NPO 20, the recommended revised Housing Strategy and HNDA provides the evidence basis for informing the projected demand for single housing in the countryside, based on historical planning permission and building commencement data for such development within the county. The recommended revised Core Strategy Table provided in Appendix 5 of this report) identifies the projected single rural housing in accordance with the recommendation of the EMRA submission.

Residential Densities

In respect of the commentary in the EMRA submission regarding the then proposed residential densities in the Draft Plan, the response and recommendations to Recommendation 4 of the OPR submission applies.

To reiterate, Section 4.14.7 of the Draft Plan provided for the proposed residential densities, with higher densities applied to the Key Town of Longford Town (30 units per hectare), with a reduction in residential densities for Self-Sustaining Growth Towns and Self-Sustaining Towns, and other towns and villages (12 units per hectare). These densities are a continuation of the densities afforded in the current CDP and were considered to be commensurate to the existing built environment of these settlements and subject to good design and Development Management Standards (see Chapter 16).

It is acknowledged that higher densities in line with those advocated in the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* (2009) will be necessary in order to give effect to more compact development patterns, particularly in the context of brownfield development and town centre first sequential development approaches. Accordingly, it is recommended that the Council amend the Draft Plan to provide for a graded reduction in revised residential densities, in keeping with the densities ranges advocated in the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* (2009), and in accordance with the revised Settlement Hierarchy to reflect as follows:

Settlement Hierarchy	
Key Town (35-40 units/ha)	Longford Town
Self-Sustaining Growth Town (25 units/ha)	Granard
Self-Sustaining Towns (25 units/ha)	Edgeworthstown Ballymahon Lanesborough
Towns and Villages (20 units/ha)	Aughnaccliffe Ballinalee Drumlisk Keenagh Legan

Rural	Newtownforbes	
	Serviced Rural Villages (15 units/ha)	Abbeyshrule Ardagh Ballinamuck Clondra
	Rural Settlement Clusters & Open Countryside	

Housing Strategy Policy

The comments on the proposed county policy objectives to ensure the provision of housing needs within the county is welcomed, with no changes proposed to these.

5.3.3 Chief Executive Recommendations

CE EMRA 1.3

Insert the following County Policy Objective under the Settlement Strategy policy objective framework contained in Section 4.8.6 of the Draft Plan:

CPO 4.6 – Support the regeneration of underused town centre and brownfield/infill lands, promote measures to reduce vacancy and the underuse of existing building stock and support initiatives that promote the reuse, refurbishment and retrofitting of existing buildings within urban centres and targeted settlements in the County in order to achieve sustainable compact growth targets of 30% of all new housing to be built within the existing urban footprint of targeted settlements in the County.

CE EMRA 1.4

*** CE OPR 1.35 refers:**

To amend County Policy Objective 4.47 as follows:

CPO 4.47 - Monitor and manage the delivery of residential development in County Longford through the development management process to ensure it is in line with the Core Strategy. In this respect, the Planning Authority shall maintain a record of residential development permitted in individual settlements, as well as residential development permitted as single rural housing, in order to ensure compliance with the population allocations defined by the Core Strategy Table.

CE EMRA 1.5

*** CE OPR 1.8 refers:**

To replace the Core Strategy Table (Table 4.12 in the Draft Plan) with the recommended revised Core Strategy Table provided in Appendix 5 of this report which illustrates the recommended revised population and housing supply allocations and recommended residential densities to be applied at settlements and settlement tiers, where relevant.

CE EMRA 1.6

Include the revised asset-based criteria assessment of settlements, used to inform the distribution of population and housing targets across the settlements and settlements tiers of the Settlement Hierarchy, within the amended Draft Plan.

CE EMRA 1.7

Insert the following section as Section 4.7.5 of the Draft Plan:

Section 10 (2A) (c) of the Planning and Development Act 2000, as amended, prescribes that a core strategy shall take account of area in the development plan already zoned for residential use or a mixture of residential and other uses, with details on the area of such lands and the quantum of housing to be included in the area. Accordingly, from the lands already zoned under the Longford County Development Plan 2015-2021 for residential use, Table 4.9 below sets out the area of land zoned for residential use in the County Development Plan 2015-2021.

Table 4.9: Quantum of Lands Zoned for Residential Use or Mixture and Associated Housing Yield as Detailed in the Longford County Development Plan 2015-2021

<i>Plan</i>	<i>Mixed Use Zoning</i>	<i>Residential Zoning</i>
<i>Longford County Development Plan 2015-2021</i>	<i>103Ha</i>	<i>163Ha</i>

It is noted that the Longford County Development Plan 2015-2021 did not allocate a residential unit figure to zonings for a mixture of residential and other uses. The amount of land that was zoned mixed use (which included developed and undeveloped land) was 103 hectares.

The number of units allocated to the residential zoned figure under the County Development Plan 2015-2021 was 2,335 which equated to 163 hectares of residentially zoned land.

CE EMRA 1.8

* CE OPR 1.3 refers

To amend the Settlement Hierarchy, as depicted in Table 4.11 of the Draft Plan, to reflect the following:

Settlement Typology	Description	Settlements
Key Town	<i>Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres</i>	<i>Longford Town</i>
Self-Sustaining Growth Town	<i>i) Self-Sustaining Growth 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.</i>	<i>Granard</i>
Self-Sustaining Towns	<i>ii) Self-Sustaining Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment</i>	<i>Edgeworthstown</i>
		<i>Ballymahon</i>

Settlement Typology	Description	Settlements
	and/or services and which require targeted 'catch up' investment to become more self-sustaining.	Lanesboro
Towns and Villages	Towns and villages with local service and employment functions.	Aughnaccliffe
		Ballinalee
		Drumlish
		Keenagh
		Legan
		Newtownforbes
Rural	Serviced Rural Villages and Rural Settlement Clusters with a limited level of services and the wider open countryside.	<u>Serviced Rural Villages</u> Abbeysrule, Ardagh, Ballinamuck, Clondra
	The open countryside provides for rural economies and rural communities, based on agriculture, forestry, tourism and rural enterprise. This should be facilitated while avoiding over-spill development from urban areas and urban generated housing. The sustainable development of the open countryside will be supported.	<u>Rural Settlement Clusters</u> Abbeylara, Ballycloughan, Ballywillan, Barry, Bunlahy, Carrickboy, Carriglass, Colehill, Coolarty, Cullyfad, Derraghan, Dring, Enybegs, Forgney, Killashee, Kilnatraun, Legga, Lisryan, Melview, Moydow, Moyne, Mullinalaghta, Newtowncashel, Ratharney, Stonepark, Taghshinny.
		<u>Open Countryside</u>

CE EMRA 1.9

* CE OPR 1.27, CE OPR 1.28 and CE OPR 1.29 refers

CE OPR 1.27

To amend the Rural Typology Map and Core Strategy Map, Figures 4.5 and 4.6 respectively of the Draft Plan) to reflect the recommended revised Rural Typology Map presented in Appendix 9 and the recommended revised Core Strategy Map provided in Appendix 11 of this report.

CE OPR 1.28

To amend the text provided in Section 4.8.12 – *Rural Settlement Strategy* of the Draft Plan as follows:

A key principle underpinning the Settlement Strategy is the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid overdevelopment, while sustaining vibrant rural communities.

The NPF prescribes national policy in relation to the development of rural housing and requires that a distinction is made between areas under urban influence and rural areas elsewhere (NPO 19). The RSES sets out regional policy that requires Local Authorities to ‘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’.

Having regard to this, rural typology mapping has been undertaken for County Longford which is consistent with national and regional policy and guidance. This typology map is based on the following 2 3 no. categories of rural areas:

- ***Rural Areas under Strong Urban Influence*** – areas which exhibit characteristics such as proximity to the immediate environs or close commuting catchment of large towns within the county with evidence of considerable pressure for development of housing owing to their proximity to such settlements. The policy in these areas is to facilitate housing development by people who have strong links to the particular rural area, who are an intrinsic part of the rural community.

Such persons would normally have spent substantial periods of their lives living in the rural area as part of the established rural community, e.g. people employed in the rural area including farmers and their sons and daughters, people originally from the rural area and wishing to return, people wishing to reside near elderly parents to provide security and care, elderly parents wishing to live near other family members, people who would have grown up in rural areas seeking to build their home close to other family members, people working in rural areas such as teachers in rural schools.

- ~~Stronger Rural Areas Rural Areas Elsewhere – these areas are the residual rural areas of the county not under Strong Urban Influence which can range from strong rural areas where population levels are generally stable within a well-developed town and village and in the wider rural areas around them to structurally weaker rural areas which exhibit characteristics such as persistent and significant population decline as well as a weaker economic structure based on indices of income, employment and economic growth. This stability is supported by a traditionally strong agricultural economic base and the level of individual housing development activity in these areas tends to be relatively low and confined to certain areas.~~
- ~~Structurally Weak Areas – areas which exhibit characteristics such as persistent and significant population decline as well as a weaker economic structure based on indices of income, employment and economic growth. The policy in these areas is to accommodate demand from individuals for permanent residential development subject to good planning practice. This policy will facilitate the expansion of the rural population and the maintenance of essential local services.~~

The Council will manage sustainable growth in designated ‘Rural Areas Under Strong Urban Influence’” ~~Stronger Rural Areas~~” 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 well as compliance with siting and design criteria for rural housing and with statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.

In respect of ~~“Structurally Weak Rural Area”~~ ‘Rural Areas Elsewhere’ ~~typologies~~, the Council aims to accommodate rural housing demand from individuals for permanent residential development, subject to good planning practice by applying a more flexible approach in the assessment of planning applications which are primarily based on sustainable planning principles (appropriate siting and design and negligible impacts to existing amenities or sensitive environments). The requirement to demonstrate local housing need will not apply to applications within ~~these~~ this designated areas. ~~This approach will assist in revitalising and sustaining these more fragile, rural communities, by way of facilitating the expansion of the rural population and the maintenance of essential local services within these structurally weak rural areas.~~

~~In addition, “Broad Zone” areas in County Longford are a further spatial planning policy consideration for rural housing. Broad Zone areas are designated areas of high amenity value and recreational potential associated with the major rivers and lakes in the county, the Royal Canal and areas of outstanding landscape quality in the northern fringes of the county. The Council aims to protect against residential developments which are urban generated or speculative in “Broad Zone” areas.~~

Dwellings and structures in the countryside need to be sited and designed to impact minimally on their setting. The utilisation of existing features, natural and manmade, can assist in integrating new development into its established setting. Design standards are outlined in Chapter 16: Development Management Standards and Annex 5: Rural Design Guidelines for Residential Developments in Rural County Longford. Furthermore, the Landscape Character Assessment (Chapter 14, Annex 9 and Appendix 9) assess the sensitivity and capacity of the different character areas ability to absorb and facilitate rural residential development.

CE OPR 1.29

Amend CPO 4.22 to reflect the Local Need Criteria as set out in the current Longford County Development Plan 2015-2021 under Objective C 12:

CPO 4.22 - 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:

- = ~~a) 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.~~*
- = ~~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).~~*
- = ~~e) 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.~~*

- = ~~e) 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.~~

CE EMRA 2.10

Amend the Draft Plan to provide for a graded reduction in revised residential densities, in keeping with the density ranges advocated in the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* (2009), and in accordance with the revised Settlement Hierarchy to reflect as follows:

Settlement Hierarchy		
Key Town (35-40 units/ha)	Longford Town	
Self-Sustaining Growth Town (25 units/ha)	Granard	
Self-Sustaining Towns (25 units/ha)	Edgeworthstown Ballymahon Lanesborough	
Towns and Villages (20 units/ha)	Aughnaccliffe Ballinalee Drumlish Keenagh Legan Newtownforbes	
Rural	Serviced Rural Villages (15 units/ha)	Abbeyshrule Ardagh Ballinamuck Clondra
	Rural Settlement Clusters & Open Countryside	

5.4.1 Transport, Infrastructure, Energy and Communications

5.4.1.1 Transportation:

EMRA welcome the inclusion of the transportation section of Chapter 5 of the Draft Plan, which coincides with Chapter 8 Connectivity of the RSES. Policies such as those relating to integrated land use and transport, the road and street network, sustainable public transport, electric vehicles and, cycling and walking, are all positive additions to the Plan.

The Assembly welcomes the reference to Longford town and the proposed development of a LTP as defined in CPO-5.9 The Assembly further welcomes the policy to reserve lands in appropriate areas for the improvement, maintenance and management of road traffic systems – specifically M4 Mullingar to Longford (Sligo) scheme which is considered positive and in keeping with RPO -8.10.

5.4.1.2 Chief Executive Response

The comments received in respect of Transport Infrastructure are noted.

5.4.1.3 Chief Executive Recommendation

No change.

5.4.2.1 Infrastructure

Water Supply and Wastewater Services

The inclusion of this section is in keeping with Chapter 10 Infrastructure of the RSES. RPO 4.2 is relevant in this regard, requiring Infrastructure investment and priority alignment with the spatial planning strategy of the RSES whereby all residential and employment developments shall be planned on a phased basis in collaboration with infrastructure providers so as to ensure availability of adequate capacity for services (e.g. water supply, wastewater, transport, broadband) to match projected demand and so that the assimilative capacity of the receiving environment is not exceeded.

Having regard to the aforementioned RPO, the inclusion of policies such as CPO 5.72 and 5.80, which promote co-operation with Irish Water during the lifetime of the Plan in the provision, upgrading or extension of wastewater collection and treatment systems in the County, and, to protect existing water infrastructure, to serve existing and planned future populations and enterprise in accordance with the requirements of the Core Strategy, are welcome inclusions within the Draft Plan.

The Draft plan acknowledges wastewater capacity constraints in Edgeworthstown and Ballymahon. Having regard to the position of these settlements within the proposed settlement hierarchy, the inclusion of CPO 5.84, which requires that future development in these settlements is contingent on wastewater capacity available, is a welcome addition to the Plan.

5.4.2.2 Chief Executive Response

The comments which are positive in nature are welcomed and noted.

5.4.2.3 Chief Executive Recommendation

No change.

5.4.3.1 Energy Networks Infrastructure

The Assembly welcome this dedicated section to energy within the Draft Plan, which outlines energy generation relating to electricity, gas and renewable energy sources.

Wind Energy

EMRA welcome the suite of policies related to renewable energy and wind energy. The Assembly suggest that prior to the finalisation of the Draft Plan, that the Council ensure that the Plan has full regard to the provisions of the Wind Energy Development Guidelines 2006, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, and the Draft Revised Wind Energy Guidelines published in December 2019, which are expected to be finalised in the near future.

5.4.3.2 Chief Executive Response

The Council acknowledge the Draft Revised Wind Energy Development Guidelines were issued, in December 2019, for public consultation. The purpose of the guidelines is to ensure a consistency of approach throughout the country for the treatment of planning applications for wind energy developments. The guidelines were also prepared within a wider national and EU energy policy context in line with binding EU and international obligations on Ireland to play its part in tackling both the causes and effects of climate change. As such, the Draft Plan also recognises the importance of wind energy, in addition to other renewable energy sources, in achieving national targets in relation to reducing fossil fuel dependency and greenhouse gas emissions.

The Council acknowledges the following recommended standards are included in the Draft Revised Wind Energy Development Guidelines (2019):

- A setback requirement for visual amenity purposes of 4 times the tip height to be applied between a wind turbine and the nearest point of the curtilage of any residential property in the vicinity of the proposed development, subject to a mandatory minimum setback of 500 metres.
- That assessments of noise are based on best international practice on wind turbine noise control including the Institute of Acoustics Good Practice Guides, WHO Guidelines and a procedure for the assessment of low frequency noise complaints.
- That a noise limit, referred to as a Relative Rated Noise Limit (RRNL) in the range of 35 – 43 dB(A), while not exceeding the background noise level by more than 5dB(A) with an upper limit of 43 dB(A). This is in line with the “preferred draft approach” announced by DHPCLG and DCCAE on 13th June 2017. The noise limits in the Draft Guidelines are more onerous than the 2006 Wind Energy Guidelines and afford a higher level of protection to people who live in the vicinity of an any future wind farm developments.
- Include a policy of zero shadow flicker and recommend planning authorities or An Bord Pleanála to impose condition(s) to ensure that no existing dwelling or other affected property will experience shadow flicker as a result of the wind energy development.
- Require a Community Report, which must set out how wind energy developers intend to provide an opportunity for local communities to benefit from proposed wind developments through community investment/ownership or through benefits and dividends. Models to support community participation will be implemented as part of the new Renewable Electricity Support Scheme (RESS).
- The two main methods of community investment indicated have the potential to offer significant socio-economic benefits including employment, supply-chain, cheaper energy, new revenue streams, energy use reduction and carbon footprint reduction.

Having regard to the submission of EMRA, it is acknowledged that the Wind Energy Section of the Draft Plan should reference the Draft Guidelines and that the Development Management Standards should also include a specific reference to the proposed standards as detailed in the Draft Revised Wind Energy Development Guidelines, December 2019 (and the 2006 Wind Energy Guidelines) and that the Draft

Plan should be amended accordingly once the Draft Guidelines are finally approved and issued.

Furthermore, the appropriate guidelines should also be referenced and included into the Renewable Energy Strategy and the associated Wind Energy Strategy.

5.4.3.3 Chief Executive Recommendation

CE EMRA 1.11

Insert text into Section 5.8.1 paragraph 2 as detailed below to reference the Draft Guidelines produced in 2019.

*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.*

CE CH EMRA 1.12

Include the following additional text in **Wind Energy**:

*The Council recognises the importance of wind energy as a renewable energy source and its potential in contributing to reductions in fossil fuel dependency and greenhouse gas emissions. Chapter 5: Transport, Infrastructure, Communications and Energy of the plan outlines the policy context for Wind Energy and should be referred to in the consideration of proposed development. The Council will have regard to the Wind Energy Development Guidelines for Planning Authorities and **Draft Revised Wind Energy Development Guidelines (December 2019)**, prepared by the Department of Environment, Heritage and Local Government, or any update made thereto. Further, regard should be given to the Landscape Character Assessment which is detailed in Chapter 14: Landscape Character and Annex 9: Landscape Character Assessment of this Plan.*

5.4.4.1 Communications

The Assembly welcome the recognition in the Draft Plan that the provision of high-speed, reliable and affordable broadband is essential to the economic growth of both County Longford and the wider region in terms of attracting inward investment and increasing competitiveness.

The Assembly identify that CPO 5.155 in the Draft Plan, is in keeping with RPOs 8.25 and 8.26 of the RSES which supports the roll out of the National Broadband Plan.

5.4.4.2 Chief Executive Response

The comments received in respect of Communications are acknowledged and appreciated.

5.4.4.3 Chief Executive Recommendation

No change.

5.5.1 Regeneration

The inclusion of a regeneration chapter as part of the Draft Plan is a positive addition. The insertion of Section 6.3.2, which details the relating RSES policy context, is welcome. Section 6.4 details the types of regeneration including Compact Growth Urban Regeneration, Economic Regeneration, Heritage Led Regeneration, and Rural Regeneration. The specific reference to Compact Growth Urban Regeneration is a welcome addition and in keeping with RSO 2 and RPO 3.2 of the RSES. The indication that the Development Plan has adopted an asset-based approach to the strategic location of new residential development, which will contribute to regeneration, placemaking and compact growth, coupled with the inclusion of Figure 6.1. detailing the RSES Asset Test Criteria for the strategic location of new residential development, enhance the robustness of the Chapter.

The chapter is reinforced through the inclusion of funding streams available to enable regeneration, including URDF, RRDF, the Climate Action Fund and Just Transition Funding streams. Indeed, the proactiveness of the Local Authority in availing of funding streams is noted.

5.5.2 Chief Executive Response

The comments which are positive in nature are welcomed and noted.

5.5.3 Chief Executive Recommendation

No change.

5.6.1 Placemaking

The Assembly welcome the inclusion of a chapter dedicated to Placemaking in the Draft Plan. Healthy Placemaking is a Key Principle of the RSES (Section 2.3) and underpins many of the Regional Strategic Outcomes and Regional Policy Objectives of the RSES. Accordingly, the inclusion of the RSES's Healthy Placemaking Strategy at Figure 7.1 of the Draft Plan, coupled with the integration of the RSES's Placemaking Guiding Principles, are positive additions to the Draft Plan.

5.6.2 Chief Executive Response

The comments which are positive in nature are welcomed and noted.

5.6.3 Chief Executive Recommendation

No change.

5.7.1 Economic Development

The Assembly welcomes the Economic Development Chapter and notes that the Draft Plan reiterates the key elements of the Economic Strategy of the RSES, coupled with the statement that guiding principles of the RSES, for the identification of locations for strategic employment growth. Similarly, the inclusion of an economic profile of County Longford creates a strong evidence base for the formulation of related economic policy.

The Assembly welcomes the statement that the Economic Development Strategy for the County is principally derived from the RSES and the spatial expression for the development of the County provided in the Core Strategy.

The Assembly notes that the economic development hierarchy is reflective of the Settlement Hierarchy and the inclusion of policies and objectives tailored for each tier of the economic development hierarchy are a positive addition and reinforce the settlement strategy and commensurate economic development of each settlement.

The Assembly welcomes the inclusion of policies such as CPO 8.5 and CPO 8.24, that seek to ensure the provision of physical infrastructure and zoned lands to realise the delivery of strategic employment lands in central accessible locations. Notwithstanding, the Assembly makes reference to the current preparation of an economic paper by EMRA which has found a shortage of appropriately sized land banks and FDI/IDA appropriate business premises throughout the Region, including in Longford Town. In this regard, the Assembly ask that the Council consider the inclusion of a complimentary policy and/or objective, to enable the delivery of same.

Retail

The Assembly welcomes the inclusion of Section 8.7.2 detailing Retail and the Retail Strategy for County Longford, yet notes that the Retail Hierarchy presented, whilst consistent with the provisions (Table 6.1) of the RSES, is at odds with the Settlement Hierarchy included as part of the Draft Plan. Specifically, this relates to the role of Granard. In this regard, the Council are asked to give full consideration to the role of Granard within the Settlement Hierarchy, having regard to the points raised in respect of the Settlement Hierarchy.

Moreover, and notwithstanding the information contained as part of the Draft Plan and Retail Strategy at Annex 7, the Assembly considers that further clarification is required regarding the need for the quantum of additional retail floorspace, whilst also having regard to the quantum of vacant retail floorspace available.

Just Transition

The Assembly welcomes the dedicated section to ‘Just Transition’ and the acknowledgment of the Draft Plan that given its substantial policy and financial support, both nationally and at EU level, ‘Just Transition’ is a significant catalyst for economic and social change in the midlands representing a significant step forward in the transition towards a low carbon economy. CPOs 8.84 to 8.88 are positive additions in this regard.

5.7.2 Chief Executive Response

The Planning Authority welcomes the positive comments contained within the EMRA submission which is supportive of the approach to economic development in the Draft Plan. The Planning Authority notes the endorsement by the EMRA of the proposed Economic Development Strategy, including its proposed Economic Development Hierarchy, which was reflective of the then proposed Settlement Hierarchy, as well as the associated policy objectives for each tier of the hierarchy which were deemed “a

positive addition and reinforce the settlement strategy and commensurate economic development of each settlement”.

Notwithstanding, following the proposed amendment to the overall Settlement Hierarchy of the Draft Plan, it is recommended that the Economic Development Hierarchy be amended, as well as associated changes to the policy framework for applicable settlements, to reflect the proposed revisions to the Settlement Hierarchy in order to reinforce the Settlement Strategy.

In relation to the comments in the EMRA submission on an identified shortage of appropriately sized land banks and FDI/IDA appropriate business locations throughout the Region, the Planning Authority recommends the inclusion of additional policy objectives supporting the collaboration with agencies such as Enterprise Ireland, Connect Ireland and IDA Ireland in identifying and delivering key, strategic employment land banks within the County to principally accommodate prospective Foreign Direct Investment (FDI) employment and/or IDA Ireland affiliated enterprises.

Retail

The response provided for Recommendation 10 of the OPR submission refers.

In undertaking the preparation of this Draft Retail Strategy, Longford County Council has sought to take a proactive approach to addressing the issue of retail floorspace vacancy, while remaining cognisant of its responsibility to facilitate growth in retail and general economic activity within the County. The Retail Strategy has taken a cumulative approach to depleting vacant floorspace, while accommodating additional floorspace where it is required.

In line with national trends, Longford has experienced a stagnation in retail construction activity since 2013 and even before this, particularly in comparison and bulky retail floorspace provision.

Only a small quantum of actual additional retail development has commenced since 2013 (approximately 246.5m²). It is also worth noting that the majority of retail floorspace commenced/delivered since 2013 has been in the convenience category (approximately 84% of total retail development since 2013). As a result, there has been little change in the baseline figure for total retail floorspace within the County over and above that which was used in the formulation of the existing retail strategy for the County.

Whilst the projected retail floorspace requirements have been undertaken in accordance with the methodology adopted in the current Retail Strategy, and in line with the approach advocated in the *Retail Planning Guidelines* (2012), it is acknowledged that critical inputs to the projected floorspace methodology, such as economic growth patterns and levels of disposable income, can produce highly variable outcomes. This is particularly apt in the case of the Draft Retail Strategy which was prepared prior to the Covid-19 pandemic and based on previous economic growth projections which are now unrealistic given the economic impact of the pandemic.

Moreover, assumptions on the rates of inflow and outflow retail activity into the county have a significant effect also in projecting future floorspace requirements. Such assumptions used in the Draft Retail Strategy were based on historic trends which may no longer accurately reflect actual retail patterns, particularly during and, undoubtedly, following the Covid-19 pandemic. Furthermore, the impact of the pandemic on retail vacancy levels and overall vitality and viability of our town centres is a further concern for the Planning Authority. In this regard, such impacts will go beyond retail activity and have the potential for profound adverse effects on more overarching planning policy, such as compact growth and more centralised residential environments, given their key town centre function.

As such, a more holistic review of the Draft Retail Strategy, rather than a review of the projected retail floorspace requirements, may be required in light of the evident impacts from the Covid-19 pandemic. However, given the advanced stage of the Development Plan process and limited resources within the Planning Authority, such a holistic review may need to be conducted after the adoption of the Draft Plan.

Notwithstanding, the Planning Authority shall conduct an interim review of projected floorspace requirements to provide an evidence-based quantum of retail floorspace requirements for the Draft Plan period.

Just Transition

The Planning Authority welcomes the recognition from the EMRA to the importance of 'Just Transition' and the policy support afforded in the Draft Plan to what is, potentially, a significant catalyst for positive economic and social change in the midlands and a significant step forward in the transition towards a low carbon economy. Accordingly, no changes are proposed to this element of the Economic Development chapter of the Draft Plan.

5.7.1 Chief Executive Recommendation

CE EMRA 1.13

To amend the Economic Development Hierarchy provided in Table 8.4 of the Draft Plan, as well as associated changes to the policy framework for applicable settlements in Section 8.7.1.2 (*Secondary Economic Growth Towns – Edgeworthstown and Ballymahon*) and Section 8.7.1.3 (*Key Employment Centres – Granard and Lanesborough*), to reflect the recommended revisions to the Settlement Hierarchy in order to reinforce the Settlement Strategy with the Economic Development Hierarchy recommended to reflect as follows:

Hierarchy of Employment 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.	<ul style="list-style-type: none"> ▪ Significant in-commuting 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 tandem with the primary economic growth town of Longford Town.	<u>Granard</u> <ul style="list-style-type: none"> ▪ 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 urban areas and wider hinterland.	<u>Edgeworthstown</u> <ul style="list-style-type: none"> ▪ Long-established manufacturing and light-industrial base. ▪ Focus on agri-food and the service sector. ▪ Excellent transports links through the N4 and Sligo-Dublin InterCity rail line.

			<p><u>Ballymahon</u></p> <ul style="list-style-type: none"> ▪ Strong manufacturing and light-industrial base. ▪ Key retail and service-sector centre. <p>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.</p> <p><u>Lanesborough</u></p> <ul style="list-style-type: none"> ▪ 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.
--------------------	--	-------------------------------------	---

CE EMRA 1.14

Insert the following County Policy Objectives under the Settlement Strategy policy objective framework contained in Section 8.7 – *County Longford Economic Development Strategy* – of the Draft Plan:

CPO 8.23 – 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.

CPO 8.24 – Facilitate the delivery of strategic employment landing space to principally accommodate FDI employment and IDA Ireland affiliated enterprises where appropriate.

CE EMRA 1.15*** CE OPR 1.39 refers:**

Conduct an interim review of projected floorspace requirements to provide an evidence-based quantum of retail floorspace requirements for the Draft Plan period.

5.8.1 Rural Economy

The inclusion of a Rural Economic Development Strategy is an extremely welcome addition to the Draft Plan. It is noted that the Rural Economic Development Strategy is underpinned by a number of principles including a focus on supporting vibrant rural communities focused around a network of rural towns and villages, and, facilitating the transition towards a low carbon and climate resilient society for instance. This is in keeping with related RSES policies for 'Rural Areas' contained at Chapter Four of the RSES and also those contained at Chapter 6 that relate to the 'Rural Economy'. The Draft Plan Chapter includes a number of generic policy inclusions, complemented by policy relating to specific sectors including agriculture, forestry and the equine industry.

5.8.2 Chief Executive Response

The comments which are positive in nature are welcomed and noted.

5.8.3 Chief Executive Recommendation

No change.

5.9.1 Tourism

The inclusion of a stand-alone Tourism Chapter is a welcome addition to the Draft Plan. The RSES recognises the important role that tourism plays in County Longford, including as a Growth Enabler for the Gateway Region as identified at Section 3.2 of the RSES, as a means to enable and sustain the rural economy as per Section 4.8

of the RSES, and as a sectoral opportunity for the Midlands as per Section 6.4 of the RSES. It is considered that the content of the Tourism Chapter is reflective of the RSES, including the suite of related policies, namely RPOs 6.8, 6.15-6.18 and 6.21, that seek to enhance the Tourism Sector; and RPO 6.19 that specially deals with tourism development in County Longford. RPO 4.60 also identifies support for Longford as a tourism hub having regard to its accessibility to key tourist destinations in the Region including Center Parcs, and proximity to natural amenities, recreational opportunities and the town's location on the Rebel Longford Trail.

5.9.2 Chief Executive Response

The comments which are positive in nature are welcomed and noted.

5.9.3 Chief Executive Recommendation

No change.

5.10.1 Built and Cultural Heritage

The Assembly welcome the inclusion of the chapter. The Assembly consider that the policies and objectives of the Draft Plan are in keeping with same, including for instance, supporting the re-use of Protected Structures as outlined at Section 11.7 of the Draft Plan and RPO 9.30 of the RSES.

5.10.2 Chief Executive Response

The comments received in respect of Built and Cultural Heritage are acknowledged and appreciated.

5.10.3 Chief Executive Recommendation

No change.

5.11.1 Natural Heritage and Environment

The Assembly welcome the inclusion of the chapter 12 in the Draft County Development Plan the array of topics covered as part of this Draft Plan Chapter is reflective and supportive of the content of the RSES and in particular Chapter 7.

The Assembly welcome the reference to the County's Peatlands within this context. This includes policy focused on providing for the future sustainable and environmentally sensitive use of large industrial peatlands sites when peat harvesting finishes, for instance. This is reflective of policy contained as part of the RSES including RPOs 4.84, 6.38 and 7.29.

5.11.2 Chief Executive Response

The positive recognition of the approach taken in the Draft Plan are acknowledged and appreciated in respect of Natural Heritage and Environment.

5.11.3 Chief Executive Recommendation

No change.

5.12.1 Green Infrastructure and Landscape Character

The inclusion of a Green Infrastructure Chapter positively enhances the Plan. In particular, welcome policies include CPO13.21 which outlines commitment to identify and map Green Infrastructure assets and sites of local biodiversity value over the

lifetime of the Plan, and, CPO13.22 that seeks to ensure the Green Infrastructure Strategy reflects a long-term perspective, including the need to adapt to climate change. The recognition of the Blueways, Greenways and Peatways of the County and the contribution that they make to the County's overall Green Infrastructure network, in addition to the many valuable economic, social and environmental benefits they provide, is a positive addition. This includes mapping of same at Appendix 5.

In finalising this section of the Draft Plan, the Council should consult with Section 7.7 of the RSES which details policy for green infrastructure and guiding principles for the preparation of Green Infrastructure Strategies. Likewise, Section 7.8 of the RSES documents Landscape consideration.

5.12.2 Chief Executive Response

The comments which are generally positive in nature are welcomed and noted.

Section 7.7 Green Infrastructure of the EMRA RSES is noted. In relation to the particular reference to the guiding principles for the preparation of Green Infrastructure Strategies, the EMRA RSES has been referenced with particular reference to the 7 guiding principles which are listed in the chapter.

Likewise, section 7.8 Landscape of the EMRA RSES is noted. Chapter 14 Landscape Character contains reference to the EMRA RSES where it is noted that the RSES supports the preparation of a national landscape character assessment, which will provide a framework for regional and local landscape character assessments and that specifically, RPO 7.27 commits, following the adoption of a national landscape character assessment, to the preparation of a Regional Landscape Character Assessment to promote better landscape management and planning in the Region.

Chapter 14 Landscape Character and associated Annex 9: Landscape Character Assessment contained within the Plan are based on the previous landscape assessment prepared and completed for the existing Development Plan. However, it is noted that the following County Policy Objectives are contained within the Draft Plan which will enable the relevant RSES provisions to be incorporated:

CPO14.1 Support and implement objectives contained in any Regional Landscape Character Assessment.

CPO14.2 Review in the context of a regional approach to landscape assessment, the County Landscape Character Assessment following publication of statutory guidelines for Planning Authorities on local Landscape Character Assessments, as outlined in the National Landscape Strategy 2015-2025.

5.12.3 Chief Executive Recommendation

No change.

5.13.1 Monitoring, Evaluation and Implementation, and Development Management Standards

The Assembly welcome the inclusion of the Chapter detailing the monitoring, evaluation and implementation of the CDP over its lifespan. The recognition of EMRA's role in this process, coupled with reference to the numerous funding streams

available, are positive additions. Chapter 12 of the RSES and Chapter 10 of the NPF, which detail implementation and monitoring measures, may provide further assistance in this regard.

Chapter 16 of the Draft Plan, Development Management Standards, provides a set of development standards to be applied in the assessment of planning applications. It is considered that the inclusion of this section as part of the Draft Plan will enable a robust application of preceding policy chapters.

5.13.2 Chief Executive Response

The comments which are positive in nature are welcomed and noted. In terms of the preparation of this Chapter, the relevant chapter in the RSES was extensively consulted.

5.13.3 Chief Executive Recommendation

No change.

5.14.1 SEA, AA and SFRA

The Draft Plan is subject to Strategic Environmental Assessment (SEA) and an environmental report has recorded the process to date. The inclusion of Ecosystem Services Approach Principles is a welcome addition. The SEA indicates that there are no probable conflicts with the status of SEOs that are unlikely to be mitigated. The Assembly welcome the indication as part of the environmental report that, where appropriate, the measures identified in the RSES SEA have been used, as they are or having been slightly modified, in most instances in order to ensure consistency.

The attention of the Council is drawn to new EPA Guidance on SEA Statements and Monitoring (Second Review of Strategic Environmental Assessment Effectiveness in Ireland), published January 2020, which provides best practice on devising meaningful monitoring measures, suitably detailed indicators and the frequency of monitoring and reporting. This guidance shall inform the iterative SEA process and preparation of the monitoring programme as part of the County Plan's SEA statement. The Draft Plan is subject to Appropriate Assessment and a Natura Impact Report (NIR) has recorded the decisions that were taken during its preparation. Having incorporated mitigation measures, it is concluded that the Draft Longford County Development Plan is not foreseen to give rise to any significant effects on designated European Sites, either alone or in combination with other plans or projects.

A Strategic Flood Risk Assessment (SFRA) was undertaken of the Draft Plan area having regard to the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities and associated circular. It is noted that all SFRA recommendations, including those related to land use zoning and flood risk management provisions, have been integrated into the Draft Plan.

5.14.2 Chief Executive Response

The comments which are positive in nature are welcomed and noted.

In terms of the new EPA Guidance on SEA Statements and Monitoring (Second Review of Strategic Environmental Assessment Effectiveness in Ireland), published

January 2020, the guidance has informed the SEA to date and will inform the preparation of the SEA Statement at the end of the process

5.14.3 Chief Executive Recommendation

No change.

5.15.1 Other

NPO 72a of the NPF states '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.' This is further developed at Appendix 3 of the NPF which sets out a methodology for a tiered approach to land zoning. Notwithstanding the reference to this approach at Section 4.3.1 of the Draft Plan, it is unclear how this has been applied. In accordance with the aforementioned national policy objective, it is recommended that the Draft Plan be updated to clearly demonstrate compliance with same.

5.15.2 Chief Executive Response

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. The Draft Plan and associated section 4.3.1 shall be updated to clearly demonstrate compliance with same. In particular an infrastructure service report is to be completed and will identify such areas of zoned serviced land and zoned serviceable land within the lifetime of the plan. This will have consequent knock-on impacts in terms of zoning provisions to be reflected in amendments to the draft plan.

5.15.3 Chief Executive Recommendation

CE CH EMRA 1.16

Amend section 4.3.1 to demonstrate compliance with national policy objective NPO 72a and the associated methodology. This will include reference to the completion of an infrastructure service report which will identify such areas which will have consequent knock-on impacts in terms of zoning provisions to be reflected in amendments to the Draft Plan.

6.0 Other Submissions to the Draft Plan by Chapter Topic

This section deals with the other submissions (Appendix 4) received relevant to the Chapter Topic (excluding the OPR and EMRA submission which are dealt with individually in this report).

Volume 1: Written Statement

1. Introduction and Strategic Context
2. County Profile
3. Climate Change
4. Core Strategy, Settlement and Housing Strategies
5. Infrastructure, Transport, Energy and Communications
6. Regeneration
7. Placemaking
8. Economic Development
9. Rural Economy
10. Tourism
11. Built and Cultural Heritage
12. Natural Heritage and Environment
13. Green Infrastructure
14. Landscape Character
15. Implementation Monitoring and Review
16. Development Management Standards
17. Format/ Procedural/ Miscellaneous

Part 2 of the Chief Executive Report (separate document) deals with the submissions which relate to the Draft Plan support documents:

Volume 2: Appendices;

Volume 4: Environmental and Flood Reports;

Land Use Zonings.

Part 3 of the Chief Executive Report (separate document) contains the appendices which support this Chief Executive Report.

Other Submissions Received

Volume 1: Written Statement

6.1: Chapter 1: Introduction and Strategic Context

Relevant Submissions Received: DCDP-70, 83, 93, 65

The following is a summary of the main issues raised in submissions received:

- Non-compliance with statutory requirements
- Sustainable Development Goals
- Vision and Tourism Plans
- Irish Water Plan updates

6.1.1 Non- Compliance with statutory requirements

The Draft fails to comply with, have regard to or take into account of the Planning & Development Acts, Plans in adjoining counties (including Draft), DoECLG Guidelines, Heritage Act 1995, National Heritage Plan, RSES and Development Plan Guidelines. There is an obligation to have regard to plans in adjoining counties as per the Planning and Development Act 2000, particularly those within the Eastern & Midland Region.

6.1.2 Chief Executive Response

The Development Plan has been prepared in accordance will the Planning and Development Acts (2000 as amended), relevant national and regional plans and strategies and relevant section 28 guidelines. This is outlined in Chapter 1: Introduction and Strategic Context. Furthermore, for each specific chapter, in relation to the topic area additional specific legislation, national, regional and local plans and guidance are outlined. All of the adjoining authorities have been consulted in accordance with the statutory procedures.

6.1.3 Chief Executive Recommendation

No change.

6.1.4 Sustainable Development Goals

Sustainable Development Goals must be a priority, and everyone needs to be encouraged to participate in their successful implementation. Sustainable Development Goals must be aligned to all Council plans and strategies. Longford County Council must work with Longford PPN to promote and support the role out of SDG initiatives in the community and support the development of future projects.

6.1.5 Chief Executive Response

The 2030 Agenda for Sustainable Development encourages countries to develop national responses to the 17 no. Sustainable Development Goals (SDGs) and incorporate them into planning and policy. In developing the Vision and key policy parameters for the County Development Plan the key policy documents which were considered from global to local level included the Sustainable Development Goals. These are detailed in section '1.9.1 UN Sustainable Development Goals 2030' of the Draft Plan.

Many of the measures through which Ireland will achieve the SDGs will take place within the context of *Project Ireland 2040* (made up of the *National Planning Framework to 2040* and the *National Development Plan 2018-2027*), which is the Government's overarching policy initiative to make Ireland a better country for all people. These in turn filter down into regional and accordingly Development Plan policy.

6.1.6 Chief Executive Recommendation

No change.

6.1.7 Vision and Tourism Plans

The reference to the Just Transition Report is welcomed and associated tourism references in the Tourism Masterplan for the Shannon Navigation, and the National Development Plan as these are identified as key plans, policies and projects which will be critical in driving the county's tourism product offering into the future. The national funding for Bord na Móna's large-scale peatlands restoration project and the opportunities which it will provide to enhance tourism in the midlands and Fáilte Ireland will work with the relevant stakeholders to build on this and help maximise these opportunities in a sustainable manner is welcomed.

While this vision intends to '*conserve and protect the built and natural environment*', it does not reference tourism or those who visit the county. It is requested that this vision also provides for those who visit the county as tourism contributes directly to the economy thereby improving many people's quality of life.

6.1.8 Chief Executive Response

The Vision for the Development Plan is as follows:

'to set out a framework for the sustainable physical development of the County, ensuring the conservation and protection of the built and natural environment, while providing in an equitable manner for all our people within the County'.

It is accepted that tourism does directly contribute to the economy and thereby has the potential to improve people's quality of life in County Longford. The Vision as outlined in the Plan relates to the 'sustainable physical development of the County'. This would incorporate tourism which is one of many sectors which contribute to both the economic prosperity and quality of life associated with the county.

6.1.9 Chief Executive Recommendation

No change.

6.1.10 Irish Water Plan updates

Irish Water acknowledges the planning policy and direction provided in the National Planning Framework and the adopted East and Midlands Region Regional Spatial and Economic Strategy (RSES) and are committed to supporting the policies therein, subject to budgetary and environmental constraints. In this regard they draw attention to Section 10 of the RSES which provides general policy direction in relation to the sustainable management of water.

Irish Water (IW) have provided some high-level updates and have indicated that they will continue to engage with the planning department as the development plan process progresses and will provide updates to Irish Water plans and projects as updates become available.

Section 1.13.2.1 Water Services Strategic Plan (under review in 2020) – delete the words ‘under review in 2020’ as the review was completed.

1.13.2.3 Irish Water Capital Investment Plan 2020-2024 (awaiting CRU determination) - delete the words ‘awaiting CRU determination’ as the CRU completed its determination.

Additional text is recommended in relation to the following sections:

1.13.2.2 Irish Water Strategic Funding Plan 2019-2024

Water Services Strategic Plan Review

Irish Water completed the 5-year review of the WSSP in October 2020, the review stated that the current WSSP is still valid and appropriate to provide strategic direction for the planning of water services by Irish Water for the next 5 years.

1.13.2.3 Irish Water Capital Investment Plan 2020-2024

Irish Water Investment Plan (Revenue Control Period 3) 2020 to 2024

Irish Water's Investment Plan is the budgetary plan for the five-year period from 2020 to 2024 inclusive, in line with our strategic objectives as detailed in the Water Services Strategic Plan (WSSP). It sets out where we are continuing to invest and prioritise where we can deliver the most urgently needed improvements to drinking water quality, leakage, water availability, wastewater compliance, efficiencies and customer service. In providing these services we play a central role in enabling economic growth, protecting both the environment and the health and safety of our customers and the public.

The list of projects and programmes included in our Investment Plan is continuously being refined and is subject to budget, technical and environmental constraints, as well as statutory approvals. Further information on the current plan submitted can be found on the CRU Website www.cru.ie

1.13.2.4 National Water Resources Plan

The National Water Resources Plan (NWRP) is carrying out a review of all Water Resource Zones in the country, to determine projects to resolve deficits on a nationwide scale. The NWRP will be published in two distinct stages, the combination of which will form our overall National Water Resource Plan.

Phase 1 is the National Water Resources Plan — Framework Plan which will be subject to Strategic Environmental Assessment and Appropriate Assessment. Phase 1 includes: the methodologies for assessing need (including how the hazards identified in the DWSPs are incorporated into the strategic plan); the methodologies for developing strategic plans for each supply as part of the Regional Water Resources Plans and, a summary assessment of need across all water supplies. The Framework Plan will highlight the vulnerability of our water supplies particularly during severe weather conditions (storms and droughts), including our largest supply, the Greater Dublin Area.

Phase 2 is made up of 4 Regional Water Resources Plans each of which will be subject to Strategic Environmental Assessment and Appropriate Assessment. The Regional Water Resources Plans will develop the strategic plan for each water supply, including short, medium and long-term options to address risk across our supplies.

The Regional Water Resources Plan for the Eastern and Midlands Region will include the strategic Plan for the Louth, including an assessment of all potential options to resolve needs in the area, and how these have been assessed to develop a Preferred Approach, including short, medium and long term investment requirements and operational improvements. Phase 2 follows after the adoption of the NWRP Framework Plan. Phase 1 and 2 combined will form the overall National Water Resource Plan

The models and intelligence relating to our existing water sources and asset base, that have been developed as part of our water resources planning process, have also been used to inform the operation of our supplies particularly during critical drought periods. Public Consultation information can be found on the IW website at <https://www.water.ie/projects/plans/our-plans/nwrp/>

6.1.11 Chief Executive Response

Chapter 1 and Section relates to '1.13.2 Irish Water National Plans'. A number of Plans of particular note are subsequently detailed.

- 1.13.2.1 Water Services Strategic Plan (under review in 2020);
- 1.13.2.2 Irish Water Strategic Funding Plan 2019-2024
- 1.13.2.3 Irish Water Capital Investment Plan 2020-2024 (awaiting CRU determination)
- 1.13.2.4 National Water Resources Plan (due for completion in 2021).

As the changes proposed by Irish Water are an update on their relevant strategies, these changes should be incorporated.

6.1.12 Chief Executive Recommendation

CE CH 1.1

Section 1.13.2.1 Water Services Strategic Plan (under review in 2020) – delete the words '*under review in 2020*'.

CE CH 1.2

Section 1.13.2.3 Irish Water Capital Investment Plan 2020 -2024 (awaiting CRU determination) – delete the words '*awaiting CRU determination*'.

CE CH 1.3

Include the additional text in relation to the policy documents as indicated by Irish Water.

6.2: Chapter 2: County Profile

Relevant Submissions Received: None
--

As no relevant submission was received, no change is recommended.

6.3: Chapter 3: Climate Change

Relevant Submissions Received: DCDP-69

The following is a summary of the main issues raised in submissions received:

- Clean Energy
- Training on Climate Mitigation Measures
- Implementation Plan for Climate Change Actions

6.3.1 Clean Energy

Reference is made to the identification of suitable sites and timelines in the delivery of sustainable energy communities throughout the County as per CPO 3.10.

6.3.2 Chief Executive Response

Specific reference under Climate Action A5.19 committing to the *“commission the feasibility study of Lanesborough becoming Ireland’s first, ‘Low Carbon Town’, with reference to the Regional Enterprise Plan (REP) 2020”* is considered to address the issue.

6.3.3 Chief Executive Recommendation

No change.

6.3.4 Construction

Reference is made Longford County Council assisting contractors in calculating their carbon footprint, and to ensure the layout and design of all future developments are reflective of the necessary response to climate change.

6.3.5 Chief Executive Response

In response to carbon footprint calculation the Local Authority refers to the existing provision within the Draft Development Plan under the ‘Regeneration Climate Actions’ *“requiring all large-scale developments (as determined by the Planning Authority) to submit supporting and professionally prepared carbon footprint calculations, and an outline of the proposed measure to be implemented to offset same”* and DMS16.6 whereby *“All developments should include the following: a) Building design which minimises resource consumption, reduces waste, water and energy use shall be incorporated where possible, in all new and renovated developments.”*

However, aside from encouraging contractors to calculate their carbon footprint through the Draft Development Plan policy and objectives the technical aspect of the calculation is considered outside of the abilities of the local authority.

Furthermore, the request to ensure the design and layout of all future developments are favourable to sustainable design, the Local Authority can refer to Development Management Standard (DMS) 16.3 requiring *“that all new development proposals seek to deliver low energy buildings and the highest energy efficiency BER ratings including:(a) – (q)”*.

6.3.6 Chief Executive Recommendation

No change.

6.3.7 Training on Climate Mitigation Measures

CPO 3.18 to “*provide training on climate mitigation measures*” should be extended to the agricultural, construction, and industry sector.

6.3.8 Chief Executive Response

The Local Authority acknowledges the wording of the policy allows for multiple interpretations and appreciates the role the agricultural, construction and industry sectors, as well as transport in tackling this challenge. Therefore, a reference to specific sectors within this policy is widely encouraged to promote a collective climate change response. The request to refer to the “*agricultural, construction, and industry sector*” to CDP 3.18 is supported and a rewording is recommended.

6.3.9 Chief Executive Recommendation

CE CH 3.1

Add additional text to existing CPO 3.18 as follows:

‘Provide training on climate mitigation measures, to include the agricultural, construction, industry and transport sector’.

6.3.10 Implementation Plan for Climate Change Actions

A request is made that a ‘implementation plan’ be inserted within for the purpose of tracking and measuring climate change actions, responsibilities and timeframes.

6.3.11 Chief Executive Response

With reference to the production of an implementation plan to ensure measurable progress on climate action, the Draft Plan has committed Chapter 15 solely to ‘Monitoring, Evaluation and Implementation’. Furthermore, in accordance with Section 15(2) of the Planning and Development Act 2000 (As Amended), “*the Chief Executive of a planning authority shall, not more than 2 years after the making of a development plan, give a report to the members of the authority on the progress achieved in securing the objectives (of the plan)*’.”

However, with increased emphasis placed on the Local Authority’s role in responding to climate change under the Climate Change Charter (2019), a bespoke climate change implement plan is considered a welcome addition. The request to include a Climate Action Implementation Plan is supported and is recommended for inclusion within *Chapter 3: Climate Change, ‘Climate Change Policies – County Policy Objectives’*.

6.3.12 Chief Executive Recommendation

CE CH 3.2

Include the following additional CPO:

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’.

6.4: Chapter 4: Core, Settlement and Housing Strategies

Relevant Submissions Received: DCDP- 7, 19, 51, 56, 69, 76, 93

The following is a summary of the main issues raised in the submissions received:

- Population projections and residential densities.
- Identification of critical strategic national road links.
- Sequential residential development.
- Provision of temporary/emergency accommodation and housing for the elderly and disabled.
- Location test standard for new housing.
- Enhanced reference to tourism sector in Core Strategy
- Vernacular Buildings and Rural Housing / Settlement Policy

6.4.1 Population Projections and Residential Densities

Submission DCDP–07 from the Northern and Western Regional Assembly (NWRA) notes that the higher end of population range detailed for County Longford in the NPF Implementation Roadmap document has been used in the Draft Plan, but no clear rationale for selecting this option provided. It also comments that the proposed densities of 30 units per hectare for Longford Town and 12 units per hectare for other towns in the County are at the lower end of national practice and could be argued would not be consistent with the achievement of compact development.

6.4.2 Identification of Critical Strategy National Road Links

Submission DCDP–19 from Transport Infrastructure Ireland (TII) advises the identification of critical strategic national road links within and through the County and to acknowledge the strategic function of the network in facilitating the movement of strategic traffic, including freight and access for goods to market, including onward connection to international gateways, including the main national port and airport locations. It recommends the inclusion of a Core Strategy objective in Section 4.6 to maintain the strategic capacity and safety of the national road network and to safeguard the investment in national roads and to that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.

6.4.3 Sequential Residential Development

Submission DCDP–56 from the National Transport Authority (NTA) recommends that the Draft Plan include land use policy and objective which states that residential development will be undertaken on a phased sequential basis.

6.4.4 Provision of Temporary/Emergency Accommodation and Housing for the Elderly and Disabled

Submission DCDP–69 from the Health Service Executive (HSE) recommends more focused solutions to need for emergency accommodation and suggests HAP caps appear to be posing a supply problem in larger towns along with private rental

shortages, thereby resulting in greater demand for emergency accommodation. It recommends that sites in towns and villages are identified for age friendly settlements.

6.4.5 Location Test Standard for New Housing

Submission DCDP-76 from An Taisce recommends that the Council make the seven location test standards for new housing outlined in the now replaced National Spatial Strategy 2002 a mandatory Development Plan requirement for new housing development.

6.4.6 Enhanced Reference to Tourism Sector in Core Strategy

Submission DCDP-93 from Fáilte Ireland suggests the inclusion of an additional Strategic Aim in the Core Strategy for supporting and promoting tourism development.

6.4.7 Vernacular Buildings and Rural Housing / Settlement Policy

Submission DCDP-51 has recommended the following policy insertion of relevance to 'Rural Housing / Settlement Policy' into the Development Plan:

Proposals for sensitive rehabilitation of disused vernacular houses will not be subject to the Rural Settlement Strategy for housing in the countryside that applies to new dwellings, assuming that their vernacular character is not compromised, that their fabric is repaired using appropriate techniques and materials, and that the structure was previously a dwelling. Where a building is derelict, measures should be taken to support and protect the building from collapse prior to and during works.

6.4.8 Chief Executive's Response

6.4.9 Population Projections and Residential Densities

In relation to the rationale for selecting the upper range of the population projections for County Longford, as detailed in the NPF Implementation Roadmap document, this was informed by demographic analysis and population projection modelling for the County conducted by consultants, KPMG Future Analytics, as part of their remit for the preparation of the HNDA and Core and Housing Strategies. This modelling was underpinned by the application of the demographic cohort component methodology (CCM), the same methodology used by the CSO in preparing the national projections, utilising key and up to date assumptions in fertility rates, mortality rates and migration rates per year of projection across the duration of the period.

The baseline projection of population, which informs both the published NPF targets, those in the NPF Implementation Roadmap, and subsequently the Regional Spatial and Economic Strategies (RSES) was originally developed by the ESRI using best practices in demographic and spatial modelling. These figures underwent adjustments on foot of policy-based intervention thereafter, however, as outlined in the ESRI's publication *Prospects for Irish Regions and Counties* (ESRI January 2018), the assumption of a lower than anticipated level of net inward migration is evidently contrary to historic and recent data published by the CSO.

For example, the NPF baseline incorporates a net inward migration figure of just 8,000 per annum to 2021, rising to 12,500 thereafter. This is in stark contrast to the published migration data available showing a +19,800 net surplus in 2017, a +34,000 net surplus in 2018 and a +33,700 net surplus in 2019 (Migration Estimates, CSO August 2019).

The population projection modelling undertaken provided three population growth scenarios for the County: low, medium and high, with variances in the level of net national migration the key determinant in each scenario.

Even in the lowest population scenario, which aligned with the CSO's 10,000 net inward national assumption from 2020 and beyond for the entirety of the period, the modelling forecasted a population of 46,409 for County Longford at the target year of 2026 and a population of 49,646 for the corresponding target year of 2031. By contrast the upper range of the NPF population targets for County Longford for 2026 and 2031 were 45,500 and 47,000 respectively.

Given the policy implications for deviating from the population projections detailed in the NPF Implementation Roadmap, principally in relation to NPO 9 of the NPF, the decision to use the upper range of population figures in the Roadmap document was justified in light of the population modelling undertaken.

In relation to the residential densities employed in the Draft Plan, it is acknowledged that the referenced densities are considered low in the context of the national policy (NPF) and guidance (Section 28 guidance in the form of *Sustainable Residential Development in Urban Areas*). The densities employed in the Draft Plan were retained from those in the current Development Plan and are considered commensurate in relation to the character and scale of most of the towns and villages in the County.

Notwithstanding, it is acknowledged that increased densities are required, particularly in respect of brownfield sites in the Key Town of Longford Town and in the Self Sustaining Growth Town and Self Sustaining Towns, in order to achieve more consolidated and compact forms of settlement growth in accordance with national and regional policy and the aforementioned Section 28 guidance.

6.4.10 Identification of Critical Strategy National Road Links

The Council acknowledges the importance of the national road network in Section 5.2.3 of the Draft Plan. CPOs 5.12 and 5.17 provide for the protection of the safety, capacity and efficiency of the national roads and associated junctions. Notwithstanding, a narrative on the national roads within the county will be provided in Chapter 4 together with the insertion of a new Strategic Aim under Section 4.6 to protect the national road network.

6.4.11 Sequential Residential Development

The NTA are directed to Section 4.6 of the Draft Plan which details the strategic aims of the Core Strategy one of which (Aim 6) states:

“To coordinate the development of land identified in this Core Strategy in a manner that supports public transport and existing services and to prioritise sequential development of settlements, including the development of infill and brownfield lands”.

This strategic aim is further expanded in policy through CPO 4.3 which states that it is the Council Policy Objective to:

“Reinforce the centres of settlements through the increased focus on the development of infill sites, brownfield lands, under-utilised land/buildings, vacant sites, and derelict sites within the existing built-up footprint of the settlements and develop outwards from the centre in a sequential manner”.

Similar worded CPOs, in respect of addressing sequential development, are provided in CPO 4.12, CPO 4.14 and CPO 4.15 of the Draft Plan.

6.4.12 Provision of Temporary/Emergency Accommodation and Housing for the Elderly and Disabled

In response to the HSE submission, CPO 4.53 provides policy support on this subject:

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”.

CPO 7.30 also provides sufficient policy support for housing elderly people, as well as people with disabilities:

Ensure the integration of age friendly and family friendly strategies in all design proposals and that provision is made for flexible housing typologies, and that buildings and public spaces are designed for all, including older people, disabled people and people with young children”.

6.4.13 Location Test Standard for New Housing

With regard to the Seven Tests for Housing Locations outlined in the National Spatial Strategy 2002, it is noted that this strategy has since been replaced by the National Planning Framework in 2018. The Draft Plan contains measures with respect to the location and design of new residential development as well as policies relating to associated areas of sustainable transport and Smarter Travel.

6.4.14 Enhanced Reference to Tourism Sector in Core Strategy

In relation to the inclusion of an additional Strategic Aim of the Core Strategy (Section 4.6) of the Draft Plan in support of the tourism sector, it should be noted that the Core Strategy has a very specific remit in articulating the medium to longer term evidence and quantitatively based strategy for the spatial development of County Longford, whilst demonstrating consistency with national and regional development objectives outlined in the NPF and RSES. The Strategic Aims outlined in Section 4.6 of the Draft Plan reflect this specific remit rather than addressing more strategic development aspirations for the County. While the tourism sector is a very important and valuable contributor to the overall economy of the County, reference to the sector in this context would conflate the Core Strategy to development areas outside its specific remit.

6.4.15 Vernacular Buildings and Rural Housing / Settlement Policy

The Local Authority recognises that the open countryside is and will continue to be, a living and lived-in landscape focusing on the requirements of rural economies and rural

communities, based on agriculture, forestry, tourism and rural enterprise. Draft CDP policy CPO 4.38 already “encourages the sensitive restoration of a derelict traditional vernacular structure...”. However, in response to item no. 1 relating to disused vernacular houses not being subject to the Rural Settlement Strategy, the policy proposal is supported.

6.4.16 Chief Executive Recommendation **CE CH 4.1**

Insert the following additional text under Section 4.8.2:

The selection of the upper population growth targets detailed in the NPF Implementation Roadmap for the County (in respect of the target years of 2026 and 2031) was informed by population projection modelling undertaken by Future Analytics using the demographic cohort component methodology and key, up to date assumptions in fertility rates, mortality rates and migration rates per year of projection across the duration of the period.

The population projection modelling undertaken by Future Analytics provided three population growth scenarios for the County: low, medium and high, with variances in the level of net national migration the key determinant in each scenario. Even in the lowest population scenario, which aligned with the CSO’s 10,000 net inward national assumption from 2020 and beyond for the entirety of the period, the modelling forecasted a population of 46,409 for County Longford at the target year of 2026 and a population of 49,646 for the corresponding target year of 2031. By contrast the upper range of the NPF population targets for County Longford for 2026 and 2031 were 45,500 and 47,000 respectively.

Given the policy implications for deviating from the population projections detailed in the NPF Implementation Roadmap, principally in relation to NPO 9 of the NPF, the decision to use the upper range of population figures in the Roadmap document was justified in light of the population modelling undertaken by our appointed consultants.

CE CH 4.2

Insert the following additional text under Section 4.5:

County Longford also benefits from a strategic national road network reflecting its central location in the country. Several strategic national primary and secondary routes traverse the County from east to west; and from north to south. These include the N4 and the N5, both of which are components of the Trans-European Transport Networks (TEN-T) Comprehensive Network; as well as the N55, N63 and several strategically important regionally routes, including the R392 which provides a route from Lanesborough and Ballymahon to Mullingar. Together the EU TEN-T Network and the national roads identified provide important strategic links within and through the county and region, including providing critical international connectivity.

CE CH 4.3

Insert under section 4.6 the following additional Strategic Aim no.9:

To maintain the strategic function, capacity and safety of the national roads network and to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.

CE CH 4.4

Include the following additional policy in the 'Rural Settlement Clusters – County Policy Objectives' as follows:

Proposals for sensitive rehabilitation of disused vernacular houses will not be subject to the Rural Settlement Strategy for housing in the countryside that applies to new dwellings, assuming that their vernacular character is not compromised, that their fabric is repaired using appropriate techniques and materials, and that the structure was previously a dwelling. Where a building is derelict, measures should be taken to support and protect the building from collapse prior to and during works.

6.5 Chapter 5: Transport, Infrastructure, Energy and Communications

Relevant Submissions Received: DCDP-02, 6, 9, 10, 13, 19, 56, 64, 68, 69, 70, 74, 76, 77, 79, 81, 83

The following is a summary of the main issues raised in submissions received:

- Transport
 - Transport Infrastructure Ireland submission
 - National Road Scheme Projects – NTA submission
 - Sustainable Public Transport
 - Sustainable Mobility
 - Longford Town Transport Plan
 - Aviation
- Water Supply
- Wastewater Services
- Flood Risk Management
 - General comments and requirement to comply with guidance
 - Sequential Approach and Justification Test
 - Constrained Land Use Zoning
- Waste
- Sustainable Industry
- Environmental Awareness
- Rainwater Harvesting
- Air Pollution
- Energy Networks Infrastructure
 - Electricity Network
 - Gas Network
 - Renewable Energy
 - Wind Energy
 - Micro and Community Wind Energy Developments
 - Solar Energy
 - Hydro Energy
 - Geothermal Energy
 - Bio Energy
 - Anaerobic Digestion and Biomass Combustion.

6.5.1 Transport Infrastructure Ireland (TII) Submission (DCDP-19)

6.5.1.1 *Managing Exchequer investment and statutory guidance*

The submission identifies that the N4 and N5 national primary road corridors through Longford are identified as part of the TEN-T Comprehensive Network.

The N55 and N63, national secondary roads, provide important regional and inter-regional connectivity within and through the Midlands. Together the EU TEN-T Network and the national roads identified provide important strategic links within and through the county and region, including providing critical international connectivity.

In addition, the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES) includes Regional Policy Objective 'RPO 8.11' which outlines the objective to support the improvement, and protection, of the EU TEN-T network as well as the strategic function of other specific road corridors.

The critical need to manage national road assets in accordance with national policy is outlined in the Strategic Investment Framework For Land Transport (DTTaS, 2014), Smarter Travel (DTTaS, 2009) and the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

6.5.1.2 Access to National Roads

TII welcomes and is supportive of Section 5.2.2 of the Draft Plan which promotes an integrated approach to land-use and transportation, supports the creation of compact urban growth, consolidation of existing settlements and the prioritisation of the development of brownfield lands. The inclusion of policy objective CPO 5.17 which concerns access onto national roads, and that development on strategic national roads will be carefully considered in accordance with the provisions of DoECLG Spatial Planning and National Roads Guidelines (2012) is welcomed. However, the submission recommends that this approach does not comply the provisions of the DoECLG guidelines (Section 2.5) and therefore considers the following amendment to CPO 5.17:

'Protect routes of strategic importance within the County, as outlined below, from further access creation and ~~discourage~~ intensification of existing accesses and development on national routes. Development on the National and Regional Routes outlined below shall be carefully considered to preserve their strategic role and safeguard the strategic function of the national road network, in accordance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012).'

The submission also identifies that the Draft Plan does not include 'exceptional circumstances' as referenced in Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines (2012). It is suggested that the Council consider the option of inserting an extra policy objective with regards to this specific issue.

6.5.1.3 Development at National Road Junctions

TII suggests that proposals for development and land use zoning designations at national road interchange/junctions should be considered and prepared in the context of the provisions of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines (2012).

The submission would welcome a new specific CPO included outlining the specific policy requirement to safeguard the strategic capacity of national road junctions in accordance with the provisions of official policy. This is referenced particularly when the Local Transport Plan is prepared to support the Longford Local Area Plan. TII have suggested that they be consulted on the preparation of this Plan at an early stage.

6.5.1.4 National Road Schemes

The submission identifies the National Road improvement projects being progressed with the County and the TII in accordance with the National Development Plan.

The Submission welcomes the identification of these projects in Objective CPO5.16. It is suggested that the citation of these projects follows that used in the NDP. However, the **N5 Ballaghaderreen to Scramogue** was noted as not being included in Table 5.1 Programme of Road Improvements 2021-2027, it is suggested that this be amended.

TII requests that the Council give careful consideration to the decision to include the requirement to apply Objective CPO 5.15 'Corridor and Route Selection Process' to National Development Plan National Road Schemes in order to avoid any unintended consequences and to avoid any ambiguity in relation to the delivery of the National Development Plan National Road Schemes.

TII acknowledge the CPO5.16 outlining the Council Policy to reserve lands on the proposed route corridors for identified road schemes. It is considered critical that corridors for national road schemes are safeguarded pending the delivery of any scheme; Section 2.9 of the DoECLG Spatial Planning and National Roads Guidelines refers. TII recommends that consideration should be given to incorporating a specific policy objective in accordance with the proposed wording below to conform to official policy;

To protect the study area, route corridor options and thereafter the preferred route corridor selected for the national road schemes being progressed in the Development Plan in accordance with National Development Plan Objectives and to prohibit development that could prejudice their future delivery.

6.5.1.5 Cycling

TII acknowledges the commitment to provide cycling infrastructure to/from Longford Town along the N63 (Ballinalee Road). The submission requests for clarity that this be referred to as an urban proposal. Further Action A5.7 outlines the commitment to prepare a feasibility study to provide cycle routes on approach and through each town in Longford.

6.5.1.6 Bus Priority

CPO 5.46 is highlighted which supports the provision of bus priority measures on existing and planned road infrastructure and CPO5.47 seeks to facilitate the provision of park and ride facilities. In respect of the two schemes cycling and bus priority the Council should ensure the road safety standards for all road users. The proposals should be plan-led and the TII recommends early consultation on the same.

6.5.1.7 Mobility Management / Travel Planning

The Draft Plan sets out the requirement for Mobility Management Plans for major developments CPO5.11. The submission suggests that the Council could take the opportunity to consider Mobility Management/Travel Planning for existing trip intensive locations such as schools and significant employers, including business parks and industrial estates where employer's plans could be co-ordinated.

6.5.1.8 National Road Drainage

The submission welcomes the inclusion of Section 5.2.3; however, would welcome a new policy objective relating to the protection of national road drainage regimes.

TII identifies that they have experienced a number of instances nationally where private development proposals have accessed/sought to access national road drainage regimes to dispose of surface water drainage.

‘The capacity and efficiency of the national road network drainage regimes in County Longford will be safeguarded for national road drainage purposes.’

6.5.1.9 Renewable Energy and Peatlands

The submission acknowledges and welcomes the requirement for a glint and glare assessment for solar projects in Section 5.8.2 and CPO5.145. The TII also state that for all renewable energy developments requiring a grid connection that an assessment of all alternatives should be undertaken. It is stated a new CPO should be added to request this in the Draft Plan.

The TII note and welcome the proposed CPO12.45 in respect of working with relevant agencies to prepare after-use framework plans for peatlands. TII recommends that any future Peatlands Framework Plan should have regard to the provisions of official policy relating to development management and access to national roads ‘Spatial Planning and National Roads Guidelines’ (DoECLG, 2012) and that the TII is available for consultation.

6.5.1.10 Other Plans / Strategies

TII requests that where there are implications for the safe and efficient operation of the national road network, existing and proposed, that appropriate consultation with TII would occur. Where such non-statutory proposals are used to inform subsequent planning decisions, TII considers that they should be subject to consultation and incorporated into relevant local area planning frameworks.

6.5.1.11 TII Publications Referencing

The TII Publications Standard describes the requirements that shall be implemented on National Roads on the approaches to towns and villages in terms of the provision of traffic calming measures and pedestrian crossings. National Roads within 60km/h zones can traverse many areas with very different characteristics such as low density residential areas, industrial areas, mixed use neighbourhoods and town and village centres. This requires different design solutions within each of these different contexts.

It is recommended that the relevant references to the Design Manual for Roads and Bridges are updated to TII Publications. The standards are detailed in TII Publications – and Section 5.2.3 and policy objectives CPO5.17 and CPO5.57 should be updated. Also it is indicated that TII Standard DN-GEO-03084 ‘The Treatment of Transition Zones to Towns and Villages on National Roads’ should be referenced in the Plan in association with the reference to DMURS.

6.5.1.12 Traffic and Transport Assessment (TTA)

It is suggested that the Draft Plan be updated to reflect the requirement for TTA undertaken in accordance with the TII TTA Guidelines where national roads are impacted.

The TII TTA Guidelines relate specifically to development proposals with implications for the national road network and outline appropriate thresholds and sub-threshold limits at which TTA are required where there may be implications for the national road network.

6.5.1.13 Road Safety

The submission identifies the difference between a Road Safety Audit and a Road Safety Impact Assessment. Both have consequences for the design and layout of any project. TII would welcome reference to the requirement for Road Safety Audit to be included as a new objective. Road Safety Audit should be undertaken on all new national road infrastructure projects and on any schemes or proposals which results in a permanent change to the layout of a national road (refer to TII Publications GE-STY-01024 Road Safety Audit).

6.5.1.14 Noise

TII requests that the Draft Plan references S.I. No. 140 of 2006 Environmental Noise Regulations and Section 3.7 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities which considers noise.

An additional policy objective is recommended confirming the requirement that development proposals in proximity to a noise source such as an existing or proposed national road should include noise attenuation measures; and that the costs of implementing the mitigation measures should be borne by the developer/applicant.

6.5.1.15 Signage

The submission references CPO5.30 which addresses signage on the road network. The reference to the NRA policy on the Provision of Tourism and Leisure Signage on National Roads (2011) is welcomed. It is recommended by TII to include reference to Section 3.8 of the DoECLG Guidelines and official policy relating to signage on national roads in Objective CPO5.30.

6.5.1.16 Settlement Plans / Development Strategies

TII identifies specific issues in respect of the Longford settlement plan included in Volume II Appendix 1 and recommends a number of amendments. TII identifies specific issues in respect of the Granard settlement included in Volume II Appendix 1c and recommends a number of amendments.

6.5.2 Chief Executive Response

6.5.2.1 Managing Exchequer investment and statutory guidance Access to National Roads

The Council welcomes the intention and the principle of the submission in respect of the Policy Objective CPO 5.17. The Council considers that the wording of the policy objective should be revised with the term '*discouraging*' new access points onto the national road network to be removed from the objective in order that policy objective complies with DoECLG Spatial Planning and National Roads Guidelines (2012).

The Council acknowledge the recommendation and supports the proposed protection of the study area for route corridor options and thereafter the preferred route corridor selected for the national road schemes being progressed in the Development Plan option to comply with Section 2.9 of the DoECLG Spatial Planning and National Roads Guidelines refers.

The Council has drafted an additional policy objective in respect of identifying the exceptional circumstances as defined and referenced in Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines (2012).

6.5.2.2 *National Road Interchange / Junctions*

The Council acknowledge the recommendation that development proposals and land use zoning designations at national road interchange/junctions should be considered and prepared in the context of the provisions of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines. These matters are addressed in the assessment of development proposals and duly considered in the land use zonings portion of this report.

The Council acknowledges the proposed additional CPO with the intention to safeguard the strategic capacity of national road junctions. The Council would suggest that the wording of the existing CPO5.17 is sufficient in respect of protecting the strategic capacity of the national road network with development proposals being considered on a case-by-case basis.

6.5.2.3 *Transport Planning and National Road Schemes*

In respect of the citation of national road schemes, the Council would highlight that the N5 Ballaghaderreen to Scramogue scheme is not a project or scheme located within Longford County, it is a project in Roscommon. The Longford to Scramogue project does include part of the County and is a project being proposed and supported by the Council.

6.5.2.4 *National Road Schemes*

The comments made about the policy objective CPO5.15 and the potential issues identified in respect of national road schemes being progressed under the National Development Plan are acknowledged. It is suggested that the wording of CPO5.15 and CPO5.16 will be revised and amended.

6.5.2.5 *Sustainable Transport, Cycling and Bus Priority Schemes*

The Council welcomes the intention of the submission from the TII in respect of sustainable transport, cycling and bus priority schemes. The Council is committed to the delivery of safe provision of infrastructure to support these modes and is committed to working in partnership with appropriate agencies to deliver such projects including the NTA and TII. In respect of cycling and bus priority schemes the early engagement of the TII will be sought as project proposals are developed and progressed.

The Council will amend the wording of policy objective CPO5.59 to identify and confirm the urban nature of the proposed cycling infrastructure projects identified.

6.5.2.6 *Mobility Management / Travel Planning*

In respect of Mobility Management / Travel Planning the Council supports the intended expansion of the Policy Objective CPO5.11 to include a wider group and remit of trip intensive developments.

6.5.2.7 *National Road Drainage*

The TII submission references the need to protect the national road drainage network. The Council will include a new Policy Objective to protect the drainage system of the national roads.

The TII proposes that the Draft Plan include a policy objective requiring that an assessment of all alternatives for grid connections should be undertaken for new and proposed renewable energy development projects, in order to avoid the assumption of using connections on national roads. The proposed new policy objective is considered suitable and the Council will therefore propose an additional CPO in this regard.

TII identifies the need to update the references and remove the comments to the NRA DMRB. The Council accepts the suggested need to update and review the references to the NRA DMRB to relevant TII guidance as appropriate throughout the Plan and in particular within Section 5.2.3 and policy objectives CPO5.17 and CPO5.57.

The references to the TII Standards document, TII Standard DN-GEO-03084 '*The Treatment of Transition Zones to Towns and Villages on National Roads*' shall be referenced in Section 5.2.3 and CPO5.21. The Council also proposes to insert an additional policy objective to specifically highlight the appropriate treatment of transition zones.

6.5.2.8 *Traffic and Transport Assessment (TTA)*

The Council welcomes the suggested updates to the Draft Plan in respect of Traffic and Transport Assessment (TTA) and Road Safety. The Council will therefore propose the modification of the policy objective CPO5.11 to include the correct TII TTA Guidelines (2014).

Furthermore, the Council will make a revision to the CPO5.24 to reflect the correct distinction and difference between an Road Safety Impact Assessment and a Road Safety Assessment and reference the correct TII publications and guidance materials.

6.5.2.9 *Signage*

The TII comments made in respect of signage and request for additional reference in the existing policy objective is supported by the Council.

6.5.2.10 *Noise*

The Council welcomes the intention of the TII in respect of road noise. The Council agree with the overall proposed intention of the new policy objective. The Council have an identified Noise Action Area and it is proposed to include this reference to the Noise Action Area within the proposed additional policy objective.

Settlement Plans / Development Strategies

The Council welcomes the comments received in respect of the Land Use zonings for Longford Town and Granard. The Council have included these specific comments into the Land Use Zonings responses of the Chief Executive's Report.

6.5.3 Chief Executive Recommendation

CE CH 5.1

To amend the policy objective CPO5.17 as follows:

Protect routes of strategic importance within the County, as outlined below, from further access creation and ~~the discourage~~ intensification of existing accesses and development on national routes. Development on the National and Regional Routes outlined below shall be carefully considered to preserve their strategic role and safeguard the strategic function of the national road network, in accordance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012).

CE CH 5.2

To 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).

CE CH 5.3

To insert new policy objective after CPO5.14 as follows:

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

CE CH 5.4

To insert new policy objective after CPO5.14 as follows:

Protect the study area, route corridor options and thereafter the preferred route corridor selected for the national road schemes being progressed in the Development Plan in accordance with National Development Plan Objectives and to prohibit development that could prejudice their future delivery.

CE CH 5.5

To amend the wording of policy objective CPO5.15 as follows:

Undertake the following Corridor and Route Selection Process for relevant new infrastructure ~~being promoted by the Council, but excluding those national road schemes which are advanced following TII guidelines and policy:~~

CE CH 5.6

To amend the wording of policy objective CPO5.16 as follows:

CPO5.16 Reserve lands in appropriate areas for the improvement, maintenance and management of road traffic systems throughout the County. Lands shall be reserved on proposed route corridors for the following potential schemes:

~~N5 Ballaghaderreen to Scramogue~~

N5 Longford – Scramogue Scheme.
N4 Mullingar to Longford (Rooskey)
N4 – N63 – N5 By-Pass to the South of Longford.
N55 Granard By-Pass
N63 Killashee By-Pass
N55 Edgeworthstown By-Pass
N55 Ballymahon By-Pass
N55 Tonywardan-Ardagullion Improvement
N63 Barnacor Road Re-alignment
N55 Ballymahon to Kilcurry Re-alignment
R392 Newcastle to Forgney Re-alignment

- The Council will investigate the feasibility of these potential schemes, taking into account environmental sensitivities as identified in the SEA Environmental Report and the objectives of the Plan relating to sustainable mobility. Any future proposals for roads shall be consistent with the other provisions contained in the Plan, including CPO 5.15 in relation to Corridor and Route Selection Process.

- Where these corridors have been identified they will be protected from further development prior to the establishment of a final route.

- Where corridors have not yet been developed the Council shall pursue the development of these corridors and shall protect corridors from development once established.

- Where route selection corridors exist, Longford County Council, in consultation with Transport Infrastructure Ireland (TII), shall ensure that the final route is identified within a reasonable timeframe.

CE CH 5.7

To amend the wording of policy objective CPO5.59 as follows:

*Seek the development of effective cycling infrastructure along the key **urban** arterial routes to and from Longford Town:*

- R198 – Battery Road/Church Street/Bridge Street;
- R393 – Dublin Road; and
- the N63 – Ballinalee Road;

*In order to coincide with key employment areas, public transport hubs and schools **within Longford Town**.*

CE CH 5.8

To 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).***

CE CH 5.9

To add a new Policy Objective under Section 5.2.3, after CPO5.30:

Ensure that the capacity and efficiency of the national road network drainage regimes in County Longford will be safeguarded for national road drainage purposes.

CE CH 5.10

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.

CE CH 5.11

To update Section 5.2.3 and policy objectives CPO5.17 and replace the references to the DMRB with the relevant TII Publication as follows:

Protect routes of strategic importance within the County, as outlined below, from further access creation and discourage intensification of existing accesses and development on national routes. Development on the National and Regional Routes outlined below shall be carefully considered to preserve their strategic role and safeguard the strategic function of the national road network, in accordance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012):

- *N4 to Dublin and Sligo & N5 to Castlebar*
- *N55 to Cavan and Athlone & N63 to Galway*
- *R194 Longford to Virginia*
- *R198 Longford/Arvagh*
- *R392 Lanesboro/Mullingar,*
- *R393 Longford to Ballynacarrigy/Mullingar*
- *R395 Edgeworthstown to Castlepollard*
- *R396 Granard to Castlepollard*
- *R397 Longford/Ballymahon*
- *R398 Derraghan to Brickeens*
- *R399 Ratharney to Kilcurry.*

Works to accesses along these routes shall be assessed according to the relevant technical criteria, including the TII/NRA ~~Design Standards.Manual for Roads & Bridges (DMRB).~~

CE CH 5.12

To amend the text under the last paragraph of Section 5.2.3 and insert the text in italics *Continued investment in the county's road and street network is necessary to ensure the sustainable efficient movement of people and goods within the county, to provide access to developing areas and to support economic activity. Longford County Council intends to proceed with a number of specific projects during the period of this plan. In order to implement a range of design measures that ensure roads and streets are designed and managed to cater for all road users, the Council will have regard to the following; ~~Design Manual for Roads and Bridges~~, Design Manual for Urban Roads and Streets (2020), the Guidelines for Setting and Managing Speed Limits in Ireland (2015), ~~TII Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads'~~ and other appropriate standards.*

CE CH 5.13

To insert an additional text in CPO5.20 as follows:

For transitional zones (subject to a speed limit of 60kph before a lower 50kph) on sections of national roads on the approaches to or exits from town centres to provide for a limited level of direct access to facilitate orderly urban development.

*Any such proposal must, however, be subject to a road safety audit carried out in accordance with the TII requirements and a proliferation of such entrances, which would lead to a diminution in the role of such zones, must be avoided and have regard to the following - Design Manual for Urban Roads and Streets (2020), the Guidelines for Setting and Managing Speed Limits in Ireland (2015), **TII Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads (2018)'** and other appropriate standards.*

CE CH 5.14

To revise the 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).***

CE CH 5.15

To amend the Policy Objective CPO5.24 and include the need for an RSA and reference the correct TII Publication as follows:

- c) Require the inclusion of a Road Safety Impact Assessment (RSIA) as part of any proposed development/project of a significant scale which may have potential implications on major transport infrastructure. Such assessments shall be in accordance with ~~the TII publication 'NRA HD 18 Road Safety Impact Assessment'~~. **TII Publications PE-PMG-02001 (Road Safety Impact Assessment 2017)** or any future update.*

*Require that a Road Safety Audit (RSA) shall be undertaken on all new **national** road infrastructure projects, on any schemes or proposals which results in a permanent change to the layout of a national road and any other developments in excess of the thresholds for a TTA and sub-thresholds for a TTA specified in **TII Publications GE-STY-01024 Road Safety Audits 2017**, or any future update.*

CE CH 5.16

To amend the Policy Objective CPO5.30 and include reference to Section 3.8 of the DoECLG Spatial Planning and National Roads Guidelines as follows:

Restrict the use of national, regional and local roads for advertising purposes in line with the Planning and Development Act 2000, as amended, and to implement the provisions of:

- *NRA policy document 'Policy on the Provision of Tourist and Leisure Signage on National Roads'*
- ***Section 3.8 of the DoECLG Spatial Planning and National Roads Guidelines***
- *'Longford County Council Policy on Advertising Signs'.*

CE CH 5.17

Insert a new Policy Objective after CPO5.30 as follows:

Development proposals in proximity to a noise source and located within the Longford County Council Noise Action Area (including existing or proposed national road) should include noise attenuation measures and shall refer to S.I. No. 140 of 2006 Environmental Noise Regulations and Section 3.7 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities.

The costs of implementing mitigation measures shall be borne by the developer / applicant. The Authority will not be responsible for the provision of additional noise mitigation.

6.5.3.1 National Road Scheme Projects – NTA Submission

The NTA Submission DCDP-56 (NTA) also references National Road schemes and projects. This submission identifies the importance of maintaining, improving and protecting the strategic function of the key transport corridors; and that in order to protect the strategic transport function of the national roads, including motorways, the NTA recommends that development objectives should be in accordance with the DOECLG *Spatial Planning and National Roads Guidelines* (2012), and that this should be referenced in the Development Plan.

6.5.3.2 Chief Executive Response

The Council has included reference to the DOECLG *Spatial Planning and National Roads Guidelines* (2012). The Council has also referenced the importance of the national road network. It is further proposed to insert an additional policy objective in respect of the national road network.

6.5.3.3 Chief Executive Recommendation

CE CH 5.18

To insert new policy objective after CPO5.14 as follows:

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

6.5.4 Sustainable Public Transport

6.5.4.1 Transport Guiding Principles

Submission DCDP-56 (National Transport Authority NTA) states that the preparation of the Development Plan should be guided by and include land use policies and objectives which support the consolidation of urban-generated development. Development principles it is stated should reference and include *Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regions*, in both the Guiding Principles on the Integration of Land Use and Transport, and the Tiered Approach to Land Use Zoning as follows:

- For urban-generated development, the development of lands, within or contiguous with existing urban areas should be prioritised over development in less accessible locations. This is of particular relevance to the largest urban areas;
- To the extent practicable, residential development in urban areas should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport, including infill and brownfield sites, are prioritised;

- Larger scale, trip intensive developments, such as offices and retail, should primarily be focused into central locations in urban areas;
- As intensively used, central locations, the management of space in town centres should deliver a high level of priority and permeability for walking, cycling and public transport modes. The key outcome of such an approach would be town centres that are accessible, attractive, vibrant and safe, as places to work, live, shop and engage in community life;
- Planning at the local level should promote walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services and other services at the local level such as schools;
- New development areas should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to give a competitive advantage to these modes for local trip making;
- The density and location of employment development should maximise the potential for the use of walking, cycling and public transport;
- Where possible, new residential developments should provide for filtered permeability, i.e. provide for walking, cycling, public transport and private vehicle access while restricting or discouraging private car through trips;
- Trip destinations (employment sites, schools, retail, etc.) should be developed at locations that can maximise the potential to access such developments by walking, cycling or on public transport;
- The strategic transport function of national roads should be maintained and protected in accordance with national policy;
- All non-residential development proposals should be subject to maximum parking standards;
- In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied – of particular relevance to the larger urban areas; and
- For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing NTA guidance.

6.5.4.2 *Modal Share*

Submission DCDP-56 (NTA) and DCDP-76 (An Taisce) identifies that the Draft Plan does not include any baseline mode share figures to illustrate the existing and current modes of travel at the County and Settlement Level. It is recommended that the Development Plan should include sustainable transport indicators including mode share for the purpose of monitoring the efficacy of policies and development objectives against a range of sustainable development indicators. The submissions seek to promote the use of sustainable transport throughout the County and ensure that public transport and active modes are a viable alternative to private transport and recommend that policy Objectives aim to:

1. Strengthen the use of existing public transport, and
2. Ensure that existing development can access corridors of existing / planned public transport alignments; and is permeable on foot / bike to the access

points, and that future developments are located and laid out to achieve similar levels of access.

6.5.4.3 Public Transport Services in Rural Areas

Submission DCDP-56 (National Transport Authority NTA) identifies the importance of public transport and the publication *Connecting Ireland: Rural Mobility Plan* which aims to improve mobility in rural areas.

The submission recommends that the Development Plan acknowledges the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns; and further states that the Draft Plan should include policy objectives to support the role of rural transport and *Connecting Ireland*.

6.5.4.4 Walking and Cycling

The submissions are broadly supportive and welcome the policy objectives proposed for walking and cycling in the Draft Plan. Several of the submissions identify the link and the opportunities between road network improvements and the support of safe walking and cycling routes. Some of the submissions suggested that Draft Plan should include table and plans that include existing walking and cycling routes within the County; and that these routes should be protected and maintained appropriately

The submission from the NTA (DCDP-56) welcomes the inclusion of policy objectives CPO5.55 and CPO5.69. The inclusion of land-use and transport planning is seen as being key to promote sustainable modes of transport. The Plan should seek to ensure that people are living within walking and cycling distance of their neighbourhood or district centres. The Plan should seek to ensure that new developments are fully permeable for walking and cycling and that the retrospective implementation of walking and cycling facilities should be undertaken where practicable in order to give a competitive advantage to these modes for local trip making.

Submission DCDP-76 (An Taisce) promotes a shift away from investment in road projects and suggests as an alternative the support of public and active transport projects and cycling infrastructure, with existing road space needing to be reallocated for high quality and segregated cycle lanes and footpaths. It is recommended that the current modal split in the County be analysed and that specific targets for 2027 be set in line with the Smarter Travel policy.

The submissions recommend a new objective ensuring that sufficient public transport as well as cycling and pedestrian infrastructure be provided prior to or in tandem with any new residential development.

CPO 5.12-5.30 on Roads and Streets should be amended to contain explicit provisions for the enhancement and expansion of safe cycling and pedestrian infrastructure. It is identified that CPOs 5.55-5.69 do address this infrastructure provision it is submitted that these issues should be integrated with road policies to best facilitate the modal shift required.

6.5.4.5 Sustainable Mobility

Reference is made to the undertaking of a 'permeability audit' for Longford towns and villages, with public consultation. Further reference is made to ensure segregated cycle and pedestrian facilities are provided with any new roads or improvement works, and the necessity for improve public transport provision.

6.5.4.6 Longford Town Transport Plan

The NTA submission DCDP-56 (NTA) identifies and welcomes the inclusion of a commitment to include the preparation of a Local Transport Plan which will inform the review of the Longford LAP - CPO5.9 refers. The NTA submission recommends that an additional objective is included requiring an LTP be prepared for all settlements for which an LAP will be undertaken.

Further, the submission states that the LTP should be prepared in tandem with LAP and that a timeline for delivery should be provided in the Plan and that the development of larger sites within subject settlements be contingent on the completion of the LAP/LTP process. The submission further identifies that the NTA, in conjunction with TII, published a guidance note on *Area Based Transport Assessment* in 2019 which provides guidance on the preparation of Local Transport Plans that is applicable at a range of development scales and settlement types. The NTA recommends that the proposed objective(s) relating to LTPs should make reference to this document.

6.5.5 Chief Executive Response

6.5.5.1 Sustainable Public Transport

The Council welcomes the intention of the Submission from the NTA and the comments made about public transport and Connecting Ireland. The Council has included a detailed Section in the Draft Plan on Sustainable transport which includes a section on public transport and a policy objective that seeks to promote and encourage public transport at CPO5.44. However, it is considered could be revised to mention explicitly the Connecting Ireland; Rural Mobility Plan.

The Council welcomes the intention of the submission from the NTA and the list of bullet points supporting and promoting the compact growth and consolidation of existing settlements. The identified principles are core principles identified in the NPF which all County Development Plans have to include. The Council has included specific sections and associated policy objectives within the chapter supporting these principles. The Draft Plan also includes land use zoning and settlement plans for the key towns, villages and settlements across the County which supports the principles of consolidated growth and development.

The Council welcomes the intention and the principle of the submissions received in respect of sustainable transport indicators. The Draft Plan does include a dedicated Section 5.2.5 specifically targeted at Sustainable Public Transport and a number of policy objectives covering the same topic area CPO5.40 through to CPO5.51. The Council has reviewed the principles of sustainable transport and have developed a proposed framework proposed to be included into the Draft Plan. It is also suggested and proposed to include additional policy objectives into the development plan targeted at developing Sustainable Transport.

6.5.5.2 Walking and Cycling

The Council are committed to the development of safe and accessible walking and cycling infrastructure within and across the County. The Council agrees that the wording of the Policy Objectives could be revised in order to fully identify the opportunities for safe walking and cycling in the County and in the support of long distance inter-county walking and cycling routes.

The Council acknowledges the submission from An Taisce (DCDP-76) which highlights the need to reduce road building and construction and rather to seek to promote sustainable transport options. The Council agrees with the sentiment and highlights that the Draft Plan has and does include a detailed section and policy objectives specifically concerned with the promotion of sustainable transport and cycling and walking facilities.

The Council is also promoting to strengthen this section of the Draft Plan with additional text promoting sustainable transport and policy objectives into the Plan.

6.5.5.3 Sustainable Mobility

The Local Authority recognises under section 5.2.7 'Cycling and Walking' there are opportunities to make walking and cycling more widespread and accessible, and has committed to the implementation of the Design Manual of Urban Roads and Streets, (DTTS and DECLG, 2020), the Permeability Best Practice Guidelines, (NTA, 2013) and the National Cycle Manual (NTA, 2011). Furthermore, and where possible the Local Authority will seek to implement enhanced pedestrian and cycling permeability in urban environments as part of the development management process, in order to provide for continual improvements and coherency to existing cycling and walking network infrastructure with individual settlements. The request to see segregated cycling and pedestrian provision to new improvements works is recognised.

The Local Authority considered the best practice to follow the Design Manual of Urban Roads and Streets and is supported under policy CPO7.6 in *"having regard to national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'"* and by Design Standard DMS16.112.

Finally, the Local Authority is fully committed to sustainability mobility, and in collaboration with Transport Infrastructure Ireland (TII) to establish a set of transport principles to encourage the modal shift to sustainable means of transport.

6.5.5.4 Longford Town Transport Plan

The Council acknowledge the comments made about the proposed Local Transport Plan to accompany the development of the Local Area Plan for Longford Town. The Council welcomes the suggested engagement of TII in this process. The CPO5.9 identifies that other relevant stakeholders will be consulted with. However, it is proposed to include the TII as an identified stakeholder in this process.

In respect of requesting an LTP for other areas, the Council identifies that an LAP will be produced for the main settlement of Longford Town only. In respect of profiling the delivery of the LAP the Council remains committed to the review and completion of

this LAP within the life of the Draft Plan according to resource commitments. The suggestion to reference the guidance note on *Area Based Transport Assessment* (2019) is considered acceptable and appropriate. The Council therefore proposes to insert the reference to the guidance note or any further update of same.

6.5.6 Chief Executive Recommendation

CE CH 5.19

To include the following text into the Development Plan under 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 2030⁶. 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 2040'⁷.

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

- 10) 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;*
- 11) 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;*
- 12) Apply the concept of the 'Complete Street' design to safely 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.*
- 13) Implement measures that will reduce vehicular speed in urban and residential areas for improved safety and system performance, where possible and appropriate;*
- 14) Support the development of high-quality public space that contain small blocks / small streets, urban parks and dense, mixed-use, people-orientated design;*
- 15) 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;*
- 16) 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;*

⁶ https://ec.europa.eu/clima/policies/strategies/progress_en

⁷ <https://www.gov.ie/en/policy/e9ec84-transport/>

- 17) 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;
- 18) Facilitate the efficient movement of goods and people in the interest of commerce and enterprise;
- 19) 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”;
- 20) 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;

CE CH 5.20

To insert the following Sustainable Transport policy objectives after section 5.2.5

- | | |
|--------------|---|
| CPOXX | <i>To 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.</i> |
| CPOXX | <i>to 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.</i> |
| CPOXX | <i>To support and develop public transport routes throughout the County through collaboration with the National Transport Authority.</i> |
| CPOXX | <i>To retrospectively provide public transport, walking and cycling infrastructure and facilities in existing development areas to achieve growth in sustainable mobility.</i> |
| CPOXX | <i>To provide suitable infrastructure on public transport corridors to improve safety and efficiency for public transport users.</i> |

CE CH 5.21

To amend 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.

CE CH 5.22

To 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.*

CE CH 5.23

To insert the following text into the existing policy objective CPO5.63:

*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.

CE CH 5.24

To insert the following underlined text into policy objective CPO5.64:

*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.***

CE CH 5.25

To add the following underlined text into CPO 5.67:

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

CE CH 5.26

To revise 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.***

6.5.7.1 Aviation

Submission DCDP-76 (An Taisce) states that the further expansion of aviation is not compatible with national or European climate commitments.

6.5.7.2 Chief Executive Response

In respect of the submission regarding Aviation (DCDP-76), the Council has sought to reference the existing airfield, the only facility located within the County located at Abbeyshrule. The intention of the land zoning and the policy objectives proposed retention and development of the airfield facility is recognition of the existing facility and the potential opportunities that this could provide for the potential economic development of the County. The Council acknowledges the existing facility and the

potential use and therefore intends to retain the policies included in the development plan relating to aviation.

6.5.7.3 Chief Executive Recommendation

No change.

6.5.8 Water Supply

6.5.8.1 Irish Water (DCDP-65)

It is indicated by Irish Water that the National Water Resources Plan (NWRP) is carrying out a review of all WRZs in the country to determine projects to resolve deficits on a nationwide scale. For WRZs where there are deficits, leakage control and water conservation will be of utmost importance and the availability of water will be on a first come, first served basis with priority given to domestic customers. Developers of non-domestic developments should review their proposals to see if they can maximise efficiency in their water requirements. Longford has five water resource zones (WRZs) and the supply across the county is managed using the interconnectivity between the zones. Comments are made in relation to the availability of supply in each of the 5 no. Water Resource Zones.

6.5.8.2 An Taisce (DCDP-76)

The consideration of compliance with the provisions of the Water Framework Directive and River Basin Management Plans in the granting of planning permissions is welcomed (CPOS 5.81 and 5.84).

It is highlighted that the ongoing proliferation of private wastewater treatment systems will present significant challenges for the achievement of Ireland's legally binding water quality targets under the Water Framework Directive. Therefore, the County Development Plan should ensure the adequate provision of serviced sites within close proximity to established water/wastewater infrastructure, where a connection to services can be readily facilitated, and where there is sufficient cumulative capacity within the wastewater treatment plant.

6.5.8.3 HSE (DCDP-69)

The HSE have submitted that the Council should have regard to the National Biodiversity Plan 2017-2021 in its protection of water sources, in its Water treatment plants and facilities under its control. The restoration of freshwater ecosystems should be considered as part of water source protection work which needs to be biodiversity sustainable. There needs to be more meaningful engagement with the agricultural sector affected by the location of water sources and catchment areas on their land to move towards a more mutually beneficial working relationship which will benefit the basin management plans and would hopefully also help in the move towards reducing the use of pesticides and nutrient losses as expected under the European Green deal.

While bearing in mind the need to conserve water especially during drought periods the EHS would like to see public drinking water facilities become available in public areas during the lifetime of this plan. This would be subject to the public water supply being adequate for community needs. The implementation of free water refills schemes in towns and villages in the county should also be considered.

6.5.9 Chief Executive Response:

6.5.9.1 Irish Water

The comments in relation to Water Infrastructure and Supply are noted.

It is considered that the following CPO's which have already been included in the Draft Plan address the issue: -

CPO 5.72 Work in conjunction with Irish Water to protect existing water infrastructure, to maximise the potential of existing capacity and to facilitate the timely delivery of new water services infrastructure to facilitate future growth.

CPO 5.77 Ensure that adequate water services is available to service development prior to the granting of planning permission and to require developers to consult Irish Water regarding available capacity, prior to applying for planning permission.

CPO 5.78 Promote the sustainable use of water and water conservation in existing and new development within the County by encouraging demand management measures among all water users and requiring new developments to incorporate water conservation measures.

As such no additional policy is considered necessary.

As per section '5.3.1 Water Supply' it is noted that the number of public water supply schemes has been numerically indicated wrongly as 6 no. public water supply schemes, although the correct 5 no. schemes in accordance with the Irish Water submission have been listed. Accordingly, the number indicated should be correctly changed from 6 no. to 5 no.

6.5.9.2 An Taisce

The positive comments in relation to CPO 5.81 and CPO 5.84 are noted. As outlined in Chapter 4: Core, Settlement and Housing Strategies the County Development Plan contains a focus on compact urban growth in accordance with higher level policy as contained in the National Planning Framework and the Regional Spatial and Economic Strategy.

6.5.9.3 HSE

In chapter 5 as per '5.3.1 Water Supply' it is noted that the protection of our surface and groundwater sources is a key challenge facing Longford in the future, and to ensure that existing water services infrastructure and capacity is adequately managed, which includes the ongoing implementation of a Water Conservation Programme. Practical water conservation measures including active leakage detection, demand management and pressure management have played and will continue to play a major role in reducing the demand for potable water, thus facilitating additional development and improving the level of service to existing consumers in the county through the existing watermain networks. The Council will continue to engage with Irish Water to ensure that the future demands of the county are provided for and will continue to promote water conservation in conjunction with Irish Water.

A number of policies relating to water supply and distribution are included in the Draft Plan and are considered adequate.

6.5.10 Chief Executive Recommendation CE CH5.27

In section '5.3.1 Water Supply' amend the following text from 6 no. to 5 no. as follows:

Public drinking water in County Longford is supplied through 5 no. public water supply schemes (Longford Central; Granard; Gowna; Ballymahon; Lanesborough and Newtowncashel).

6.5.11 Wastewater Services 6.5.11.1 Irish Water (DCDP-65)

It is indicated by Irish Water that the County is served by 20 wastewater treatment plants and that available capacity at any plant varies daily and that where there are constraints, applications for developments would be on a first come, first served basis. It is indicated that if no project is associated with a constrained area, then any infrastructure will be developer led. Irish Water can work with developers to form the best solution for a particular site. This would be through the Connections and Developer Services section of Irish Waters website.

A table has been provided which gives a snapshot of capacity of some of the larger settlements (these figures are estimates and are subject to change). It is indicated that there are constraints in the sewer networks in some settlements.

Other areas, particularly if zoning changes are proposed, infrastructure will have to be assessed on a case by case basis. Developers should enquire through the aforementioned web link.

In terms of the wastewater networks it is indicated that throughout the County, general capital maintenance upgrades are on-going through Network programmes based on needs. This includes rehabilitation of sewers, upgrades to pumping stations, assessment of storm water overflows and installation of telemetry in line with national programmes.

6.5.11.2 An Taisce (DCCP-76)

It is highlighted that the ongoing proliferation of private wastewater treatment systems will present significant challenges for the achievement of Ireland's legally binding water quality targets under the Water Framework Directive. Therefore, the County Development Plan should ensure the adequate provision of serviced sites within close proximity to established water/wastewater infrastructure, where a connection to services can be readily facilitated, and where there is sufficient cumulative capacity within the wastewater treatment plant.

The insertion of a policy objective is recommended to promote changeover from septic tanks to public collection networks in all cases where this is feasible.

6.5.11.3 Chief Executive Response 6.5.11.3.1 Irish Water

The comments from Irish Water in relation to Wastewater Infrastructure are noted. It is considered that the text contained within Section '5.3.2 Wastewater' of the Draft Plan and the specific detail in relation to '5.3.2.1 Serviced Areas' and '5.3.2.2 Unserviced Areas' along with the following CPO's which have already been included in the Draft Plan address the issue:-

CPO 5.80 Liaise and work in conjunction with Irish Water during the lifetime of the Plan in the provision, upgrading or extension of wastewater collection and treatment systems in the County to serve existing and planned future populations and enterprise in accordance with the requirements of the Core Strategy.

CPO 5.81 Ensure that development will only be permitted in instances where there is sufficient capacity for appropriate collection, treatment and disposal (in compliance with the Water Framework Directive and River Basin Management Plan) of wastewater.

CPO 5.82 Collaborate with Irish Water in contributing towards compliance with the relevant provisions of the Urban Wastewater Treatment Regulations 2001 and 2004 and the Wastewater Discharge (Authorisation) Regulations 2007 as amended.

CPO 5.83 Support strategic wastewater treatment infrastructure investment and provide for the separation of foul and surface water networks to accommodate future growth in the County.

The following CPO 5.84 is also noted:-

Have regard to the capacity of the Edgeworthstown and Ballymahon wastewater treatment plants, with any further growth in these settlements contingent on the upgrading of these treatment plants, or the submission of appropriate temporary engineering solutions for individual developments which suitably address wastewater treatment and disposal to the satisfaction of the Council and Irish Water and in accordance with the provisions of the Water Framework Directive and relevant River Basin Management Plan.

However, in relation to CPO 5.84 which specifically relates to capacity issues in Edgeworthstown and Ballymahon it is considered that this could be widened to include reference to 'any other plants within the County of limited capacity to accommodate the core strategy and settlement hierarchy'. This in conjunction with existing CPO 5.80 which relates to the entire county should assist in ensuring development takes place in accordance with infrastructure provision and core strategy requirements.

6.5.11.3.2 An Taisce

The comment from An Taisce in relation to wastewater are noted. As outlined in Chapter 4: Core, Settlement and Housing Strategies the County Development Plan contains a focus on compact urban growth in accordance with higher level policy as contained in the National Planning Framework and the Regional Spatial and Economic Strategy.

In terms of the proliferation of septic tanks Chapter 12: Natural Heritage and the Environment, the following CPO is noted:

CPO 12.85 Discourage the over-concentration of individual septic tanks and treatment plants to minimise the risk of groundwater pollution.

The content of Chapter 5 and specifically section '5.3.2.2 Unserved Areas' should also be noted. In terms of policy content, it is accepted that the inclusion of a policy to promote changeover from septic tanks to public collection networks in all cases where this is feasible should be included in Chapter 5.

6.5.12 Chief Executive Recommendation

CE CH 5.28

Amend CPO 5.84 to include the following additional text as indicated: -

Have regard to the capacity of the Edgeworthstown and Ballymahon wastewater treatment plants (and any other plants within the County of limited capacity to accommodate the core strategy and settlement hierarchy), with any further growth in these settlements contingent on the upgrading of these treatment plants, or the submission of appropriate temporary engineering solutions for individual developments which suitably address wastewater treatment and disposal to the satisfaction of the Council and Irish Water and in accordance with the provisions of the Water Framework Directive and relevant River Basin Management Plan.

CE CH 5.29

Include the following additional CPO text after existing CPO 5.87:

'Promote changeover from septic tanks to public collection networks in all cases where this is feasible'.

6.5.13 Flood Risk Management

This should be read in conjunction with the appropriate submissions received on specific settlements as detailed in Part 2, section 7; the Strategic Flood Risk Assessment (SFRA) (Part 2, section 9); mapping contained within Part 3: Appendix 8; and Appendix 15 in relation to an additional table in the SFRA.

6.5.13.1 Support for content

The OPW welcomes the acknowledgement of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), hereafter referred to as the 'Guidelines' and the proposed measures set out in the Flood Risk Management Plans (FRMPs) based on the work undertaken for the CFRAM Programme, and the preparation of a Strategic Flood Risk assessment (SFRA). In particular, the OPW welcomes:

- The commitment to address surface water flooding issues and the need for SuDS (Objectives CPO 5.90, 5.92 and 5.93)
- The recognition of the potential impacts of climate change on flood risk and the need to address these impacts (Objective CPO 3.1, 3.4 and 5.107)
- The commitments to managing flood risk in line with the Guidelines and the measures set out in the FRMPs (Objectives CPO 5.95 - 5.109).

6.5.13.2 Chief Executive Response:

The comments made are noted. OPW climate change scenario mapping to be added to SFRA Appendix II.

6.5.13.3 Chief Executive Recommendation:

CE CH 5.30

OPW climate change scenario mapping to be added to SFRA Appendix II.

6.5.14.1 Sequential Approach and Justification Test

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. It would appear that 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 Justification Test as set out in the Guidelines does not appear to have been applied or reported in the preparation of the Draft Development Plan. 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. Proposed land use zones within Flood Zones A and B are shown in the settlement zoning maps, some of these zone types are classified as Highly vulnerable development in the Guidelines.

No commentary has been provided to demonstrate that the Justification Test has been applied in proposing vulnerable development zoning within Flood Zones A and B.

6.5.14.2 Chief Executive Response

As stated in Section 4.4 of the SEA Environmental Report:

*“The Justification Test (including its various criteria – see **Appendix I**) is required to be passed whereby highly vulnerable⁸ land uses are being proposed on undeveloped lands in Flood Zone A or whereby highly and/or less vulnerable land uses are being proposed on undeveloped lands in Flood Zone B.*

This requirement did not arise as the levels of flood 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.

With respect to lands which have already been developed, the potential conflict between zonings and highly and less vulnerable development will be avoided by applying the constrained land use approach, with blue hatched shaded zone, ‘Constrained Land Use’, applied on the land use zone mapping in order to differentiate that there is a flood risk issue. This approach is established and tested and consistent with the requirements of the Flood Risk Management Guidelines and associated Circular PL 2/2014.

⁸ For details on what types of development are considered highly vulnerable, less vulnerable or water compatible please refer to **Error!**
Reference source not found..

Although Stage 3 detailed flood risk assessment has not been required for the Plan-preparation process thus far, it may be required for individual projects following adoption of the Plan.”

It is proposed to add additional text to this section of the SFRA.

**6.5.14.3 Chief Executive Recommendation
CE CH 5.31**

On lands zoned ‘Constrained Land Use’ no further zoning will be considered, and the lands will be amended for the relevant settlements as indicated in the Land Use Zoning portion of this report.

CE CH 5.32

To insert the following into SFRA Section 4.4 “Justification Test” after the sentence *“This approach is established and tested and consistent with the requirements of the Flood Risk Management Guidelines and associated Circular PL 2/2014”*:

“Table 6 provides a justification of the Constrained Land Use approach for previously developed lands.” - See Appendix 11 for Table 6 to be included.

6.5.15.1 Constrained Land Use Zoning

The OPW welcomes that flood zone mapping has been included in the settlement zone maps for larger settlements, as zoning type Constrained Land Use, and Objective 5.108, that the management of flood risk in this zone type will be facilitated by Longford County Council. The County Development Plan further outlines that developments within this zone will require a detailed flood risk assessment. It would be beneficial if the Constrained Land Use zoning could also be used for Rural Settlements to highlight the lands at flood risk and require a flood risk assessment in these smaller settlements.

6.5.15.2 Chief Executive Response

SFRA datasets will be made available to the lower-tier forward planning and Development Management and associated SFRA/FRA processes in the Council. It is proposed to update County Policy Objective - CPO 5.108.

**6.5.15.3 Chief Executive Recommendation:
CE CH 5.33**

To add the following text to County Policy Objective CPO 5.108:

“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.”

6.5.16.1 Waste

In terms of waste management, it is submitted in Submission DCDP-69 that Longford County Council should implement measures and set targets to reduce its own waste. Also, other waste measures which could be implemented are identified which include:

- a) Implement waste prevention measures with local business and community groups.
- b) Include community waste prevention demonstration programmes, which provides skills to develop waste prevention within local communities.
- c) The use of easily accessible public recycling bins should be considered for public areas, paths and green spaces that will allow for adequate waste segregation and will encourage the use of the waste management hierarchy.
- d) Food waste reduction initiatives and incentives should be implemented in homes and in business.

Submission DCDP-79 suggests an additional policy objective in this section of the Draft Plan as follows:

‘Ensure that all waste collectors and householder who use the services of authorised waste collectors are fully compliant with the Waste Management Act 1996, as amended and the Waste Management (Collection Permits) Regulations 2007, as amended’.

6.5.16.2 Chief Executive Response

As per section ‘5.6.1 Waste Recovery and Disposal’ of the Draft Plan it is indicated that the Eastern and Midlands WMP sets out 3 no. specific and measurable performance targets to:

- achieve a 1% reduction per annum in the quantity of household waste generated per capita over the period of the Eastern and Midlands WMP.
- reduce to 0% the direct disposal of unprocessed municipal waste to landfill (from 2016 onwards), in favour of higher value pre-treatment processes and indigenous recovery practices.
- achieve a recycling rate of 50% of managed municipal waste by 2020.

The NPF supports circular economy principles (NPO 56) that minimise waste going to landfill and maximises waste as a resource, with prevention, preparation for reuse, recycling and recovery prioritised in that order over the disposal of waste. The NPF (NSO 9) also supports the development of district heating networks where technically feasible and cost effective as well as the development of necessary and appropriate hazardous waste management facilities to avoid the need for treatment elsewhere. Similar circular economy principles in relation to waste management are supported in the RSES through RPO 10.25. As such it is considered that there are targets in relation to waste management and the local authority will be subject to these targets.

In terms of the additional measures that are recommended it is considered that they are more generally already accommodated within the existing policies included. In particular attention is drawn to the following policy:

CPO 5.114 Promote and facilitate communities to become involved in environmental

awareness activities and community-based recycling initiatives or environmental management initiatives that will lead to local sustainable waste management practices.

In respect of the submission DCDP-79 and the proposed new Policy Objective the Council welcomes this suggestion and proposes to include a new policy objective.

6.5.16.3 Chief Executive Recommendation CE CH 5.34

To include a new Policy Objective after CPO5.118 as follows:

Ensure that all waste collectors and householder who use the services of authorised waste collectors are fully compliant with the Waste Management Act 1996, as amended and the Waste Management (Collection Permits) Regulations 2007, as amended.

6.5.17.1 Sustainable Industry

To ensure more sustainable and environmentally respectful production cycles, to include the following:

1. Promote and facilitate the incorporation of energy efficient design into projects;
2. Develop and implement an energy management programme for all public buildings to ensure energy efficiency (i.e. the big switch off);
3. Develop skillsets in areas such as green procurement, carbon accounting, carbon management and energy management.

6.5.17.2 Chief Executive Response

1. The existing Draft Development Plan detail under 'Development Management Standards – Climate Change and Sustainable Buildings' adequately addresses the issue. The Council in assessing development proposals will consider multiple criteria to encourage the delivery of sustainable and energy efficient design including DMS16.1 thereby *"encouraging renewable development proposals which contribute positively to reducing energy consumption and carbon footprint"*;
2. The proposed integration of a Building Management System (BMS) into all public building is considered a positive step and implementable for those under Local Authority ownership and/or occupation;
3. The existing Draft Development Plan detail under 'Climate Action' A8.4 commits to Longford County Council *"applying the principles of the voluntary Green Public Procurement (GPP) initiative in accordance with the Office of Government Procurement (OGP) across all local authority procurement, wherever feasible"*.

6.5.17.3 Chief Executive Recommendation CE 5.35

The request for the proposed integration of a Building Management System (BMS) is supported and the following inserted into Chapter 5 'Transport, Infrastructure, Energy and Communications – Climate Actions' recommended.

Longford County Council shall: Require the integration of a Building Management Systems (BMS) at its primary office locations for the benefit of reducing energy and maintenance costs.

6.5.18.1 Environmental Awareness

There needs to be active education and the community must be informed and involved in protecting the natural environment.

6.5.18.2 Chief Executive Response

This is considered addressed within the Draft Development Plan under policy CPO 5.114 whereby *“It is the County Policy Objective to: Promote and facilitate communities to become involved in environmental awareness activities and community-based recycling initiatives or environmental management initiatives that will lead to local sustainable waste management practices.”*;

6.5.18.3 Chief Executive Recommendation:

No change.

6.5.19.1 Rainwater Harvesting

Submission DCDP-83 (PPN) states that the Council should develop water harvesting and conservation projects. With all commercial buildings being assessed for the installation of grey water harvesting systems. All future developments should be encouraged to have rainwater harvesting systems including water butts.

6.5.19.2 Chief Executive Response

The Council actively promotes the principle of rainwater harvesting especially in respect of reducing surface water run-off and has included specific policy objectives in the Draft Plan in this regard. Section 5.4 and includes a number of specific policy objectives related to the topic under CPO5.89 to CPO5.94.

6.5.19.3 Chief Executive Recommendation

No change.

6.5.20.1 Air Pollution

Air pollution must be reduced with all county residents encouraged to use smokeless coal and to cessate burning of peat briquettes and/or turf. Effective and consistent enforcement of the Smoky Coal Ban in Longford Town.

6.5.20.2 Chief Executive Response

This is considered addressed within the Draft Development Plan, and not limited to, policy CPO 5.117 where *“It is the County Policy Objective to: Control development within its powers through the planning process in order to prevent and/or limit the impact of potential air, water and soil pollution.”* and CPO 12.75 to *“Pursue the preparation, establishment and implementation of/compliance with the following (and any future updates): EU and National legislation on the prevention of Air and Noise Pollution.”*

6.5.20.3 Chief Executive Recommendation:

No change.

6.5.21 Energy Networks Infrastructure**6.5.21.1 Electricity Network**

Submission DCDP-13 (EirGrid) and DCDP-77 (ESB) supports the inclusion of policy objectives relating to electricity transmission and distribution. CPO5.119 and 5.121 which deal with promoting the sustainable improvement and expansion of electrical transmission and distribution (CPO5.119) and electricity and gas supplies and associated networks (CPO5.121).

In County Longford specifically there is significant transmission infrastructure in the county given its central location on the island. EirGrid have developed a programme of projects which are detailed in the EirGrid Transmission Development Plan 2020-2029 and includes the following:

- Flagford – Louth 220 kV Line Refurbishment Project
- Cloon – Lanesboro 110 kV Line Refurbishment Project
- Lanesboro 110 kV Station Redevelopment
- Richmond 110 kV Station Power Flow Control Scheme.

CPO 5.123 states *“Require that the location of local energy services such as electricity, be undergrounded, where appropriate.”*

Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure (July 2012) emphasises the strategic and economic importance of investment in networks and energy infrastructure whereby the Government has mandated the State-owned Networks Companies *“to deliver the State’s network investment programmes in the most cost efficient and timely way possible in the interests of all energy consumers who need the investment and who also pay for it.”*

Restrictive policies which outline the preferred option in advance of the required analysis and planning process are not consistent with the policies and objectives of the Government which require *“that these investment programmes are delivered in the most cost efficient and timely way possible, on the basis of the best available knowledge and informed engagement on the impacts and the costs of different engineering solutions.”* Therefore, it is suggested that CPO 5.123 could act as an impediment to the achievement of EirGrid objectives and that it be amended to exclude transmission grid infrastructure

6.5.21.2 Chief Executive Response

The Council appreciates and acknowledges the detailed programme of infrastructure improvements as detailed in the submission from EirGrid and the ESB. The CPO’s detailed in the section of the chapter make reference to encouraging the upgrading and the improvement of energy supply networks. However, it is and remains a Policy Objective of the Council to request and aim for the undergrounding of such supply to development sites, in order to protect and retain the visual amenity of the local area.

In terms of the CPO 5.123, it is considered that this is a Policy Objective suggested that there is a distinction between transmission power lines and localised networks and that an additional policy objective be added to the Section of the Plans. The existing CPO5.123 shall be kept and re-numbered as CPO5.124

CPO 5.123: *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.*

6.5.21.3 Chief Executive Recommendation CE CH5.36

The Council will 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.

CE CH5.37

To amend the wording of policy objective CPO 5.124 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.*

6.5.21.4 Gas Network

DCDP-76 (An Taisce) submits that there is no capacity for further expansion of the fossil gas networks under national, EU and international climate policy.

6.5.21.5 Chief Executive Response

The Council welcomes the intention and the principle of the submission in respect of the development of Gas Networks and infrastructure. The Council is keen to make the transition from high polluting fuel sources to cleaner and renewable forms. The use of gas is recognised as being a cleaner alternative and recommended for current use. The Council is committed to both the use and development of cleaner fuels and the development of renewable energy and this is fully stated within the Draft Plan

6.5.21.6 Chief Executive Recommendation

No change.

6.5.21.7 Renewable Energy

Renewable Energy Targets

Submissions DCDP-68, DCDP-74, DCDP-77, DCDP-79 and DCDP-81 all reference the EC Energy Roadmap 2050 which commits the EU to reducing greenhouse gas emissions to 80-95% below 1990 levels by 2050 and it is stated that Europe's energy

production will have to be carbon-free by 2050. The submission requests that the Draft Plan fully elaborates further on the National and International policy for climate change and the provision of renewable energy and that the Draft Plan includes a firm policy framework that supports renewable energy proposals.

The National Climate Action Plan (CAP) 2019 has set a target of 70% for renewable energy production by 2030 that the amount generated from renewables will have to double, with onshore wind generation providing the majority of required electricity. This will require the installation of 4GW of new wind energy developments over the next decade.

Renewable Energy Strategy

The submissions welcome the preparation of a dedicated Renewable Energy Strategy for the County over the lifetime of the forthcoming Draft Plan as stated within CPO5.129 and of the Policy Objectives in respect of Solar Energy. A number of recommendations are made as follows:

1. The Draft Plan includes a firm policy framework that supports renewable energy proposals and recognises the specific development requirements to facilitate large, grid scale renewable energy projects at suitable locations in the County.
2. The Draft Plan includes a specific CPO supporting utility scale solar development at suitable locations, where it can be demonstrated that there are no significant adverse impacts to landscape or local amenity.
3. In preparing the County Renewable Energy Strategy and in the identification of Strategic Energy Zones that the Council does not adopt an overly restrictive approach in establishing the acceptable locations for solar PV developments but rather assesses developments on their merits on a case-by-case basis.

Submission DCDP(TII) states that for all renewable energy developments requiring a grid connection to the national grid, an assessment of all alternatives should be undertaken and considered. It is considered inappropriate to only consider utilising the strategic national road network as a grid connection route when alternatives are available.

Potential of Peatlands for Renewable Energy

Submission DCDP-79 references the character, size and scale of the cutaway bogs in their ownership and the contribution that these lands can make. The potential and suitability of the peatlands for the wind energy is highlighted in the National Planning Framework. The submission makes reference to the Derryadd Wind Farm and the commitment to delivering the project. The inclusion of the text in Section 5.8.1.1 on Commercial Wind Energy in the Draft Plan and the Policy Objectives in particular the following are welcomed:

CPO5.129 - 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.

CPO5.137 - Encourage proposals for commercial wind energy developments to be located on cutaway peatlands in those areas identified as having wind potential within the county, as defined in Appendix 2, subject to environmental, landscape, habitat and wildlife protection requirements being addressed.

Submission DCDP-81 (IWEA) welcomes and is generally supportive of CPO's 5.124, 5.125, 5.126, 5.127, 5.128, 5.129, 5.130, 5.131, 5.133 and 5.134. The submission makes specific comments in respect of CPO5.128 and CPO5.129 in that IWEA requests the Council to urge EMRA to initiate and complete this study at the earliest possible date:

CPO5.128. "the identification of Strategic Energy Zones" – areas suitable to accommodate large energy generating projects within the Eastern and Midlands Regional Areas.

CPO5.129 "prepare a Renewable Energy Strategy for the County over the lifetime of this Plan and subject to the availability of resources.

6.5.21.8 Chief Executive Response

It is considered that the Draft Plan has provided a detailed and comprehensive overview for the provision of renewable energy and is broadly supportive as schemes as evident in the Plan. The Council is working to secure and assist in the delivery of renewable energy projects across the County and to support this further the Council is committed to the delivery of a Renewable Energy Strategy, including a Wind Energy Strategy during the life of the Draft Plan.

The Council will include the details of approved / granted renewable energy schemes in the Draft Plan in order to provide context and detail in respect of the direction that the County is making in respect of renewable energy and the support of the National Climate Action Plan (CAP) 2019 targets.

The Council welcomes the comments about grid connections. The Draft Plan already contains specific references to the importance of grid connections and the need to ensure that these are fully assessed. The existing policies included in the Draft Plan are considered adequate.

The Council welcomes the intention and the principle of the submission in respect of CPO5.128 and CPO5.129. The Council remains committed to contributing towards the CPO5.128 which is a regional wide objective and will work with EMRA and neighbouring and adjoining Council's. The Renewable Energy Strategy will seek to include a Wind Energy Strategy as part of the wider Strategy document and will be progressed during the lifetime of the proposed Plan. The timing of the delivery of these key pieces of work is beyond the direct influence of the Council and not in the scope or the remit of the Draft Plan. However, the Council will continue to work EMRA in the progress and delivery of the work.

6.5.21.9 Chief Executive Response

CE CH 5.38

Insert the following text into Section 5.8 Renewable Energy

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
Total Granted		175.1MW High estimate / 160.1MW low

The Council considers that securing a balance between renewable energy sources is the appropriate direction and that identifying appropriate areas within the County for potential wind generation the County can aim to direct potential wind generation schemes in the future. In the absence of national renewable energy targets the County has performed well in being able to secure a number of projects for future development. In considering the identified national target of 4GW over the next ten years and in looking at the land area of Longford the following figures are identified:

- Land area Longford (1,091km²) 1.6% of the whole state = 70,273km²
- 4GW required new renewable energy for National (CAP) = approx. 64MW apportioned for County Longford (1.6% of 4GW)

6.5.21.10 Wind Energy National Targets

The County has an important role in meeting the national targets and should be proactive in identifying appropriate areas and targets for renewable energy and wind generation schemes. The objective to prepare a Renewable Energy Strategy is supported and this should include/incorporate an updated Wind Energy Strategy. The County has no operating wind farms; but the Derryadd Wind Farm will generate 96MW in the coming 2-3 years when fully operational.

It is indicated that as a consequence a sufficient quantum of lands will be required to allow for the natural attrition rates of sites deemed theoretically acceptable. In order to deliver 4.2GW of new onshore by 2030 will require a potential quantum of land of 15-20GW. It is suggested that the Development Plan classify a sufficient quantum of land as being suitable for wind energy to ensure national renewable energy targets and to demonstrate how the quantum of lands are suitable for this purpose.

Submission DCDP-81 states that in the absence of national / regional assembly guidance the local authority should seek to identify enough land to accommodate as much as possible of the additional 4.2GW of additional onshore wind energy by the Climate Action Plan by 2030. The sieve analysis is referenced by the SEAI which states the quantum of land gets refined and reduced down.

Wind Energy Strategy

Submissions DCDP-70, DCDP-74, DCDP-77, DCDP-79 and DCDP-81 acknowledge and welcome the potential contribution of wind energy can make as a clean and sustainable solution to energy requirements and its vital role in helping achieve national targets. The submissions support the preparation of the Renewable Energy Strategy and recommend that this will include an update of the Wind Energy Strategy. In finalising and progressing the WES the Council should not consider the following potential constraints in the process of identifying areas:

1. Grid Capacity.
2. Wind Speed.
3. Nature Conservation Areas

Areas of Windfarm Potential

The submissions highlight Appendix 2 “Areas of Windfarm Potential”, and that the map depicts 2 designations of ‘Preferred Locations’ and ‘Non-preferred Locations’ with no detailed description about how they were designated.

There are 120km² of potentially unconstrained lands in County Longford which could potentially host wind turbines, but the proposed map indicates an area of 60km², with half of this land including the Derryadd windfarm, leaving only an area of 30km² for future potential windfarms.

It is requested that the map in Appendix 2 Areas of Windfarm Potential be removed in anticipation of the proposed new Renewable Energy Strategy. Submissions DCDP-70 and DCDP-81 suggests that the County has good wind energy resource potential, excellent electricity transmission infrastructure, and as county with a heritage of electricity generation. It suggests that the County needs a progressive and ambitious WES with clear and supportive policies in favour of further wind energy development.

Submission (DCDP-79) states the map included in Appendix 2 – Areas of Windfarm Potential appears to have been developed using SEAI data on wind speeds across the County. The Submission identifies that’s it is the intention to continue developing renewable energy projects within the cutaway bogs. The map appears to exclude many of the Counties Bord na Móna bogs. The submission requests that the Council carries out a full assessment of renewable energy development in compliance with the methodologies outlined in the SEAI Methodology for Local Authority Renewable Energy Strategies (LARES), with the current Wind Energy Development Guidelines (2006) and the Draft Revised Guidelines (2019) – it is stated that this will ensure a consistent and transparent renewable energy zoning methodology. The Submission also suggests that the Council reviews the Landscape Character Assessment in order to ensure a consistent approach to the determination of lands suitable for the development of wind energy developments.

In terms of appendix 2 the map it is stated identifies 3 no. areas as being preferred locations which the area is estimated to be 60km² (Derryadd wind farm = 50% of these lands). The proposed Plan it is suggested leaves little scope for future development of wind energy in the County. The Submission requests and promotes a Regional-Approach of wind farm developments, fitting in with the principles of the RSES, providing a consistent methodology, identify optimum locations, landscape sensitivity being assessed on a broader and regional scale, providing a consistent, evidence-based landscape policies across local authority areas.

Landscape Capacity and Sensitivity

Historic WES in providing guidance for the siting of windfarm have tended to direct them towards landscapes of lower sensitivity, as such areas are deemed to have higher capacity to accommodate wind energy projects. As renewable energy targets increase wind energy developments will have to extend from least sensitive landscapes with the most capacity into areas of slightly more sensitive landscape. The most scenic parts of the County can still be protected and deemed not normally permissible for wind energy in the WES.

Environmental Issues

Submission DCDP-81 makes reference to the following policy objective:

CPO 5.134 - Ensure environmental assessments for new energy developments should address reasonable alternatives for location.

Where existing infrastructural assets such as sub-stations, powerlines and roads already exist within proposed development areas, then such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development.

The submission states that the identified Assessment of Alternatives should be no more onerous than required by legislation i.e. in accordance with Article 5 of Directive 2014/52/EU and as may be interpreted by CJEU rulings e.g. Case C-461/17.

The submission welcomes the aspirations contained within Section 5.8.1.1 in respect of using cutaway peatlands for wind energy, given that many of these areas are served with an extensive electrical transmission network already in place. The submission identifies specific issues with CPO 5.136 and CPO 5.137 and CPO 5.138 which in respect of the former references the Renewable Energy Strategy and Appendix 2 Areas of Windfarm Potential in the latter two. The submission seeks clarity in respect of the map and questions whether this forms part of the RES and, or if this map will be revised in the development of the RES.

Draft Wind Energy Development Guidelines (2019)

A number of submissions reference the current Draft Wind Energy Development Guidelines (2019), which are due to be finalised in 2021. It is suggested that referencing the draft guidelines would provide a more consistent and comprehensive basis for their assessment and consideration (DCDP-77 and DCDP 81). Further the submission (DCDP-77) identifies the need to establish consistency across neighbouring and adjoining Planning Authorities and Council's in order to ensure a common approach and in order to maximise potential of future wind farm projects.

The inclusion of CPO5.135 is welcomed but an amendment of the wording in order to directly reflect the wording in Policy 7.36 of the RSES as follows is suggested:

‘Planning policy at local authority level shall reflect and adhere to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications relating to ‘Wind Energy Development’ and the DCCAE Code of Practice for Wind Energy Development in Ireland on Guidelines for Community Engagement and any other relevant guidance which may be issued in relation to sustainable energy provisions’.

Noise

The submission comments on CPO5.139 which makes specific reference to ensure proposals for energy development demonstrate that human health has been considered, including those relating to the topics of noise (including consistency with the World Health Organisation’s 2018 Environmental Noise Guidelines for the European Region).

Submission DCDP-14 (Dept of the Environment, Climate and Communications)

The submission is generally supportive of the Draft Plan and proposed policy objectives in respect of Renewal Energy and Windfarms. The submission states that CPO 5.138 identifies and lists the criteria for the assessment of wind energy development proposals. It is suggested that the County Geological Sites be included into criteria for the assessment of wind energy development already listed in the CPO.

Wind Farm Development Levies

The Development Contribution Scheme 2018-2022 Table 2 identifies the amount to be charged for Category H – Industrial Wind Farm Development / Turbines is €71,600 per MW. This is identified as being 7 times the identified norm of €10k charged by most other Local Authorities. This renders many smaller and community wind farm projects in County Longford uncompetitive. Additional information should be provided on the proposed use of the funds and the proposed use of the funds and the justification for the proposed increase to be levied on the wind farms.

Micro and Community Wind Energy Development

Submission DCDP-70 references the inclusion of small scale and community-based wind and renewable energy projects. It is suggested that the development of such projects should be better promoted and encouraged with an additional policy objective.

6.5.21.11 Chief Executive Response

The Council acknowledges the statement about the County having no current wind farms located within the immediate geographical area of the County; however, it is noted that An Bord Pleanála (June 2020) granted permission for a 96Megawatt windfarm at Derryadd. 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.

Securing a balance between renewable energy sources is the appropriate direction and that identifying appropriate areas within the County for potential wind generation

the County can aim to direct potential wind generation schemes in the future. In the absence of national renewable energy targets the County has performed well in being able to secure a number of projects for future development.

In considering the identified national target of 4GW over the next ten years and in looking at the land area of Longford the following figures are identified:

- Land area Longford is relatively small (1,091km²) 1.6% of the whole state = 70,273km²
- 4GW required new renewable energy for National (CAP) = approx. 64MW apportioned for County Longford (1.6% of 4GW)

The County has already secured a considerable proportion of renewable energy projects = 160MW / 175MW, and it is anticipated that additional projects will be facilitated in appropriate locations during the course of the next County Development Plan 2021-2027. It is noted that the Derryadd Wind farm project approved by ABP in June 2020 and contributes 60% of this total.

The Council will prepare the Renewable Energy Strategy for the County during the life of the County Development Plan which will include a review of solar and wind generation projects and other such schemes, the Strategy will further include a Wind Energy Strategy. Policy Objective CPO5.129 will be revised and amended to include the review and preparation of a Wind Energy Strategy.

The Council remains committed to contributing towards the CPO5.128 which is a regional wide objective and will work with EMRA and neighbouring and adjoining Council's. The Renewable Energy Strategy will seek to include a Wind Energy Strategy as part of the wider Strategy document and will be progressed during the lifetime of the proposed Plan.

Appendix 2 Areas of Windfarm Potential

This will be retained in the Draft Plan. The attached map was developed in previous iterations and versions of the County Development Plan. The lands identified as preferred locations have been reduced in regard to the sensitive nature of subject sites and the general settlement distribution across the County.

The zoned lands identified on the map will be reviewed as part of the development of the Renewable Energy Strategy which will include the Wind Energy Strategy. The categories and criteria for assessing potential wind farm projects will be explained and detailed and include the reference to the latest Wind Energy Development Guidelines once finalised and published. The Council supports and welcomes the identified regional approach to windfarm developments and will support EMRA in the delivery of this coordinated approach.

The Council consider that the existing Policy Objective CPO5.138 is detailed and comprehensive, but the Council acknowledges the proposed addition of the county geological sites within the criteria for assessing proposed schemes. The intention of protecting the existing geological sites is agreed and supported and the Council will include these sites into the objective.

Noise

The Council will consider a revision to CPO5.139 and the text relating to the assessment of noise.

Development Contribution Scheme

With regards to the submissions on the Development Contribution Scheme, the Council considers that the existing scheme is suitable and sufficient for Longford County Council. The Scheme has been in operation since 2018 and is due for renewal in 2022. The Council will seek to review this schedule at the appropriate time and consider all of the development contributions within the framework. The Council does undertake monitoring of the development contributions received and, in the use, and expenditure of these funds within and across the County.

Small Scale Micro and Community Energy Projects

The submission regarding the promotion and development of small-scale micro and community wind energy development projects is supported by the Council. The Draft Plan seeks to encourage and promote these. The proposed additional Policy Objective has been considered, whilst supporting the principle the Council does not consider it appropriate to add a new CPO to the Plan.

**6.5.21.12 Chief Executive Recommendation
CE CH 5.39**

To amend policy objective CPO5.129 to reference the delivery of the Wind Energy Strategy 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.***

CE CH 5.40

Review CPO5.138 and insert text regarding county geological sites as follows:

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.*

CE CH 5.41

To 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.

CE CH 5.42

Review CPO5.139 and insert text in red italics referencing the Draft Wind Energy Development Guidelines (2019) and delete text striked through 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)

6.5.21.13 Solar Energy***Principle of Solar Energy***

Submissions DCDP-68 and DCDP-77 welcomes CPO5.143 and DMS16.181 which seeks to encourage the development of solar energy in suitable locations and which in the DMS in the absence of national guidance identifies the criteria that should be considered for renewable energy projects including solar farms.

The potential of solar energy is broadly supported within the submissions received and it is also recognised and suggested that such projects have fewer environmental impacts. DCDP-68 and DCDP-77 identifies that from a spatial planning perspective utility scale, solar development has few environmental impacts. The low profile of solar development and the retention of hedgerows and tree lines can result in limited visual and landscape impact and large scale solar schemes can integrate well with the landscape.

Solar PV is a key technology that can assist with the State's transition to a low carbon society. Large scale development of solar PV would lower greenhouse gas emissions from the energy system while satisfying the demand for energy services.

Glint and Glare Assessment

Submission DCDP-19 (TII) welcomes the inclusion for the requirement of a Glint and Glare Assessment in Objective CPO5.145. TII would emphasise the importance of such assessments where there may be implications for the safety and efficiency of the strategic national road network given the high speed and highly trafficked nature of

such roads. It is important that mitigation proposed is robust from the earliest stages of construction and or commission and is sufficient to function all year round.

Duration of Permission

The submissions suggest that Solar PV developments can take in excess of 5 years to progress to a construction phase. The Planning Authority should retain the option to grant permission for a longer period than the standard 5 years, if requested by the developer in appropriate circumstances. The lifetime of solar developments is now extending with current technologies and is now suitable for a minimum of 30 years in operation and investment decisions for such projects are being made on projects of up to 40 years. It is requested that permissions be granted for a lifetime of up to a maximum of 40 years. Deterioration of the infrastructure can be addressed by the lodgement of a financial security/bond and the requirement to provide a Decommissioning Plan.

Submission DCDP-70 states that Government Guidelines should be produced for ground mounted solar farms. Solar farm developments must have no significant adverse impacts on the surrounding environment and amenities with a presumption against their development in sensitive areas such as Natura 2000 sites. All development proposals should include a Landscape Impact Assessment which should include the potential impacts on any existing rights of ways and amenity facilities.

6.5.21.14 Chief Executive Response

The Council is of the Response that the Draft Plan is broadly supportive of Solar Energy having a section of the plan and specific policy objectives related to it in the Draft Plan. Solar Power is identified as being a key renewable energy source in the County and provides an opportunity to meeting future renewable energy targets. The references to Landscape Impact Assessments being required for all such projects are acknowledged by the Council.

The Council acknowledge the proposed intention of extending the length of planning permission in certain circumstances and the consideration for the maximum lifetime of the solar projects. The Council would suggest that the Policy Objective could apply to all renewable energy projects and should be applied on a case-by-case basis.

The concerns identified about the negative impacts of solar developments are noted. Whilst the intent of the comments is acknowledged the Council would state that all planning applications for development are thoroughly assessed, and that included in this process is the protection of sensitive sites including protected Natura 2000 and other sites, Landscape Character Assessments. The Draft Plan has included the list of criteria to be used in the assessment of renewable energy projects which is considered to be detailed and thorough.

6.5.21.15 Chief Executive Recommendation

No change.

6.5.21.16 Hydro-Energy

Submission DCDP-09 promotes the development of hydro-electric generation schemes on local rivers, weirs and former mill buildings throughout the County.

6.5.21.17 Chief Executive Response

The Council recognises the potential for development of small scale hydro-electricity projects in the County. In particular for the on-site generation to meet the electricity requirements of proposed new buildings; or the refurbishment of existing buildings appropriate to their riverside location and setting. The Draft Plan includes renewable energy under section 5.8. *Hydro Energy* and under 5.8.3 and includes specific policy objectives that support the roll out of small-scale hydroelectric projects.

6.5.21.18 Chief Executive Recommendation

No change.

6.5.21.19 Geothermal Energy

In DCDP-14 (Dept of the Environment, Climate and Communications), the Department identify recently published information regarding the energy type – Geothermal Roadmap which provides a policy and regulatory framework. The use of Geothermal Suitability Maps to determine the most suitable type of ground source heat collector for the use of heat pump technologies is recommended.

6.5.21.20 Chief Executive Response

The proposed referencing of the Geothermal Roadmap and the use of Geothermal Suitability Maps is considered a useful addition to the Draft Plan.

6.5.21.22 Chief Executive Recommendation

CE CH 5.43

Section 5.8.4 Geothermal Energy will be amended in order to include the Geothermal Roadmap (policy and regulatory framework) and the Geothermal Suitability Maps.

6.5.21.23 Bio-Energy

Submission DCDP-10 (Gas Networks Ireland) is supportive and welcomes the section 5.8.5 Bio-Energy and policy 5.151 that seeks to facilitate the development of projects that convert biomass to energy. The submission identifies that Biogas is a Bio-Energy that when upgraded to biomethane, can be injected into the gas network to complement or substitute natural gas, and can also be compressed to create Compressed Natural Gas (CNG) and used as a transport fuel.

Biomethane and CNG can help the County to reduce carbon emissions which is an important part of the county's strategic objective to transition to a competitive, low carbon, climate resilient and environmentally sustainable economy. The production of renewable gas can be included onto the gas network and when utilised by vehicles modified to use bio-CNG carbon neutral transport may be achieved, with reduced carbon emissions, improved air quality and less Nitrogen Oxide and Sulphur Dioxide relative to diesel.

6.5.21.24 Chief Executive Response

The Council are supportive of the BioEnergy sector and propose to include a policy objective to seek the development of bioeconomy plan for the region.

6.5.21.25 Chief Executive Recommendation

CE CH 5.44

Insert a new policy objective before CPO5.151 as follows:

To support EMRA and work with the Regional Assembly in developing and progressing a bioeconomy plan for the region (RSES RPO 7.37) in order to identify potential new opportunities for the County.

6.5.21.26 Anaerobic Digestion and Biomass Combustion

Submission DCDP-76 (An Taisce) in principle welcomes the objective to provide for the development of biogas through anaerobic digestion – but only where the sustainability of this resource is justified. The submission states that whole supply chain needs to be considered including the feedstock used, fertilisers. Anaerobic digesters can suffer from ‘fugitive emissions and methane leaks. The effect of the leakage may greatly reduce or cancel out the claimed climate benefits of using biogas in place of fossil fuels. Further digesters do not remove ammonia from the digestate. The submission states therefore that any provision of bioenergy is provided in a fully sustainable manner. The granting of permissions for biogas facilities should only be granted where the biomethane will not be mixed with fossil gas as this would exacerbate lock-in fossil fuel use.

The submission states that the CPOs for bioenergy be clarified.

CPO5.151 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.

CPO5.152 Promote and prioritise utilisation of existing waste streams from agricultural and forestry sectors for renewable energy projects including anaerobic digestion, subject to proper planning and environmental considerations. The sourcing, sustainability and impacts of the proposed feedstocks require full assessment.

Submission DCDP-79 states that the Draft Plan should include the EMRA RSES RPO7.37 which states that “a bioeconomy plan for the Region should be developed that outlines the capacity of the Region to supply the range of bioenergy resources required for the fuel mix as well as the current and projected consumption requirements for growth in this market.”

The submission also states that the wording of Section 8.8 page 169 should be reviewed especially the section that references bioenergy.

Aside from Solar and Wind, Biomass and Hydroelectricity at 3.5% combined largely makes up the remainder of Ireland’s renewable energy supply⁸. Biomass by comparison to other forms of renewable energy is comparatively expensive, with a limited availability of indigenous biomass, high import costs and its inconvenience in comparison to other fuels, such as oil and gas. Although poorly developed, Tidal/Wave Energy potential in Ireland is enormous, calculated by the SEAI to be 29GW, and easily meeting Ireland’s peak electricity demands of above 5GW (Eirgrid). The submission states that there is a considerable volume of indigenous biomass readily available and unlike wind, solar and other forms of renewable energy sources, biomass can be easily stored and used when required

6.5.21.27 Chief Executive Response

It is proposed to amend the wording of the policy objectives CPO5.151 and CPO5.152 as suggested in the submission.

6.5.21.28 Chief Executive Recommendation**CE CH 5.45**

To amend the Policy Objectives CPO5.151 and CPO5.152 as follows:

CPO5.151	Facilitate the development of projects that convert biomass to energy, subject to proper planning considerations. <i>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.</i>
CPO5.152	Promote and prioritise utilisation of existing waste streams from agricultural and forestry sectors for renewable energy projects including anaerobic digestion, subject to proper planning and environmental considerations. <i>The sourcing, sustainability and impacts of the proposed feedstocks require full assessment.</i>

6.6. Chapter 6: Regeneration

Relevant Submissions Received: DCDP-63, 70, 76, 81, 77, 79, 83, 93, 94, 51

The following is a summary of the main issues raised in submissions received:

- Support for chapter content.
- Regeneration of Brownfield sites.
- Economic Development
- Supporting urban and rural development
- (Working) Draft Economic and Enterprise Development Strategy for Lanesborough - Ballyleague
- Revitalisation of Historic Urban centre
- Community Enterprise, business and digital hubs
- Internal Regeneration submission

6.6.1 Support for Chapter Content

Fáilte Ireland states that Chapter 6 identifies, in terms of strengthening rural towns, the significance of tourism to the economy. Section 6.64 sets out the importance of tourism and its links to Rural Enterprise and Regeneration and identifies a number of key tourism products in the county as well as green and blue infrastructure. Equally it identifies and supports the transition of peatland areas for other uses including tourism. Section 6.5.4.2 sets out projects that have been subject of RRDF funding including the Historic Granard Motte Project which is a collaboration with Fáilte Ireland. The chapter identifies the key towns and villages with existing and proposed tourism offerings. In particular CPO 6.18 is identified as a good objective which aims to support the development of projects which support community led themes of Local Actions Plans in terms of digital connectivity, enterprise creation opportunities, public realm and environment, tourism infrastructure, promotion and marketing.

An Taisce welcomes the Regeneration approach taken in the Draft CDP. This is also supported by the 2020 Programme for Government, which includes a mandate for implementing a Town Centres First policy to "implement a strategic approach to town centre regeneration by utilising existing buildings and unused lands for new development, and promote residential occupancy in our rural towns and villages. We will use the National Planning Framework as our template."

Keep Ireland Open have indicated their support for this chapter and in particular have specified their support for 6.4.4 Regeneration Policy Objectives and CPO 6.43.

IWEI supports CPO's 6.86, 6.87, 6.90 and 6.91.

6.6.2 Chief Executive Response

The comments which are positive in nature are welcomed and noted.

6.6.3 Chief Executive Recommendation

No change.

6.6.4 Regeneration of Brownfield Sites

ESB are committed to an orderly closure of the Lough Ree Plant and support the view that there is significant potential to develop a Green Energy Hub on these lands due to its extensive area of peatlands and its long history of power generation.

Brownfield sites, particularly those relating to industrial or employment generating development offer significant opportunities to efficiently and sustainably contribute to the county's stock of available economic assets. Brownfield lands will have supported employment use in the past and already have in place a range of services, hard standings and access that could support new energy uses, industry, infrastructure and other job-creating activities into the future. Locating industrial and infrastructural development on brownfield sites make better use of existing infrastructure, services and transport links, prevents sprawl and preserves productive or environmentally significant greenfield land.

ESB supports the view that the given its substantial policy and financial support, both nationally and at EU level, 'Just Transition' offers a significant opportunity for economic and social change in the midlands.

In addition to the financial support provided by ESB, we acknowledge the objectives set out in Chapter 8 - *Economic Development*, of the Draft CDP, seeking engagement from all stakeholders in relation to supporting alternative sustainable development at Lough Ree and the associated peatlands including;

CPO 8.84: *"Engage with all relevant government stakeholders, sectoral representatives, ESB and Bord na Móna in developing and supporting sustainable alternative economic development, guided by the principles of 'Just Transition', for those employees and communities affected by the closure of the ESB Lough Ree Power Station and associated Bord na Móna peat harvesting practices."*

CPO 8.85: *"Identify, in collaboration with all relevant government stakeholders, sectoral representatives, ESB and Bord na Móna, potential uses for the ESB Lough Ree Power Station site as part of an overall regeneration programme for the site underpinned by the principles of 'Just Transition'."*

CPO 8.86: *"Support the use of the former Lough Ree Power Station site in Lanesborough for energy generation and transmission, tourism, industrial, commercial or other suitable alternative use, subject to other planning considerations and the proper planning and sustainable development of the area"*

6.6.5 Chief Executive Response

The comments which are positive in nature are welcomed and noted. In addition to the policies in Chapter 8 which support regeneration, there is also a specific chapter in the Development Plan which relates to regeneration (Chapter 6). In this chapter the general policies on regeneration are outlined, in addition to the different types of regeneration opportunities within the county. Specific projects are indicated to be pursued within the lifetime of the Plan, which include 'Just Transition' opportunities.

6.6.6 Chief Executive Recommendation

No change.

6.6.7 DCDP-64 - Longford and Roscommon County Councils (Working) Draft Economic and Enterprise Development Strategy for Lanesborough - Ballyleague

The proposed over-arching vision for Lanesborough Ballyleague is:

By 2040 Lanesborough-Ballyleague will be a better place to live, visit, work and study; a place with a high quality of life and a range of employment opportunities where people choose to locate and visit. A thriving integrated and attractive town with sustainability at the heart of the economy; a hub for the Mid-Shannon area.

Two Regional Catalytic Projects are recommended:

- A: Collaborating to Establish the Lough Ree Biosphere Nature Reserve
- B: Collaborating to Encourage Sustainable Villages Cluster

The goal is to build on the town and the areas strengths, and to increase footfall in the town, thus making businesses more viable and revitalising the town centre; providing a range of employment opportunities which in combination will lead to sustainable economic development and revitalisation of the towns.

Four key enabling pillars are identified for capital projects, focussing on making the town a more desirable place to choose to live, visit, work and study, and to raise awareness of the town's offering targeting investors, those seeking to re-locate, and visitors. Ten themes and fifteen transformational projects are underdefined under the four pillars. Together these projects have the potential to transform not only Lanesborough-Ballyleague, but to create a regionally significant employment and visitor hub. While this is a long-term strategy focussed on more sustainable development, there is an urgent need to deliver employment opportunities in the short term, to support those workers that are being made redundant and to ensure that the town doesn't fall into irreversible decline.

6.6.8 Chief Executive Response

The work currently underway on the preparation of the Draft Economic and Enterprise Development Strategy for Lanesborough – Ballyleague is acknowledged. However, it is also recognised that this is a working draft document and may be subject to further substantial change. Existing CPO 6.59 is to 'Prepare masterplans for additional areas as required, such as the Ardnacassa area of Longford Town and other areas suffering from social and economic deprivation both within Longford town and throughout the County'. It is considered that this encompasses the Draft Economic and Enterprise Development Strategy for Lanesborough – Ballyleague.

However, in terms of Specific Regeneration Opportunities in '6.6.2 Other Locations' outside of Longford Town it is considered that an additional CPO could be included after existing CPO 6.84 as follows:

Promote the development of Lanesborough – Ballyleague in accordance with the Economic and Enterprise Development Strategy for Lanesborough – Ballyleague, or other relevant subsequent plan / strategy.

There are also opportunities for this to be referenced with appropriate policy in other sections of the Plan i.e. Tourism, Economic Development and this is dealt with under the appropriate chapter heading.

6.6.9 Chief Executive Recommendation

CE CH 6.1

Include an additional CPO could be included after existing CPO 6.84 as follows:

Promote the development of Lanesborough – Ballyleague in accordance with the adopted Economic and Enterprise Development Strategy for Lanesborough – Ballyleague, or other relevant subsequent plan / strategy.

DCDP51- Department of Tourism, Arts, Culture, Gaeltacht Sports and Media

6.6.10 The revitalisation of Historic Urban Centre

The Department is a key stakeholder in promoting the revitalisation of historic urban centres and has had a central role in the development of innovative policy, guidance on best practice in the reuse of existing buildings and the development of high quality public realm, concepts which have been supported through annual funding programme for towns and their building fabric.

The Department is developing a National Policy on Architecture (NPA), under several themes, all of which are applicable to the future sustainable development of town centres i.e. research strategies required to inform planning and development, heritage-led regeneration and climate change adaptation and the design of high quality places for people. The Department suggest the inclusion of the following policy in the Development Plan: -

- *To consider concepts of historic urban landscapes as a collection of buildings at the various scales of settlement, the origins of Irish cities, towns and villages which give rise to their special characteristics. These include setting, topography and natural features. The conservation and reuse of early traditional structures, roofscapes of historic centres and the recognition of interrelationships between sites and landscape features in terms of the insertion of new buildings and managing their impact on the historic environment.*
- *To consider a Town first approach to the revitalisation of historic urban centres, the appointment of a Local Authority multi-disciplinary team which communicates the historical, architectural context and focuses on the repair and upgrade of existing historic buildings and their adaptation to new uses with regard to their architectural character and significance.*
- *To promote the development of heritage-led regeneration, to plan for the reuse and conservation of core-built heritage and archaeological sites within urban centres as an integral part of the evolution of the historic place and its significance.*
- *To consider the identification of built heritage at risk registrar as the basis for actively managing, attracting funding and resources, drawing on the legislative provisions to safeguard protected structures and their setting i.e. enabling works to ensure their long terms survival, appropriate moth-balling and inspection to prevent further deterioration or loss.*

- *To promote best conservation practice and to lead by example through the management and safeguarding of historic properties in the ownership of the Local Authority.*
- *To support the development of sustainable infill to the town back lands that is appropriate in scale and character to that of the historic centre, that transitions and accommodates surviving structures and retain the historic streetscape form particularly within sensitive areas of built and archaeological importance. To ensure the strategic housing development support rather than detract from the vitality and overall character of historic town centres in terms of their scale, connection and mobility strategies.*
- *To draw on the historic environment viewer, to compile core data information about the built and archaeological evolution of historic places to draw on the readily accessible resources such as historic mapping and databases, i.e. to inform future development strategies and progress based on an awareness of the cultural significance of a place.*
- *To coordinate significant infrastructural projects such as public realm works, flood relief works or new transport routes and alternative modes of transport to the benefit of surviving historic sites in order to improvement their enjoyment, presentation and enhanced accessibility.*

We note in this regard examples from European counterparts of the removal of traffic from urban centres and the resulting improvement in air quality which has been exemplified by the recent COVID-19 lockdown and the perceived enjoyment of urban living in Ireland. These transitions support a return to sustainable and attractive urban living.

6.6.11 Chief Executive Response

The Draft Development Plan contains a number of chapters where this content is covered – Chapter 4: Core, Settlement and Housing Strategies indicates the concept of compact urban growth. Chapter 5: Transport, Infrastructure, Energy and Communications contains content in relation to sustainable transport.

In Chapter 6: Regeneration there is a specific section included as per 6.4.3 Heritage Urban Regeneration where it is stated that ‘Planning for the regeneration of a historic town needs an integrated approach that balances the protection of the built heritage and the sustainable development of historic urban areas with the needs of modern living and takes account of the concerns and aspirations of the community and key stakeholders. This requires the coordination and management of different stakeholders. The development of a common vision for a town, supported by a coordinated and integrated series of objectives and a programme of realistic, achievable actions, will balance the conservation of heritage, alongside the needs of those who live in and use the historic town. Bringing unused or underused spaces within towns back into use has many advantages, such as reviving economic value, activating abandoned and derelict sites, and reducing pressure for greenfield development. Additional initiatives to promote placemaking and the economic vibrancy include Town Centre Health checks, historic and public realm plans, which are linked to statutory local area plans. The importance of community led village design and enhancement statements is also recognised. Relevant Heritage Urban Regeneration County Policy Objectives are included to reflect this and regeneration related funding to support heritage led regeneration projects is included.

Chapter 7: Placemaking contains a specific section 7.4.2.1 Public Realm Improvements and associated policy. This along with the other elements contained in 7.4.2 Elements of Placemaking is considered sufficient.

Content is also covered in Chapter 12: Built and Cultural Heritage. There is also a Chapter on Climate (Chapter 3) and specific climate actions at the end of each chapter of the Draft Plan.

6.6.12 Chief Executive Recommendation

No change.

6.6.13 Sustainable and Community Planning

Our towns and villages must be well maintained with buildings re-used to fulfil community needs.

Council land, unless required for other purposes, e.g. recreational and housing, should be allowed to rewild. Rewilding plans should include designated areas for pollinator friendly native flora, which may require initial manual seeding prior to self-seeding. As many of these areas as possible should be excluded from future residential or commercial use due to the establishment of vital habitats.

Residents should be encouraged to allow their gardens/land to rewild, and/ or to actively convert them to pollinator friendly spaces.

Each town must have adequate green space, community gardens, cycle tracks, playground and wildlife areas (to include native flora)

6.6.14 Chief Executive Response

This is considered addressed within the Draft Development Plan, and not limited to, in its commitment to prepare 'Rural Settlement Cluster Policy and Design Statements' within the lifetime of the Draft Plan, and under policy CPO 6.11 to *"Carry out master planning to ensure that large areas of land, are appropriately planned and developed in a sustainable manner, which includes provision for phasing, infrastructure provision, community facilities, density, layout, open spaces, landscaping and development design briefs and statements"*;

6.6.15 Chief Executive Recommendation

No change.

6.6.16 Community Enterprise, business and digital hubs

The submission by the PPN contends that there needs to be more opportunities and support for community enterprise, business and digital hubs. It is submitted that high quality dedicated spaces need to be provided for community activities and support, and for business development and that sustainable jobs and employment that provide good livelihoods need to be available. There must be excellent broadband throughout the county. Our community must be physically and digitally well-connected and integrated.

6.6.17 Chief Executive Response

The content of this submission is noted. This is considered addressed within the Draft Development Plan under policy CPO 6.18 where *“It is the County Policy Objective to: Support the development of projects which support community led themes of Local Action Plans, in terms of digital connectivity, enterprise creation opportunities, public realm and environment, tourism infrastructure, promotion and marketing.”*; In addition to related content already contained within the Regeneration Chapter and other chapters of the Draft Plan – Chapter 7 Placemaking, and Chapter 8: Economic Development and is considered appropriate and satisfactory.

6.6.18 Chief Executive Recommendation

No change.

6.6.19 DCDP-63 - Internal Regeneration section**6.6.19.1 General**

Submission no. DCDP-63 contained a large amount of alternative wording and phraseology, formatting changes, recommendations in relation to movement of text to different locations, changes to the layout of the chapter and substantial detail into particular item delivery.

6.6.19.2 Chief Executive Response

The changes proposed in relation to alternative wording and phraseology, formatting, movement of text to different locations both within the Chapter itself and to other parts of the plan, and changes to the layout of the chapter are not considered necessary. In some cases, substantial detail to the level being requested is not necessary and, in many instances, will be overly restrictive in terms of delivering the ethos of the plan. In many cases the subject is already covered in the chapter sufficiently or in another relevant chapter in the Draft Development Plan. Items within the chapter are considered to best fit within the format indicated unless otherwise indicated. The content and format used takes cognisance of higher-level documents including in particular the subject content covered in the EMRA RSES, which combined with the individual circumstances of Longford which the chapter captures, are considered a best fit approach for Regeneration in County Longford.

6.6.19.3 Chief Executive Recommendation

No change.

6.6.19.4 Policy Context***National Planning Framework (NPF) 2018***

It is queried whether significant public lands have been identified in County Longford for development under the initiative highlighted in the Policy Context as set out below: *The National Planning Framework highlights that the utilisation of public lands can act as a catalyst to stimulate regeneration and wider investment. One of the key policy priorities is the harnessing of publicly owned lands, including military sites, and combining the potential of such assets with community and wider private and public sector support and investment.*

Action Plan for Rural Development: Realising our Rural Potential (GoI, 2018)

The need for the inclusion of '6.6.3 Action Plan for Rural Development: Realising our Rural Potential (GoI, 2018)' in the Policy Context is questioned and that it is recommended that it should be just a reference / footnote.

Framework for Town Centre Renewal (DBEI, 2017)

It is submitted that the 'Framework for Town Centre Renewal (DBEI, 2017)' is dealt with at length in the placemaking section and that section 28 guidance should possibly be prioritised.

6.6.19.5 Chief Executive Response

The purpose of the 'Policy Context' of the chapter is to simply highlight relevant policy documents and associated sections over the period of the Development Plan as was carried out. These do not necessarily have to be put in place at the time of writing the Plan but are considerations which frame the context and content of policy over the duration of the Plan.

The 'Policy Context' section of the chapter details relevant plans and strategies considered relevant to the Regeneration chapter. It is considered that the inclusion of the 'Action Plan for Rural Development: Realising our Rural Potential (GoI, 2018)' is a relevant publication to be included in the summation of documents included in the Regeneration policy context.

The Action Plan for Rural Development contains a range of measures to support the revitalisation of rural Ireland under the Government's *Project Ireland 2040 Rural Regeneration Programme*. The *Town and Village Renewal Scheme* which was launched by the Government in 2016 is such a measure aimed at starting the process of rejuvenating Ireland's rural towns and villages to make them more attractive places in which to live, work and visit. It is therefore considered an essential part of the policy context of this chapter and should not be relegated to just a footnote / reference.

Placemaking is a separate chapter in the Draft Plan (Chapter 7) and relevant policy context is detailed therein. Some of the policy context will overlap as has been the case in many sections and chapters throughout the plan. Relevant statutory guidance has been indicated where relevant.

6.6.19.7 Chief Executive Recommendation

No change.

6.6.19.8 Draft County Longford Regeneration Strategy

It is indicated that the 'Draft County Longford Regeneration Strategy 2020' has been renamed the 'Longford Regeneration Initiative'.

Additional text is recommended for inclusion:

Established in 2015, the regeneration section is tasked with the delivery of a wide range of projects and initiatives and securing funding for these through community-led development and capacity building, policy alignment and coordination and delivery. The following points summarise the main action areas of the section in support of:

- *The provisions of the Core Strategy in securing the settlement hierarchy, ensuring that towns and villages are attractive places to live works and visit generating positive change in local communities*
- *Reversing town/village and rural population decline, by encouraging new roles and functions for buildings, streets and sites and promoting new economic opportunities through appropriate placemaking initiatives including targeted regeneration master planning for specific areas*
- *Compact and Sustainable Growth - encouraging compact forms of development that that focus on consolidating the footprint of existing settlements with new development.*
- *Integration of sustainable and climate action policies, the national transition objective and the Just transition process*
- *Strong stakeholder engagement through established Town Teams and other vehicles to maximise a bottom-up approach*
- *Protecting environmental and heritage assets, encouraging access, awareness conservation and preservation as appropriate*

6.6.19.9 Chief Executive Response

As the name of the 'Draft County Longford Regeneration Strategy 2020' has since the preparation of the Draft Plan been renamed to the 'Longford Regeneration Initiative', this should accordingly be amended in the text.

In terms of the additional text in relation to the functions of the Regeneration section this can be included. However, it is not considered necessary to include the year the Regeneration section was established.

6.6.19.10 Chief Executive Recommendation

CE CH 6.2

Amend the title of section '6.3.5 Draft County Longford Regeneration Strategy 2020' to '*Longford Regeneration Initiative*'.

Include the following text:

The regeneration section of Longford County Council is tasked with the delivery of a wide range of projects and initiatives and securing funding for these through community-led development and capacity building, policy alignment and coordination and delivery. The following points summarise the main action areas of the section in support of:

- *The provisions of the Core Strategy in securing the settlement hierarchy, ensuring that towns and villages are attractive places to live works and visit generating positive change in local communities*
- *Reversing town/village and rural population decline, by encouraging new roles and functions for buildings, streets and sites and promoting new economic opportunities through appropriate placemaking initiatives including targeted regeneration master planning for specific areas*
- *Compact and Sustainable Growth - encouraging compact forms of development that that focus on consolidating the footprint of existing settlements with new development.*
- *Integration of sustainable and climate action policies, the national transition objective and the Just transition process*

- *Strong stakeholder engagement through established Town Teams and other vehicles to maximise a bottom-up approach*
- *Protecting environmental and heritage assets, encouraging access, awareness conservation and preservation as appropriate.*

6.6.19.11 Regeneration Typology

In relation to the 4 no. types of regeneration which are identified, it is queried as to whether these typologies are mandatory. It is submitted that the formatting of the section based on these serves to divide rather than integrate approaches and results in significant repetition of objectives

6.6.19.12 Chief Executive Response

Section '6.4 Regeneration Typology' indicates that there are many different types of regeneration, which are discussed accordingly in the chapter and which are identified as follows:

1. Compact Growth Urban Regeneration (Housing)
2. Economic Urban Regeneration
3. Heritage Urban Regeneration
4. Rural Regeneration

These were identified taking account of the areas of Regeneration identified in the NPF and RSES as a guide, and areas considered relevant to County Longford.

6.6.19.13 Chief Executive Recommendation

No change.

6.6.19.14 Compact Growth Urban Regeneration (Housing)

It is queried as to why this is restricted to housing as a mix of uses is required to create an attractive environment for investment which includes housing. CUG is provided for in regeneration and more specifically, VSL in an overall regeneration sense (mixed use, housing where appropriate – as per proposed variation no.5) which is more suited to a Longford situation to avoid over-proliferation of usually single tenure housing that is not conducive to town centre placemaking. Objectives here would appear to relate to housing and development management standards in a general sense rather than regeneration.

6.6.19.15 Chief Executive Response

The EMRA RSES contains a specific section which relates to 'Compact Growth Urban Regeneration (Housing)'. The Development Plan must take account of this regional strategy and as such drill down and implement its content and policy at a county level as has been done.

6.6.19.16 Chief Executive Recommendation

No change.

6.6.19.17 Figure 6.1: Asset Test

It is queried as to whether this would sit better in the housing/development management/standards section and cross-refer.

6.6.19.18 Chief Executive Response

Figure 6.1 relates to 'Asset Test: Criteria for the strategic location of new residential development'. Its source is from the EMRA RSES 2019. It forms part of the EMRA RSES consideration in relation to 'Compact Growth Urban Regeneration (Housing)' from which the Development Plan must take reference. There is inevitable overlap between various sections of the Development Plan, including Chapter 4: Core, Settlement and Housing Strategies, where the Asset Test is also referenced. It is also noted that EMRA specifically welcome the inclusion of the Asset Test Figure from the EMRA RSES in the Regeneration Chapter of the Draft Plan.

6.6.19.19 Chief Executive Recommendation

No change.

6.6.19.20 Rural Regeneration**Issue Raised**

In relation to the provision of serviced or serviceable sites the approach indicated is queried and it is indicated that a sequential approach is required and that this material is more appropriate in the enterprise or development standards section of the Plan: - *It is recognised that provision of serviced or serviceable sites in a manner that provides a structured space for new enterprise would help to sustain smaller rural communities. Small industrial estates on the edge of towns facilitate local enterprise and entrepreneurship would help prevent both drift to larger urban centres and the construction of one-off units around domestic properties in rural areas.*

6.6.19.21 Chief Executive Response

Section '6.4.2 Rural Regeneration' contains material which is based on regional guidance contained in the EMRA RSES which aims to strengthen the fabric of rural Ireland, supporting rural towns and communities and which indicates that the rejuvenation of rural towns and villages requires that appropriate job creation can be supported in rural areas. It is considered that the inclusion of the text supports consolidation of urban areas in accordance with higher policy.

6.6.19.22 Chief Executive Recommendation

No change.

6.6.19.23 Issue Raised

Environmental concerns are raised in relation to current forestry practice and it is queried whether these are addressed in another section.

The countryside within the County provides for rural economies and rural communities, based on agriculture, forestry, tourism, renewables, heritage-based development and rural enterprise. Traditional sectors such as agriculture, tourism, extractive industries and forestry are complemented by diversification in sectors such as food, renewable energy and opportunities provided from improved digital connectivity.

6.6.19.24 Chief Executive Response

Section '6.4.2 Rural Regeneration' references forestry in a rural regeneration context. The forestry sector is a significant contributor to the economy. Further detail in relation to Forestry can be found in Chapter 9: Rural Enterprise as has been referenced in the Draft Plan. An environmental issue relating to same if relevant would have been

indicated in the accompanying Strategic Environmental Assessment carried out as part of the Draft Plan.

6.6.19.25 Chief Executive Recommendation

No change.

6.6.19.26 Issue Raised

In relation to Rural Regeneration County Policy Objective CPO 6.3.6 it is queried if the areas have been identified which relate to this policy.

6.6.19.27 Chief Executive Response

CPO 6.3.2 is to *'encourage sustainable growth in rural areas, especially those that have experienced recent decline or stagnation, while maintaining and enhancing the viability of smaller towns and rural settlements'*.

This is a County Policy Objective which is applicable to a range of locations across the county and it is not considered necessary to be overly prescriptive in naming specific locations at this time, as these may change during the course of the plan and the policy may accordingly be overly prescriptive and self-limiting in its impact.

6.6.19.28 Chief Executive Recommendation

No change.

6.6.19.29 Issue Raised:

In relation to CPO 6.38 it is indicated that this is repetitive as it is also included in Placemaking and that it is more appropriate there.

CPO 6.38 Support the recommendations of the RIAI's *Toolkit for Towns and Villages* in relation to rural regeneration.

6.6.19.30 Chief Executive Response

As is the case with many sections of the Plan there is a degree of overlap, which is a sign of a cross cutting and integrated Development Plan.

It is recognised that the RIAI's *Toolkit for Towns and Villages* provides useful advice for local authorities in relation to rural regeneration. It is therefore considered appropriate to reference it in this location and to contain an appropriate relevant policy in relation to same.

6.6.19.31 Chief Executive Recommendation

No change.

6.6.19.32 Active Land Management County Policy Objectives

It is submitted that CPO 6.48 should be amended to include reference to 'the provisions of the Urban Regeneration and Housing Act 2015 as an incentive.

6.6.19.33 Chief Executive Response

CPO 6.48 as included in the Draft Plan is to 'Use, where appropriate, Compulsory Purchase Orders (CPO) and other incentives including development contributions to encourage urban regeneration of brownfield lands over the development of greenfield sites. It is considered that the reference to the provisions of the Urban Regeneration and Housing Act 2015 can also be included.

6.6.19.34 Chief Executive Recommendation

CE CH 6.3

Amend CPO 6.48 to include the following text '*in combination with the provisions of the Urban Regeneration and Housing Act 2015 in order to*' as follows':

CPO 6.48 *Use, where appropriate, Compulsory Purchase Orders (CPO) and other incentives including development contributions in combination with the provisions of the Urban Regeneration and Housing Act 2015 in order to encourage urban regeneration of brownfield lands over the development of greenfield sites in urban areas*

6.6.19.35 Issue Raised

CPO 6.49 should be amended to the following:

CPO 6.49	<p><i>Apply the provisions of the Urban Regeneration and Housing Act 2015 (as amended) in the following areas:</i></p> <ol style="list-style-type: none"> <i>1. Areas zoned under the following objectives within identified regeneration areas:</i> <ul style="list-style-type: none"> <i>- Mixed Use/Expanded Town Centre zonings as they offer opportunities to sustain and enhance the vitality and viability of town centres and where appropriate to consolidate urban areas.</i> <i>- All 'Enterprise and Employment' and 'Commercial' zoned lands contained within Tier 1 – Tier 3 of the County's settlement hierarchy.</i> <i>2. Strategic sites and areas covered by the "Site Resolution" objective designated in Longford Town LAP</i> <p><i>Vacant sites will be identified in accordance with statutory criteria for regeneration purposes within these areas and a levy applied in accordance with the provisions of the Urban Regeneration and Housing Act 2015. These sites will be placed on the Vacant Site Register which will be maintained and periodically reviewed.</i></p>
----------	---

Accordingly, as a result of these suggested additional text changes to the aforementioned policy it is indicated that there would be consequent repetition in the inclusion of CPO 6.50.

6.6.19.36 Chief Executive Response

In the Draft Plan the following relevant CPO's are included:

CPO 6.49 Maintain and update a Vacant Sites Register in accordance with the provisions of the Urban Regeneration and Housing Act 2015.

CPO 6.50 Facilitate the implementation of the Urban Regeneration and Housing Act 2015, by utilising site activation measures, including the provision of the Vacant Site Levy, to assist in bringing vacant and underutilised zoned land into beneficial use.

It is not considered favourable to have a County Policy Objective which is overly long, and which is covering 2 policy areas and as such 2 separate policies are favoured. It is considered that the additional policy content suggested in relation to the Vacant Sites Register and Urban and Regeneration and Housing Act 2015 is a mixture of alternative wording and an expansion and repetition of material covered in the preamble text detailing the Urban Regeneration and Housing Act 2015. It is considered that CPO 6.49 and CPO 6.50 as written in the Draft Plan cover the material in a more concise way.

6.6.19.37 Chief Executive Recommendation

No change.

6.6.19.38 Prioritisation of CPO 6.49

It is submitted that CPO6.49 should be prioritised within this section.

6.6.19.39 Chief Executive Response

This section of County Policy Objectives relates to 'Active Land Management County Policy Objectives'. It is considered that the order of priority in which they have been placed in the Draft Plan is appropriate, as it relates to the general to the more specific and it also follows on from the order and sequence of the text which precedes the policies outlined.

6.6.19.40 Chief Executive Recommendation

No change.

6.6.19.41 Collaboration with National Land Development Agency

It is queried as to have significant public landbanks been identified and residential need established (as per housing/core strategies).

6.6.19.42 Chief Executive Response

As per section 'Mechanisms to Deliver Regeneration' among the measures identified are Active Land Management. As per section '6.5.1 Active Land Management' the following is stated:

Achieving compact growth targets will require active land management responses to ensure that land and building resources within existing settlements are used to their full potential. In this regard Longford County Council will establish a database of strategic brownfield and infill sites so that brownfield site re-use can be managed and co-ordinated across multiple stakeholders as part of the active land management process. It is considered that this is something which can be considered over the duration of the Plan (2021-2027) and does not have to be currently in place.

As per section '6.5.1.2 Collaboration with National Land Development Agency' it has been indicated that Longford County Council will work collaboratively with the National Land Development Agency (LDA) in their role to support the consolidation and development of strategically located land banks, particularly publicly owned lands, to unlock housing and regeneration opportunities. The Core Strategy and zoning provisions will identify and quantum and location of lands for development, but the collaboration with the National Land Development Agency will be an ongoing process

to be undertaken by the Regeneration and other relevant sections over the duration of the Plan.

6.6.19.43 Chief Executive Recommendation

No change.

6.6.19.44 Designation of 'Regeneration Areas'

It is submitted that this section would be more appropriate as a subheading under land activation/vacant sites – aware that this may also have a relationship to core strategy etc and should be cross-referred.

6.6.19.45 Chief Executive Response

Section 6.5 relates to 'Mechanisms to Deliver Regeneration. Under this Active Land Management which relates to Collaboration with National Land Development Agency and application of the vacant site levy are discussed. The designation of 'Regeneration Areas' is another mechanism which is identified to deliver regeneration and is discussed accordingly. Its location within this section is considered appropriate.

6.6.19.46 Chief Executive Recommendation

No change.

6.6.19.47 Master Planning

It is submitted that there is a need to differentiate between statutory and non-statutory, planning (i.e. that required as part of application for pp or those to define specific phasing, density and design requirements) and regeneration.

6.6.19.48 Chief Executive Response

It is not considered that there is a need to differentiate between statutory and non-statutory planning at this stage. This will be a management decision which will be undertaken at a later stage. However, unless these are subject to local area plans it is most likely at this stage that such masterplans will be non-statutory in nature.

6.6.19.49 Chief Executive Recommendation

No change.

6.6.19.50 Longford Integrated Action Plan 2018 – Military Assets as Public Spaces

It is indicated that all of section on the 'Longford Integrated Action Plan 2018- Military Assets as Public Spaces' should be removed and replaced with text on the 'Camlin Quarter Masterplan' as follows:

*This plan deals with the Development of the **Camlin Quarter** including Connolly Barracks, Church St. Great Water Street, Little Water Street onto the Albert Reynolds Peace Park, enhancing the public realm, investigation of potential land uses, landbank assembly and connectivity improvements. This plan continues to form the basis of funding applications in support of identified actions, including large-scale development proposals under the URDF.*

6.6.19.51 Chief Executive Response

During the Plan preparation the Regeneration section were repeatedly consulted with and it was indicated that a piece on the Longford Integrated Action Plan 2018 – Military Assets as Public Spaces should be included in the Plan. However, if the Regeneration are of the Response that this is no longer relevant, it can be removed and the text in relation to the ‘Camlin Quarter Masterplan’ included in lieu of same.

6.6.19.52 Chief Executive Recommendation

CE CH 6.4

Delete the following:

~~‘6.5.3.2 Longford Integrated Action Plan 2018 – Military Assets as Public Spaces’~~

~~This is an Integrated Action Plan for Connolly Barracks and the Northern Quarter of Longford Town, which was produced as part of the URBACT Military Assets as Public Spaces (MAPS) project. It recognises that Longford town suffered significant decline following the economic crash in 2008, in the past was heavily reliant on the construction sector for employment and had not experienced the same growth in retail or commercial activity as other parts of the country. This was exacerbated by the closure of Connolly Barracks in 2009, with the loss of 200 jobs on site and a knock-on effect on the wider economy.~~

~~Longford County Council recognised the potential and importance of this site to the future of the town and purchased a portion of it, acknowledging the ability of it to act as an economic driver for the town and wider region if developed appropriately.~~

~~The Integrated Action Plan (IAP) recognises the importance of improving the physical environment in which Connolly Barracks is located in enhancing and utilising the River Camlin which bounds the site. The redevelopment of Connolly Barracks and the wider area now provides an opportunity to open up the town to the River Camlin and embrace this valuable natural asset. This will be developed through a new masterplan for the wider Northern Quarter area, taking in Great Water Street and Little Water Street, as well as Lower Main Street, up to and including Connolly Barracks and Church Street.~~

Insert the following text:

~~‘6.5.3.2 Camlin Quarter Masterplan’~~

~~This plan deals with the Development of the **Camlin Quarter** including Connolly Barracks, Church St. Great Water Street, Little Water Street onto the Albert Reynolds Peace Park, enhancing the public realm, investigation of potential land uses, landbank assembly and connectivity improvements. This plan continues to form the basis of funding applications in support of identified actions, including large-scale development proposals under the URDF.~~

6.6.19.53 Other Potential Masterplans

In the internal regeneration section submission, it is submitted that the text it is indicated that reference to the Ardnacassa area should be removed. It is also submitted that a number of the policies included are LAP / Development Management Standards:

CPO 6.59	Prepare masterplans for additional areas as required, such as the Ardnacassa area of Longford Town and other areas suffering from social and economic deprivation both within Longford town and throughout the County.
CPO 6.60	Encourage private development in accordance with a detailed and agreed masterplan that fully addresses the potential of the site in its wider context.

6.6.19.54 Chief Executive Response

The Ardnacassa area is an area suffering from significant physical, social and economic regeneration and would benefit from regeneration initiatives over the lifetime of the Development Plan. In relation to the suggestion that a Local Area Plan is more relevant in the context of Ardnacassa, taking account the size and population of the areas and the statutory requirements for the mandatory preparation of a Local Area Plan it is not considered that this would be required and that a preparation of a masterplan for Ardnacassa as indicated in CPO 6.59 is more apt. It is considered that the CPO's identified are appropriate in a policy context in this Chapter.

6.6.19.55 Chief Executive Recommendation

No change.

6.6.19.56 Securing Funding Streams

It is indicated that in addition to the URDF and RRDF that regeneration will pursue complementary funding streams that support broader aims to achieve these outcomes in the areas of tourism, economic, recreation, heritage, amenity, social inclusion and climate action.

6.6.19.57 Chief Executive Response

It is acknowledged that there will be additional funding streams to the URDF and RRDF which will be pursued in terms of regeneration initiatives and as such this should be acknowledged in a general sense.

6.6.19.58 Chief Executive Recommendation

CE CH 6.5

In section '6.5.2 Securing Funding Streams' include the following sentence at the end of the existing text:

Regeneration will pursue complementary funding streams that support broader aims to achieve these outcomes in the areas of tourism, economic, recreation, heritage, amenity, social inclusion and climate action.

6.6.19.59 Longford Regeneration Opportunities

It is submitted in a single submission that there is significant repetition of other sections in this area of the chapter.

6.6.19.60 Chief Executive Response

This section was included in order to give specific detail and context in relation to the application of the previous principles in the chapter in a Longford context in terms of particular regeneration opportunities. The preceding sections were originally intended to be general approach. However additional detail and content was also required to

be included in these more general sections by the Regeneration section in earlier stages of the preparation on of the Draft plan and accordingly was included at the sections required. It is considered that the specific section on Longford Regeneration Opportunities is a good focus for the reader, which brings together the relevant regeneration projects to be actioned in terms of real deliverables over the course of the duration of the Development Plan and where specific relevant projects for implementation can be easily identified.

6.6.19.61 Chief Executive Recommendation

No change.

6.6.19.62 Other Locations

It is submitted that the following County Policy Objectives could be one objective.

Regeneration Opportunities (Other Locations) – County Policy Objectives	
It is the County Policy Objective to:	
CPO 6.81	Promote the delivery of resource-based tourism initiatives at Granard, Edgeworthstown, Ballymahon, Lanesborough (in conjunction with Roscommon County Council) and Drumlish and provide enhanced, sustainable links between these in conjunction with the community, Waterways Ireland and Bord na Mona.
CPO 6.82	Continue the coordinated approach to development of rural and urban areas, greenways, blueways, and the development of Longford, Ballymahon and Lanesborough as destination towns which are part of wider national and regional networks.

6.6.19.63 Chief Executive Response

These policies cover did areas of activity and relate to different projects and have a different list of settlements to which they apply.

6.6.19.64 Chief Executive Recommendation

No change.

6.6.19.65 Climate Change Action and ‘Just Transition’ Fund Opportunities

A single submission contained multiple text insertions and omission recommendations were made to chapter text and policy objectives, to include increased clarification on the ‘Just Transition’ process, to refer to a live Lanesborough feasibility study, and the omission of text relating to ‘Midlands Engagement Process’.

6.6.19.66 Chief Executive Response

It is considered that there was an overconcentration on specific on the specific wording of the Draft County Development Plan as opposed to commentary relating to the improvement of the content. No changes proposed in submission were considered of adequate difference / improvement to the original that justified its revision.

6.6.19.67 Chief Executive Recommendation

No change.

6.6.19.68 Regeneration Climate Context and Associated Actions

A single submission questioned the relevancy of the Climate Action text to County Longford, along with the proposed revision of Action A6.3 and the additional of 4 no. Actions.

6.6.19.69 Chief Executive Response

It is accepted that the text contained within 'Regeneration Climate Context and Associated Actions' is without direct reference to County Longford. However, the content contained within is considered important to establish the 'bigger picture', while the principles referred within are universal. Subsequently, the Actions that originate from the text outline are specifically Longford focused.

The wording change to Action A6.3' from "Require" to "Seek" is considered more appropriate.

Furthermore, the proposed 4 no. Action additions are considered too close in wording to that used for objectives and do not meet the criteria as 'Actions'. The 'Actions' proposed are tangible, easily quantifiable and are contain detail for ease of implementation and monitoring.

6.6.19.70 Chief Executive Recommendation **CE CH 6.6**

Modify the wording to that as proposed for Action A6.3 from '*require*' to '*seek*'.

6.6.19.71 Mapping

A number of maps (4 no.) have been submitted with this submission – 2 no. of which relate to this chapter; Longford Town and County.

6.6.19.72 Chief Executive Response

In relation to the 4 no. maps submitted with this submission; 2 relate to this chapter; mapping for Longford Town and County.

The map contained within the Draft Plan shall be amended to reflect the content of the Longford Regeneration map submitted.

The county wide map and appeared to be a more schematic diagram with a number of icons scattered without legend. It is considered an abstract document which would add confusion to the reader and is not considered sufficient for inclusion in the Development Plan.

The remaining 2 no. maps within this submission relate to zoning in Granard and Lanesborough. In terms of Granard this related to amending the zoning to include all of the visitor centre for tourism use and the placement of a green route on the map. In the case of Lanesborough it related to the re-location of the tourism objective in the correct location and the placement of an additional tourism objective to recognise the amphitheatre development and for the expansion of the previous tourism objective to encompass URDF funding. These have been dealt with in the appropriate zoning settlement section of this report – see Part 2 and mapping in Part3.

6.6.19.73 Chief Executive Recommendation:

CE CH 6.7

Amend the Longford Town Regeneration map – see Part 3 Appendix 12.

CE CH 6.8

Amend Granard Zoning Settlement maps – see Part 2 and Part 3, Appendix 8 of this report (separate document).

CE CH 6.9

Amend Lanesborough Zoning Settlement maps – see Part 2 and Part 3, Appendix 8 of this report (separate document).

6.7 Chapter 7: Placemaking

Relevant Submissions Received: DCDP-63, 93 70, 78, 82, 83, 51

The following is a summary of the main issues raised in submissions received:

- Introduction
- Policy Context
- Healthy Placemaking
- Elements of Placemaking – Revitalisation of Historic Centres
- Public Realm Improvements
- Universal Design
- Accessible Tourism
- Industry and Enterprise Placemaking
- Regeneration
- Social and Community Infrastructure – Population Analysis and Infrastructure Provision
- Recreation and Open Space
- Education
- Burial Grounds
- Placemaking Climate Context and Associated Actions

6.7.1 Introduction

It is submitted that the Placemaking and Regeneration chapters should be combined as there is significant repetition between both sections. (it should be indicated that this chapter should be read in conjunction with the Regeneration section).

Additional material is suggested in relation to the content of the introduction. This included material in relation to the COVID -19 crisis as follows:

The COVID-19 crisis and subsequent lockdowns have highlighted the need for good placemaking practice. Strong accessible connections to amenity areas and recreational facilities for residents of Longford town core in particular, were essential during this time and provide insight into the development requirements of future proposals to enhance liveability and the maintenance of local economies in the County over the plan period.

6.7.2 Chief Executive Response

There are various levels of overlap between various chapters throughout the Plan, which is not just limited to the regeneration and placemaking chapters, and indeed all chapters have a degree of overlap with each other. The Regeneration and Placemaking chapters follow the format and content of the RSES and accordingly are dealt with separately. While it is acknowledged that there is some level of overlap, as there is inevitably in all chapters, there is a large amount of separate individual content with placemaking focusing on specific elements of social infrastructure for the community; while the regeneration section focuses on a more economic component.

Nonetheless it is accepted that the concept of placemaking overlaps with regeneration and that this should be highlighted in the text. It is already indicated in the relevant section in '7.4.2.4 Regeneration' where Regeneration is explored as an

element of Placemaking. However, it is considered that reference to the Regeneration chapter overlap should be included in the 'Introduction'.

It is acknowledged that the COVID-19 crisis has had a large impact on placemaking and will continue to for years to come and accordingly it should be referenced.

6.7.4 Chief Executive Recommendation

Include the following text at the end of '7.1 Introduction':

CE CH 7.1

The COVID-19 crisis and subsequent lockdowns have highlighted the need for good placemaking practice. Strong accessible connections to amenity areas and recreational facilities for residents of Longford town core in particular, were essential during this time and provide insight into the development requirements of future proposals to enhance liveability and the maintenance of local economies in the County over the plan period.

In terms of placemaking this overlaps with the concept of regeneration. A central objective of this Plan is to regenerate the County's towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint (see Chapter 4: Core, Settlement and Housing Strategies and Chapter 6 Regeneration for more detail).

6.7.5 Policy Context

In terms of the Policy Context it is submitted that the reference to the National Planning Framework should cross reference the relevant section in regeneration that addresses the interconnectedness of NSOs in a Longford context – RRDF, URDF etc. In terms of '7.3.2 Eastern and Midland Regional Assembly Spatial Economic Strategy (RSES)' it is submitted that cross reference to the relevant regeneration for Longford Specific objectives and how these have been implemented to date.

6.7.6 Chief Executive Response

The intent of the 'Policy Context' of this chapter is to simply highlight briefly the relevant sections in national and regional policy in relation to placemaking, as has been done. Relevant Longford Specific regeneration objectives are not appropriate in this context and have been addressed in Chapter 6: Regeneration.

6.7.7 Chief Executive Recommendation

No change.

6.7.8 Healthy Placemaking

In terms of section '7.4 Healthy Placemaking' it is submitted that there should be reference to the relevant regeneration section regarding initiatives to date, ie connectivity improvements to promote sustainable travel in urban and rural areas, URDF RRDF initiatives. It is submitted that URDF and RRDF initiatives in a Longford specific context should be referenced.

Good Placemaking should also include environmental. Reference is also made to climate action, green infrastructure and biodiversity.

It is contended that CPO 7.1 and CPO 7.2 are development standards.

CPO 7.1	Support new development which supports public health policy.
CPO 7.2	Promote the development of healthy and attractive places by ensuring exposure of children to the promotion of unhealthy foods is reduced such as through the careful consideration of the location of fast food outlets in the vicinity of schools and parks.

In terms of CPO 7.5 and CPO 7.6 it is submitted that these could work as one amalgamated objective. It is also submitted that same could refer to the consideration of public realm design.

In CPO 7.8 the reference to '*climate change measures*' to be changed to '*climate action measures*'.

6.7.9 Chief Executive Response

It is stated in the draft Plan that 'A key element of healthy placemaking is the need to ensure the provision of alternatives to the car in the design of streets and public spaces, and to prioritise and promote cycling and walking as active means of transport. The provision of high-quality public transport, greenways and cycleways can enhance areas, contributing to more attractive places and creating opportunities to be physically active, and reduce the negative consequences of car-based commuting'. It is considered that an additional CPO should be included in order to Promote and encourage connectivity improvements to promote sustainable travel in urban and rural areas in accordance with relevant funding initiatives.

This section on 'Healthy Placemaking' deals with the general concepts of Healthy placemaking as derived from higher level policy with particular relevance to the EMRA RSES Placemaking Strategy. Such specific funding initiatives and locational context is provided in other sections of the Plan where appropriate.

Taking account of the tangible and on-tangible elements as indicated in Figure 7.1 it is recognised that good placemaking is also environmental, as well as being both physical and social. Accordingly, the text should be amended to incorporate this. As the elements of climate action, green infrastructure and biodiversity would fall within environmental considerations, it is not however considered necessary to individually name these.

Both CPO 7.1 and CPO 7.2 are County Policy Objectives and not development management standards.

As per the Draft Plan CPO 7.5 is to '*Have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the EMRA RSES*'. CPO 7.6 is to '*Have regard to national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)*'. It is accepted that these objectives could be ratified and amalgamated into one objective.

In relation to the suggestion to reference public realm design in this objective, this is not favourably considered as public realm design is only one aspect of healthy

placemaking, to which these documents apply, and hence the broader scope afforded by this objective.

In the Draft Plan CPO 7.8 is to

Promote the development of healthy and attractive places by ensuring:

- *Provision of open space should consider types of recreation and amenity uses required;*
- *Public open spaces to have good connectivity and be accessible by safe, secure walking and cycling routes;*

Open space to be planned for on a multi-functional basis incorporating ecosystem services, climate change measures, Green Infrastructure and key landscape features in their design.

As per section 7.5 Placemaking Climate Context and Associated Actions. By changing the text in CPO 7.8 from 'change' to 'action' will wrongly confuse the reader who may think it relates to the actions in 7.5 7.5 Placemaking Climate Context and Associated Actions which is not the case for this CPO.

6.7.10 Chief Executive Recommendation

CE CH 7.2

Include the following additional CPO after CPO 7.3

'Promote and encourage connectivity improvements to promote sustainable travel in urban and rural areas in accordance with relevant funding initiatives.'

CE CH 7.3

In section 7.4.1 Placemaking include 'environmental' in 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.*

CE CH 7.4

Merge CPO 7.5 and CPO 7.6 as follows:

Have regard to national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)' and regional policy as set out in the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' in the EMRA RSES.

6.7.11 Elements of Placemaking – Revitalisation of Historic Centres

The Department of Tourism, Arts, Culture, Gaeltacht Sports and Media is developing a National Policy on Architecture (NPA), under several themes, all of which are applicable to the future sustainable development of town centres i.e. research strategies required to inform planning and development, heritage-led regeneration and climate change adaptation and the design of high quality places for people. The Department suggest the inclusion of the following policy in the Development Plan: -

To coordinate significant infrastructural projects such as public realm works, flood relief works or new transport routes and alternative modes of transport to the benefit of surviving historic sites in order to improvement their enjoyment, presentation and enhanced accessibility.

We note in this regard examples from European counterparts of the removal of traffic from urban centres and the resulting improvement in air quality which has been exemplified by the recent COVID-19 lockdown and the perceived enjoyment of urban living in Ireland. These transitions support a return to sustainable and attractive urban living.

6.7.12 Chief Executive Response

The Draft Development Plan contains a number of chapters where this content is covered – Chapter 4: Core, Settlement and Housing Strategies indicates the concept of compact urban growth. Chapter 5: Transport, Infrastructure, Energy and Communications contains content in relation to sustainable transport.

In Chapter 6: Regeneration there is a specific section included as per 6.4.3 Heritage Urban Regeneration where it is stated that ‘Planning for the regeneration of a historic town needs an integrated approach that balances the protection of the built heritage and the sustainable development of historic urban areas with the needs of modern living and takes account of the concerns and aspirations of the community and key stakeholders. This requires the coordination and management of different stakeholders. The development of a common vision for a town, supported by a coordinated and integrated series of objectives and a programme of realistic, achievable actions, will balance the conservation of heritage, alongside the needs of those who live in and use the historic town. Bringing unused or underused spaces within towns back into use has many advantages, such as reviving economic value, activating abandoned and derelict sites, and reducing pressure for greenfield development. Additional initiatives to promote placemaking and the economic vibrancy include Town Centre Health checks, historic and public realm plans, which are linked to statutory local area plans. The importance of community led village design and enhancement statements is also recognised. Relevant Heritage Urban Regeneration County Policy Objectives are included to reflect this and regeneration related funding to support heritage led regeneration projects is included.

Chapter 7: Placemaking contains a specific section 7.4.2.1 Public Realm Improvements and associated policy. This along with the other elements contained in 7.4.2 Elements of Placemaking is considered sufficient.

Content is also covered in Chapter 12: Built and Cultural Heritage. There is also a Chapter on Climate (Chapter 3) and specific climate actions at the end of each chapter of the Draft Plan.

6.7.13 Chief Executive Recommendation

No change.

6.7.14 Public Realm Improvements

In terms of a number of Public Realm Improvements County Policy Objectives it is questioned whether a number of the CPO’s are to be progressed as part of a statutory LAP. CPO 7.9, 7.10, 7.11 and 7.12 refer.

CPO 7.9	Prepare Design Guidelines to provide for improvements in the appearance of streetscapes and for revitalising spaces.
CPO 7.10	Promote placemaking in town centres, by preparing a Placemaking Strategy for the towns of Longford, Edgeworthstown, Ballymahon, Granard and Lanesborough, and any other urban areas as deemed appropriate.
CPO 7.11	Seek funding to support the preparation of site-specific Public Realm Strategies to enhance the unique characteristics and assets of Longford's towns and villages.
CPO 7.12	Ensure the best quality of design is achieved for all new commercial and residential development, which respects and enhances the specific characteristics of the different towns and villages in the County, by promoting quality urban design that accommodates creative patterns of use having regard to the physical, cultural, and social identities of individual settlements building on existing investment in these measures to date.

Section 7.4.2.1 identifies that towns and villages are important attractions in themselves and should be referenced in relation to tourism benefits particularly that high quality and attractive towns and villages can increase visitor dwell time and expenditure in local businesses and communities. The section should make particular reference to Covid-19. The popularity of cycling and walking has increased significantly throughout the Covid-19 pandemic. Outdoor events and gatherings are going to play a more pivotal role in attracting visitors and events to towns and villages, high quality public realm and external spaces should be identified and prioritised for delivery. Improvements to public realm spaces should consider the visitor perspective and the ability of these spaces to facilitate and accommodate stimulating new experiences e.g. festivals/performance spaces etc. Quality urban design and architecture should facilitate vibrancy and animation throughout the day and night, and this can be achieved through creative design and multi-functional use within buildings and public spaces which encourage a broader mix of uses.

6.7.15 Chief Executive Response

CPO 7.9, 7.10, 7.11 and 7.12 reference Design Guidelines and Placemaking Strategies. It is not considered necessary at this point to stipulate whether or not these will be progressed as part of a statutory LAP process for the relevant settlement or whether they will be progressed in a non-statutory manner. This will be a management and resource driven issue will be decided as time and resources allow and will not impact on policy. In any case taking account the number of towns for which a placemaking strategy has been specified (as per CPO 7.10) which names for the towns of Longford, Edgeworthstown, Ballymahon, Granard and Lanesborough, and any other urban areas as deemed appropriate, it is therefore considered unlikely that Local Area Plans would be undertaken for all of these settlements taking account of their size and the statutory requirements for the preparation of LAPs for urban areas with a population over 5,000 persons.

It is considered that content required in relation to public realm is already covered in the Chapter in the Public Realm County Policy Objectives contained in section 7.4.2. Attention is also drawn to the following CPO: -

CPO 7.8 Promote the development of healthy and attractive places by ensuring:

- *Provision of open space should consider types of recreation and amenity uses required;*
- *Public open spaces to have good connectivity and be accessible by safe, secure walking and cycling routes;*
- *Open space to be planned for on a multi-functional basis incorporating ecosystem services, climate change measures, Green Infrastructure and key landscape features in their design.*

6.7.16 Chief Executive Recommendation

No change.

6.7.17 Universal Design

It is submitted that in terms of the various cohorts which should be catered for that 'young families' should also be included.

In terms of Universal Design County Policy Objectives, it is submitted that CPO 7.17 is a specific design guidance rather than a strategic objective.

CPO 7.17	<p>Promote simple and considered design interventions in urban environments as follows:</p> <ul style="list-style-type: none"> • Elimination of stepped features to facilitate wheelchair users and to assist people with prams, suitcases or shopping trolleys, those using walking or mobility aids and people with impaired vision; • Use of clear, well-placed signage and way-marking using recognised symbols or pictograms and visual supports to help the visually impaired and people with reading or cognitive difficulties and which can be understood by different language speakers; • Provision of sensory-friendly designs and layouts, with considered lighting and wayfinding installations together with sensory sensitive physical spaces to provide an inclusive and autism friendly environment; • Provision of designated parking spaces for older persons close to shopping centre entrances and any other such places as deemed appropriate; • Provision of outdoor retractable seating for older and infirmed persons; • Provision of seating areas for older persons and infirmed persons in commercial and retail premises.
----------	--

It is suggested that this CPO could refer to the following:

- Town centre placemaking – prevent leakage to periphery/out of centre locations?
- Reference retail strategy
- Appropriate mix of uses to increase use of TC/attractiveness
- Parking policy
- Links to LEO

- Living-over the-shop, BID, Purple flag initiatives
- Refer to VSL in regeneration
- Industry and enterprise – role of LEO, design statements – PP/DM CPO 7.23-25

6.7.18 Chief Executive Response

Universal Design refers to the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by everyone. Successful public spaces are multi-dimensional and appeal to people of all abilities, young and old, for a variety of reasons and purposes with a central focus on improving quality of life. It is accepted that families are a cohort which should be considered and specifically names in terms of universal design application.

In terms of Universal Design County Policy Objective CPO 7.17, it is considered that the additional issues raised have already been dealt with elsewhere in the relevant sections of the Draft Plan.

6.7.19 Chief Executive Recommendation

CE CH 7.5

Amend section 7.4.2.2 Universal Design to include provision for ‘families’ as follows:

Universal Design refers to the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by everyone. Successful public spaces are multi-dimensional and appeal to people of all abilities, young and old, for a variety of reasons and purposes with a central focus on improving quality of life. In catering for various cohorts in terms of older persons and disabled persons, families etc., it is important to recognise that successful buildings, urban spaces and public realms should not only be attractive but should serve a functional purpose that is easily accessible to everyone, regardless of age or ability. It is therefore important in the creation of new or adapted built environments that an inclusive universal design approach is undertaken. Quality placemaking should integrate the principles of universal access in the design of buildings, housing, public realm, amenities and transport services to create places that are safe, easy to move around and accessible to all (National Disability Authority ‘Building for Everyone: A Universal Design Approach’).

6.7.20 Accessible Tourism

It is considered that a section on Accessible Tourism be inserted into Section 7.4.2.2 ‘Universal Design’ or Chapter 10.

- *To facilitate, where appropriate, proposals to improve access for all at existing tourism sites and facilities, and to require all new tourism related developments to ensure the development is accessible to everyone, regardless of their age, or ability.*
- *It is an objective of the Council to support the provision of accessible tourism.*
- *To ensure all projects and improvements will adopt the principles of Universal Design.*
- *To undertake an Accessibility Audit within the lifetime of the Development plan to inform Accessible Tourism priority investments at key tourism hubs.*

6.7.21 Chief Executive Response

This material is considered more suitable to Chapter 10: Tourism and should therefore be considered in said chapter material. This is dealt with under the relevant section of this report.

6.7.22 Chief Executive Recommendation **CE CH 7.6**

These policies as relevant will be considered for inclusion in Chapter 10: Tourism and are dealt with in that section of this report.

6.7.23 Town Centre Placemaking

The inclusion of CPO 7.19 is questioned: *Promote a range of complimentary commercial activities in existing buildings previously in single commercial use.*

In terms of CPO 7.22 it is submitted that this could refer to incentives outlined under active land management.

6.7.24 Chief Executive Response

This policy is an important inclusion as it allows for flexibility and a range of uses in town centre locations. This is particularly important for maintaining the vitality and viability of town centres. It provides both increased economic viability which is particularly relevant in light of Covid 19 restrictions and the in order to counter the ill effects on town centres of the increased move to online retailing. An extended range of uses in buildings will extend the pull of town centres and will contribute to town centre renewal and potential attainment of 'purple flag' status.

In the Draft Plan CPO 7.22 is to 'Support the use of targeted financial incentives to strengthen the role of town and villages centres'. It is considered that referring to specific incentives is not necessary as it will narrow the remit of this objective.

6.7.25 Chief Executive Recommendation

No change.

6.7.26 Regeneration

It is submitted that section '7.2.4 Regeneration' should be moved to the introduction.

6.7.27 Chief Executive Response

In the Draft Plan as per section '7.4.2 Elements of Placemaking' it is stated that Placemaking includes many elements and the principal ones are then detailed in the subsequent sub sections. Regeneration is one of the elements of placemaking which are listed and described. Accordingly, its inclusion at this point is considered relevant.

Section '7.2.4 Regeneration' states the following:

In terms of placemaking this overlaps with the concept of regeneration. A central objective of this Plan is to regenerate the County's towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint (see Chapter 3: Core Strategy and Housing and Chapter 6 Regeneration for more detail). Given the varied nature and attributes of the town and village centres in

Longford, these chapters provide a framework to guide new development, regeneration and renewal of our towns and villages.

6.7.28 Chief Executive Recommendation

No change.

6.7.29 Industry and Enterprise Placemaking

In terms of CPO 7.25 it is queried whether there is a threshold / scale required to trigger the mobility management plan.

6.7.30 Chief Executive Response

CPO 7.25 is to *'Require industry / enterprise proposals to be accompanied with a Mobility Management Plan to include a site-specific programme to facilitate and promote sustainable operational practices, including the use of public transport services, walking and cycling'*.

This would be trigger in accordance with the requirements of the NRA and TII guidelines. As such it is considered that the CPO should be amended to reflect this.

6.7.31 Chief Executive Recommendation

CE CH 7.7

Include that following additional text in CPO 7.25 (in accordance with NRA threshold requirements) as follows:

Require industry / enterprise proposals to be accompanied with a Mobility Management Plan (in accordance with NRA and TII threshold requirements) to include a site-specific programme to facilitate and promote sustainable operational practices, including the use of public transport services, walking and cycling.

6.7.32 Social and Community Infrastructure – Population Analysis

It is submitted that placemaking is concerned with the interaction of the following areas rather than a detailed analysis of each which is already contained in another section: - Growing Population, Growing Youth Cohort, Ageing Population, Disabled Population. Ethnic Groups, Traveller Community, Social and Community Infrastructure Requirements, Healthcare and Care Facilities, Libraries, Fire Services' Places of Worship' Burial Grounds.

6.7.33 Chief Executive Response

The areas and population cohorts indicated in the Draft Plan Placemaking chapter represent the various cohorts and areas for which placemaking must provide adequate social infrastructure provision. There is a requirement for Development Plans to be evidenced based in their approach, and accordingly such analysis is provided and necessary in order to provide the necessary evidence for community and social infrastructure provision.

6.7.34 Chief Executive Recommendation

No change.

6.7.35 Social and Community Infrastructure - Provision

An Post (DCDP – 66)

An Post are currently assessing their existing facilities and lands within their ownership to devise a nationwide programme of development that will enhance their capability of providing a robust and reliable public service. In this regard, An Post are seeking to engage with Local Authorities to ensure this future development can be undertaken in a sustainable and efficient manner that benefits local areas and accords with local and national planning policy.

It is considered important that during the finalisation of the Longford CDP, Longford County Council carefully consider the existing and future operational requirements of An Post and include appropriate policies to support An Post's ambition to enhance postal facilities in Co. Longford. The following policies would assist in the delivery of future An Post projects in the County.

- *To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in the County;*
- *To facilitate the provision of postal infrastructure at suitable locations in the County;*
- *To promote the integration of appropriate post office facilities within new and existing communities that are appropriate to the size and scale of each settlement.*

6.7.36 Chief Executive Response

As per '7.4.4 Social and Community Infrastructure Requirements' it is indicated that as a result of the particular population characteristics, there is therefore potential for mis-alignment in the county across a range of social and infrastructure services in the county, which the Development Plan aims to address. The Development Plan aims to consider demographic trends and patterns in terms of the provision of social infrastructure. The existing County Policy Objectives included in the Draft Plan in terms of social and community infrastructure provision are noted and it is considered that these are appropriate and supportive of An Post.

It is the County Policy Objective to:

CPO 7.26 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.

CPO 7.28 Support the planned provision of easily accessible social, community, cultural and recreational facilities and ensure all communities have access to a range of facilities that meet their needs easily accessible by walking, cycling or public transport.

CP0 7.29 Encourage shared use and co-location of social and community facilities, in order to align service provision, use land more efficiently and facilitate opportunities for further inclusion and community participation.

6.7.37 Chief Executive Recommendation

No change.

6.7.38 HSE (DCEP-69)

The HSE made a detailed submission which contained content in relation to this chapter in relation to social inclusion and health inequalities, housing, elderly, younger people, people with disabilities and obesity.

In terms of the elderly it is submitted that there needs to be a range of options in housing provision for the elderly, not just an emphasis on care homes as has previously been the case throughout the country. It is recommended that sites in towns and villages in Longford are identified and earmarked for age friendly settlements. Further measures in relation to Universal Design principles, and social integration are recommended.

In terms of people with disabilities a number of measures are also recommended in terms of housing, access, employment and education opportunities and community services.

In terms of younger people, it is submitted that Longford County Council should consider providing a range of facilities such as skate parks, graffiti/art walls, playing courts, meeting areas etc. to cater for adolescent. The EHS suggests suitable sites are identified for youth cafes or similar facilities and that specific funding is put aside for these multifunctional community spaces which should aim to provide sports, music and drama activities. Specific guidance in relation to the running and operation of these facilities are recommended. Connectivity and transport issues to these facilities should also be considered by Longford County Council. It is also recommended that Longford County Council establish processes that enable consultation with young people in the development and implementation of programmes in which they are involved i.e. playgrounds, activity centres and public spaces. Specific measures that tackle isolation and exclusion of young people from minority backgrounds should also be implemented.

In terms of obesity it is submitted that an assessment of food outlets in every town and village in Longford should be carried out to ensure that choices of healthy food options are equally available and to prevent a proliferation of fast food outlets. Longford County Council should create environments that make the healthy choice the easy choice through a number of recommended measures. It should also be a strategic aim from the Longford Development Plan to facilitate the production of more locally produced healthy, high quality food and implement a food strategy for the county.

6.7.39 Chief Executive Response:

The content of this submission is noted. Reference has been made to a wide range of demographic groups of the population with particular reference to Longford. Related content on specific demographic cohorts is already contained within the Placemaking Chapter and other chapters of the Draft Plan. In particular in relation to Obesity, attention is drawn to Chapter 16; Development Management Standards and the associated Fast Food Outlet Development Management Standards contained within. Specific issue in relation to Housing is addressed in

Chapter 4: Core, Settlement and Housing Strategies. It is considered that sufficient text and policy objectives as outlined in the Draft Plan have been included which addresses the issues raised in the submission.

Some of the issues highlighted in this submission are outside the remit of the County Development Plan and more appropriate to consideration in the LECP or other fora.

6.7.40 Chief Executive Recommendation:

No change.

6.7.41 PPN (DCCP-83)

It is submitted by the PPN that along with opportunities for education, training and further skills development that more comprehensive training programmes from re-employment to outreach degree programmes must be developed. It is also submitted that there needs to be accessible, affordable childcare to enable parents to access employment. Support for volunteering needs to be developed. All new businesses and buildings must be accessible to people with disabilities.

The submission also contains content in relation to a plethora of issues in relation to health, housing, targeted actions for various population cohorts and associated social and community infrastructure provision, as well as miscellaneous issues. Such issues raised included social and affordable housing; rural isolation; provision of additional supports that meet the needs of all members of the community including those with disabilities, older citizens, and vulnerable people; provision of appropriate spaces and services that promote social interaction, information sharing and appropriate training; provision of a broad range of accessible sporting and outdoor activity facilities for all; education and training supports; measures to address social exclusion and unemployment; universal access issues; general and mental health issues, wellbeing; promotion of volunteerism and culture; community participation, anti – social behaviour; development of walking and cycling trails etc.

6.7.42 Chief Executive Response

The content of this submission is noted. Related content is already contained within the Placemaking Chapter and other chapters of the Draft Plan – Chapter 6: Regeneration, Chapter 4: Core, Settlement and Housing Strategies, Chapter 8: Economic Development and Chapter 16 Development Management Standards and are considered appropriate and satisfactory. Some of the issues highlighted in this submission are outside the remit of the County Development Plan and more appropriate to consideration in the LECP or other fora.

In terms of measures to address anti-social behaviour it is considered that additional measures could be included in order to support measures to design out crime in relation to community infrastructure and recreational areas and accordingly a CPO to this effect should be included as part of the plan.

6.7.43 Chief Executive Recommendation

CE CH 7.8

To insert the following new CPO after CPO 7.29

Ensure crime prevention measures are incorporated into the design of community buildings and recreational areas

6.7.44 Recreation and Open Space Provision

It is submitted that this section should be cross referenced to the relevant regeneration section.

6.7.45 Chief Executive Response

Recreation and open space provision are addressed specifically in the Placemaking Chapter and there is not a specific section in Chapter 6: Regeneration to which it should be cross referenced to.

6.7.46 Chief Executive Recommendation:

No change.

6.7.47 Education

The Department notes and welcomes the various Education County Policy Objectives outlined. In section 7.4.6 on Education the policy for the provision of new schools on well-located sites within or close to existing built-up areas that meet the diverse needs of local populations is welcome. Based on its analysis, the Department anticipates that some requirements for additional educational accommodation may emerge over the lifetime of the Plan, should the projected population increases materialize but did not identify a requirement at this stage to zone additional school sites. Given the NPF objectives around compact growth, the facility to expand existing schools and/or to otherwise maximise the use of existing school sites will be critical for the community in Longford and for the Department in the future, in order to meet emerging requirements in Longford (and nationally). In that context, the inclusion of a specific objective in the Plan explicitly supporting the intensification of development on existing school sites would be welcomed.

In order to strengthen the zoning provision on existing school sites it would be welcome if education is specifically referenced in the zoning by applying the zoning category “Social/Community/Education” to all existing school sites in Co. Longford.

The Department of Further and Higher Education, Research, Innovation and Science would welcome their addition as a strategic stakeholder in the areas of Further Education, Higher Education and Training, most notably in the areas of: -

- The improvement and expansion of existing Higher Education/Further Education and Training facilities
- The identification and scale of sites necessary for the future provision of Higher Education/Further Education and Training in the region
- To work with the local authority in ensuring that appropriate infrastructural requirements are identified, planned and provided, concurrent with the provision of Higher Education/Further Education and Training facilities

6.7.48 Chief Executive Response

Taking account of the Department analysis that there may be some requirements for additional educational accommodation over the lifetime of the Plan it is accepted that given the NPF objectives around compact growth, the facility to expand existing schools and/or to otherwise maximise the use of existing school sites will be critical for the community in Longford and for the Department in the future, in order to meet

emerging requirements in Longford. In that context, the inclusion of a specific objective in the Plan explicitly supporting the intensification of development on existing school sites will be included.

In order to strengthen the zoning provision on existing school sites, education will be specifically referenced in the zoning by applying the zoning category “Social/Community/Education/Public Utility” to all existing school sites in Co. Longford.

The Department of Further and Higher Education, Research, Innovation and Science’s comments are noted. The following existing CPO’s are contained in the Draft Plan:

CPO 7.36: Work collaboratively with the Department of Education and Skills to ensure a planned approach to education provision and to the location of school facilities within access to public transport and sustainable travel modes (i.e. walking, cycling).

CPO 7.37 Ensure in areas where significant new housing is proposed, an assessment of need regarding schools’ provision is carried out in collaboration with the Department of Education and Skills.

It is considered that both of these policies should be amended to include reference to the Department of Further and Higher Education, Research, Innovation and Science

6.7.49 Chief Executive Recommendation

CE CH 7.9

To insert the following new CPO after existing CPO 7.39:

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

CE CH 7.10

Apply the zoning category “*Social/Community/Education/Public Utility*” to all existing school sites in Co. Longford.

CE CH 7.11

Amend CPO 7.36 to include reference to the Department of Further and Higher Education, Research, Innovation and Science as follows:

CPO 7.36 : Work collaboratively with the Department of Education and Skills and Department of Further and Higher Education, Research, Innovation and Science to ensure a planned approach to education provision and to the location of school facilities within access to public transport and sustainable travel modes (i.e. walking, cycling).

CE CH 7.12

Amend CPO 7.37 to include reference to the Department of Further and Higher Education, Research, Innovation and Science as follows:

CPO 7.37 Ensure in areas where significant new housing is proposed, an assessment of need regarding schools’ provision is carried out in collaboration with the Department of Education and Skills and Department of Further and Higher Education, Research, Innovation and Science.

6.7.50 Burial Grounds

Keep Ireland Open have indicated their support for this chapter, and in particular have specified their support for 7.14.12 Burial Grounds Policy Objectives. However, it is submitted that CPO 7.63 should be replaced by the following which is based on Roscommon, Laois, Leitrim, Westmeath Draft and many other plans.

Protect, preserve, enhance, conserve and maintain archaeological, historic and cultural value of graveyards and their settings and historic burial grounds (including those identified in the RPM) and those in the guardianship of the Council through improved access and preserve their heritage value Encourage and promote local involvement and community stewardship in the care, upkeep, maintenance, management rehabilitation and conservation of these graveyards in accordance with legislation, best conservation practice and heritage principals and best practice guidelines. Maintain all burial grounds in the Council's charge in good condition.

The Department of Tourism, Arts, Culture, Gaeltacht Sports and Media indicated that due to the particular concerns presented by applications for extensions to medieval graveyards, the following new County Policy Objectives should be included in the County Development plan.

- To protect historic graveyards, including through the avoidance of extensions to them that would have an inappropriate level of impact on sub-surface archaeological remains or on their setting or amenity and, in that regard, as an alternative to extensions to historic graveyards to endeavour to find alternative locations where additional land for burial is considered necessary.
- To ensure that historic graveyards in the ownership or care of the local authority are managed and maintained in accordance with appropriate conservation standards and that local communities involved in care and maintenance of historic graveyards receive appropriate advice regarding such standards.

The PPN have requested the establishment of a Natural Burial Ground to provide green burial options.

6.7.51 Chief Executive Response

In the Draft Plan as per section 7.4.12 Burial Grounds it is indicated that local Authorities are responsible for ensuring that there are adequate burial facilities, including the reservation and acquisition of lands for such facilities, where necessary. The Council aims to provide an adequate level of cemetery provision on a county wide basis, taking into account the likely future requirements. In this regard the Council will seek to ensure that the lands necessary to provide for future needs are acquired and developed in a planned manner. A number of County Policy Objectives are included to support this.

In the draft Plan CPO 7.68 is to 'Protect the cultural heritage of historical burial grounds within the County and encourage their management and maintenance in accordance with best conservation practice'. This is considered to cover the content of the additional content suggested in a more succinct manner. It should also be noted that content in relation to the protection of historic monuments, heritage and conservation is covered in Chapter 12: Built and Cultural Heritage.

In relation to the suggestion of the establishment of a natural burial ground to provide green burial options, attention is drawn to Section '7.4.12 Burial Grounds' and specifically CPO 7.59 to *'Facilitate the provision of traditional burial grounds, eco-friendly burial grounds, crematoria, and the extension of existing cemeteries and associated facilities, as appropriate, to cater for the needs of the County, subject to appropriate planning considerations, including ground and surface water, environmental, noise and traffic impacts'*.

6.7.52 Chief Executive Recommendation

No change.

6.7.53 Placemaking Climate Context and Associated Actions

In terms of specific Placemaking Climate Context and associated actions it is submitted that additional actions as follows should be included:

1. Green infrastructure, flood mitigation, biodiversity, proximity to other functions/uses – encouraging walking cycling – Longford specific e.g. Albert Reynolds Peace Park
2. Town Centre use mix – reduce need for vehicular travel
3. Installation of EV points at appropriate locations?
4. Co-location of facilities to reduce need to travel (bullet points above)
5. Promote Micro renewables and retrofit in conjunction with JTF and climate action plan

6.7.54 Chief Executive Response

In general, it is considered that the wording of the proposed Actions is more appropriate under policy and objective and are already addressed under same.

As raised about under submission:

1. Proposed Action 1 of the submission refers to the inclusion of 'Green Infrastructure' and is deemed addressed within the existing Chapter 13 (Green Infrastructure).
2. Proposed Action 2 of the submission refers to Town Centre mixed use, and is deemed addressed within the existing '4.5 County Longford Development Plan Strategy (Core Strategy)', where *"In accordance with statutory requirements the County Longford Core Strategy sets out to: Provide an evidence-based rationale for the land proposed to be zoned for residential and mixed-use development having regard to the capacity of existing zoned land and the phasing of development taking account of the location of public transport and services."*
3. Proposed Action 3 of the submission refers to the installation of Electric Vehicle (EV) points, and is deemed addressed within the existing policy CPO 5.52 to *"Liaise and collaborate with relevant agencies to support the growth of EVs with support facilities and infrastructure through a roll-out of additional electrical charging infrastructure at appropriate locations."*, and Action A5.1 and A5.2 of the 'Transport, Infrastructure, Energy and Communications – Climate Actions'.

4. Proposed Action 4 of the submission refers to the availability of facilities and deems already address under CPO 14.29 to *“Encourage provision of facilities to strengthen settlements”*.
5. Proposed Action 5 of the submission refers to the promotion of micro renewables and retrofit and is considered already address under the topic of ‘Buildings’ and ‘Transport’ within ‘Table 3.1 Climate Mitigation Measures’ of the draft Plan.

6.7.55 Chief Executive Recommendation:

No change.

6.8 Chapter 8: Economic Development

Relevant Submissions: DCDP- 7, 19, 58, 62, 69, 79
--

The following is a summary of the main issues raised in submissions received:

- Retail Strategy
- Employment/Economic development and national road access
- Extractive Industry
- Strategic Employment Lands
- Commercial and Industrial Development on Bord Na Móna Landholding

6.8.1 Retail Strategy

The submission from the NWRA (DCDP-07) has expressed concerns at the quantum of new retail development proposed, whilst highlighting the nearly 10,000m² of vacant retail space already in existence. The submission contends that if development of this scale occurs there could be adverse impacts on existing retail operations in our region. It is also noted that the proposed settlement hierarchy and retail hierarchy are not consistent with each other.

Another submission (DCDP-53) requests that flexible zonings be provided to ensure the retail function of Longford's primary settlements can be strengthened.

The submission from TII (DCDP-19) recommends the insertion of a policy objective to reference the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways reflecting policy outlined in the Retail Planning Guidelines, 2012.

6.8.2 Employment/Economic Development and National Road Access

The submission from TII (DCDP-19) recommends the insertion of a policy objective to reference cross referencing with policies included in Chapter 5 relating to access to national roads.

6.8.3 Extractive Industry

Concerns are expressed (under DCDP-58) in relation to the absence of reference to quarrying or the extractive industries within the Economic Development Chapter of the Draft Plan.

6.8.4 Strategic Employment Lands

The submission of the Local Enterprise Office (DCDP-62) has expressed the need to conduct a detailed examination of transport corridors surrounding Longford Town to identify strategic land banks that may be suitable for commercial and industrial development.

6.8.5 Commercial and Industrial Development - Bord Na Móna

The submission from Bord Na Móna (DCDP-79) references an example where a former briquette production plant has been repurposed as a plastics recycling facility supporting 40 new jobs and advises that the Council provide policy support for appropriate commercial and industrial development on Bord na Móna landholding.

6.8.6 Chief Executive's Response

6.8.7 Retail Strategy

In response to the concerns raised in the submission by the NWRA regarding the quantum of retail floorspace projected over the plan period, the response provided for Recommendation 10 of the OPR submission refers.

The projected retail floorspace requirements have been undertaken in accordance with the methodology adopted in the current Retail Strategy, and in line with the approach advocated in the *Retail Planning Guidelines* (2012), it is acknowledged that critical inputs to the projected floorspace methodology, such as economic growth patterns and levels of disposable income, can produce highly variable outcomes. This is particularly apt in the case of the Draft Retail Strategy which was prepared prior to the Covid-19 pandemic and based on previous economic growth projections which are now unrealistic given the economic impact of the pandemic.

Assumptions on the rates of inflow and outflow retail activity into the county have a significant effect also in projecting future floorspace requirements. Such assumptions used in the Draft Retail Strategy were based on historic trends which may no longer accurately reflect actual retail patterns, particularly during and, undoubtedly, following the Covid-19 pandemic. Accordingly, the Planning Authority shall conduct an interim review of projected floorspace requirements to provide an evidence-based quantum of retail floorspace requirements for the Draft Plan period.

In response to the submission from Tesco (DCDP-53) regarding the need for flexible policies and land use zonings to allow for development of modern convenience floorspace and enhancement of existing retail units, it should be noted that the 'Town Core' land use zoning objective associated with defined settlements of the Settlement Hierarchy provides for a range of permissible uses included retail. Given the overall preferred location for new retail development is within town centres (as per the sequential development approach advocated in the *Retail Planning Guidelines* (2012), it is considered that there is sufficient flexibility and associated policy support for retail development within the Draft Plan.

With regard to the recommendation from TII on the insertion of a policy objective referencing the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways, Section 5.6 of the Draft County Longford Retail Strategy makes reference to presumption against the further development of out-of-centre retail parks and a preference for sites in or adjacent to town centres to ensure the potential for linked trips and commercial synergy. Notwithstanding, a more explicit policy objective is recommended to be inserted into the amended Draft Plan as per Chief Executive Recommendation CE OPR 1.30.

6.8.8 Employment/Economic Development and National Road Access

A policy objective cross referencing with policies included in Chapter 5 relating to access to national roads shall be included in Section 8.7 of the Plan.

6.8.9 Extractive Industry

The contribution that the extractive industry makes to the economy in County Longford is acknowledged. With respect to the absence of the citing of the same within the Economic Development chapter of the Draft Plan (Chapter 8), it is noted that Extractive Industries are specifically addressed in Section 9.3.7 of the Draft Plan.

6.8.10 Strategic Employment Lands

In response to the submission of the Local Enterprise Office regarding the need to conduct a detailed examination of transport corridors surrounding Longford Town to identify strategic land banks for commercial and industrial development, regard is had to the following relevant policies:

CPO 8.5 - Ensure that sufficient land is zoned for economic activity through the County Development Plan and any relevant Local Areas Plan. Such land will normally be protected from inappropriate development that would prejudice its long-term development for employment and economic activity.

CPO 8.6 - Ensure that zoning for employment uses will be carried out in a manner which protects investment in the national road network, in accordance with Chapter 2 of the DECLG guidelines on 'Spatial Planning and National Roads'.

CPO 8.7 - Collaborate with key agencies in the identification, scope, development and promoting of sites as potential enterprise landing spaces throughout the County.

CPO 8.8 - Support economic development at locations that maximise existing infrastructural provision, particularly in relation to locating high employee generating enterprise and industry proximate to high capacity public transport networks and links.

CPO 8.24 - Support the provision of physical infrastructure and zoned lands to realise the delivery of strategic employment lands in central accessible locations".

It should be noted that the preparation of the forthcoming Longford Town Local Area Plan will be informed by a Local Transport Plan to be prepared for Longford Town in accordance with RPO 8.6 of the RSES. Notwithstanding, the Council understands that the Eastern and Midland Regional Assembly (EMRA) is currently preparing an economic paper on activity and land supply in the region and has found a shortage of appropriately sized land banks and FDI/IDA appropriate business premises throughout the Region, including in Longford Town. EMRA has requested the inclusion of a complimentary policy and/or objective, to enable the delivery of same.

6.8.11 Commercial and Industrial Development - Bord Na Móna

In response to the submission from Bord Na Móna (CDCP-79) in relation to the repurposing of former Bord na Móna facilities for economic development, regard is had to CPO 8.15 which supports the reuse of sites and existing building stock for economic development and is considered sufficiently broad to adequately provide policy support.

6.8.12 Chief Executive Recommendation

CE CH 8.1

Insert the following additional County Policy Objective after existing CPO 8.6:

Have regard to the County Policy Objectives contained in Section 5.2.3 of this Plan when assessing proposals for economic or employment generating development and their potential impact on the road and street network where the protection of routes of strategic importance within the County from further access creation and intensification of existing accesses and development on national routes is a key consideration. Development on the National and Regional Routes outlined in CPO 5.17 shall be carefully considered to preserve their strategic role and safeguard the strategic function of the national road network, in accordance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012)".

CE CH 8.2

*** CE OPR 1.26 refers:**

Conduct an interim review of projected floorspace requirements to provide an evidence-based quantum of retail floorspace requirements for the Draft Plan period.

CE CH 8.3

*** CE OPR 1.30 refers:**

Insert new CPO after CPO 8.68 as follows:

Impose a presumption against the provision of large scale out of town retail development located adjacent or close to existing, new or planned national roads in accordance with the provisions of the Retail Planning Guidelines (2012).

6.9 Chapter 9: Rural Economy

Relevant Submissions: DCDP- 19, 47, 52, 58, 69, 70, 76, 79, 83

The following is a summary of the main issues raised in submissions received:

- Supporting Rural Regeneration (Bord na Mona)
- Rural development and national road access
- Accommodation for seasonal workers
- Development charges for horticulture structures
- Extractive Industry
- Suggested policy objectives amendments
- Sustainable agriculture
- Native woodland planting
- Horticultural practices
- Provision of Market Space

6.9.1 Supporting Rural Regeneration (Bord na Mona)

Accessibility and connectivity to amenities is crucial. Cutaway peatlands have enormous potential to provide quality recreational areas for both local and national users. By developing cycle and walkways the greater region has the potential to become more accessible to all sections of society. If done in conjunction with a well thought out tourism plan there is real potential to create sustainable tourism jobs within the local communities. It is important to maintain a balance which recognises the suitability of a particular site as a potential future amenity or as a site which can be developed for the purposes of commercial activity: which will also have the effect of strengthening local rural economies and communities.

Bord na Mona are pioneers in the development of community benefit schemes providing significant funds for investment in catchment communities for rural, town and village regeneration supported by the commercial renewable energy developments. Such funding presents a major opportunity for communities near wind and solar farms to benefit from flexible, long-term, private sector investment with the potential to draw in additional matched funding under the Renewable Electricity Support Scheme (RESS). With the Government target of 70 per cent of electricity coming from renewable sources by 2030, it is conservatively estimated that the cumulative value of community benefit contributions from 2020 to 2030 would be approximately €250 million for wind energy alone.

This is not just an opportunity for the communities living close to renewable energy projects; it is a green opportunity — a significant portion of the money invested in community benefit funds will be used to drive the decarbonisation of communities, to cut energy bills for families and fight fuel poverty, invest in the green economy infrastructure and create jobs.

6.9.2 Rural Development and National Road Access

The submission from TII (DCDP-19) recommends the insertion of a policy objective and related text cross referencing with policies included in Chapter 5 relating to access to national roads for rural enterprise and economic development.

6.9.3 Accommodation for Seasonal Workers

DCDP-47 requests policy requirements be made in the Draft Plan to support the provision of temporary onsite accommodation to facilitate seasonal workers associated with producers of homegrown foods and vegetables.

6.9.4 Development Charges for Horticulture Structures

Reference is made to the absence within the Draft Plan for a provision for the construction of poly houses and tunnels for the growing and harvesting of fruit crops or other horticultural crops with zero or minimum development charges.

6.9.5 Extractive Industry

Roadstone Limited (DCDP-58) requests that policy provisions emphasising the socio-economic benefits of the extractive industry should be included in the Plan. An Taisce (DCDP-76) requests that a policy objective be included to require strict enforcement against unauthorised development and of conditions applied to permitted quarry development.

6.9.6 Suggested Policy Objective Amendments

Keep Ireland Open (DCDP-70) suggests a number of amendments to policy objectives relating to agriculture, forestry and the extractive industry, as well as suggested policy objectives in respect of the same based on similar policies and objectives contained in other county development plans. Reference is also made to the inclusion of a policy objective to only permit commercial/industrial development in the countryside where such development could not be accommodating at an alternative location and not give rise to any adverse impacts on the receiving environment.

6.9.7 Sustainable Agriculture

An Taisce (DCDP-76) recognises that agriculture will continue to form a key part of the rural economy in Longford, with added reference to the need for sustainable agriculture practices. It is recommended that stated objectives promoting agriculture diversification be enhanced to specifically promote the production of vegetables, grains, nuts, pulses, fruits etc. In addition, the same submission also makes reference to EU Commission's "*A Farm to Fork Strategy*" and the "*EU Biodiversity Strategy for 2030 – Bringing Nature Back Into Our Lives*" for inclusion into the Draft Plan in terms of context and policy.

A request is made to insert objectives which promote sustainable farming practices. Reference is made to the implementation of a 'Food Strategy'. The community needs to be supported to be self-sufficient in agriculture and horticulture. All Tidy Towns groups should be required to establish and maintain a community garden, which should include a composting facility. Fruit trees and bushes should be planted on suitable council land.

6.9.8 Native Woodland Planting

An Taisce (DCDP-76) considers that the policy objectives around forestry should differentiate between the planting of native woodland and the planting of other species such as sitka spruce and suggests that greater emphasis should be placed on facilitating the planting of broadleaf woodlands.

6.9.9 Horticultural Practices

An Taisce (DCDP-76) requests that an additional policy objective should be included to prohibit the extraction and use of peat for horticulture.

6.9.10 Provision of Market Space

The provision of space for food markets in line with Food Wise 2025.

6.9.11 Chief Executive Response

6.9.12 Supporting Rural Regeneration (Bord na Mona)

The comments which are positive in nature are welcomed and noted. In addition to the policies and content contained in chapters 8 and 9, there are also policies contained in Chapter 6 which support regeneration, where general policies on regeneration are outlined, in addition to the different types of regeneration opportunities within the county. Specific projects are indicated to be pursued within the lifetime of the Plan, which include 'Just Transition' opportunities. There are also specific chapters in the Development Plan which relates to economic development, rural development and infrastructure where this submission has been considered.

6.9.13 Rural Development and National Road Access

Relevant text addressing the requirement to adhere to the provisions of official policy in relation to development accessing national roads shall be inserted under Section 9.3.1, along with a corresponding policy objective to ensure the safeguarding of the operation and safety of the national road network in respect of rural development.

6.9.14 Accommodation for Seasonal Workers

Temporary residential structures (e.g. mobile homes, caravans, cabins, portacabins etc) form a haphazard and substandard form of residential accommodation and generally have poor aesthetic value and can detract from the overall appearance of an area, particularly in a rural context. It is the preference of the Council that accommodation for any such seasonal workers should be provided in existing buildings either on or off site where possible.

6.9.15 Development Charges for Horticulture Structures

The rates of development contributions payable are set under the Development Contribution Scheme (DCS), with the current scheme for Longford County Council in place until 2022. This scheme operates under a separate legal mechanism to that of the County Development Plan (under Section 48 of the Planning and Development Act 2000, as amended), and therefore any submissions regarding development contributes fees for classes of development should be facilitated in the public consultation phase relevant to same.

6.9.16 Extractive Industry

The role of the extractive industry in underpinning construction output and providing employment and economic growth in the local and regional economy is recognised in Section 9.3.7 of the plan and underpinned by sufficient support in a series of County Policy Objectives.

In relation to enforcement against unauthorised development and of conditions applied to permitted quarry development, the Draft Plan provides the policy context against which planning applications for any extractive industry are assessed such as *Quarries and Ancillary Activities* (DEHLG 2004) and *Guidelines for Environmental Management in the Extractive Sector* (EPA, 2006), as well as any other relevant superseding policy guidance as outlined under Section 16.4.16.3 of *Chapter 16 – Development Management Standards*. Any unauthorised developments come under the remit of Planning Enforcement in accordance with provisions as set out in the Planning & Development Act. As such no further change to the Draft Plan is considered necessary.

6.9.17 Suggested Policy Objective Amendments

In relation to the suggested amendments to policy objectives and additional policies relating to agriculture, forestry and the extractive industry, the policy objectives detailed in Sections 9.3.1 (*Rural Enterprise and Economy*), 9.3.2 (*Agriculture*), 9.3.3 (*Forestry*) and 9.3.7 (*Extractive Industries*), as well as relevant policy objective content contained elsewhere in the Draft Plan, most notably in Chapters 8 – *Economic Development*, 9 – *Rural Economy* and 12 – *Natural Heritage and Environment*, are considered sufficient.

In relation to the request for a specific policy objective for commercial/industrial development in the countryside, regard is had to the provisions available in CPO 8.45 of the Draft Plan which states:

Consider proposals for enterprise and employment uses on their merits in rural locations and where their specific location offers amenity, environmental and economic advantage. Such enterprises or considered industrial projects, new or expanded, may sometimes require sites outside settlements because of their size or other specific site requirements. Such projects will be assessed taking account of:

- *The contribution of the proposed development to the county's economy;*
- *The contribution of the proposed development to the county's environment and the principles of sustainable development;*
- *Assessment of any potential environmental effects;*
- *The economic viability and availability of alternative sites; and*
- *National planning policy.*

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

Accordingly, it is considered that there is sufficient policy coverage.

6.9.18 Sustainable Agriculture

The request to promote more sustainable farming practices is already addressed under section 9.3 'County Longford Rural Economic Development Strategy' of the Draft Plan whereby current and continued adherence to the document is based on the principle of *"supporting sustainable agriculture and food production practices that safeguard the environmental and ecological elements of our rural setting, with a particular focus on encouraging less intensive farming practices and catering for localised food markets in a bid to reduce our over-reliance on overseas food producers."*

This is considered acknowledged within the Draft Development Plan under Section 9.3.1 'Rural Enterprise and Economy, whereby *"Key considerations for rural enterprise will be: Horticulture, forestry, tourism, energy production and rural resource-based enterprises will be facilitated in the rural areas, subject to proper planning considerations."* and under policy CPO 9.32 whereby *"It is the County Policy Objective to: Support the horticulture and nursery stock industry as a means of diversifying agriculture and contributing to maintaining population in the rural area."*;

Further reinforcement is made under 'Agriculture, Land Management and Forestry' of 'Table 3.1 Climate Mitigation Measures', setting out multiple measures relating to the sustainable production of food and acknowledged within the plan under policy CPO 9.2 and CPO 9.19. The issues raised relating to food production are also referenced within the 'Agriculture, Land Management and Forests' section of the Climate Mitigation Measures outlined in Table 3.1 of the Draft Plan.

The Draft Plan supports the role of rural areas and the countryside in sustaining the rural economy and its role as a key resource for agriculture and agri-food, forestry, energy production and carbon reduction, tourism, recreation, mineral extraction and/or other new and emerging rural based enterprises, in an environmentally sustainable manner. CPOs 9.12 – 9.20 provide extensive policy coverage supporting environmentally sustainable agricultural practices in a manner that protects watercourses, wildlife habitats and areas of ecological importance from the threat of pollution. Notwithstanding the aforementioned policies, it is considered appropriate to include reference to the EU "A Farm to Fork Strategy" 2020 and the 14-point EU Nature Restoration Plan in the EU "Biodiversity Strategy for 2030 - Bringing nature back into our lives".

6.9.19 Native Woodland Planting

The importance of native woodlands is acknowledged in the Draft Plan with CPO 9.27 encouraging *"the planting of diverse and native species to ensure rich and varied biodiversity value, particularly in areas where there is evidence of a dominant species planted cumulatively within the landscape"*. Section 9.3.3 of the Draft Plan makes reference to the low biodiversity and ecological value forestry offers if dominated by one single species and particularly conifer-type species. It is considered that the inclusion of a specific county policy objective advocating the provision of broadleaf planting should be included in the Plan.

6.9.20 Horticultural Practices

The Council recognises the importance of peatlands as a major natural, archaeological and non-renewable resource. The Draft Plan acknowledges under Section 12.9 of *Chapter 12: Natural Heritage & Environment*, that peatlands are the most important long-term carbon store in the terrestrial biosphere and in their natural state peatlands act as long-term sinks for atmospheric carbon dioxide. Given the extent of intact raised bogs in County Longford, considerable potential exists to use this valuable resource to mitigate against the impacts of climate change.

In terms of restricting the use of peat for horticultural purposes it is noted that there are a number of peatlands county policy objectives (CPO12.42-12.45) which seek to protect the County's designated peatland areas and landscapes, and to exercise control of peat extraction, both individually and cumulatively. As such no changes are necessary in this regard.

6.9.21 Provision of Market Space

CPO 9.33 sets out the Local Authority's commitment to *"supporting the development of country and farmers' markets as key trading areas for the sale of local agricultural and craft produce and to support their role as visitor attractions"*.

6.9.22 Chief Executive Recommendation

CE CH 9.1

Amend the text contained in Section 9.3.1 (4th paragraph) to include the following additional text:

Such developments, as with all rural-based developments and enterprises, will be subject to the policy objectives contained in Chapter 5 of this Plan with particular emphasis on those policy objectives contained in Section 5.2.3 in relation to development accessing national roads, in the context of traffic safety and the protection of the national road network.

CE CH 9.2

To insert a new County Policy Objective after CPO 9.11 as follows:

Have regard to the County Policy Objectives contained in Section 5.2.3 of this Plan when assessing proposals for rural economic or employment generating development and their potential impact on the road network where the protection of routes of strategic importance within the County from further access creation and intensification of existing accesses and development on national routes is a key consideration. Development on the National and Regional Routes outlined in CPO 5.17 shall be carefully considered to preserve their strategic role and safeguard the strategic function of the national road network, in accordance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012).

CE CH 9.3

To insert a new County Policy Objective after CPO 9.20 as follows:

Ensure that agriculture development is in compliance with the EU “A Farm to Fork Strategy” 2020 and parallel to the 14 point EU Nature Restoration Plan in the EU “Biodiversity Strategy for 2030 - Bringing nature back into our lives.

CE CH 9.4

To amend County Policy Objective 9.27 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.

6.10 Chapter 10: Tourism

Relevant Submissions: DCDP-09, 12, 14, 38, 51, 52, 57, 70, 79, 83, 93
--

The following is a summary of the main issues raised in submissions received in this subject area:

- Sustainable Tourism and enhancement of Biodiversity
- Accessible Tourism, mobility, visual or learning issues support
- Support Heritage and Geotourism
- Consider Archaeology, Architecture and town revitalisation for tourism opportunities
- Sensitive location of tourism developments.
- Protect and encourage public access and amenities.
- Support for additional Greenways infrastructure
- Supporting Tourism in Rural Areas and Forestry
- Mutual inclusive future uses in cut away bogs
- Destination Experience Development Plans
- Restoration of Heritage Buildings for Tourism Activities

Chapter 10 is a standalone chapter dedicated to Tourism. The aim of this chapter is to provide for the continued sustainable development and expansion of the tourism sector, with a focus on creating strong visitor destination towns and villages, sufficient high-quality visitor services and the continued development and enhancement of visitor attractions and activities to provide memorable experiences, capitalising on our natural and cultural heritage assets, whilst safeguarding these resources for future generations.

6.10.1 Sustainable Tourism, Visitor Services and the Natural Environment

Longford's approach to the Tourism Chapter is endorsed in several submissions. Positive recognition for the policies and objectives as outlined in the Draft Plan relating to sustainable tourism, local tourism, recreation and amenities, delivering local and wider community benefit is recognised. The various submissions relating to Tourism discuss various elements of tourism and the tourism chapter and make certain suggestions for inclusion. The main theme of these submissions shall be briefly discussed below and additions/alterations where appropriate shall be recommended for inclusion in the Draft Plan. Where some of these suggestions have already been covered in the Chapter or elsewhere in the Plan no addition/alteration is recommended.

Fáilte Ireland and others welcome the inclusion of a dedicated tourism chapter which, it is submitted is very detailed and comprehensive in its approach. The submissions and Fáilte Ireland in particular recognises that the Chapter references many of the key areas which relate to tourism such as natural and built heritage; economic development and the rural economy and support the policies and objectives which provide guidance and enable decision makers and stakeholders to develop tourism in the county sustainably. The submission welcomes reference to Fáilte Ireland's role and policies including Fáilte Ireland's policy documents.

It is requested by Fáilte Ireland that reference be included to various issues such as Accessible Tourism, Destination Experience Development Plans and sustainable tourism. Various submissions including Keep Ireland Open requested additional supports for Heritage, Geology, Archaeology, Architecture and Urban revitalisation for tourism opportunities. Also, additional protections for various landscape types, public access, amenities and the sensitive location of tourism developments. An Taisce and Keep Ireland Open have referenced the need for protecting biodiversity and the natural environmental and a greater emphasis on walking and cycling tourism. These submissions where appropriate are considered worthwhile additions to the Tourism Chapter and have been recommended below.

In responding to the Draft Plan, Coillte request that the Council support the provision of tourism infrastructure and visitor services, including the provision of tourism accommodation at appropriate locations in the Coillte estate. They reference the success of the Center Parcs project in Newcastle woods and recommend the support of similar potential activities in the future. Bord na Mona in their submission requested a mutual inclusiveness of future uses of cut away bogs particularly regarding renewable energy which would align with the renewable energy section of the Draft Plan. The Bord also welcomes the inclusion of the proposed Mid Shannon Wilderness Park and the UNESCO Biosphere Reserve in the Plan.

6.10.2 Chief Executive's Response

Positive comments in relation to the structure and content of the Tourism Chapter in the Plan are acknowledged and welcomed. The Draft Plan gives a comprehensive commitment to support tourism across the County with CPO 10.1 specifically supporting the implementation of the County's Tourism Strategy, in collaboration with Fáilte Ireland, Waterways Ireland, EMRA, adjoining local authorities, tourism businesses and communities and other supporting agencies. It is recommended that the existing policy support for tourism development be strengthened by additional wording as part of the Plan.

The An Taisce submission indicated that it is their particular objective that future tourism and recreational visitor promotion nationally should be as car-free as possible. This theme was also supported by Keep Ireland Open in terms of public access, walking and cycling. Is it the intention of the Tourism Chapter of the Draft Plan to encourage longer area-based stays rather than drive-through tourism, based on enhanced promotion and development of safe greenway cycling routes, and attractive walking and hiking routes for all ages and abilities. It is recommended that this aspect of the Plan will be enhanced by additional wording and policy support to clarify this position.

In terms of support for Accessible Tourism, Destination Experience Development Plans, Sustainable Tourism, Heritage, Geology, Archaeology, Architecture, Urban revitalisation for tourism opportunities and public access, it is recommended that additional policy support be inserted as part of the plan. Also, additional protections for the County's landscape, public access, amenities and the sensitive location of tourism developments where appropriate are supported by adding text to the existing policies in this regard.

In addition, there are several CPO's in the Tourism Chapter of the plan which support the development of further tourism facilities, forest tourism, greenways, the biosphere reserve and the future use of cut away bogs. It is recommended that where appropriate these policies are amended to support and strengthen the existing policies in this regard. The importance of climate change and climate adaptation is recognised under the Draft Plan and in this regard, it is recommended that a specific reference to Sustainable Tourism and protecting biodiversity be inserted into the plan to support these Climate policies. Indeed, it is considered that the proposed application for UNESCO Biosphere reserve designation for the Mid Shannon Area will result in not only the protection of biodiversity but a substantial restoration of the Counties natural environment.

6.10.3 Chief Executive's Recommendations

CE CH 10.1

To add the following underlined text to the title and text of Section 10.5.2

10.5.2 *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.*

CE CH 10.2

To insert the following text at end of CPO10.1;

*Continue to support the implementation of the County's Tourism Strategy in line with national and regional policy in collaboration with Fáilte Ireland, Waterways Ireland, EMRA, adjoining Local Authorities, tourism businesses and communities and other supporting agencies. **As part of this process Longford County Council will liaise with Fáilte Ireland as required on the development of its strategy, as well as any smaller scale plans or programmes that are prepared to give effect to that strategy. Any such plans, programmes or policies shall be screened or assessed in full compliance with EU Directives including the SEA Directive and the Habitats Directive.***

CE CH 10.3

To insert the following underlined text into CPO10.2;

*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.*

CE CH 10.4

To insert the following underlined text into and at end of CPO10.5;

*Promote the development of sustainable and high-quality visitor attractions, activities and infrastructure, enabling an increase in the overall capacity, **encouraging longer area-based stays** and long-term development of the county's*

tourism industry, subject to appropriate siting and design criteria and the protection of environmentally sensitive areas.

CE CH 10.5

To insert the following underlined text into and at end of CPO10.7;

*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 too conflict with the enjoyment of areas used for informal recreation and existing public rights of way and walking routes.***

CE CH 10.6

To insert the following underlined text into CPO10.9;

*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.*

CE CH 10.7

To insert the following underlined text into and at end of CPO10.10;

*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.***

CE CH 10.8

To insert the following CPO after CP10.10;

To support the future development of Destination Experience Development Plans (DEDP's) which may be developed by Fáilte Ireland during the lifetime of this development plan and to ensure continued collaboration and alignment with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these DEDP's

CE CH 10.9

To insert the following underlined text within CPO10.14;

*Support and promote the use of **Sustainable Tourism and where appropriate 'Ecotourism Principles of Tourism Development'** in all proposed tourism activities in the County.*

CE CH 10.10

To insert the following CPO after CP10.24;

Develop public open spaces in all of Longford's towns that have good connectivity and are accessible for safe, secure walking and cycle routes.

CE CH 10.11

To insert the following CPO after CP10.24;

To facilitate, where appropriate, proposals to improve access for all at existing tourism sites and facilities, and to require all new tourism related developments to ensure the development is accessible to everyone, regardless of their age, or ability. It is an objective of the Council to support the provision of accessible tourism and to achieve this, all projects and improvements will adopt the principles of Universal Design. The Council shall undertake an Accessibility Audit within the lifetime of the Development plan to inform Accessible Tourism priority investments at key tourism hubs subject to the necessary resources.

CE CH 10.12

To insert the following underlined text into CPO10.27;

*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.*

CE CH 10.13

To insert the following underlined text at end of CPO10.30;

*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.***

CE CH 10.14

To insert the following underlined text into start of CPO10.31;

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

CE CH 10.15

To insert the following 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.

CE CH 10.16

To insert the following underlined text into CPO10.36;

*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.

CE CH 10.17

To insert the following word into the title of 10.9 and County Policy Objectives; 10.9 Lakes, Bogs, *Forests* and Waterways

CE CH 10.18

To insert the following underlined text at start of CPO10.46;

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.

CE CH 10.19

To insert the following underlined text at start of CPO10.49;

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.

CE CH 10.20

To insert the following underlined text to end of CPO10.51;

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.

CE CH 10.21

To insert the following CPO 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.

CE CH 10.22

To insert the following underlined text into CPO10.54;

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.

6.10.4 Restoration of Heritage Buildings for Tourism Activities

Old heritage buildings must be preserved and restored for community and tourism activities, including the purchase of heritage buildings/sites that are not being properly maintained, e.g., Carrigglas Manor and Ardagh House.

6.10.5 Chief Executive Response

It is considered addressed within the Draft Development Plan, and not limited to, under policy CPO 10.37 whereby it is the County Policy Objective to *‘Support the conservation and development of Newcastle House, Carriglass Manor and demesnes and other heritage structures by way of facilitating appropriate development that contributes to their economic viability and tourism potential.’*

6.10.6 Chief Executive Recommendation

No change.

6.11 Chapter 11: Built and Cultural Heritage

Relevant Submissions: DCDP-51, 83
--

The following is a summary of the main issues raised in submissions received:

- Record of Protected Structures and Appendix 6: Built and Cultural Heritage
- The National Inventory of Architectural Heritage (NIAH)
- Architectural Heritage / Conservation
- Vernacular Architecture
- Rural Settlement and Architectural Conservation
- Archaeology
 - Framework and Principle for the Protection of Archaeological Heritage
 - Development Management Standards
- Climate
 - Climate and Sustainability / Energy Efficiency
 - Architectural Heritage and Climate Change Adaptation Strategy

6.11.1 Record of Protected Structures and Appendix 6: Built and Cultural Heritage

Submission DCDP-16 requests the removal of no. 360 from the Draft Plan Record of Protected Structures (RPS), relating to 'Attached Houses' of 'Architectural' interest along Crannach Road (R198) in the village of Keenagh, County Longford (Grid Ref. E:212236 / N:263743). The structure is also registered with the National Inventory of Architectural Heritage (NIAH) under Reg. No. 13313012 for its 'Architectural / Social' interest of 'Regional' importance. The subject site falls within the 'Commercial / Residential' zoning of Keenagh village. The rationale supporting this submission includes loss / concealment / poor condition of original detailing / finishes (stone walling, timber windows, roof structure, floors, etc).



Fig. 6.1: DCDP-16 Subject Structure

6.11.2 Chief Executive Response

There are no recent planning applications relating to the subject site. The Local Authority appreciates the existing structure and arrangement provides an inoffensive and balanced frontage to the main street of Keenagh village. However, its build-quality and internal design proves inappropriate for modern retail / residential occupation in accordance with its zoning (residential / retail), without significant refurbishment. The Local Authority does not consider any individual elements of the subject structure to be of significant architectural importance and appreciates the current lost / concealment of original detailing / finishes. The structure's protected status relies heavily on its original form and proportion and is easily replicated using modern construction techniques if required. Considering the above, the removal of No. 360 from the Draft Plan Record of Protected Structures (RPS) is not opposed.

6.11.3 Chief Executive Recommendation

CE CH 11.1

The removal of RPS No. 360 from the Draft Plan Record of Protected Structures.

6.11.4 National Inventory of Architectural Heritage (NIAH)

Submission DCDP-51 has recommended the following policy insertions to the 'National Inventory of Architectural Heritage' section of the Draft Plan:

1. To consider the inclusion of all structures identified by the National Inventory of Architectural Heritage (NIAH) and recommended by the Minister in the Local Authority's Record of Protected Structures;
2. To consider that all such structures be regarded as 'Candidate Protected Structures', pending verification by the Council and inclusion in the Record of Protected Structures;

3. To direct users of relevant local authority services to the information resources of the NIAH website www.buildingsofireland.ie.

6.11.5 Chief Executive Response

In response to item no. 1 and no. 2, the Local Authority considers the inclusion of all structures identified by the National Inventory of Architectural Heritage (NIAH) and recommended by the Minister in the Local Authority's Record of Protected Structures onto the forthcoming Record of Protected Structures (RPS), or separately regarded as 'Candidate Protected Structures' to be excessive. The Council notes that the majority of NIAH structures which are of regional significance are included within the proposed Record of Protected Structures. In addition, individual structures may be considered for inclusion on the Record, as appropriate.

In response to item no. 3 relating to the promotion of the NIAH resource website, the Local Authority recognises the invaluable built heritage resource the NIAH provides for local authority and general public. A policy reflecting same is therefore considered appropriate.

6.11.6 Chief Executive Recommendation

No changes necessary in light of the recommended policy insertions no. 1 and 2.

CE CH 11.2

The request for the insertion of policy outlined above under no. 3 is supported and is recommended below without amendments, and for inclusion within 'Chapter 11: Built and Cultural Heritage' under 'Architectural Heritage Policies':

"It is the Policy Objective of the Council to: Promote and direct users to the National Inventory of Architectural Heritage (NIAH) website (www.buildingsofireland.ie) wherever appropriate"

6.11.7 Architectural Heritage / Conservation

Submission DCDP-51 has recommended the following policy insertions of relevance to 'Architectural Heritage / Conservation' into the Development Plan:

1. To protect, maintain and enhance the established character and setting of vernacular buildings, farmyards and settlements;
2. Development proposals affecting vernacular buildings will be required to be accompanied by a detailed measured survey, photographic record and written report carried out by a professional with appropriate conservation expertise and, preferably, an understanding of vernacular buildings. Early consultation with the planning authority is strongly advised;
3. Facilitate appropriate, high-quality design solutions for adaptations of vernacular buildings that carefully consider their vernacular qualities in terms of design, scale, setting and finishes. While new design can be expressed in contemporary architectural language, consideration should be given to exploring the use of appropriate vernacular features, building techniques and materials;

4. Where it is proposed to extend a vernacular house, the design, scale, footprint and materials should be sympathetic to the existing building and its setting. Extensions should generally be located to the rear and not obscure the form or layout of the existing building; substantial removal of walling is not generally recommended; connecting the existing building and extension should minimize the number of new openings and ideally use existing openings; sometimes, an outbuilding contiguous to a dwelling can be successfully incorporated;
5. Promote the protection and maintenance of the character and setting of vernacular buildings, farmyards and settlements, including historic gateways, boundaries and other features;
6. Ensure that developments proposed within or adjacent to vernacular settlements respect and enhance their spatial character, building forms, features, details and materials;
7. Promote the protection and maintenance of thatched buildings (domestic or non-domestic), particularly those with historic layers and roof structures;
8. To maintain an up-to-date record of thatched buildings, promote available grant schemes and facilitate engagement with owners in the maintenance of these buildings.

6.11.8 Chief Executive Response

Vernacular architecture is the back-bone of all our towns and villages. The Local Authority recognises that such structures are becoming increasingly rare, frequently overlooked in development applications and proposals, where demolition and new build over adaptive reuse of traditional buildings is generally the most common approach. Policy CPO4.38 along with policy table (i.e. Vernacular Architecture Policies – County Policy Objective) containing CPO11.34 to CPO11.39 inclusive, has been set out to adequately address the demise of Longford's vernacular architecture.

Development Management Standard DMS16.190 further reinforces the protection measures considered necessary to accompany planning applications for permission to restore, refurbish, demolish, develop or change of use of Protected Structures and other buildings of significant heritage interest.

6.11.9 Chief Executive Recommendation

No change.

6.11.10 Vernacular Architecture

Submission DCDP-51 has recommended the following policy insertions of relevance to Vernacular Architecture and Buildings into the County Development Plan:

1. *Promote the appropriate rehabilitation, revitalization and reuse of vernacular buildings, wherever feasible, employing best conservation practice and using traditional, especially vernacular, building methods and materials.*
2. *There will be a presumption against the demolition of vernacular buildings where restoration or adaptation is a feasible option;*
3. *To consider the uniqueness of vernacular buildings and ensembles in terms of their focused and specific relationship with their immediate environment as a model and guide for the development of modern design approaches in rural and other appropriate settings.*

6.11.11 Chief Executive Response

The Local Authority considers the proposed policy insertion no. 1 and 2 to be adequately addressed through existing policy CPO11.17 in *“encouraging the rehabilitation, renovation and reuse of existing older buildings/ buildings of architectural merit, where appropriate, in preference to their demolition and redevelopment. In certain cases, land use zoning restrictions may be relaxed in order to secure the conservation of the Protected Structure”*;

The Local Authority considers the proposed policy insertion no.3 to be adequately addressed through existing policy CPO11.17 in *“protect(ing) the setting of Protected Structures and 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”*.

6.11.12 Chief Executive Recommendation

No change.

6.11.13 Rural Settlement and Architectural Conservation

Submission DCDP-51 has recommended the following policy insertions of relevance to ‘Rural Settlement / Architectural Conservation’ into the Development Plan:

1. To identify significant historic designed landscapes, demesnes and gardens for protection under the development plan;
2. To designate Architectural Conservation Areas, where considered appropriate, in order to preserve the character of historic designed landscapes, demesnes and gardens;
3. To identify and protect significant views to or from such places;
4. To encourage the compilation of Conservation Plans for the long term conservation and management of cultural landscapes and their components in the ownership of the Local Authority/State;
5. To cooperate with the National Inventory of Architectural Heritage in assessing and celebrating historic designed landscapes, demesnes and gardens;
6. To encourage and facilitate the retention and careful maintenance of these places and the various components set out in the introduction above;
7. To encourage the cataloguing of plant collections, trees and habitats within these places to appropriate national standards;
8. To encourage the cataloguing of fauna within these places to appropriate national standards;
9. To protect and promote heritage and traditional varieties of plants and trees within our historic designed landscapes, demesnes and gardens;
10. To promote public awareness, enjoyment of and access to these sites and to seek the cooperation and assistance of other interested parties, including Government Departments and state agencies, in this regard;
11. To preserve and protect the biodiversity of these places and, where appropriate, to encourage the enhancement of the range of plant and animal species, in order to add to local, regional and national biodiversity;
12. To promote conservation, renewal and improvement that enhances the character and setting of historic designed landscapes, demesnes and gardens and of former examples of such places, and to resist proposals or

developments that would lead to the loss of, or cause harm to the character, principal components, or setting of these places.

6.11.14 Chief Executive Response

The Local Authority considers proposed policy no. 1 to be already addressed under its commitment to upholding the Record of Protected Structures and through policy CPO11.12;

The Draft Plan has identified 2 no. Architectural Conservation Areas within the County (Ardagh village and Battery Road Longford town), the extent of each are mapped and the details contained within 'Appendix 6: Built and Cultural Heritage';

The Local Authority considers the proposed policy no. 3 to be already addressed under existing policy CPO14.8 thereby *"preserv(ing) views and prospects as illustrated on the accompanying map as part of Appendix 9: Landscape Character and as listed in Tables 14.2 and 14.3."*;

The Local Authority considers the proposed policy no. 4 to be already addressed in its commitment to the overarching 'Vision of the Plan' to *"ensure the conservation and protection of the built and natural environment ..."* and through CPO policy 11.30 thereby *"encourag(ing) 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"*;

The Local Authority consider the National Inventory of Architectural Heritage (NIAH) to be an invaluable built heritage resource for local authorities and the general public. The recommend policy insertion committing to collaboration with the state initiative is supported for the betterment of Longford architectural heritage;

The Local Authority considers the proposed policy no. 6 to be already addressed under its commitment to upholding the Record of Protected Structures and through policy CPO11.34 to *"encourage the retention, sympathetic maintenance and sustainable reuse of historic buildings, including vernacular dwellings or farm buildings and the retention of historic streetscape character, fabric, detail and features."*;

The Local Authority considers the proposed policy no. 7 to be already addressed under policy CPO11.34 whereby "It is the Policy Objective of the Council to *"encourage the retention, sympathetic maintenance and sustainable reuse of historic buildings, including vernacular dwellings or farm buildings and the retention of historic streetscape character, fabric, detail and features."*

In relation to item no. 8, 9, 11 and 12, the Local Authority considers the proposed policy no. 8 and no. 9 to be already addressed under policy CPO12.1 whereby *"it is the Policy Objective of the Council to "protect, conserve and enhance to the County's natural heritage and biodiversity. This includes wildlife (flora and fauna), habitats, landscapes and/or landscape features of importance to wildlife, or which play a key role in the conservation and management of natural resources"*;

The Local Authority considers the proposed policy no. 10 to be already addressed under policy CPO11.34 whereby *“it is the Policy Objective of the Council to encourage the enhancement, management, protection and the promotion of access to and understanding of the architectural heritage of the County”*.

6.11.15 Chief Executive Recommendation

No changes in light of the recommended policy insertions no. 1-4 and 6-12 inclusive.

CE CH 11.4

The request for the insertion of policy no. 5 is supported and is recommended for inclusion under ‘Architectural Heritage Policies’ as follows:

“It is the Policy Objective of the Council to: cooperate with the National Inventory of Architectural Heritage in assessing and celebrating historic designed landscapes, demesnes and gardens”;

6.11.16 Archaeological Heritage

DCDP-51 Submission has the following policy recommendations relating to ‘Archaeological Heritage’ for inclusion in the Development Plan:

1. To protect and enhance archaeological monuments and historic wrecks and their settings and amenities, having particular regard to the importance of historic town defences, historic graveyards, national monuments in the ownership of the Minister for Housing, Local Government and Heritage or a local authority and, in general, monuments and historic wrecks which, through their presence in the landscape or seascape, provide tangible evidence of the past;
2. To protect historic graveyards, including through the avoidance of extensions to them that would have an inappropriate level of impact on sub-surface archaeological remains or on their setting or amenity and, in that regard, as an alternative to extensions to historic graveyards to endeavour to find alternative locations where additional land for burial is considered necessary. ;
3. To ensure that historic graveyards in the ownership or care of the local authority are managed and maintained in accordance with appropriate conservation standards and that local communities involved in care and maintenance of historic graveyards receive appropriate advice regarding such standards;
4. To promote and facilitate appropriate forms of access (including disabled access) to archaeological monuments and historic wrecks, including maintaining or developing means of access (by working with landowners to secure appropriate access over private lands), providing appropriate, accurate signage and interpretive material and providing appropriate forms of virtual access where physical access is not possible;
5. To ensure that all aspects of archaeological heritage and underwater cultural heritage, in all environments, are considered in the development process, including impacts on unidentified elements of the archaeological and underwater cultural heritage;
6. To promote knowledge and appreciation of archaeological and underwater cultural heritage and facilitate access to appropriate guidance regarding its protection and conservation, including at all stages of the development process (including pre-planning application consultations);

7. To promote early and comprehensive public access to the results of archaeological excavations carried out as a result of development or conservation projects through publications and the provision of on-site interpretive material even where no physical remains are visible;
8. To support community initiatives and projects regarding preservation, presentation and access to archaeological heritage and underwater cultural heritage, provided such are compatible with appropriate conservation policies and standards, having regard to the guidance and advice of the Department of Housing, Local Government and Heritage.

6.11.17 Chief Executive Response

The Local Authority considers the proposed policy insertion no. 1 and no. 5 to be already addressed in its commitment to uphold the 'Framework and Principles for the Protection of the Archaeological Heritage' (1999) under chapter section 11.4.2 on 'The Architectural Heritage Protection Guidelines' (2011). Furthermore, multiple existing policies including CPO9.29 (buffer zones), CPO11.8 (sensitive development), CPO11.9 (archaeological impact assessments), and CPO11.10 (referral), alongside 11 no. 'Architectural Heritage' specific policies outlined in Chapter 11 (Built and Cultural Heritage) from CPO11.45 to CPO11.55 inclusive reinforce the Local Authority's protection and enhancement measures. The designation of 2 no Architectural Conservation Areas (ACAs) reinforces the mechanism of support and preservation;

The Local Authority considers the proposed policy insertion no. 2 to be already addressed under its responsibilities to Historic Graveyards on the Record of Protected Structures (RPS) and Record of Monuments and Places (RMP) within the county;

The Local Authority considers the proposed policy insertion no. 3 to be already addressed through existing policy CPO7.61 thereby *"ensur(ing) that the cemeteries and associated facilities for which the Council is responsible are accessible and appropriately maintained"*, and supported by CPO 7.62 policy *"encourage(ing) local community groups to development, manage and maintain burial facilities"*. The overarching policy CPO7.63 then sets out to *"protect the cultural heritage of historical burial grounds within the County and encourage their management and maintenance in accordance with best conservation practice"*;

The Local Authority considers the proposed policy insertion no. 4 and 7 to be already addressed through existing policy CPO10.52 to *"support and develop opportunities to access, enjoy and understand Longford's significant archaeological, early Christian Heritage, natural heritage and historical locations including the lake Islands which contain many of these sites"* and indirectly through CPO10.57 *"supporting increased opportunities for off-road walking, including ... built heritage and archaeological features"*;

The Local Authority considers the proposed policy insertion no. 6 to be already addressed through existing policy CPO11.6 to *"provide detailed guidance notes and continue to develop the Council's advisory/educational role with regard to heritage matters and to promote awareness, understanding and appreciation of the architectural heritage of the County"*;

In relation to item no. 8 the request to include policy relating to community initiatives of archaeological heritage is supported, and a rewording of the existing CPO11.49 policy relating to the promotion, management and enhancement is considered appropriate.

6.11.18 Chief Executive Recommendation

No changes in light of the recommended policy insertions no. 1 to 7 inclusive.

CE CH 11.5

Policy recommendation No. 8 that makes reference to the support of community initiatives of archaeological heritage is encouraged, and a rewording of the existing CPO11.49 policy contained within 'Chapter 11: Built and Cultural Heritage' under 'Archaeological Heritage Policy' is recommended to include explicit reference to community initiatives as follows:

It is the Policy Objective of the Council to encourage and promote the appropriate management and enhancement of the County's rich archaeological heritage, to include community initiatives.

6.11.19 Development Management Standards Archaeology

DCDP-51 submission has made the following policy recommendation for inclusion:

1. That proposed developments which may, due to their location, size, or nature, have implications for elements of the archaeological heritage (including underwater cultural heritage) be subject to an archaeological assessment, which should in general be carried out before any grant of permission. Such developments include those that are located at or close to archaeological sites or monuments or historic wrecks, those which are extensive in terms of area (ground disturbance of 1/2 hectare or more) or length (1km or more) even if no known elements of the archaeological heritage are present, those which would affect significant areas of environments such as wetlands, reclaimed areas of rivers, lakes and coastlines and underwater areas even if no known elements of the archaeological heritage are present, and any developments that require the carrying out of Environmental Impact Assessment;
2. Proposed developments in areas of the marine environment or inland waterways for which there are no located wrecks may be considered to be areas of high archaeological potential due to the number of historic ship losses recorded for these areas over time. Therefore, developments in riverine, lacustrine, intertidal and sub-tidal environments of archaeological potential should be subject to an archaeological assessment, which should in general be carried out before any grant of permission;
3. To ensure that archaeological assessment is carried out in accordance with relevant policies and standards, in particular those set out in the *Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999) and the *Policy and Guidelines on Archaeological Excavation* (Government of Ireland 1999) and the advice in particular cases of the Department, with all relevant techniques (including documentary research, aerial photographic research, geophysical survey and archaeological test

excavation) being required as appropriate. This will also include, in some cases, the carrying out of building surveys and assessments of upstanding structures to determine the extent to which they are, or contain within them, structures of medieval or early modern date;

4. To ensure that all planning applications for developments of categories set out above are referred to the Department through the Development Applications Unit, that such referrals take place in a timely manner and that full account is taken of the recommendations made by the Department;
5. That permission for proposed development will be refused where the development cannot be carried out in a manner compatible with the protection of the archaeological heritage as provided for in the policies and objectives contained in the development plan and in relevant national policies, in particular the *Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999);
6. That where permission is granted for proposed development such grants of permission will contain appropriate conditions to secure the protection of the archaeological heritage, either by preservation *in-situ* or, where impact cannot be avoided, by way of preservation by record. In imposing such conditions, the planning authority will act in accordance with relevant policies and standards, in particular the *Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999) and the *Policy and Guidelines on Archaeological Excavation* (Government of Ireland 1999), and be guided in particular cases by the advice of the Department of Housing, Local Government and Heritage. Such conditions may require, as appropriate, archaeological assessment, preservation *in-situ*, preservation by record and/or archaeological monitoring as well as post-excavation conservation, analysis and reporting;
7. That where preservation *in-situ* is required as a condition, further conditions may require appropriate immediate and long term conservation and management of the archaeological features in question and long term monitoring of the effectiveness of conservation measures, with appropriate steps required to be taken in the event conservation measures are proving ineffective;
8. That where preservation by record is required as a condition, such conditions will further require preparation of appropriate follow-up reports, analyses and publications and the conservation as necessary of archaeological material and objects recovered during the archaeological excavations as carried out;
9. That where permission is granted conditions may require presentation to the public of archaeological features preserved *in-situ* on the site, where practicable, and/or provision of interpretive material at the site (including on a permanent basis) whether or not any features have been preserved *in-situ*;
10. That where archaeological excavation is required as a condition of permission, further conditions may be imposed requiring the provision of public access to such excavations, subject to appropriate safeguards;
11. To develop the planning authority's own professional archaeological expertise and involve that expertise in dealing with planning casework, including the drafting of future revisions of the development plan.

6.11.20 Chief Executive Response

The Local Authority considers the proposed policy insertion no. 1 and no. 8 to be already addressed through policy CPO11.9 thereby *“requiring, as part of the development management process, archaeological impact assessments, geophysical survey, test excavations or monitoring as appropriate, for development in the vicinity of monuments or in areas of archaeological potential. Where there are upstanding remains, a visual impact assessment may be required”*.

The Local Authority considers the proposed policy insertion no. 2 to be already addressed through existing policy CPO11.55 setting out the *“contribution, as appropriate, towards the protection and preservation of underwater archaeological sites in riverine or lacustrine locations”*;

The Local Authority considers the proposed policy insertion no. 3 and no. 5 to be already addressed through the commitment under 11.4.2 of the Draft Development Plan to adhere to the ‘Framework and Principles for the Protection of the Archaeological Heritage’ (1999), and ‘Policy and Guidance on Archaeological Excavation’ (1999);

The Local Authority considers the proposed policy insertion no. 4 to be already addressed through existing policy CPO11.10 thereby *“referring any proposed development which may impact on the integrity and/or setting of any monuments, sites, objects or areas of archaeological, cultural, architectural, historical or heritage importance under the protection of this Development Plan and/or the Department of the Arts, Heritage and the Gaeltacht to the relevant section of the DoAHG for observations/comment prior to a grant of permission / approval being obtained”*;

The Local Authority considers the proposed policy insertion no. 6 and no. 7 to be already addressed through the commitment under policy CPO11.53 whereby the Local Authority shall *“presume in favour of the physical preservation in-situ of archaeological remains and their settings, where appropriate, feasible and in accordance with the proper planning and sustainable development of the County”* and its commitment to the Framework and Principles for the Protection of the Archaeological Heritage (1999); Policy and Guidance on Archaeological Excavation (1999) as set out under chapter section 11.4.2;

The Local Authority considers the proposed policy insertion no. 9 and no. 10 to be adequately addressed through existing policy CPO10.52 in *“supporting and develop opportunities to access, enjoy and understand Longford’s significant archaeological, early Christian Heritage, natural heritage and historical locations including the lake Islands which contain many of these sites”*

The Local Authority considers the proposed recommendation no. 11 to be addressed through its existing staff provision, to include a full time and permanent, Heritage Officer.

6.11.21 Chief Executive Recommendation

No change.

6.11.22 Climate Change and Sustainability / Energy Efficiency

Submission DCDP-51 has recommended the following policy insertions of relevance to 'Climate Change and Sustainability / Energy Efficiency' into the Development Plan:

1. To recognise the inherent sustainability of vernacular buildings by virtue of their use of natural and renewal materials of local origin;
2. To ensure the continued sensitive and appropriate rehabilitation and reuse of vernacular buildings in the interest of sustainability;
3. To ensure the conservation and reuse of traditional materials in the interest of sustainability, good conservation practice and maintaining the long-term viability of such buildings and their associated features;
4. The retention and careful rehabilitation of historic buildings in our landscapes, including vernacular houses and other structures, whether urban or rural, allows the materials and embedded energy of these structures to be harnessed for present and future generations. Removal and replacement of such buildings represents a waste of their embedded energy and such proposals should be subject to rigorous scrutiny;
5. Where permission is sought to demolish a vernacular building on the grounds of structural defects or failure, or that it is not reasonably capable of being made structurally sound, such a contention must be convincingly demonstrated through a detailed report on the existing condition produced by a professional with appropriate conservation expertise and, preferably, an understanding of vernacular buildings. As part of such justification, details will be required of remedial works normally used in similar circumstances and setting out why these would not be appropriate;
6. Where a building has been destroyed by fire or accident, the Council may consider demolition to be appropriate, but a report by a professional with appropriate conservation expertise, specifying the cause and extent of damage, will be required. As a minimum, a vernacular building proposed for demolition should be fully recorded to an agreed professional standard. If a disused vernacular house is demolished or replaced with a replica, the Rural Settlement Strategy will apply;
7. Ensure that measures to upgrade the energy efficiency of vernacular buildings acknowledge their inherent vernacular characteristics, techniques and materials and do not have a detrimental physical or visual impact;
8. Promote and support appropriate and well-informed energy efficiency upgrades to vernacular buildings through the dissemination of factual and relevant information to the general public.

6.11.23 Chief Executive Response

Vernacular architecture is the back-bone of all our towns and villages. The Local Authority recognises that such structures are becoming increasingly rare, frequently overlooked in development applications and proposals, where demolition and new build over adaptive reuse of traditional buildings is generally the most common approach. Policy CPO4.38 along with policy table (i.e. Vernacular Architecture Policies – County Policy Objective) containing CPO11.34 to CPO11.39 inclusive, has been set out to adequately address the demise of Longford's vernacular architecture.

6.11.24 Chief Executive Recommendation

No change.

6.11.25 Architectural Heritage and Climate Change Adaptation Strategy

Submission DCDP-51 has recommended the following insertions relating to 'Local Authority Climate Change Adaptation Strategy' into the Development Plan:

1. Appointment of a Conservation Officer;
2. Identify the architectural heritage in the local authority area that may be under threat, directly or indirectly, due to climate change. This should include, but not necessarily be restricted to, the protected structures and architectural conservation areas designated in the local authority Development Plan. It is noted that due to the COVID -19 lockdown of urban centres that many town buildings have been left vacant and inaccessible and many will not re-open. Buildings that are left with poorly forming rainwater goods, roof coverings and badly secured will be very vulnerable in inclement weather;
3. Include objectives to carry out climate change risk assessments for the historic structures and sites in the local authority's functional area particularly those in the authority's own remit;
4. Include objectives to develop disaster risk reduction policies addressing direct and indirect risks to the architectural heritage in its area;
5. Include objectives to develop resilience and adaptation strategies for the architectural heritage in its area;
6. Develop the skills capacity within the local authority to address adaptation / mitigation / emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works

6.11.26 Chief Executive's Response

The recommendation in relation to the appointment of a Conservation Officer is noted. The Council acknowledges the rich architectural heritage of County Longford as demonstrated on the Record of Protected Structures for the County. The Local Authority is mindful of its responsibilities in relation to the conservation of county Longford's built heritage and measures are in place to avail of appropriate conservation expertise, both in house and from external sources, as required.

The suggestion in relation to carrying out climate change risk assessments for historic structures and sites and to develop resilience and adaptation strategies for architectural heritage sites is considered worthwhile. In this regard, CPO's 3.1 to 3.4 inclusive are relevant. Furthermore, Climate Actions A11.1 to A11.6 inclusive sets out to provide guidance for owners of protected structures or historic buildings on upgrading for energy efficiency and climate resilient measures and promote the principles of sustainable building design in conservation.

6.11.27 Chief Executive Recommendation

No changes.

6.12 Chapter 12: Natural Heritage and Environment

Relevant Submissions: DCDP- 14, 17, 51, 70, 76, 79, 83, 93

The following is a summary of the main issues raised in submissions received:

- Biodiversity
- Designated and Protected Sites
- Non-Designated Sites
- Geo-heritage and County Geological Sites
- Groundwater
- Peatlands
- Water Quality
- Waterways, rivers and canals
- Noise Pollution
- Air pollution
- Protection of Natural Heritage
- Restoration and reinstatement of Royal Canal Spur and as Protected Structure

6.12.1 Biodiversity

The Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (DCDP-51) welcomes the inclusion of chapters relating to Natural Heritage and Environment, Green Infrastructure and Climate Change which it is stated will assist the Council in meeting the main objectives of the National Biodiversity Action Plan 2017-2021 and the EU Biodiversity Strategy 2030.

The submission identifies a number of positive policy objectives, specifically the Department references CPO12.1 and CPO12.4 which directly support the National Biodiversity Action Plan, the All Ireland Pollinator Plan and the National Peatlands Strategy. The submission suggests that the Biodiversity section could be strengthened by the inclusion of the National Biodiversity Action Plan objectives in the Plan.

The submission acknowledges the detailed range of positive policy objectives and the appropriate protection afforded to Natura 2000 sites, NHA and pNHA sites in the Draft Plan. The submission suggests that an Ecological Impact Assessment (EIA) for any proposed development which may have a significant impact on rare, threatened and or protected species and non-designated habitats of biodiversity value should be included as a Policy Objective to support the existing CPOs 12.13, 12.15 -12.19.

The submission also suggests that the Draft Plan should make reference to the when surveys are undertaken in the process of undertaking assessments, such as (EIA or EIAR, NIS) that generate biodiversity data previously unknown or unrecorded in the County, the submission proposes that an additional Policy Objective is included requiring this data to be submitted to the National Biodiversity Data Centre (NDBC) as this would strengthen the County's knowledge base on biodiversity and aid its further protection.

The submission from the Department acknowledges the survey work already completed by Longford County Council on wetland surveys in the county.

The submission makes reference to and encourages the use of the Ecosystem Services Scoring approach in mapping these and other wildlife corridors e.g. hedgerows and trees to help inform the planning process during the lifetime of the Plan.

Submission DCDP-76 states that the Draft Plan should directly and thoroughly address the gravity of the biodiversity crisis. The submission supports the inclusion of a suite of policies aimed at biodiversity protection and enhancement, including Longford's eight SACs and four SPAs. The submission recommends that the 14 points in the EU Biodiversity Strategy 2030 should be included as a specific set of biodiversity objectives in the Draft County Development Plan.

6.12.2 Chief Executive Response

The Council supports the proposed inclusion of an additional CPO related to the requirement for an Ecological Impact Assessment for any proposed development which may have a significant impact on rare, threatened and or/protected species and non-designated habitats of biodiversity value.

The Council welcomes the proposed additional Policy Objective proposed in respect of biodiversity surveys and assessments.

The Council acknowledges the proposed additional Policy Objective proposed in respect of Ecosystems Services Scoring and proposes to include a new CPO.

The Council acknowledges the principle and recommendation in respect of the EU Biodiversity Strategy 2030. The Council acknowledges that the latest Strategy should be referenced in the Draft Plan. This is considered sufficient and it is not considered necessary to list all of the individual key commitments of said strategy.

6.12.3 Chief Executive Recommendation

CE CH 12.1

Include 2 no. new policy objectives after existing CPO 12.14 as follows:

CPO12.XX	<i>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.</i>
CPO12.XX	<i>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).</i>

CE CH 12.2

To 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.

CE CH 12.3

Insert reference to the EU Biodiversity Strategy 2030 after the second paragraph of 12.11 as follows:

The Council will work collaboratively to meet the actions and objectives identified in the EU Biodiversity Strategy 2030.

6.12.4 Designated and Protected Sites

The Department references the inclusion of objectives relating to Appropriate Assessment (AA) in the Chapter. The submission indicates that CPO12.7 could be simplified to state “*Require screening for Appropriate Assessment for development not directly connected with or necessary for the management of Natura 2000 Sites*”. The submission further states that the Policy Objectives should clearly state the intention that all plans and projects flowing from the County Development Plan should pass the Article 6(3) test and avoid adversely affecting the integrity of European sites. It must also be clear that any derogation under Article 6(4) of the Directive can only be considered in exceptional circumstances which meet the strict requirements of the Directive in this regard.

A number of submissions identify the section in the chapter that references designated and protected sites within the County and welcome the list of the sites. It is suggested in submission DCDP-70 that the wording of the CPO12.5 should be revised as the current wording of the objective references candidate SPA's first. It is also suggested that 2 no. additional policy objectives be inserted and included into the section of the Draft Plan in order to ensure that the designated sites and areas are duly and fully protected 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).

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.

6.12.5 Chief Executive Response

The Council acknowledge the reference to Appropriate Assessment and the proposed review of the policy objective CPO12.7. The Council consider that the existing wording of the policy objective is sufficiently detailed and comprehensive. However, in order to align the proposed policy objective with national policy it is proposed to insert additional text ‘to comply with the Habitats Directive’ at the end of the objective.

In relation to the reference to Appropriate Assessments and Article 6(3) and Article 6(4), the Council acknowledge that the reference should be strengthened, and the proposed additional Policy Objective should be included into the Draft Plan.

The Council welcomes the submission received in respect of the Natural Heritage and the designated sites. The Council acknowledges the suggested improvements to the wording of CPO12.5 and proposes to revise this accordingly; with the wording mentioning the identified SACs and SPAs first.

In relation to European Natura 2000 designated sites, the proposed 2 no. additional policy objectives suggested to help protect and maintain the designated sites within the County will provide additional weight and strength to the Plan and it is therefore suggested that they be included.

6.12.6 Chief Executive Recommendation

CE CH 12.4

To amend the wording of CPO12.5 and insert the text underlined:

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.

CE CH 12.5

Include 2 no. new policy objectives after CPO12.5 as follows:

CPO 12.-XX	<i>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).</i>
CPO 12.XX	<i>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.</i>

CE CH 12.6

To amend the wording of 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.

6.12.7 Non-Designated Sites

The inclusion of a Section on Non-Designated Sites is acknowledged and supported by many Submissions. The Submission from DCDP-70 suggests that the wording of

the Policy Objective 12.15 be amended and revised in order to reflect the value of the potential environmental sites by referencing 'natural heritage' and 'environmental' value.

6.12.8 Chief Executive Response

In terms of non-designated sites, the Council accepts the proposed re-wording of the Policy Objective which it agrees will help to clarify the potential ecological value of the natural heritage and environmental assets in such important and non-designated sites.

6.12.9 Chief Executive Recommendation

CE CH 12.7

To 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.*

6.12.10 Geo-heritage and County Geological Sites

The submissions acknowledge and welcome the inclusion of a section related to Geo-Heritage and County Geological Sites in the Natural Heritage Chapter of the Draft Plan. Submission DCDP-14 (Dept EC&C) welcome the inclusion of the County Geological Sites (CGS) within the Draft Plan Section 12.6 Geological Sites and Vol 2 Appendices Longford Geological Sites map and the associated CPOs. Listing these sites is considered to provide protection against potentially damaging developments. It is suggested that Wind Energy objective CPO 5.138 in Chapter 5 could include the CGS for consideration. This matter has been referenced in the Chapter 5 Wind Energy section and is agreed.

The submission identifies the 8 County Geological Sites recommended for removal from the County Geological Sites in the current Plan. It is suggested that a statement is included to clarify the context of this recommendation as follows:

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 County Geological Sites for the County. During the Longford County Geological Heritage Audit 2015 the sites listed below were assessed as being unsuitable for the County Geological Sites status and were listed as rejected in Appendix 4 of the Geological Heritage of County Longford report.

6.12.11 Chief Executive Response

The Council welcomes the intention and the principle of the submission. The suggested statement is considered appropriate to confirm the reason for the removal of the eight sites from the County Geological Sites as listed in the Draft Plan and to clarify the reason why the identified list of County Geological Sites has reduced in number.

6.12.12 Chief Executive Recommendation

CE CH 12.8

To insert the text highlighted in italics after the list of Geological Sites to be removed from the Draft Plan. The wording of the Section 12.6 County Geological Sites, after the 8 sites proposed for removal shall include the following additional text:

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.

6.12.13 Wetlands, Turloughs, Wetlands, Watercourses and Fens

The Submissions identify the inclusion of a Section 12.7 specifically related to Wetlands, Turloughs, Wetlands, Watercourses and Fens. The Policy Objectives proposed are broadly welcomed by the Submissions, however a proposed re-wording is proposed for CPO12.27 in order to strengthen the overall meaning and prevent the infilling, fragmentation, degradation of identified wetlands.

6.12.14 Chief Executive Response

The Council acknowledges and accepts the proposed re-wording of the Policy Objective CPO12.27 which seeks to add extra detail regarding the protection and conservation of identified wetlands.

6.12.15 Chief Executive Recommendation

CE CH 12.9

To amend the highlighted text into 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.

6.12.16 Inland Lakes, Waterways and Broad Zones

The Submissions identify the inclusion of a Section 12.8 specifically related to Inland Lakes, Waterways and Broad Zones. The Policy Objectives proposed are broadly welcomed by the Submissions, however a proposed re-wording is proposed for CPO12.37 in order to strengthen the overall meaning and prevent the negative impact of development on the Royal Canal.

It is suggested that an additional Policy Objective should be included into the Section in order to support and promote with the cooperation of private landowners public access to the Islands, to adopt byelaws prohibiting or restricting jet-skiing, water skiing and any other noise generating activities during the lifetime of this Plan. Further it is suggested that suitable lands should be reserved 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.

6.12.17 Chief Executive Response

The Council has reviewed and assessed the wording of the Policy Objective CPO12.37. The Council identify that the wording and intent of the Policy Objective should be extended to improve both its meaning and effectiveness in protecting the Royal Canal.

The Council acknowledges and supports the proposed addition of Policy Objectives proposing to improve public access to the islands in the County; to adopt appropriate bye laws to reduce noise generating activities; and to reserve lands adjacent to the canals, riverbanks and other waterbodies to promote and facilitate the creation of waterside linear routes.

6.12.18 Chief Executive Recommendation

CE CH 12.10

To 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.***

CE CH 12.11

To insert the follows additional CPO's after the existing CPO12.41 as follows:

CPO 12.XX	<i>Support and promote, with the co-operation of private landowners, public access to islands in the County.</i>
CPO 12.XX	<i>Adopt bye laws prohibiting or restricting jet-skiing, water skiing and any other noise generating activities during the lifetime of this Plan.</i>
CPO 12.XX	<i>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 lay-by facilities.</i>

6.12.19 Groundwater

The Submission DCDP-14 commends the inclusion of the CPO 12.92 to protect Longford's groundwater resources and the groundwater protection schemes within the Draft Plan. The Department are pleased to see the use of National Aquifer mapping datasets recommendation of their use in the environmental sections of planning and in assessing individual projects.

6.12.20 Chief Executive Response

The comments which are positive in nature are noted.

6.12.21 Chief Executive Recommendation

No change

6.12.22 Peatlands

Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (DCDP-51)

This submission acknowledges the strong objectives in relation to protecting wetlands and peatlands and the importance of the peatland habitats within the County. The submission suggests additional Policy Objectives in relation to supporting the implementation of the National Peatlands Strategy and the National Raised Bog Special Area of Conservation Management Plan 2017-2022 as follows:

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.

The submission also proposes an additional policy objective in respect of designated and non-designated peatlands. The submission recommends a clear policy objective in the Draft Plan in relation to development on peat to ensure clarity in relation to the requirements of the planning code as follows:

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.

TII (DCDP-19)

This submission suggests that any future Peatlands Framework Plan should have regard to the provision of official policy relating to development management and access on to national roads set out in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines’ (DoECLG, 2012). The TII is available for consultation with the Council in relation to any future peatlands after use framework plan.

Bord Na Mona (DCDP-79)

This submission identifies the work in terms of peatland rehabilitation programmes which will reduce carbon emissions. This will, it is stated enhance and support biodiversity in the County, which support and protect rare and protected species. Examples in the County include Lough Bawn pNHA, which contains Annex I bog woodlands and transition mire habitats, Knappogue Bog which attracts wintering wildfowl and Whooper Swans.

Bogs located on the eastern margin of Co. Longford and Co. Westmeath are part of the Bord na Móna Raised Bog Restoration Programme and have significant biodiversity value. The Submission identifies that Clonwhelan Bog and Mostrim Bog have been drain blocked and Clynan and Glenlough Bogs are ear-marked for future restoration and drain blocking. Corlea Bog is identified as a good example of the re-wetted cutaway landscape that is expected to develop in the future. The Submission note the inclusion of the Mid Shannon Wilderness Park and the proposed Biosphere Reserve in the Draft Plan. The proposed Park includes much Bord na Móna lands

along with others; Bord na Móna supports the development of the proposed Park and the Biosphere Reserve.

While Bord na Móna supports this development, it does state that there is a need to ensure that the proposed amenity is compatible with the integrated land-use strategy (renewables, industry and amenity). It is identified that the land bank provides a unique opportunity to develop a network of recreational and amenity uses across the midlands and it's important that this is developed in a structured and planned way and that any future amenity projects would be funded through appropriate grant aid schemes.

The submission acknowledges and welcomes the preparation of a comprehensive after-use framework plan for the peatlands and related infrastructure and the inclusion of Policy Objective 12.45.

6.12.23 Chief Executive Response

The Council acknowledges the context and detail of the submissions. The Council acknowledges the broad support identified in the submissions in respect the identified and stated proposed new Policy Objectives in respect of the identified benefits of restoring peatlands to their natural state which will have benefits in terms of nature conservation, climate change and flood prevention and alleviation.

The Council consider that the proposed additional Policy Objectives suggested within the submission from Department (TCAGSM) will add further strength to the section and add positively to the list of objectives already in the Draft Plan.

The Council welcomes the submission and support from the TII. The Council acknowledges the availability of the TII for early consultation on any future peatlands after-use framework plan and project within the County.

The Council acknowledges the detailed comments about the work of Bord na Móna and welcomes the comments made in respect of the proposed the Mid Shannon Wilderness Park and the proposed Biosphere Reserve in the Draft Plan.

6.12.24 Chief Executive Recommendation

CE CH 12.12

To insert the following 2 no. County Policy Objectives after CPO12.45 as follows:

CPO12.XX	<i>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.</i>
CPO12.XX	<i>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.</i> <i>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</i>

	<i>supported by an Appropriate Assessment and/or Environmental Impact Assessment where necessary.</i>
--	---

6.12.25 Noise and Light Pollution:

The Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media submission (DCDP-51) references the Section on Light Pollution 12.19 and recommends an amendment to CPO12.103. The Department state the *Dark Sky Ireland Lighting Recommendations* and suggest – LED luminaries with warmer colours (i.e. CCT values at or below 2700K) be specified for future installations to avoid environmental impacts associated with blue-rich LED light.

Submission DCDP-69 references and welcomes the Section on noise. The Policy objectives CPO12.99 “Support the Implementation of the Longford Noise Action Plan 2018-2023” and CPO12.101 “Require the submission of a Noise Impact Assessment” are particularly noted.

The HSE recommend that the Draft Plan should reference and apply the WHO/Europe Night Noise Guidelines (2009) when assessing planning proposals with potential noise implications. The submission states that guidelines indicates that the average annual night noise exposure should not exceed 40(dB) which is equivalent to the sound from a quiet street in a residential area. The submission also suggests that the noise environment within the County is measured and mapped; with the identified quiet areas protected.

6.12.26 Chief Executive Response

The Council has included a detailed section in the Draft Plan covering noise and light pollution and included a range of specific Policy Objectives concerning noise and the need for Noise Impact Assessments. The existing policy objectives identified in the Draft Plan are considered to be sufficient to control noise within the County and are therefore considered appropriate. The Council will continue to address known problem noise generating sites and seek to control the impacts of noise at the earliest stages of the development process.

The Council acknowledge the reference to a proposed new Policy Objective in respect of LED luminaries. However, instead of including a new CPO it is suggested to include an amendment to the existing CPO12.103 by inserting additional text to reference same.

6.12.27 Chief Executive Recommendation

Noise:

No change.

Light:

CE CH12.13

To amend the Policy Objective CPO12.103 and insert text as follows:

- (a) *Require the use of energy efficient public lighting in all new development proposals.*
- (b) *New / Replacement LED luminaries with warmer colours (i.e. CCT values at or below 2700K) be specified for future installations to avoid environmental impacts associated with blue-rich LED light.*

6.12.28 Water Quality

Submission DCDP-69 (HSE) states that the Draft Plan should have regard to the National Biodiversity Plan 2017-2021 in its protection of water sources and the restoration of freshwater ecosystems should be considered as part of water source protection. It is suggested that there needs to more meaningful engagement with the agricultural sector and support the basin management plan and help in the move towards reducing the use of pesticides and nutrient losses as defined in the European Green Deal. The submission promotes the installation of public drinking water facilities in public areas including towns and villages, subject to public water supply being adequate for community needs.

6.12.29 Chief Executive Response

The Council acknowledge the reference to the National Biodiversity Plan (2017-2021) and the identified links to the protection of water sources. The Council supports the identified links with the agricultural sector in the move towards reducing the use of pesticides and nutrient losses.

The Council whilst acknowledging the intention of the submission contend that the Draft Plan does include a variety of Policy Objectives under Section 12.16 Groundwater Protection and that this includes Policy Objectives CPO12.86 and CPO12.87 specifically referencing the links with the Agricultural Sector and are considered to be acceptable.

6.12.30 Chief Executive Recommendation

No change.

6.12.31 Waterways rivers and canals

Submission DCDP-83 suggests that the waterways, rivers and canals must be clean and accessible to the community whilst recognising one of the key aims is to provide sustainable habitats for water-based species. Pollution of water bodies must be prevented. The submission further states that greenways, heritage sites, woodlands are developed and well maintained with minimal interference and effect on established habitats / ecosystems.

6.12.32 Chief Executive Response

The Council welcomes the submission and the comments made in respect of improving accessibility and the need to improve and ensure water quality. The Council is committed to improving accessibility and the use of the green infrastructure in the County.

6.12.33 Chief Executive Recommendation

No change.

6.12.34 Air Pollution

Submission DCDP-83 suggests that air pollution must be reduced, and all county residents encouraged to use smokeless coal and to cessate the burning of peat briquettes and or turf.

6.12.35 Chief Executive Response

The Council acknowledge the reference to air pollution and air quality in the submission. The Council has included a comprehensive section and policy objectives on air quality and climate change within the Draft Plan.

6.12.36 Chief Executive Recommendation

No change.

6.12.37 Protection of Natural Heritage

Waterways, rivers and the canal must be clean and developed and accessible to the community, while recognising that the primary aim of maintaining water bodies is to provide sustainable habitats for water-based species.

Greenways, brownfield and heritage sites, woodlands, walkways and trails are developed and well maintained with minimal interference and effect on established habitats/ecosystems.

Flora and fauna need to be protected throughout the county, not just within areas recognised as ecologically sensitive, or who have already received ecological designations.

6.12.38 Chief Executive Response

This is considered addressed within the Draft Development Plan under multiple policies and objectives contained with Chapter 11 (Built and Cultural Heritage) and Chapter 12 (Natural Heritage and Environment), and under policy CPO12.1 whereby *“It is the County Policy Objective of the Council to: Protect, conserve and enhance to the County’s natural heritage and biodiversity. This includes wildlife (flora and fauna), habitats, landscapes and/or landscape features of importance to wildlife, or which play a key role in the conservation and management of natural resources”*.

6.12.39 Chief Executive Recommendation

No change.

6.12.40 Restoration and reinstatement of Royal Canal Spur and as Protected Structure

Submission DCDP-17 requests the restoration and reinstatement of the Royal Canal Basin and Spur, and as protected under ‘RPS no. 36 of the ‘Longford Town Plan 2009 – 2015’. The subject site is located to the rear of the Market Square, Longford Town, is zoned ‘Town Core’ and is currently occupied as a public car park.

The rationale supporting this submission includes:

1. Existing N63 route could be retained and improved as part of the reinstatement;
2. The existing residential structures built upon the Royal Canal Spur are poorly arranged and restrict opportunity for improved urban space;
3. Potential reconnection to railway / station buildings;

6.12.41 Chief Executive Response

There are no recent planning applications relating to the subject site. The Local Authority is committed to the protection of our architectural heritage and considers the

Royal Canal and Longford Spur as of highest amenity. Existing policy provision under CPO13.19 within the dCDP sets out to *“protect, enhance and preserve the built and natural heritage of the Royal Canal and its associated structures ...”* and under CPO12.40 to *“promote and encourage ongoing works to improve the navigability of the Royal Canal, ...”*. Furthermore, Section 6.6 (Longford Regeneration Opportunities) has identified *“opportunities for improved links between both ends of the town and enhanced rejuvenation of, and connections between, the Royal Canal Greenway, the former location of the canal harbour ...”*. Also the layout and design of the approved Part 8 (No. 52) proposes the outline reinstatement of the canal basin for public amenity and received ‘Destinations Towns – Faille Ireland’ funding and currently lead by LCC Regeneration Section. To realise this the Local Authority considers the demolition of a minimum 4 no. existing and occupied dwellings at Harbour View, and the rerouting of a National Road (N63) to be excessive within the lifetime of the plan. However, the potential to develop such a proposal is considered worthy of protection.

6.12.42 Chief Executive Recommendation

CE CH12.14

Insert the following policy in ‘Inland Lakes, Waterways and Broadzones – County Policy Objectives’ 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”.

6.13 Chapter 13: Green Infrastructure

Relevant Submissions: DCDP-5, 9, 51, 69, 70, 79, 81, 83
--

The following is a summary of the main issues raised in submissions received:

- Support for Chapter Content
- Additional Trackways and Walkways
- Additional Support Infrastructure
- Biodiversity Risk – Green and Blue Infrastructure Development
- Land Zonings - Recreation/Amenity/Green Space
- Public Rights of Way
- Bord na Mona submission

6.13.1 Support for Chapter Content

The submissions are broadly supportive of the Chapter specifically focussing on Green Infrastructure within the County and the inclusion of policy objectives supporting the development, management and enhancement of Green Infrastructure. The submissions note the importance of maintaining and enhancing Green Infrastructure and its essential role in protecting the biodiversity of the County.

6.13.2 Chief Executive Response

The comments which are positive in nature are acknowledged and noted.

6.13.3 Chief Executive Recommendation

No change.

6.13.4 Additional Tracks and Walkways

Several of the submissions identify the opportunities to create and establish new and additional tracks and walkways in order to build up the Green Infrastructure within the County. The submission from the IWEA identifies the potential opportunities provided by wind farm projects which can contain a large track network, and there many examples of wind farms which incorporate amenity facilities for community use. The submission requests that future wind farm projects include tracks as part of the greenway network.

Several submissions are supportive of the proposals to turn the Bord na Mona old rail lines into walkways and cycle routes using the existing routes as these will provide a great additional local amenity and an attractive eco-tourism product and offer. The proposed trail route from Clondra to Newtownforbes is welcomed and will provide a link and allow residents to access the mid Shannon Wilderness Park.

6.13.5 Chief Executive Response

The Council identifies and welcomes the successful projects that have been achieved and acknowledges the intended and future opportunities for developing new and additional Green Infrastructure routes and assets within the County. The Council acknowledges the projects listed in the submissions and especially the Clondra to Newtownforbes route and others which will improve the access to greenways across the County.

The proposed use of windfarm service tracks is acknowledged; however, the Council would identify that there are no windfarms as yet constructed in the County. The existing policy objective does not explicitly state wind farm projects or renewable projects but is considered to be sufficiently broad to cover all proposed development projects.

6.13.6 Chief Executive Response

No change.

6.13.7 Additional Support Infrastructure

In developing and providing additional green infrastructure consideration should be given to thinking about the extra infrastructure that may be required to improve the use of the facility including car parking provisions. Further access barriers should be considered in order to balance the need for accessibility but also protecting these from motorbikes and horses.

6.13.8 Chief Executive Response

The identification of additional facilities such as car parking will have to be considered on a case by case basis and in certain areas so as they do not cause issues and problems. Further the access barriers is something that would be considered in order to protect the use of and the integrity of the infrastructure.

6.13.9 Chief Executive Recommendation

No change.

6.13.10 Biodiversity Risk – Green and Blue Infrastructure Development

The submission from the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (DCDP-51) makes reference to the risks to biodiversity with the development of green infrastructure including blueways and mooring points with Lough Ree (SAC) highlighted. There is need to apply the precautionary principal when screening for Appropriate Assessment (AA) and/or undertaking AA for greenways, blueways and peatways. Greenways and other associated linear trails should be designed to take into account, and avoid where necessary, the sensitivities of natural heritage.

This issue is also identified in the submission from the EPA (DCDP-5), which identifies the intent to progress these projects and to undertake appropriate environmental assessments. The submission identifies that such projects should not negatively impact on any designated European or nationally important sites. It is suggested that recent research reports and toolkits in relation to the health benefits of both blue and green spaces should be referenced in the Draft Plan and used in its monitoring.

Submission DCDP-05 also states that “*proposals for greenway/blueway development should contribute towards the protection or enhancement of existing green infrastructure*”. The submission further states that the Draft Plan should have regard to the “Connecting with nature for health and wellbeing” EPA Research Report 2020.

6.13.11 Chief Executive Response

The Council accepts the sensitivities of the environment in which green infrastructure are often located and or proposed.

Likewise, the essential need to apply the precautionary principal when screening for Appropriate Assessment of such projects. The Council has included a range of policy objectives that seek to both protect and enhance the green infrastructure network within the County, for example:

CPO13.12 Ensure all planning applications for development have regard to the County's Green Infrastructure resources and that they provide for the protection of existing green infrastructure, and, where appropriate, the provision of new green infrastructure.

The Council considers that current mechanisms for the screening for AA are considered sufficient and robust to meet the needs and requirements.

In respect of the Submission DCDP-05 the Council proposes the insertion of an additional policy objective after CPO13.19 in line with the wording recommended in the submission and referencing the EPA Research Report 2020.

6.13.12 Chief Executive Recommendation

CE CH 13.1

To 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.

6.13.13 Recreational / Amenity / Green Space Zonings

Submission DCDP-51 makes reference to land zonings and commends the Council on the zonings of lands recreational/amenity/green space in many of the towns across the County. The submission identifies that many of these zoned areas within the settlements are along watercourses and riparian habitats, the Department recommends that the new guidance from Inland Fisheries Ireland (2020) on "*Planning for watercourses in the Urban Environment*" is considered in the Plan.

It is suggested that there is an opportunity to enhance biodiversity and Green Infrastructure and it is further recommended that the Ecosystem Services Scoring approach is used to score and map these recreational/amenity/green space zones within each town to facilitate enhancing these areas for biodiversity during the lifetime of the Plan. In addition all development proposals within the identified recreational/amenity/green space zones should include an Ecological Impact Assessment, at a minimum, in order to ensure that the potential impacts on protected species and habitats are assessed.

6.13.14 Chief Executive Response

The Council acknowledges the new guidance from Inland Fisheries Ireland (2020) on "*Planning for watercourses in the Urban Environment*". The Plan will be amended in order to reference this guidance within both the Green Infrastructure Chapter and Chapter 12 *Natural Heritage and Environment*.

The Council supports the proposed requirement for all development proposals within lands identified and zoned as Recreation/Amenity/Green Space to include and submit

an Ecological Impact Assessment (EclA) at a minimum to ensure that the potential impacts on protected species and habitats are assessed.
The Council supports the proposal for survey work to be undertaken of the lands zoned Recreation/Amenity/Green Space and suggests that a new policy objective be added.

6.13.15 Chief Executive Recommendation

CE CH 13.2

To insert a reference to new guidance after 13.3.5 CEDRA 2012 'Energising Ireland's Rural Economy' as follows:

Inland Fisheries Ireland (2020) on "Planning for watercourses in the Urban Environment".

CE CH 13.3

Amend 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 (EclA) 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.

CE CH 13.4

To insert a new policy objective after CPO13.7 as follows:

Survey lands zoned Recreation/Amenity/Green Space and to apply the Ecosystem Scoring Service to assess the habitat and species value of the subject lands zoned in the key settlements of the County as resources and opportunities allow during the lifetime of the Plan.

6.13.16 Public Rights of Way

Submission DCDP-70 suggests that the title of Section 13.9 Public Rights of Way be revised to include walking and cycling routes and trails. The submission recommends a review of the section on Public Rights of Way in order to appropriately and better define the difference between public rights of way and walking routes and trails on the other hand. The submission suggests the addition of the following text under Section 13.9:

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 submission further states that additional policy objectives should be included; to create additional rights of way and extend existing ones for pedestrian, cycling, amenity or recreational purposes, and; to promote the preservation, protection, enhancement, maintenance and improvement for the common good of all public rights of way.

6.13.17 Chief Executive Response

In respect of Section 13.9 Public Rights of Way, the Council acknowledges the proposed changes to the title of the section and the additional text included within the chapter. The Council acknowledge the opportunities to include additional policy objectives and proposes to include two additional policy objectives related to public rights of way.

The Council have identified the list of known rights of way in the County and propose to include the list of routes into the Draft Plan and the map of these throughout the County as an appendix in the Draft Plan.

6.13.18 Chief Executive Recommendation

CE CH 13.5

Insert the following additional text into section 13.9 Public Rights of Way:

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.

CE CH 13.6

To Insert additional policy objectives after CPO13.31 as follows:

CPO 13.XX	<i>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.</i>
CPO 13.XX	<i>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.</i>

CE CH 13.7

To include a list of known rights of way in the County in the Development Plan – see Part 3, Appendix 13 of this report.

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

CE CH 13.8

To include a map of the know rights of way in the County in the Development Plan – see Part 3, Appendix 13 of this report.

6.13.19 Bord na Mona Submission (DCDP-79)

This submission acknowledges the inclusion of Green Infrastructure and the economic, environmental and social benefits of connecting such infrastructure particularly in rural areas. Section 13.7 is referenced and the connections between walkways, cycleways along rivers, canals, disused rail lines and peatlands and the opportunities for future tourism development.

The additional creating peatways through the landscape connecting biodiversity and cultural hotspots. The submission identifies the success achieved in enabling green infrastructure including:

- Corlea Trackway and Visitor Centre
- Derryogue and Knappogue greenways providing connectivity to the towns of Lanesborough and Clondara
- Derryadd Windfarm which includes an amenity plan with proposed direct connectivity to the Royal Canal, with opportunities for connectivity through other Bord na Móna bogs in the future.

The submission references the Bord na Mona Biodiversity Action Plan 2016-2021 which supports the integration of green infrastructure with commercial development. The submission references the similar objectives and identifies that future Bord na Mona land-use strategies will support the Longford County Development Plan in the development of green infrastructure.

6.13.20 Chief Executive Response

The Council acknowledges the submission from Bord na Móna and welcomes their specific support and action in making available access to a number of green infrastructure projects in the County and welcome their commitment to future projects. The reference to the Bord na Móna Biodiversity Action Plan 2016-2021, is further supported and its reference to the development of additional green infrastructure projects. No change to the Draft Plan is required in respect of this submission.

6.13.21 Chief Executive Recommendation

No change.

6.14 Chapter 14: Landscape Character

Relevant Submissions: DCDP-7, 70, 38

The following is a summary of the main issues raised in submissions received:

- Support for the content of the Chapter
- Proposed Landscape Policy Objective Amendments
- Protected View mapping change.

6.14.1 Support for the content of the Chapter

The NWRA have indicated that there are similar opportunities for collaboration with Local Authorities in the NWRA region. This is consistent with NWRA regional policy RPO5.2 for a collaborative approach by Local Authorities.

Keep Ireland Open have indicated their particular support for section 14.5 Table 14.1 Landscapes Character Types and Sensitivity and Figure 14.1 Landscape Character Areas.

6.14.2 Chief Executive Response

The comments which are positive in nature and indicate that local authorities in the NWRA area should take a similar approach are noted. Collaboration with other local authorities and relevant stakeholders is a feature of the Draft Plan.

6.14.3 Chief Executive Recommendation

No change.

6.14.4 Proposed Landscape Policy Objective Amendments

In relation to Landscape Policy Objectives it is submitted that CPO 14.1 and CPO 14.2 should be merged with CPO 14.4 and replaced by:

Protect, conserve, maintain, safeguard, identify, enhance and ensure the preservation of the uniqueness of a landscape type and the visual integrity, scenic quality, general amenity and the visual quality of areas of intrinsically important and outstanding, highly sensitive, designated, natural, unspoilt and open landscapes, the natural environment scenic areas, high amenity areas and the environs of archaeological or historic sites from intrusive, inappropriate, injurious or unsympathetic new, or additions to, existing developments and reinforce their character and promote their distinctiveness by prohibiting development where it could unduly impinge or impact on or be detrimental to such landscapes or would be injurious to, or detract from natural amenities or introduce incongruous landscape elements.

This is based on 2015 Plan, Fingal, Louth, South Dublin, Kildare, Westmeath, Cavan, Meath and many other plans.

6.14.5 Chief Executive Response

The Draft Plan contains CPO 14.4 to

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.

It is considered that this could be augmented based on the submission received with the inclusion of additional text.

6.14.6 Chief Executive Recommendation

CE CH 14.1

Insert the following underlined text into CPO14.4:

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.

6.14.7 Landscape Unit 2

In terms of 14.6.2 Landscape Unit 2 - Northern Upland Policy Objectives it is submitted that an additional policy objective should be included as follows: -

*Preserve, maintain, enhance important landscapes and **protect** the amenity value, visual integrity of 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 the uplands. Ensure that development will not materially interfere or detract from scenic uplands and that particular regard is had to potential impacts of new developments 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, walking trails, public amenities, settlements and roads. Have particular regard to the potential impacts of development on sensitive upland areas and consider the difficulty of establishing and maintaining screening vegetation.*

This is based on Laois, Kildare and many other plans

6.14.8 Chief Executive Response

This is considered a good policy which should be include in the draft plan.

6.14.9 Chief Executive Recommendation

CE CH 14.2

Insert the following CPO after existing 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.

6.14.10 Protected Views - Mapping Change

Submission DCDP-38 requests a change to the Longford Protected Views Map for part of the route known as the Full View F.S.3 at Soran, Ballinalee, County Longford in the Draft Longford County Development Plan 2021-2027. The rationale supporting this submission includes that the stretch of road in question should not be considered a scenic route as there is no view towards Corn Hill at that point along the road. Photographs were attached to explain this numbered 1, 2 & 3. The submission further stated that scenic view of Corn Hill begins further along this stretch of road in the direction of Corn Hill. (Please see attached photograph 4) and this is where the scenic route / view should commence.

6.14.11 Chief Executive Response

The submission and its contents are acknowledged. The submission however misunderstands the basis of the protected view in that it is in both directions not just towards Corn Hill. It is accepted that not all the views in the opposite direction are full views, but the majority are quite spectacular across Co. Longford and Westmeath. The purpose of the protection is twofold: (A). to limit the type of development which will block these views from the public road as well as (B). the erection of structures on the view which can be viewed from the far distance towards the rising land which contains the protected view. Developments at these locations destroy the rural amenity and visual attractiveness of the area. These potential visual obstructions reduce the attractiveness of Longford both to local people but also for visitors and tourists to the County.

6.14.12 Chief Executive Recommendation

CE CH 14.3

It is recommended that only the lower half of the portion of view between photograph 1 and 2 be removed and as identified as a red line circled in yellow – see Part 3, Appendix 14.

6.15 Chapter 15: Implementation, Monitoring and Review

Relevant Submissions: DCDP-69, 76, 81, 70
--

The following is a summary of the main issues raised in submissions received:

- Monitoring and Implementation measures
- Development Contributions
- Policies subject to availability of resources

16.15.1 Monitoring and Implementation measures

Clear proposals for the monitoring and implementation of the objectives outlined in the draft Longford development plan 2021-2027 could not be found. Longford County Council must define criteria by which development in the county can be monitored to assess compliance with the objectives of the Development Plan. The council should develop and publish specific performance indicators which establish how progress is quantified and measured. It is recommended that the local communities are involved in the monitoring process. The results of the statutory 2-year progress report and 4-year review should be made public.

In the absence of rigorous application of policy, the divergence between policy and practice results in unsustainable, economically inefficient, structurally weak and spatially dispersed settlement patterns. Therefore, it is of paramount importance that the new CDP moves beyond objectives within the text and towards robust targets, actions and measures to achieve the tangible implementation of the plan's objectives and policies. The success or otherwise of the forthcoming CDP can only be judged against quantifiable and implementable criteria which are subject to ongoing monitoring.

16.15.2 Chief Executive Response

It is accepted that the progressive nature of the Longford County Development plan will only be considered a success if it is effectively implemented. Chapter 15 is a specific chapter which has been included to monitor and assess the compliance of objectives in the Development Plan. A review of the Development Plan will be completed as a statutory process within 2 years of its adoption.

As indicated in this chapter a statutory progress report is required after 2 years and a review must be carried out after 4 years. Both of these will be completed in accordance with statutory requirements.

16.15.3 Chief Executive Recommendation

No change.

16.15.4 Development Contributions

Development Contributions and Rates are effectively funding streams which could be considered under 15.5.2 *'Any other funds as deemed relevant by EMRA, the local authority or other relevant agency'*. In Longford County Council's Development Contribution Scheme 2018 — 2022 the amount to be charged for Industrial Wind Farm Development / Turbines is €71,600 per MW. This is over 7 times the norm of c. €10,000 charged by most other Local Authorities.

This effectively renders many smaller and community wind farm projects in County Longford uncompetitive in the context of Renewable Energy Support Scheme (RESS) auctions.

The primary objective of the development contribution mechanism is to partly fund the provision of essential public infrastructure, without which development could not proceed. Wind Farm developments pay directly for road upgrades, electricity upgrades, telecom upgrades and do not require any water or wastewater beyond domestic scale connections. The Ministerial Guidelines state the "development contributions are ultimately designed to offset only a portion of the costs of public infrastructure and facilities". Additional information should be provided on the proposed use of the funds and the justification for the proposed increase to be levied on wind farms. It is also not clear why wind turbines are being subjected to such a significant charge when other forms of development will face a much smaller charge despite requiring a greater degree of infrastructure to be provided by the Local Authority. The extremely high charges are effectively a barrier to all small and medium scale wind farms in the County. The Development Contribution Scheme should be reviewed at the earliest possible date.

16.15.5 Chief Executive Response

It is not appropriate to include a policy in relation to the preparation and content of the Development Contribution Scheme as this is a separate task to the preparation of the Development Plan and is subject to the separate agreement of the elected members when the scheme is reviewed and prepared in accordance with the relevant timeline.

16.15.6 Chief Executive Recommendation

No change.

16.15.7 Policies subject to availability of resources

Some policy objectives carry a rider subject to the availability of resources. As many policy objectives involve a financial commitment it is invidious to single out any particular one.

16.15.8 Chief Executive Response

It is considered prudent to outline if resources may be an issue to the delivery of any particular objective.

16.15.9 Chief Executive Recommendation

No change.

6.16 Chapter 16: Development Management Standards

Relevant Submissions: DCDP-14, 51, 53, 58, 66, 68, 69, 70, 81, 83, 93
--

The following is a summary of the main issues raised in submissions received:

- Development Management Standards - location and cross -reference
- Environmental Education
- Sightlines
- Service Areas
- Extractive Industry
- Renewable Energy
 - Wind
 - Solar
 - Renewable Energy and Flood Risk / Flood Areas and Renewable Energy Development
- Tourism and Recreation
- Archaeology

6.16.1 Development Management Standards - location and cross - reference

It is submitted that the Development Standards should be dealt with at the end of each Chapter as this would make the plan more user friendly. It is submitted that policy chapters and the DM standards should be cross referenced.

6.16.2 Chief Executive Response

Taking account of the cross-cutting nature of the policy content in the various chapters in the Development Plan, it is not considered that this is a favourable approach, and that to have the DM Standards in one chapter is better approach.

In relation to the cross referencing of policy chapters with content in the DM standards chapter, where this is directly relevant it has already occurred. As chapter content deals with policy content which is not strictly mirroring DM policy it is considered onerous to cross reference all policy and DM standards.

6.16.3 Chief Executive Recommendation

No change.

6.16.4 Environmental Education

Education on the environment and sustainability must continue and be developed in all schools.

6.16.5 Chief Executive Response

This is considered addressed within the Draft Development Plan under Development Standard DMS16.44 whereby *“The Council in assessing development proposals will consider the following criteria: Incorporation of measures to ensure sustainable design such as rainwater harvesting, green roofs and walls etc.”*, and DMS 16.160 for *“Proposals should incorporate Sustainable Urban Drainage Systems (SuDS) and other measures that address adaptation to climate change including rainwater*

harvesting, the creation of integrated wetlands, the construction of green/living roofs whereby opportunities for existing solar energy and wind energy are taken.”

6.16.6 Chief Executive Recommendation:

No change.

6.16.7 Sightlines

Submission DCDP-19 (TII) identifies different distances used in DMS 16.91 (230m) and subsequently in DMS 16.114 (215m). The Council have been asked to address this.

6.16.8 Chief Executive Response

The Council acknowledge the comments made in respect of the sightlines and the distances quoted in the Development Management chapter 16 of the Draft Plan. The Council had used a simplified table with the distances quoted. Having received the Submission and reviewed the guidance a revised table is now suggested which seeks to correctly use and apply the speed of the road to identify the sightline distance required. As a consequence, the sightlines referenced in chapter 16 shall be revised including the distances quoted in DMS16.91 and DMS16.114.

6.16.9 Chief Executive Recommendation

CE CH 16.1

To amend the wording of DMS16.91 sightlines as highlighted.

DMS16.91	<p><u>Access and Sightlines</u></p> <p>a) All applications for planning permission must include (at a minimum scale of 1:500) comprehensive details of the way in which safe access and egress to the site can be achieved.</p> <p>b) Existing roadside hedgerows and trees should be retained as much as possible. The entrance should be carefully considered to achieve the required sight distance with the removal of a minimum extent of existing hedgerow.</p> <p>c) Where satisfactory access can be achieved only by removing large stretches of roadside hedgerow/ditches/stone boundaries, an alternative site for the proposed development should be considered subject to satisfaction of other planning assessment criteria.</p> <p>d) The sharing of vehicular entrances will be encouraged where appropriate in order to avoid a proliferation of access points. Where a new house is to be sited adjacent to existing dwellings, use of existing entrances, avenues and driveways should be considered.</p> <p>e) Safe unobstructed sight distances should be provided and maintained thereafter from vehicular entrances onto the road network <i>as per the details specified in DMS16.114 follows:</i></p> <p>i. Local Roads: 90 metres, (subject to the discretion of the Planning Authority where a lesser distance is demonstrably adequate in terms of traffic safety)</p> <p>ii. Regional Roads: 150 metres</p> <p>iii. National Roads: 230 metres</p>
----------	---

CE CH 16.2

To amend the wording of DMS16.114 sightlines as highlighted.

DMS16.114

Safe unobstructed sight distances should be provided and maintained thereafter from vehicular entrances onto the road network as follows:

Road Type	Sight Distance
National Primary Road	215 metres
National Secondary Road	215 metres
Regional Road	150 metres
Local Road	90 metres

Speed Limit	Road Type				Applicable Standard
	NP	NS	REG	LOCAL	
120kph	295m	295m	-	-	TII Publications
100kph	215m	215m	215m	-	TII Publications
80 kph	160m	160m	160m	160m desirable but subject to road width and alignment, traffic volumes and traffic speeds and where a lesser distance is shown to be adequate in terms of safety.	TII Publications
60 kph	65m	65m	65m	65m	DMURS
50 kph	49m	49m	49m	49m	DMURS
40 kph	36m	36m	36m	36m	DMURS
30 kph	24m	24m	24m	24m	DMURS

a) In general, only the minimum interference with existing roadside boundaries and hedges shall be permitted.

b) Third Party consent letters and accompanying Land Registry Maps for the provision of adequate Sight Distance Triangles should be submitted, if applicable.

In terms of Local Roads, this is also subject to the discretion of the Planning Authority where a lesser distance is demonstrated to be adequate in terms of traffic safety.

6.16.10 Deliveries and Access

Submissions stated that certain buildings and facilities in towns and settlements have specific requirements for receiving and accepting deliveries. Restricting the times of

deliveries/collections to and from postal service centres may have significant impacts on the ability of the service to meet service standards.

Consultation and engagement should be provided to service providers and businesses who operate in town and village centres especially when alterations and public realm improvements are proposed; and in the development of Local Area Plans and Local Transport Plans for Longford town, in order that projects do not negatively impact business and service provision.

6.16.11 Chief Executive Response

In respect of deliveries and access the Council is mindful of the needs of business and other stakeholders within our towns, villages and settlements. The Council welcomes the suggestions about early engagement on public realm and regeneration projects within our main settlements in order to achieve effective and early engagement of all stakeholders. The Council would, however, identify the important role it plays in ensuring appropriate standards and controls on developments in order to protect residential amenity and ensure sustainable development at all times.

6.16.12 Chief Executive Recommendation

No change.

6.16.13 Service Stations

TII would welcome consideration being given to including the provisions of the DoECLG Guidelines Section 2.8, in formal policy included in the Development Plan and as a reference guide in Development Management Standards, prior to adoption, in the interests of road user safety and adherence to the provisions of official policy.

The submission suggests that the following section be included into the Section 16.4.12 Service Stations

Service stations and associated truck parking facilities in locations at or near national roads will be assessed having regard to the Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

6.16.14 Chief Executive Response

The Council acknowledges the intention of the submission from the TII in respect of Service Stations. The proposed referencing and the insertion of the *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)* is considered an appropriate amendment of the Draft Plan. The Council therefore propose to revise the wording of Section 16.4.12 Service Stations to reflect this.

6.16.15 Chief Executive Recommendation

CE DM 16.3

To amend the wording of Section 16.4.12 and the text as follows:

16.4.12 Service Stations

The role of service stations has become more diverse with the expansion from merely selling fuel to also providing convenience services and goods including functioning as rest areas. Ancillary uses include tyre repair, collection points for online retail activity and self-service launderettes. Service stations must be located on the outskirts of the town or village, but inside the 50km to 60km speed limits.

Service stations and associated truck parking facilities in locations at or near national roads will be assessed having regard to the Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

6.16.16 Car Parking Standards

A number of submissions referenced the car parking standards included in the Draft Plan. The inclusion of maximum standards is both acknowledged and welcomed in the submissions. It is suggested that flexible standards be provided for certain uses in the towns and settlements across the County and that certain uses are effectively future proofed given an increase in anticipated uses.

6.16.17 Chief Executive Response

The Council acknowledges the submissions received in respect of car parking and deliveries and accessibility for buildings and premises within towns and settlements. The principle of the submissions is understood; however, the guidance and standards provided in the Plan are intended to provide defined maximum standards to be applied for all developments in order to provide consistency.

6.16.18 Chief Executive Recommendation

No change.

6.16.19 Cycle Parking

The submission (NTA) further welcomes the detailed cycle parking standards as set out in Table 16.2 of the Draft Plan and the DMS16.138 to provide shower and changing facilities. The Submission identifies the cycle parking requirements for residential apartment developments has been specified by Department of Housing, Local Government and Planning's *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities* which states the following:

Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. The submission therefore suggests that the Table 16.2 cycle should be revised accordingly.

6.16.20 Chief Executive Response

The Council acknowledges accepts the proposed revision to Cycle Parking Standards and Table 16.2 in respect of cycle parking standards for apartments and flats. The Council welcomes the comments in respect of the parking standards and the use of maxima standards. These are stated within the Draft Plan in the Development Standards in DMS16.126 section of the Plan and table 16.1 Car Parking Standards.

6.16.21 Chief Executive Recommendation

CE CH 16.4

To revise Table 16.2 and include the cycle standards for apartments and studio flats as per apartment developments has been specified by Department of Housing, Local Government and Planning's *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities*

LAND USE	CYCLE PARKING SPACE REQUIREMENT
HOUSES APARTMENTS STUDIO FLATS	1 space per dwelling 1 stand per bedroom and 1 visitor stand per 2 units 1 stand per unit and 1 visitor stand per 2 units
RETAIL	1 storage space per 100 sq. m
OFFICES	10% of employee numbers, (subject to minimum of 10 bicycle storage places or one bike space for every car space, whichever is the greater)
FINANCIAL INSTITUTIONS	1 unit per 40 sqm GFA, or 1 space per car space whichever is greater
RETAIL WAREHOUSING / CASH AND CARRY	1 space per 20 parking spaces whichever is greater
INDUSTRY & WAREHOUSING	1 per 100sq.m GFA
HOTELS, B&B, GUESTHOUSES*	2 stands per unit accommodation
Cinemas/Theatre	1 space per 10 seats
SURGERIES/CLINICS	1 space per 5 members of staff and 0.5 space per consulting room
CHILDCARE, CRECHE, MONTESSORI	1 space per 5 members of staff and 1 space per 10 children
SCHOOLS	10% of pupil registration numbers, minimum 10 places. Consider separate teacher/ employee storage
COMMUNITY CENTRE, SPORTS CLUBS	1 space per 20 sqm GFA
GOLF AND PITCH AND PUT COURSES	4 spaces per course
GOLF DRIVING RANGE	2 spaces per facility
PUBLIC TRANSPORT HUBS (RAIL / BUS)	5% of number of daily boarders at that point/ station
OTHER DEVELOPMENTS	1 bike storage space for every car space

6.16.22 Extractive Industries

The Department of the Environment, Climate and Communications submission (DCDP-14) is supportive of the proposed assessment criteria for development management standards for extractive industries as detailed in Section 16.4.16.3. The Department makes reference to *the 'Geological Heritage Guidelines for the Extractive Industry'* which it states provide a useful framework document to be considered in addition to *"Guidelines for Planning Authorities on Quarries and Ancillary Activities 2004"* (DoEHLG).

Submission DCDP-58 states that aggregate resources are not evenly distributed across the country or the county and the Draft Plan should ensure that the extraction

of aggregates can take place in suitable locations where the resource exists. The submission suggests that the Council adopt the 'safeguarding of reserves' and the Draft Plan maps areas of proven deposits on an appropriate map in order to protect them from future development of incompatible land-use. Furthermore, extensions to existing quarry operations should be given favourable consideration.

Submission DCDP70 identifies the potential and significant visual impact on sensitive landscapes of quarries and extractive industry developments and proposes the insertion of an additional DMS.

Submission DCDP-58 references DMS16.180 and states that the sector provides significant financial contributions to the Council through the Development Contribution Schemes and payment of rates. Any special contributions on a particular development should be determined on a proportionate basis in the context of overall traffic usage and traffic related to the development.

6.16.23 Chief Executive Response

The identified additional guidelines '*Geological Heritage Guidelines for the Extractive Industry*', are considered to be of relevance and shall be referenced in the Development Management Standards.

The Council identifies that the Draft Plan seeks to balance the need for extractive industry and the requirement to protect the local environment. The Draft Plan contains adequate policy objectives in this regard.

The Council welcomes the submission and the comments about protecting sensitive landscapes and the assessment of visual impact. Having reviewed the development management standards included for the extractive industry which includes DMS16.175 through to DMS16.180 the Council is of the Response and agrees that the protection of sensitive landscapes should be better referenced in the Draft Plan. The Council proposes to add detail to DMS16.176 (f) - *Likely environmental effects, including visual impact on sensitive landscapes and proposed mitigation measures and restoration.*

The Council acknowledges the financial contributions made by industry sector and would reiterate that the principle of the DM Standard is included to be applied in certain and specific circumstances. The impacts of heavy traffic and vehicles on the road network and on defined routes can be significant and the application of a special contribution / bond is only sought in order to ensure that any damage associated from the development is appropriately repaired and reinstated.

In the Draft Plan DMS 16.180 is as follows

A special contribution levy may be required from the developer towards the cost of upgrading or repairing the local roads serving the quarry and to minimise the adverse impacts of associated quarry operations on the road network.

This provides the opportunity for the Council to properly manage the impact of the developments and to seek the appropriate repair and maintenance as required, with costs apportioned from the source of any damage.

6.16.24 Chief Executive Recommendation**CE CH 16.5**

Section 16.4.16.3 Extractive Industry will be amended and the reference to the 'Geological Heritage Guidelines for the Extractive Industry' will be included in DMS 16.175 as follows:

DMS16.175	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 <i>Geological Heritage Guidelines for the Extractive Industry</i> .
-----------	--

CE CH 16.6

To amend the wording and insert the wordings into DMS16.176

DMS16.176	<p>Require Developer's / Applicant's to submit the following:</p> <ul style="list-style-type: none"> a) An appropriate map detailing total site area, area of excavation, any ancillary proposed development and nearest dwelling and/or any other development within 1km of the application site. b) A description of the aggregate to be extracted, method of extraction, any ancillary processes (crushing etc), equipment to be used, stockpiles, storage of soil and overburden and storage of waste materials. c) The total and annual tonnage of extracted aggregates expected in the lifetime of the extraction, maximum extent and depth of working and a phasing programme. d) Details of water courses, water table depth and hydrological impacts, natural and cultural heritage impacts, traffic impact, waste management and the impacts upon landscape and walking and cycling routes. e) Assessment of cumulative impact when taken with any other extractive operations in the vicinity. f) Likely environmental effects, <i>including visual impact on sensitive landscapes and</i> proposed mitigation measures and restoration. g) Detailed Rehabilitation and after-care proposals. These should include a report with plans and section drawings, detailing the following: <ul style="list-style-type: none"> 1. Anticipated finished landform and surface/landscape treatments (both of each phase proposed (where applicable) and the excavation as a whole) 2. Quality and condition of topsoil and overburden 3. Rehabilitation works proposed 4. Type and location of any vegetation proposed 5. Proposed method of funding and delivery of restoration / reinstatement works etc. h) Current Legal Planning Status of the Existing Development (Quarry/Sand and Gravel Pit).
-----------	--

	<p>i) Justification on need for the development proposed, the extent of existing authorised quarry supplies available and the impact of the development on the local environment.</p> <p>j) Limited duration on permissions may be provided to allow for the re-evaluation of the development in light of unforeseen environmental implications and in light of changes in environmental standards and technology.</p>
--	--

6.16.25 Renewable Energy

Wind Energy

Submission DCDP-81 (IWEA) acknowledges and supports the Section 16.4.17 on Renewable Energy. The submission suggests that the opening paragraph should reference the forthcoming Renewable Energy Strategy and Wind Energy Strategy.

Solar Energy

Submission DCDP-68 is generally supportive of the requirements for assessing renewable energy projects and solar energy schemes (DMS16.181 and DMS16.182). DMS16.181 includes a number of elements, item (I) references the decommissioning of obsolete infrastructure and after-use. The Submission, however, suggests *'a draft Decommissioning plan will be agreed with the local authorities three months prior to the decommissioning the proposed development'*.

Submissions DCDP-68 and DCDP-77 recommend that the duration of the permission for solar PV development projects should be for a period up to ten years from the date of grant of planning permission. Furthermore, that future solar PV developments be granted planning permission for an operational period of between 30-40 years.

In addition Renewable Energy projects and developments should be considered on a case by case basis recognising that there is a necessity in some instances for larger scale solar developments to be fragmented on account of ecological considerations, access requirements, flood related concerns, land stability, residential amenity considerations and land availability.

Flood areas and Renewable Energy Development

Submission (DCDP-68) states that solar panels are 100% water compatible and that their provision in a flood zone should not be precluded.

The submission states that this should be assessed on a site specific basis involving the preparation of a Site Specific Flood Risk Assessment as part of any future solar PV development in areas identified as being moderate to high risk of flooding. The submission refers to a number of An Bord Pleanála and Planning decisions in which the installed panels have been sited within known and identified flood zones; notwithstanding this noting that the electrical infrastructure including substations and inverters will be required to be located outside of such flood zones. In this regard Development Management Standard DMS16.182 as included within the Draft County Development Plan 2021-2027 should be revised to state the following:

'All development proposals within or incorporating areas of moderate or high risk of flooding shall be accompanied by a site-specific Flood Risk Assessment in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (DHELG and OPW, 2009)'

The above is considered to be in line with best practice approaches for alternative types of renewable energy projects and as such we would encourage Longford County Council to adopt this approach in respect of future solar PV developments.

6.16.26 Chief Executive Response

Wind Energy

The Council acknowledges the principle of the submission in respect of renewable energy. The proposed additional text providing a brief addition to the Section under 16.4.17 and an introduction to the Section confirming that regard should be had to the proposed County Renewable Energy Strategy and the Strategic Energy Zones to be identified by EMRA is considered to be relevant and appropriate.

Solar Energy

The Council identifies that decommissioning is referenced in the existing Development Management Standard DMS16.181 under (l) Decommissioning of obsolete infrastructure and after-use.

The Council acknowledges the request and the intention for an extended period for the life of the planning permission; and the intention of granting planning permission for an operational period of between 30-40 years. The Council proposes that such matters should be considered on a case-by-case basis with consideration being given on its relative merits. An amendment to DMS16.181 is proposed and it is suggested to include the following:

“m) The length and duration of renewable energy projects planning permissions and the life of the project shall be considered on a case-by-case basis and subject to agreement of the Planning Authority.”

In respect of the fragmenting of larger scale renewable energy projects, the principle of the proposal is acknowledged; however due to the nature of such developments the Council would expect such considerations to emerge in the design and layout of the proposed projects. As such no change to the proposed DMS is proposed in respect of this matter.

Flood areas and Renewable Energy Development

In the Draft Plan DMS16.182 is as follows:

Ensure that proposals for the development of wind and solar farms are not located within areas identified as being within Flood zones A or B as per the Planning System and Flood Risk Management Guidelines 2009 for Planning Authorities (or any updated guidelines).

The Council is of the Response that the wording of the DMS16.182 should be amended in order to facilitate the potential use of lands in the flood zone for potential solar renewable energy projects. However taking account the stability impacts associated with the deep foundations of wind turbines, it is not considered that this should be removed for wind farm developments. The Plan would continue to be in compliance with relevant Guidelines if reference to solar farms was removed from this DMS.

6.16.27 Chief Executive Recommendation**Wind Energy****CE CH 16.7**

To 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.

Solar Energy**CE CH 16.8**

To amend the wording and details of DMS16.181

DMS16.181	<p>In the assessment of renewable energy development proposals such as wind and solar energy schemes (but not limited to), the Council will take the following criteria into account:</p> <ul style="list-style-type: none"> a) The proper planning and sustainable development of the area; b) The environmental and social impacts of the proposed development including those on residential properties, such as noise and shadow flicker; c) Traffic impacts including details of haul routes; d) Glint / Glare and the potential impact on the adjoining road networks and dwellings through the submission of an associated report; e) Impact of the development on the landscape and the Zone of Visual Influence (see Chapter 14: Landscape Character and Annex 9; Landscape Character Assessment); f) Impact on protected Views and Prospects (see Chapter 14: Landscape Character and Appendix 9 and Annex 9; Landscape Character Assessment); g) Impact on public rights of way and walking / cycling routes, blueways, greenways and peatways; h) Impact of the grid connection from the installation to the ESB network and National Grid (where applicable); i) Mitigation features, where impacts are inevitable; j) The protection of designated areas - NHAs, SPAs and SACs, areas of archaeological potential and scenic importance, proximity to structures that are listed for protection, national monuments, etc. (see Chapter 11: Built and Cultural Heritage; Chapter 12: Natural Heritage and Environment and Chapter 13: Green Infrastructure); k) The cumulative Impact of proposal development on protected bird and mammal species; l) Decommissioning of obsolete infrastructure and after-use; <i>m) The length and duration of renewable energy projects planning permissions and the life of the project shall be considered on a case-by-case basis and subject to agreement of the Planning Authority.</i>
-----------	--

CE CH 16.9

Amend DMS 16.182 as follows:

Ensure that proposals for the development of wind ~~and solar~~ farms are not located within areas identified as being within Flood zones A or B as per the Planning System and Flood Risk Management Guidelines 2009 for Planning Authorities (or any updated guidelines).

Ensure that proposals for the development of solar farms located within areas identified as being within Flood zones A or B are subject to a Site-Specific Flood Risk Assessment as per the Planning System and Flood Risk Management Guidelines 2009 for Planning Authorities (or any updated guidelines).

6.16.28 Tourism and Recreation

Several submissions welcome the section in the Development Management Standards relating to Tourism and Recreation. DMS 16.188 is particularly identified and supported:

In terms of sustainable forms of niche tourism and recreation, facilities should be located within existing structures, or in buildings of character requiring renovation or in traditional farm houses, where possible.

Submission DCDP-93 suggests *that certain facilities may be required in order to enhance, grow and develop the tourism product and offer.*

6.16.29 Chief Executive Response

The Council welcomes the intent of the Submission. Whilst the proposed amendment is acknowledged, the existing wording is considered to provide sufficient scope for the development of additional facilities without needing an amendment to DMS 16.188.

6.16.30 Chief Executive Recommendation

No change.

6.16.31 Archaeology

Development Management Standards Archaeology

DCDP-51 submission has made the following policy recommendation for inclusion:

That where conditions are imposed for the protection or preservation of the archaeological heritage, these will make clear that the costs of implementing these are to be borne by the developer;

6.16.32 Chief Executive Response

The recommended inclusion is conserved favourable making clear the costs of implement imposed protection or preservation measures by condition to be borne by the developer is supported.

6.16.33 Chief Executive Recommendation

CE CH 16.10

Include the following additional wording in DMS16.200 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.

6.17 Format / Miscellaneous

Relevant Submissions: DCDP-70

6.17.1 Format

It is submitted that the contents should include sub-sections. An index should be provided as recommended in the Development Plan Guidelines (5.15), and that the page numbers where topics are primarily dealt with should be bolded. The layout can be improved by sub-numbering or sub-lettering lists of points and paragraphs. The present layout creates difficulties when referring to particular points. Also the Chapter numbers should be placed on each page.

6.17.2 Chief Executive Response

A Contents has been provided. The value of sub-sections contained within the contents is recognised and this will be contained within the final version of the adopted plan.

Chapter numbers along with Chapter title are already included as part of the header on each page of the Plan. The Draft Plan contains report style numbering with sub sections also numbered making the text easily navigational.

The final numbering of individual paragraphs in terms of report numbering format is a useful navigational tool and can be considered for the final adopted plan.

6.17.3 Chief Executive Recommendation

CE CH 17.1

A contents with reference to sub chapter content shall be contained within the final adopted version of the Plan.

Report style numbering of all individual paragraphs will be considered in the final adopted version of the Plan.