

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



PART 2 SUBMISSIONS ON DRAFT PLAN SUPPORT DOCUMENTS AND LAND ZONING

PART 2: SUBMISSIONS ON DRAFT PLAN SUPPORT DOCUMENTS AND LAND ZONING

CONTENTS

	Page No.
Glossary of Abbreviations	3
7.0 Submissions on Volume 2 of Draft Plan	4
7.1 Appendix 1: Land Use Zoning	4
7.2 Appendix 1A: Key Town: Longford Town	5
7.3 Appendix 1B; Self Sustaining Growth Towns: Ballymahon Edgeworthstown	6
7.4 Appendix 1C: Self-Sustaining Towns: Granard Lanesborough	7
7.5 Appendix 1D: Towns and Villages: Aughnacliffe Drumlish Legan	12
7.6 Appendix 1E: Serviced Rural Villages: <u>Abbeysrule</u> Ballinamuck Clondra Newtownforbes	15
7.7 Appendix 1F: Rural Settlement Clusters Carrickglass	18
8.0 Submissions on Appendix 6: Built and Cultural Heritage	19
9.0 Submissions on Volume 4: Environmental and Flood Reports	21
10.0 Land Use Zoning Submissions	38
10.1 Longford Town	39
10.2 Ballymahon	52
10.3 Granard	59
10.4 Lanesborough	75
10.5 Aughnacliffe	77
10.6 Ballinalee	84
10.7 Drumlish	98
10.8 Newtownforbes	114

10.9	Ardagh	120
10.10	Clondra	123
10.11	Cullyfad	125
10.12	Keel	126
10.13	Killoe	128
10.14	Melview	129

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

7.0 Submissions on Volume 2: Draft Plan

7.1 Appendix 1: Land Use Zonings

Relevant Submissions: DCDP-66, 64, 78, 51, 94
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This should be read in conjunction with the appropriate submissions received on specific chapters of the Development Plan and in conjunction with the Environmental and Flood Risk Assessment (SFRA) portion of this report (section 9); the mapping contained within Part 3: Appendix 8; and Appendix 15 in relation to an additional table in the SFRA.

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

- Land Use Zoning and Matrix
 - Flexible Land Use Zoning
 - Constrained Land Use Zoning
- Specific Settlement Plans

7.1.1 Flexible Land Use Zoning

The local authority should encourage flexible land use zoning objectives and recognition of An Post services and facilities within the land use zoning matrix, where appropriate.

7.1.2 Chief Executive Response

In relation to the existing zoning matrix in Appendix 1 of the County Development Plan, it is considered that postal services would cover a range of services ranging from distribution centres, offices to town centre use, and these are suitably accommodated within the existing zoning matrix.

7.1.3 Chief Executive Recommendation

No change.

7.1.4 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.

7.1.5 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.

7.1.6 Chief Executive Recommendation

CE AP 1.1

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.”

7.2 Appendix 1A: Key Town - Longford Town

7.2.1 Flooding / Constrained Land Use Zoning and Other Zoning Overlap

Industrial Commercial and Site Resolution Objective (redevelopment for the community and residents needs including housing) sites are located within Flood Zone A. Some of these developments are Highly Vulnerable and are considered inappropriate for Flood Zone A and B.

7.2.2 Chief Executive Response

There is overlap with undeveloped Industrial/Commercial lands. It is recommended that any further development on “Constrained Land Use” zoned lands will not be permitted and that no other land use zoning should be indicated on these lands.

Regarding, Site Resolution Objective lands, if these are considered to be previously developed then the Constrained Land Use provisions would apply.

7.2.3 Chief Executive Recommendation

CE AP 1.2

To amend zoning maps so that no further development or other zoning is included on the ‘constrained land use’ objective.

7.2.4 Post Primary School Provision

The Department of Education has identified that there will be some requirement for school place provision at post-primary level in Longford Town should the proposed population increases materialise. This may possibly be served by the expansion of existing facilities.

7.2.5 Chief Executive Response

In Longford town St Mel’s has large grounds and adequate lands for future development. In the town the provision of additional lands for educational purposes has been made on a new site to the north of the town. This is for provision for a Gael Scoil and is also considered to be of sufficient size (3.5 ha.) to accommodate the needs of other educational establishments which may have existing site constraints.

7.2.6 Chief Executive Recommendation

No change.

7.2.7 Longford Local Area Plan

The Draft Longford CDP notes that Urban/Local Area Plans will be prepared for Longford Town - to align with the NPF, RSES and the CDP. It is requested that the Local Authority consider the specific requirements of An Post during the preparation of these future local area plans.

7.2.8 Chief Executive Response

Any Local Area Plans prepared in the future will be subject to statutory public consultation at which stage submissions can be made on any subsequent individual local area plans prepared.

7.2.9 Chief Executive Recommendation

No change.

7.3 Appendix 1B: Self-Sustaining Growth Towns Ballymahon

7.3.1 Flooding

There are Strategic Residential Reserve sites located within Flood Zone B, and Highly Vulnerable development is considered inappropriate in Flood Zone B.

An undeveloped Social/Community/Public Utility site is situated within the OPW Arterial Drainage Benefitted Land Map. The land may be prone to flooding, and a site-specific flood risk assessment may be required.

7.3.2 Chief Executive Response

There is some overlap with flood areas and lands zoned for Strategic Residential Reserve. It is recommended that any further development on "Constrained Land Use" zoned lands will not be permitted and that no other land use zoning should be indicated on these lands.

Noted regarding Benefitted Lands. As provided for by the Plan (see, for example, Policy County Policy Objective CPO 5.97), it is Council policy to support the implementation of the 'The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and Department Circular PL2/2014. For clarification, see update to County Policy Objective CPO 5.98.

7.3.3 Chief Executive Recommendation

CE AP 1.3

To amend zoning maps so that no further development or other zoning is included on the 'constrained land use' objective.

CE AP 1.4

Update to County Policy Objective CPO 5.98- see Ballinamuck for policy content.

Edgeworthstown

7.3.4 Flooding

There is a Strategic Residential Reserve site located partially within Flood Zone A and Highly Vulnerable development is considered inappropriate in Flood Zone A and B.

7.3.5 Chief Executive Response

There is some overlap with Strategic Residential Reserve lands. It is recommended that any further development on "Constrained Land Use" zoned lands will not be permitted and that no other land use zoning should be indicated on these lands.

7.3.6 Chief Executive Recommendation

CE AP 1.5

To amend zoning maps so that no further development or other zoning is included on the 'constrained land use' objective.

7.4 Appendix 1C: Self-Sustaining Towns

Granard

7.4.1 Flooding and Impact on Relief Road

Through the ground truthing exercise lands at risk of flooding and poorly drained were identified and has been designated as Flood Zone A. Zonings in this area, Town Core, Industrial/Commercial/Warehousing and Transport & Utility Objective (new relief road to bypass the town) sites are located within Flood Zone A. Some of these developments are Highly Vulnerable and are considered inappropriate for Flood Zone A and B.

Commentary on the ground truthing for Granard, also notes that cottages to the west of Parnell Row have previously flooded. The OPW has no record of this flood event in the Past Floods Database and would request Longford County Council to submit a flood event report to floodinfo@opw.ie.

7.4.2 Chief Executive Response

There is some overlap with previously undeveloped lands and zoning needs to be amended. Constrained Land Use provisions apply to previously developed lands.

The “Transport and Utility Objective” is provided for by CPO 5.16 which needs to be amended in light of this submission.

7.4.3 Chief Executive Recommendation

CE AP 1.6

To amend zoning maps so that no further development or other zoning is included on the ‘constrained land use’ objective.

CE AP 1.7

Amend CPO 5.16 as follows:

*“Reserve lands in **advance of investigating the feasibility of potential schemes 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 Longford – Scramogue Scheme*
- *N4 – N63 – N5 By-Pass to the South of Longford.*
- *N4 Mullingar to Longford (Roosky)*
- *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*

*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; **and take into account the most up to date, available information on flood risk at that time.**”*

7.4.4 Heritage Centre Site and Provision of Greenways

There is a requirement from the internal regeneration section for the amendment of the zoning map as follows

1. Incorporate the full area of the heritage centre site under the same zoning – tourism.
2. Facilitate provision of greenways

7.4.5 Chief Executive Response

In the Draft Plan the Motte itself is Zoned ‘Recreational’, while the land parcel containing the heritage centre is zoned half ‘Recreational’ and half ‘Tourism’. As such the Heritage Centre site has been indicated to be bisected by 2 no. different zonings. It is acknowledged that the full area of the heritage centre site should be included under the same zoning and as such the portion of the site zoned ‘Recreational’ should

be amended to *'Tourism'* so that the zoning for the entire Heritage Centre site is *'Tourism'* use.

In relation to the provision of greenways, the settlement zoning map will be amended to include an *'amenity walkway'*.

7.4.6 Chief Executive Recommendation

CE AP 1.8

Change zoning from *'Recreational'* to *'Tourism'* as indicated in the revised settlement map (see Part 3: Appendix 8).

CE AP 1.9

Include an *'Amenity Walkway'* as indicated in the revised settlement map (see Part 3: Appendix 8).

Lanesborough

7.4.7 Flooding

Industrial/Alternative Energy and Industrial/Commercial/Warehousing sites are located in Flood Zone A. Highly Vulnerable is considered inappropriate in Flood Zone A and B and Vulnerable development inappropriate in Flood Zone A.

7.4.8 Chief Executive Response

There is some overlap with previously undeveloped lands and zoning needs to be amended. Constrained Land Use provisions apply to previously developed lands.

7.4.9 Chief Executive Recommendation

CE AP 1.10

To amend zoning maps so that no further development or other zoning is included on the *'constrained land use'* objective.

7.4.10 Post Primary School Provision

The Department has identified that there will be a requirement for school place provision at post-primary level in Lanesborough should the proposed population increases materialize. It is noted that there is only one post-primary school in the town. It is possible that an expansion to that facility will be required to cater for any increase.

7.4.11 Chief Executive Response

In Lanesborough the existing post primary school at Knock has large grounds and adequate lands for future development. It is considered sufficient in size (3.?) to

accommodate any potential extension to facilities required over the lifetime of the Development Plan.

7.4.12 Chief Executive Recommendation

No change.

7.4.13 Walkway and Amphitheatre Development

There is a requirement from the internal regeneration section for the amendment of the zoning map as follows:

1. Provide a walkway as indicated by dotted line on submission.
2. change the existing zoning on the amphitheatre area to provide for ecologically sensitive tourism and amenity development (current zoning does not allow for amphitheatre development which has received funding).

7.4.14 Chief Executive Response

It is acknowledged that the provision of a walkway at the location shown would improve the permeability of the town and as such the settlement plan zoning map shall be amended to reflect this. There are no flooding, or environmental issues associated with this.

Visitor Centre - The new location for the visitor centre objective is not within the SAC and has been relocated outside of Flood Zone A/B.

Amphitheatre development – A new objective symbol (amphitheatre development) should be included. As this is located within the Lough Ree SAC and close to the Lough Ree SPA and within Flood Zone B, any application for an amphitheatre at this location would have to be subject to a site-specific FRA. Accordingly it is recommended that *'subject to compliance with the provisions of the Habitats and Birds Directives and subject to completion of a site-specific flood risk assessment'* is added to the text for this objective.

7.4.15 Chief Executive Recommendation

CE AP 1.11

Amend zoning settlement map to provide walkway (see Part 3, Appendix 8).

CE AP 1.12

Amend zoning settlement map to provide for visitor centre and amphitheatre development objective (see Part 3, Appendix 8).

CE AP 1.13

Add the following text in relation to the text associated with the new objective symbol (amphitheatre development):

The amphitheatre development objective is located within the Lough Ree SAC, close to the Lough Ree SPA and within Flood Zone B. Any application for an amphitheatre at this location would have to be subject to a site-specific FRA and will be subject to compliance with the provisions of the Habitats and Birds Directives and subject to completion of a site-specific flood risk assessment.

7.4.16 (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.

7.4.17 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. The inclusion of relevant policy has been included in Chapter 6 Regeneration and is dealt with in said section of this report. An additional CPO has been recommended for inclusion which reference to this Strategy in the Regeneration Chapter, however it is not considered relevant to alter the zoning map at this stage as the document is still only at working draft stage and alterations to the zoning map would be premature until the strategy is adopted.

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.

7.4.18 Chief Executive Recommendation

None.

7.4.19 Tourism Zoning and proximity to Natura 2000 sites

Attention is drawn to the proposed zoning of tourism objectives at Lanesborough, noting the proximity of these objectives to Natura 2000 sites. Any proposed zoning objectives near to the Natura 2000 sites should ensure that the proposals are screened for AA.

7.4.20 Chief Executive Response

The Plan contains various provisions for nature conservation that apply to land use zoning related developments.

Existing CPO 12.7 reads:

CPO12.7 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.

It is unclear whether “development” (PDA: “development” means, except where the context otherwise requires, the carrying out of any works on, in, over or under land or the making of any material change in the use of any structures or other land) would cover “projects and plans”.

As indicated in the changes associated with *Chapter 12: Natural Heritage and the Environment* the existing Draft Plan CPO 12.7 is to be expanded to include additional text “*to comply with the Habitats Directive*”.

7.4.21 Chief Executive Recommendation:

The findings of the SEA/AA do not change on foot of this part of the submission.

7.5 Appendix 1D: Towns and Villages

Aughnacliff

7.5.1 Flooding

The Constrained Land Use zoning has been omitted from the Zoning and Flood Map. Without the zoning on the map it is difficult to establish if the New Residential and Strategic Residential Reserve zonings overlap with Flood Zone A or B. If the zonings are within Flood Zone A or B, then a Plan making Justification Test should have been supplied. If the zonings are adjacent to Flood Zone A or B, then the lands may become vulnerable to flooding when climate change is taken into account. Longford County Council might consider requiring these sites to carry out a site-specific FRA.

7.5.2 Chief Executive Response:

It is recommended that any further development on “Constrained Land Use” zoned lands will not be permitted and that no other land use zoning should be indicated on these lands.

7.5.3 Chief Executive Recommendation

CE AP 1.14

To amend zoning maps so that no further development or other zoning is included on the ‘constrained land use’ objective.

Drumlish

7.5.4 Flooding

Through the ground truthing exercise an area prone to flooding was identified to the South western end of the town and has been designated as Flood Zone A. Zonings in this area, Strategic Residential Reserve, Site Resolution Objective (redevelopment for the community and residents needs including housing), Industrial/Commercial/Warehousing and Strategic Industrial Reserve sites are located within Flood Zone A. Some of these developments are Highly Vulnerable and are considered inappropriate for Flood Zone A and B,

7.5.5 Chief Executive Response

There is overlap with undeveloped Strategic Residential Reserve/ Strategic Industrial Reserve/Industrial Commercial Warehousing lands.

Regarding, Site Resolution Objective lands, if these are considered to be previously developed then the Constrained Land Use provisions would apply.

It is recommended that any further development on “Constrained Land Use” zoned lands will not be permitted and that no other land use zoning should be indicated on these lands.

7.5.6 Chief Executive Recommendation

CE AP 1.15

To amend zoning maps so that no further development or other zoning is included on the ‘constrained land use’ objective.

7.5.7 Village Walkway

It is noted that a village walkway is proposed for Drumlish and the Department would recommend that the lighting considerations as already outlined are incorporated with regard to this proposal in terms of impacts on wildlife e.g. bat species.

7.5.8 Chief Executive Response

The Plan contains various provisions for nature conservation and lighting that would apply to any proposals for development in this context. The findings of the SEA/AA do not change on foot the submission.

7.5.9 Chief Executive Recommendation

No change.

Legan

7.5.10 Flooding

Strategic Residential Reserve sites are partially located within Flood Zone A. and Highly Vulnerable development is considered inappropriate in Flood Zone A and B. Sites adjacent to Flood Zones may become vulnerable to flooding when climate change is taken into account. Longford County Council might consider requiring these sites to carry out a site-specific FRA.

7.5.11 Chief Executive Response

There is some overlap with Strategic Residential Reserve. It's possible that wording to SRR could fix this, however it could be challenged, and the best option is to amend the zoning. It is recommended that any further development on "Constrained Land Use" zoned lands will not be permitted and that no other land use zoning should be indicated on these lands.

In compliance with the Guidelines, the Flood Zones identified by the SFRA are defined on the basis of current flood risk. The potential impacts of climate change include increased rainfall intensities and increased fluvial flood flows have been taken into account by the assessment as detailed in the SFRA report and as provided for by various County Policy Objectives. It is acknowledged that sites adjacent to Flood Zones may become vulnerable to flooding when climate change is taken into account and the CFRAM Programme currently provides maps for two potential future scenarios taking account of different degrees of climate impact - a Mid-Range Future Scenario (average of climate predictions) and a High-Range Future Scenario (most extreme climate predictions).

7.5.12 Chief Executive Recommendation

CE AP 1.16

To amend zoning maps so that no further development or other zoning is included on the 'constrained land use' objective.

CE AP 1.17

See update to County Policy Objective CPO 5.98 in Chapter 5 Infrastructure and as detailed earlier in this zoning land use section.

7.6 Appendix 1E: Serviced Rural Villages

Abbeyshrule

7.6.1 Flooding

It is suggested that potential sites within the established residential area could be developed with new small scale residential or other residential amenities such as schools, creches, small shops, doctor's surgeries, playing fields, etc. These potential sites have not been identified within the plan. There are undeveloped lands within the Residential zoning which are within Flood Zone A and Flood Zone B and some of these types of development would be considered inappropriate in Flood Zone A or Flood Zone B.

7.6.2 Chief Executive Response

It is recommended that any further development on "Constrained Land Use" zoned lands will not be permitted and that no other land use zoning should be indicated on these lands.

7.6.3 Chief Executive Recommendation

CE AP 1.18

To amend zoning maps so that no further development or other zoning is included on the '*constrained land use*' objective.

Ballinamuck

7.6.4 Flooding

A New Residential site is situated within the Drainage District Benefited Land Map, The land may be prone to flooding, and a site-specific flood risk assessment may be required.

An undeveloped Town Core site is partially within Flood Zone A and some types of Town Core development may be inappropriate in Flood Zone A, subject to application of the Justification Test.

7.6.5 Chief Executive Response

Noted regarding Benefitted Lands. As provided for by the Plan (see County Policy Objective CPO 5.97), it is Council policy to support the implementation of the 'The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and Department Circular PL2/2014. For clarification, see update to County Policy Objective CPO 5.98.

It is recommended that any further development on "Constrained Land Use" zoned lands will not be permitted and that no other land use zoning should be indicated on these lands.

7.6.6 Chief Executive Recommendation

CE AP 1.19

To amend County Policy Objective CPO 5.98 as follows:

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

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

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

CE AP 1.20

To amend zoning maps so that no further development or other zoning is included on the 'constrained land use' objective.

Clondra

7.6.7 Flooding

The Tourism/Mixed Use with Provision of Marina site is to provide for mixed use and marina development, including residential uses, compatible social and community facilities, local shopping and commercial facilities, recreational facilities, open spaces and supporting tourism development. Some of these developments are Highly Vulnerable and are considered inappropriate for Flood Zone A and B.

7.6.8 Chief Executive Response

Much of this site is within Flood Risk Zone A/B. It is proposed to update this zoning objective as detailed in the following section.

It is recommended that any further development on "Constrained Land Use" zoned lands will not be permitted and that no other land use zoning should be indicated on these lands.

7.6.9 Chief Executive Recommendation

CE AP 1.21

To amend zoning maps so that no further development or other zoning is included on the 'constrained land use' objective.

CE AP 1.22

To delete the following text as follows:

~~Tourism/Mixed Use with Provision of Marina~~

~~To primarily provide for mixed use and marina development, including residential uses, compatible social and community facilities, local shopping and commercial facilities, recreational facilities, open spaces and supporting tourism development. This shall be in tandem with the creation and provision of a Marina at the developer's expense on developing the site and be subject to the provision of a site for educational purposes.~~

The principles of sustainable development shall be taken into account when considering applications for residential development in the area, including the use of appropriate housing densities, naturally, locally sourced materials, energy efficiency and transport implications, the impact on the existing ecology and compatibility with local environmental conditions.

Proposals for development on the site shall clearly demonstrate adequate access proposals as part of any application for development.

Required future roads are intended to be achieved through the development management process, as conditions on any future planning permissions and shall be provided at the developer's expense on developing the site. Pedestrian linkages shall also be included as part of any development proposal. Development carried out under this zoning shall give consideration to the natural landscape setting of the site and in particular to the adjoining River Camlin, Cloondara Canal and River Shannon.

No other development will be permitted on the site in the absence of the development of a marina.

Newtownforbes

7.6.10 Tourism Zoning and Proximity to Natura 2000 sites

Attention is drawn to the proposed zoning of tourism objectives at Newtownforbes, noting the proximity of these objectives to Natura 2000 sites. Any proposed zoning objectives near to the Natura 2000 sites should ensure that the proposals are screened for AA.

7.6.11 Chief Executive Response

The Plan contains various provisions for nature conservation that apply to land use zoning related developments.

Existing CPO 12.7 reads:

CPO12.7 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.

It is unclear whether “development” (PDA: “development” means, except where the context otherwise requires, the carrying out of any works on, in, over or under land or the making of any material change in the use of any structures or other land) would cover “projects and plans”.

The existing Draft Plan CPO 12.7 provides more detail than the suggested shortened CPO.

The most simplified approach could state “to comply with the Habitats Directive”.

As indicated in the changes associated with *Chapter 12: Natural Heritage and the Environment* the existing Draft Plan CPO 12.7 is to be expanded to include additional text “*to comply with the Habitats Directive*”.

7.6.12 Chief Executive Recommendation

The findings of the SEA/AA do not change on foot of this part of the submission.

7.7 Appendix 1F: Rural Settlement Clusters

Carrickglass

7.7.1 Flooding

There are undeveloped Development Envelope lands located within Flood Zone A and B. This zoning type is for small scale residential and limited local level services such as post offices, neighbourhood shops, schools etc. Some of these developments are Highly Vulnerable and Vulnerable developments are considered inappropriate for Flood Zone A and B.

7.7.2 Chief Executive Response

Mapping for Carrickglass is included in the SFRA in error. Land Use Zoning is not provided for by the Plan for Carrickglass the Guidelines so not require the identification of flood zones at this level. Nonetheless, SFRA datasets will be made available to the lower-tier forward planning and Development Management and associated SFRA/FRA processes in the Council. Refer to update of County Policy Objective - CPO 5.108 (Chapter 5: Infrastructure: Constrained Land Use Zoning).

7.7.3 Chief Executive Recommendation

CE AP 1.23

Remove mapping for Carrickglass from SFRA Appendix II.

CE AP 1.24

Refer to update of County Policy Objective - CPO 5.108.

8.0 Submissions on Appendix 6: Built and Cultural Heritage

Relevant Submissions: DCDP-16

8.1 Removal of Structure from Protected Structure List

Submission DCDP-16 requests the removal of no. 360 from the Draft Plan Record of Protected Structures, 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. 8.1: DCDP-16 Subject Structure

8.2 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, it's 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.

8.3 Chief Executive Recommendation

CE AP 6.1

The removal of RPS No. 360 from the Draft Plan Record of Protected Structures.

9.0 Submissions on Volume 4: Environmental and Flood Reports

9.1 Strategic Environmental Assessment

Relevant Submissions: DCDP-05, 14, 51
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9.1.1 Geological Mapping

The submission DCDP-14 commends the inclusion of the Bedrock Mapping in Section 4.8 Soil in the SEA Environmental and Flood reports. The Dept are pleased to see the recommendation of their use in the environmental sections of planning and in assessing individual projects.

9.1.2 Chief Executive Response

The comments which are positive in nature are noted.

9.1.3 Chief Executive Recommendation

No change.

9.1.4 Environmental Protection Agency (DCDP-05)

For land use plans at county and local level, we provide a 'self-service approach' via our guidance document SEA of Local Authority Land Use Plans — EPA Recommendations and Resources'. This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority Land Use Plans. It is suggested that this guidance document is taken into account and incorporate the relevant recommendations, in finalising and implementing the Plan.

Longford County Council should also ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.

9.1.5 Chief Executive Response

The EPA's 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' document has been and will be taken into account in undertaking the SEA and preparing the Plan.

The Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.

9.1.6 Chief Executive Recommendation

No change.

9.1.7 Sustainable Development Goals & Key Actions for Ireland

Our State of Environment Report Ireland's Environment - An Assessment 2020 (EPA, 2020) identifies thirteen Key Messages for Ireland which align with many of the UN Sustainable Development Goals (SDGs). Delivering Ireland's long-term sustainable development and environmental protection goals will require a concerted effort by government departments to address these key actions:

1. National Policy Position for Ireland's Environment - Recognition of the need for an integrated policy position given the many interlinkages and dependencies.
2. Full Implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies
3. Promote the benefits of a clean environment for health and wellbeing
4. Systematic change is needed for Ireland to become climate neutral and a climate resilient society and economy.
5. WHO clean air quality guideline values to be adopted within the Clear Air Strategy as specific targets to achieve.
6. Safeguard nature and wild places as a national priority to preserve its legacy for future generations
7. Improve the water environment and tackle water pollution water quality locally at a water catchment level.
8. Reduce human induced pressures on the marine environment
9. Move away rapidly from extensive use of fossil fuels to the use of clean energy systems
10. An agriculture-food sector that demonstrates validated performance around producing food with a low environmental footprint.
11. Drinking water and wastewater infrastructure must meet the needs of our society
12. Move to a less wasteful and circular economy where the priority is waste prevention, reuse, repair and recycle.
13. Promote integrated land mapping approaches to support decision making on sustainable land use.

The relevant aspects of these Key Actions and the SDGs should be taken into account in preparing the Plan and SEA and reflected in the principles/objectives/measures in the Plan. This will ensure that the Plan aligns with and contributes to achieving Ireland's sustainable development and environmental protection ambitions.

9.1.8 Chief Executive Response

The Sustainable Development Goals have been and will be taken into account in undertaking the SEA and preparing the Plan. Note, for example, Plan CPO 4.63 "United Nations Sustainability Goals" "Contribute, as practicable, towards achievement of the 17 no. Sustainable Development Goals of the United Nations' 2030 Agenda for Sustainable Development, which came into force in 2016."

9.1.9 Chief Executive Recommendation

No change.

9.1.10 Sensitivity Mapping Webtool

The EPA funded Environmental Sensitivity Mapping webtool may be a useful resource to also consider in the context of identifying environmental sensitivities in the Plan area available at www.enviromap.ie.

9.1.11 Chief Executive Response

This tool has been and will be used in undertaking the SEA and preparing the Plan.

9.1.12 Chief Executive Recommendation

No change.

9.1.13 Blueways and Greenways

Under Regeneration Opportunities the development currently underway of a number of Greenways and Blueways within the Plan area and the intention to develop similar projects during the lifetime of the Plan is noted. The commitment that these initiatives will be the subject of relevant environmental assessments is welcomed. There is also merit in the Plan promoting the need to be careful not to remove or degrade existing natural or existing green infrastructure, and potentially negatively impact on any designated European or national sites. Development of new greenways and blueways should support rather than replace existing green infrastructure. We refer you to the recent HSE NUIG & UCD research reports and toolkits in relation to the health benefits of blue and green spaces. This toolkit could be used in the monitoring for the plan.

9.1.14 Chief Executive Response

The Plan contains various provisions providing for the protection of green infrastructure. As indicated earlier in this report it is proposed to include an additional additional policy objective after CPO13.19 as follows:

CH 13.1

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.

This has been vetted with environmental consultants and it is considered that it will result in no change to SEA/AA.

9.1.15 Chief Executive Recommendation

No change to SEA/AA.

9.1.16 Content of the Environmental Report - Alternatives

Chapter 6 Description of Alternatives and Chapter 7 Evaluation of Alternatives, and the assessment of alternatives against the Strategic Environmental Objectives identified in the SEA Environmental Report are noted. There is merit to including a short summary paragraph/schematic, as appropriate, briefly describing the Alternatives concerned and how the selection of these has led to the preferred Alternatives. You should also consider including this short paragraph/schematic in the Non-Technical Summary.

9.1.17 Chief Executive Response

A short summary will be included in Section 7 of the SEA Environmental Report when being updated at the end of the process.

9.1.18 Chief Executive Recommendation

CE ENV.1

To include a short summary in Section 7 of the SEA Environmental Report when this is being updated at the end of the process.

9.1.19 Monitoring

The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities. If the monitoring identifies adverse impacts during the implementation of the Plan, Longford County Council should ensure that suitable and effective remedial action is taken. Guidance on SEA-related monitoring is available on the EPA website.

9.1.20 Chief Executive Response

The required information on monitoring measures is provided in Section 10 of the SEA Environmental Report - this will inform the final Programme to be included in the SEA Statement. The cited guidance has been and will be taken into account in undertaking the SEA and preparing the Plan.

9.1.21 Chief Executive Recommendation

No change.

9.1.22 Future Amendments to the Plan

Future amendments to the Plan should be screened for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the Plan.

9.1.23 Chief Executive Response

Proposed material alterations will be screened using a method similar to that used for the Plan.

9.1.24 Chief Executive Recommendation

No change.

9.1.25 SEA Statement "Information on the Decision"

Once the Plan is adopted, an SEA Statement should be prepared that summarises:

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.
- A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.
- Guidance on preparing SEA Statements is available on the EPA website.

9.1.26 Chief Executive Response

An SEA Statement containing the required information will be prepared at the end of the process. The cited guidance will be taken into account in preparing the SEA Statement.

9.1.27 Chief Executive Recommendation

No change.

9.1.28 Environmental Authorities

Under the SEA Regulations, prior to making your SEA determination you should also consult with:

- The Minister for Housing, Local Government and Heritage,
- The Minister for Agriculture, Food and the Marine, and the Minister for the Environment, Climate and Communications, where it appears to you as the competent authority that the plan or programme, or modification to a plan or programme, might have significant effects on fisheries or the marine environment,
- any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

9.1.29 Chief Executive Response

Noted. These environmental authorities are being consulted with as part of the SEA/Plan preparation process.

9.1.30 Chief Executive Recommendation

No change.

DCDP51- Department of Tourism, Arts, Culture, Gaeltacht Sports and Media – **9.1.31 General Comments**

While Article 17 Habitats Directive reports are referenced, the Article 12 Birds Directive reports along with Irelands 6th National Report under the Convention of Biological Diversity should be reviewed in the preparation of the Plan in the relevant sections under 'existing problems'.

Green, Blue and Peat network infrastructure may also adversely impact on biodiversity if not planned appropriately and the relationship between 'Amenity'/Broadzone' areas and Natura 2000 sites should reflect the overlap of these areas with designated sites.

The Department acknowledges that environmental considerations have been integrated into the Plan and mitigation measures provided in the SEA, ER link the draft Plan provisions to avoid significant adverse impacts from the implementation of the Plan.

9.1.32 Chief Executive Response

To make reference to Article 12 Birds Directive reports and the 6th National Report under the Convention of Biological Diversity under 'existing problems' in the SEA Environmental Report.

Refer to commentary in Section 8 of the SEA Environmental Report: The development of new and existing greenways, blueways, peatways, trails and walking and cycling routes, including those between County Longford, adjoining counties and beyond has the potential to contribute towards sustainable mobility and a better management of movements in sensitive areas, thereby benefitting various environmental components including habitats at certain locations. The development of these projects, however, presents a variety of potentially adverse environmental effects that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure. These types of infrastructure are often constructed in ecologically and visually sensitive areas adjacent to the banks of rivers and streams.

Potential adverse effects would be mitigated both by measures which have been integrated into the Plan which provide for and contribute towards environmental protection, environmental management and sustainable development (including those identified at Section 9 of this report and Objective CPO 5.15 that requires a Corridor and Route Selection Process for relevant new infrastructure) and by measures arising from lower tier assessments (including those for the preparation of lower tier plans and projects). The development of green infrastructure can achieve synergies with regard to the provision of open space amenities, sustainable mobility, the sustainable management of water, the protection and management of biodiversity, the protection of cultural heritage and the protection of protected landscape sensitivities.

It is noted that the Plan contains various provisions for nature conservation that apply to green/blue/peatway developments.

9.1.33 Chief Executive Recommendation

No change.

9.1.34 Nature conservation

The Department would welcome a clear and specific monitoring plan to be included with the Strategic Environmental Assessment report that will clearly outline how it is proposed to record the impacts of the plan's implementation on biodiversity, both in terms of biodiversity loss and biodiversity enhancement during its lifetime.

For example, monitoring of nitrogen deposition impacts on Natura 2000 sites within the draft Plan's zone of influence in the SEA, is recommended, as research in this area is expanding.

This type of monitoring during Plan implementation will allow for corrective action and intervention if environmental damage is noted. It also provides for a learning opportunity for practitioners and decision makers for future land use plans. The CDP has been subject to environmental assessments including Strategic Environmental Assessment.

While monitoring can use existing sources of information including data collected by other government departments or agencies, the loss or enhancement of biodiversity due to development can only be adequately monitored and recorded through the planning process.

The Department would welcome the publishing of monitoring reports and would be happy to provide nature conservation observations on the reports.

The Department would again like to acknowledge the important nature conservation objectives which have been included in this draft Plan, to protect and enhance the natural heritage and environment in Longford.

The Department is available to assist in clarifying any of the observations raised in the submission should this be of further assistance.

9.1.35 Chief Executive Response

The required information on monitoring measures is provided in Section 10 of the SEA Environmental Report - this will inform the final Programme to be included in the SEA Statement.

Impacts on European Sites are encompassed by the measures, which are also consistent with those provided for by the Eastern and Midland Regional Spatial and Economic Strategy (RSES) RSES SEA.

9.1.36 Chief Executive Recommendation

No change.

9.2 Natural Impact Report

Relevant Submissions: DCDP-51

9.2.1 Department of Tourism, Arts, Culture, Gaeltacht Sports and Media

The 15km zone is commonly used in screening for AA and would like to highlight that 'likely significant effects' can occur beyond 15km specifically in relation to River SACs and also to sites designated as SPAs for bird species. The Department recommends that flight collision and barrier risks are considered in the NIR, for example, with respect to the movement of species between SPAs and migratory bird routes across the county. It is important to ensure that development pressure does not inadvertently threaten internationally important bird species protected within or outside the Special Protection Areas in County Longford and the Department recommends that this is assessed in the Plan.

Hydrological interactions have been identified as potential effects in the NIR. The Department would like to highlight that the term 'hydrological' should include both surface and geological hydrological processes which have been shown to be important in the context of more recent scientific research on active raised bog habitat, an Annex I priority habitat which is within a number of raised bog SAC sites in Longford.

The Department acknowledges the mitigation measures through CPOs which have been identified in the NIR to reduce or avoid adverse impacts on Natura 2000 sites and would recommend that these mitigation measures are specified for each Natura 2000 site in a clear format. Mitigation measures should be clear, concise and directly linked to the likely impacts identified to avoid significant adverse effects on the Natura 2000 site.

9.2.2 Chief Executive Response

Sites downstream and beyond 15 km are considered by the AA, namely:

- Donegal Bay SPA
- Lough Derg (Shannon) SPA
- River Shannon and River Fergus Estuaries SPA
- Lough Derg, North-east Shore SAC
- Lower River Shannon SAC
- Upper Lough Erne SPA
- Upper Lough Erne SAC

With regard to SPAs within, within 15km of and downstream of the County, provisions have been integrated into the Plan that will protect these sites from the full range of potential effects. Other SPAs would not be impacted upon due to distances involved.

Various provisions have been integrated into the Plan that will contribute towards the protection of both surface and groundwater processes – these are identified in Section 5 Mitigation.

All mitigation measures apply to all developments and European sites, as relevant, to be determined at project level, when the nature, location, size, layout and operational processes associated with individual and combinations of projects are known.

9.2.3 Chief Executive Recommendation CE ENV 1.2

To add the following text to Section 3.2 of the AA NIR:

Sites downstream and beyond 15 km are considered by the AA, namely:

- *Donegal Bay SPA*
- *Lough Derg (Shannon) SPA*
- *River Shannon and River Fergus Estuaries SPA*
- *Lough Derg, North-east Shore SAC*
- *Lower River Shannon SAC*
- *Upper Lough Erne SPA*
- *Upper Lough Erne SAC*

With regard to SPAs within, within 15km of and downstream of the County, provisions have been integrated into the Plan that will protect these sites from the full range of potential effects. Other SPAs would not be impacted upon due to distances involved.

CE ENV 1.3

To add the following text to Section 3.2 of the AA NIR:

“Hydrological” includes both surface and groundwater processes, which have been shown to be important in the context of more recent scientific research on active raised bog habitat, an Annex I priority habitat which is within a number of raised bog SAC sites in Longford. Various provisions have been integrated into the Plan that will contribute towards the protection of both surface and groundwater processes – these are identified in Section 5 Mitigation.

CE ENV 1.4

To add the following text to Section 5 of the AA NIR:

All mitigation measures apply to all developments and European sites, as relevant, to be determined at project level, when the nature, location, size, layout and operational processes associated with individual and combinations of projects are known.

CE ENV 1.5

To update text in Section 3.2 of the AA NIR as follows:

“The Department of the Environment (2009) Guidance on AA recommends a 15 km buffer zone to be considered. Although sites beyond this buffer zone would be

considered if relevant, a review of all sites within this zone has allowed a determination to be made that in the absence of significant hydrological/*hydrogeological* links the characteristics of the Plan will not impose effects beyond the 15 km buffer.”

CE ENV 1.6

To update text in Section 3.2 of the AA NIR as follows:

*Details of European Sites that occur within 15 km of the County are provided in Table 3.1 and mapped on Figure 3.1. Details of European Sites that occur outside the 15 km buffer zone of the County, but are hydrologically/*hydrogeologically* connected are also provided in Table 3.1, and mapped on Figure 3.2.”*

9.2.4 Tourism Objectives at Newtownforbes and Lanesborough

The Department would like to draw attention to the proposed zoning of tourism objectives at Newtownforbes and Lanesborough, noting the proximity of these objectives to Natura 2000 sites. Any proposed zoning objectives near to the Natura 2000 sites should ensure that the proposals are screened for AA.

9.2.5 Chief Executive Response

The Plan contains various provisions for nature conservation that apply to land use zoning related developments.

Existing CPO 12.7 reads:

CPO12.7 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.

It is unclear whether “development” (PDA: “development” means, except where the context otherwise requires, the carrying out of any works on, in, over or under land or the making of any material change in the use of any structures or other land) would cover “projects and plans”.

As indicated in the changes associated with *Chapter 12: Natural Heritage and the Environment* the existing Draft Plan CPO 12.7 is to be expanded to include additional text “to comply with the Habitats Directive”.

9.2.6 Chief Executive Recommendation

The findings of the SEA/AA do not change on foot of this part of the submission.

9.2.7 Drumlish

It is noted that a village walkway is proposed for Drumlish and the Department would recommend that the lighting considerations as already outlined are incorporated with regard to this proposal in terms of impacts on wildlife e.g. bat species.

9.2.8 Chief Executive Response

The Plan contains various provisions for nature conservation and lighting that would apply to any proposals for development in this context. The findings of the SEA/AA do not change on foot the submission.

9.2.9 Chief Executive Recommendation

No change.

9.3 Strategic Flood Risk Assessment

Relevant Submissions: DCDP-14, 64
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This section should be read in conjunction with the appropriate submissions received on Chapter 5 in relation to flooding and associated issues (Part 1) and also specific settlements as detailed in section 7 of this report pertaining to the specific settlements; Part 3: Appendix 8 in relation to associated mapping; and Appendix 15 in relation to the additional table in the SFRA.

9.3.1 Geological Mapping

The submission DCDP-14 commends the inclusion of the Bedrock Mapping in Section 4.8 Soil in the SEA Environmental and Flood reports. The Dept are pleased to see the recommendation of their use in the environmental sections of planning and in assessing individual projects.

9.3.2 Chief Executive Response

The comments which are positive in nature are noted.

9.3.3 Chief Executive Recommendation

No change.

DECP-64 - Office of Public Works (OPW)

9.3.4 General Comments and Higher Level Guidance

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). 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).

9.3.5 Chief Executive Response

OPW climate change scenario mapping to be added to SFRA Appendix II.

9.3.6 Chief Executive Recommendation

CE SFRA 1.1

OPW climate change scenario mapping to be added to SFRA Appendix II.

9.3.7 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. Please note that the Justification Test applies only to the urban centre (i.e., the core area of a city, town or village which acts as a centre for a broad range of employment, retail, community, residential and transport functions), and would not be applicable to the periphery of urban areas.

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. Examples of these are detailed in the Comments on Specific Settlements section below. 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.

9.3.8 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 vulnerable¹ 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.

¹ For details on what types of development are considered highly vulnerable, less vulnerable or water compatible please refer to **Error!**
Reference source not found..

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.

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.

9.3.9 Chief Executive Recommendation

CE SFRA 1.2

To insert an additional table (Table 6) 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"* (see *Part 3: Appendix 15 in relation to additional table in SFRA*).

9.3.10 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.

9.3.11 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 as has been indicated earlier in this report.

9.3.12 Chief Executive Recommendation

CE SFRA 1.3

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.”

10.0 LAND USE ZONING

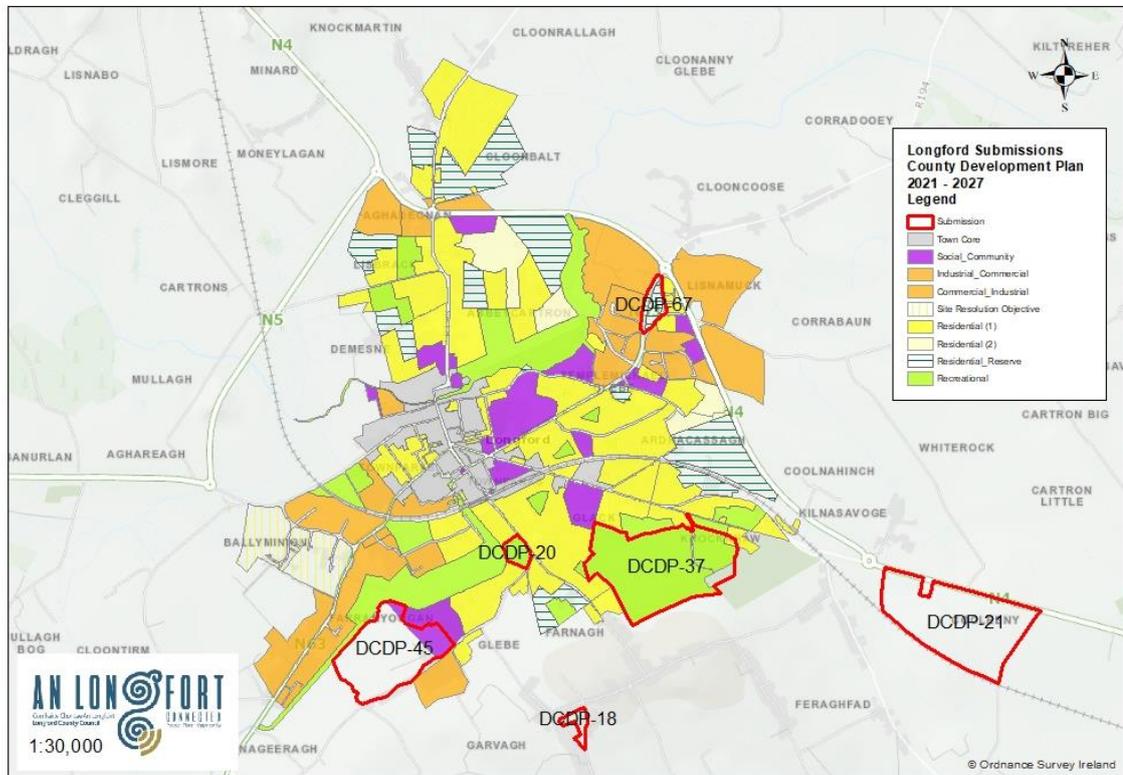
This section provides an overview of the submissions received to the Draft Plan in relation to requests for zoning of land. The submissions have been categorised by settlement. The quantum of lands zoned in the settlements has been revised and amended following the submissions received. Of note and particular relevance are the submissions of the Office Planning Regulator (OPR DCDP – 80) and Office Public Works (OPW DCDP – 64). Both of these cross cutting submissions have specifically sought a revision of all of the settlement plans and land zonings in order to provide a more compact and consolidated form of town and urban development better aligned to the policies and objectives of the National Planning Framework and the EMRA RSES; based on an assessment of the infrastructure available and the tiering of lands. The Council has undertaken a review and assessment of the infrastructure capacity for each of the main settlements. This has included water supply and wastewater capacities and the transport and roading requirements for each of the main settlements and zoned lands identified. As a consequence, the land zoning plans of all the settlements have been revised and amended, and they are included as appendix to this chapter. The zoned lands have been centred around the existing settlement providing more compact form consistent with the defined CSO boundaries for the settlements that have also been included onto the revised settlement plans.

Each settlement which received submissions is considered in the subsequent sections:

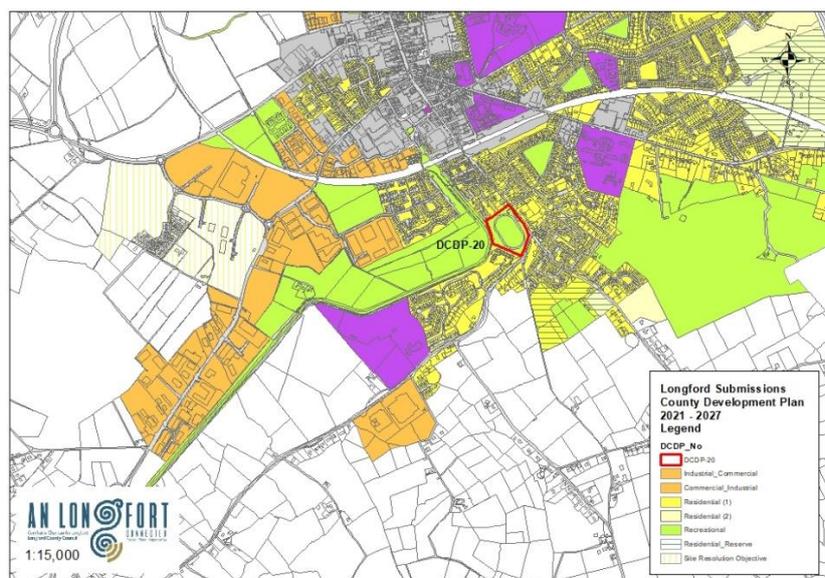
- 10.1 Longford Town
- 10.2 Ballymahon
- 10.3 Granard
- 10.4 Lanesborough
- 10.5 Aughnaccliffe
- 10.6 Ballinalee
- 10.7 Drumlish
- 10.8 Newtownforbes
- 10.9 Ardagh
- 10.10 Clondra
- 10.11 Cullyfad
- 10.12 Keel
- 10.13 Killoe
- 10.14 Melview

10.1 Longford Town

Submissions Reference No. DCDP-19, DCDP-20, DCDP-37, DCDP-45, DCDP-59 and DCDP-18 and DCDP-21 (on the outskirts of the settlement)



Submission DCDP-20



Submission DCDP-20 requests a change of land zoning to 'Residential' or 'New Residential' from "Recreational, Amenity and Green Space' at the subject lands at Glack, Longford Town in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

1. Respond to current housing shortages in the country;
2. Meeting the NPF compact growth and RSES objectives;
3. Central location most appropriate for sustainable access and climate change response.

Planning History There are no recent planning applications specific to the subject site.

Chief Executive's Response

The subject lands are zoned 'Recreational' and set to continue under the draft CDP 2021 – 2027. The objective has been established for the "*preservation, provision and improvement of active and passive recreational public and private open space, environmental buffers and ancillary structures*" as set out in Appendix 1A.

Specific reference is made within same as to the importance of preserving and protecting the "amenity and recreational use" of the Longford Dog Track, and it's "historical and cultural significance" to Longford Town.

Aside from the Royal Canal west of the subject lands, zoning within the area is exclusively Residential and deprived of adequate public open space amenity. Therefore, the provision and protection of existing recreational use sites is of paramount importance, and in consideration of additional and recently granted residential developments in close proximity (19/111, 19/303, and 20/70).

Furthermore, the Dog Track is a strategically important in its ability to open-up and improving access to the Royal Canal and its future plans and investment. Current public access to the Royal Canal from the residential east is restricted to and unsuitably achieved via the existing and private residential estates of Prospect Woods and Canal Bank.

Policies of support within the Draft County Development Plan 2021 - 2027 include:

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;

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;

CPO 7.40 Support the development of recreation and open space in accordance with the *EMRA RSES Recreation and Open Space Guiding Principles* and *Guiding Principles for Healthy Placemaking*.

CPO 7.41 Promote the development of a wide variety of high quality accessible open space areas, for both active and passive use, and formal and informal activities in accordance with the Core Strategy and Settlement Strategy.

CPO 7.42 Provide multifunctional open spaces at locations deemed appropriate providing for both passive and active uses.

CPO 7.43 Assess the existing parks and open space assets in the County over the life of the Development Plan to identify opportunities for improvements where necessary to increase their usefulness as recreational spaces.

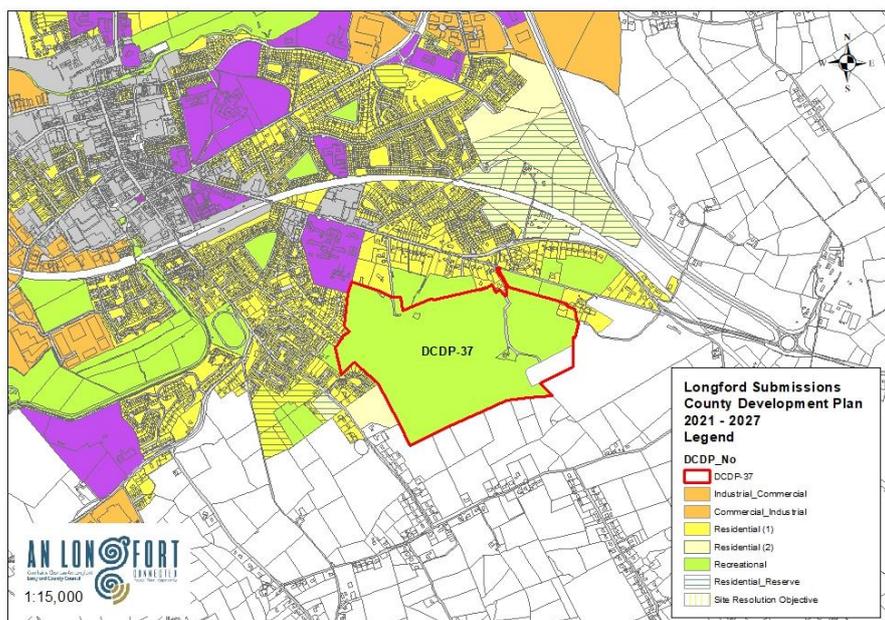
CPO 7.44 Resist the loss of existing public open space, unless alternative recreational facilities are provided in a suitable location.

CPO 7.45 Ensure public open space is accessible

Chief Executive’s Combined Recommendation

With respect to submission DCDP-20 no changes are recommended.

Submission DCDP-37



Submission DCDP-37 requests a change of land zoning from ‘Recreational’ to ‘Recreational/Open Space’ at the subject lands Longford Town in the Draft Longford County Development Plan 2021-2027.

A 50m cordon around the perimeter of the existing Gold Club restricting future development is also sought.

The rationale supporting this submission includes:

1. Protect the existing boundaries and amenity of Longford Golf Course;

Planning History

- Planning permission was granted for alteration to existing clubhouse (Planning Ref. No. 99/700004);
- Planning permission was granted for change of use from agriculture to golf course (Planning Ref. No. 99/700050);
- Planning permission was granted for extensions and alteration to existing golf (Planning Ref. No. 02/700004);
- Planning permission was granted construction of toilet facilities (Planning Ref. No. 13/7000013);
- Planning permission was granted for 24m communication mast (Planning Ref. No. 19/35);

Chief Executive’s Response

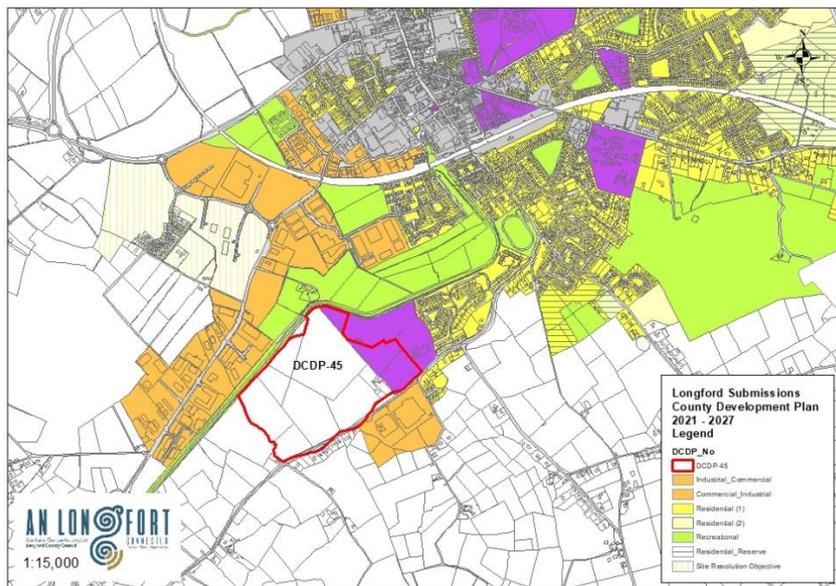
The recreational use as a golf course is set to remain within the draft CDP and is considered a welcome amenity to County Longford for locals and visitors alike. The facility closely alignment with CPO 6.44 in “*Supporting the development of Longford as a tourism hub ... and proximity to recreational opportunities*”.

The requested sterilisation of land within a 50m perimeter buffer is considered overly restrictive and has more appropriately been applied on a case by case basis development within such proximities.

Chief Executive’s Combined Recommendation

With respect to submission DCDP-37 no changes are recommended.

Submission DCDP-45



Submission DCDP-45 requests a change of land zoning to accommodate a mixed-use development to include residential, education, recreational and hotel provision. The lands are currently un-zoned and for agricultural use except for a small segment to the

north east, zoned 'Social / Community' at the subject site identified at Farraneyhoogan, Longford Town in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

1. Proximity of local amenities (incl. Longford Slashers GAA, Backstage Theatre, Gaelscoil Longfoirt and Roylea Canal);
2. Meeting the NPF compact growth and RSES objectives;
3. Responding to housing demand;
3. Catalyst for regeneration;

Planning History There are no recent planning applications specific to the subject site.

Chief Executive's Response

Longford Town is defined as a 'Key Town' in the Draft Plan. It is considered that there are sufficient lands zoned in Longford Town to cater for the population and housing provision during this Plan period.

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements over the use and development of identified greenfield sites.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional zoning to be included as part of the Plan at this time. The addition of these lands would result in a housing and population growth that would be considered unsustainable over the lifetime of this plan and it is therefore recommended that the lands not be zoned for residential purposes as part of the Plan.

Chief Executive's Combined Recommendation

With respect to submission DCDP-45 no changes are recommended.

Submission DCDP-59

No map attached with this submission. Submission DCDP-59 requests the provision of a building near the Town Core to accommodate present needs, and/or the provision of a greenfield site (or Connolly Barracks) and to develop into a flagship campus, in consideration of the current substandard accommodation.

The rationale supporting this submission includes:

1. Current accommodation under receivership, not up to regulation or adequate utility/service standards, and high rent.

Planning History

There are no recent planning applications specific to the subject site.

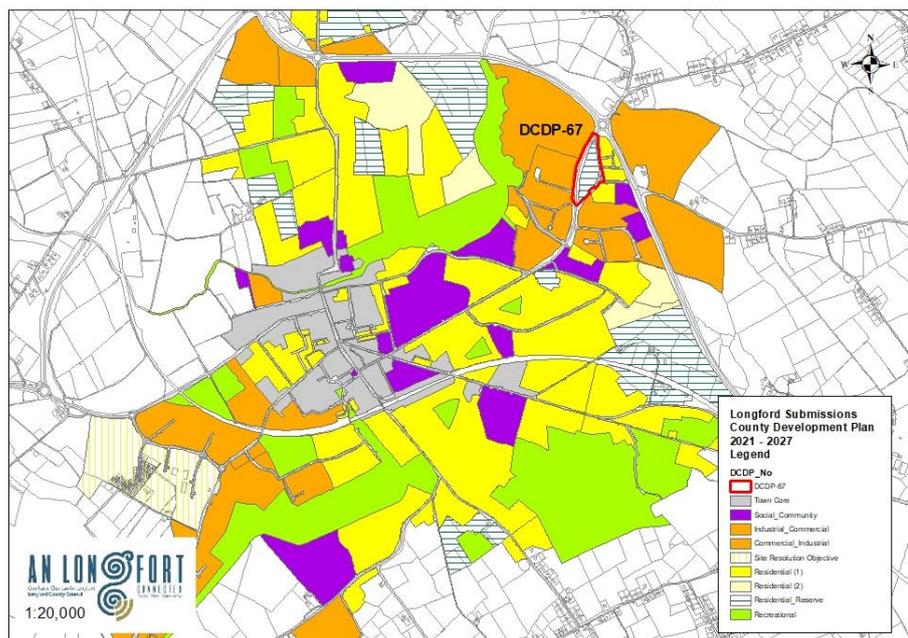
Chief Executive’s Response

The intention of the motion is acknowledged. The Explicit Direct Instruction (EDI) Centre’s current location and building provision is accepted and unsuitable and inappropriate for its proper use. However, in light of the request, is it not the role of the draft CDP to be overly specific or restrictive in assigning sites for individual uses. Educational use is widely catered for within Longford Town under multiple land use zoning that include ‘Site Resolution Objective’, ‘Recreation, Amenity and Green Space’ and “Social/Community”

Chief Executive’s Combined Recommendation

With respect to submission DCDP-59 no changes are recommended.

Submission DCDP 67



Submission DCDP-67 requests a change of land zoning to accommodate "Residential" instead of "Strategic Residential Reserve". The lands are currently zoned for “Strategic Residential reserve at the subject site identified at Island Site, Lisnamuck, Longford Town, Co. Longford in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

1. Previous planning permission on the site PL60/00 from 2000
2. Ideally situated within walking distance of several places of employment
3. The lands in question are serviced with a public footpath along the land's entire road frontage

Planning History

Full planning permission was granted in 2000 on the lands that are subject to this submission under planning reference number PL66/00 for a residential development Erection of Housing Development of 41 Houses with associated services. This permission was not acted on and has now withered.

Chief Executive's Response

The intention of the motion is acknowledged. The subject site is located within the defined town envelope of Longford Town and is zoned Strategic Residential Reserve and the lands are currently grassland.

Longford Town is defined as a 'Key Town' in the Draft Plan. It is considered that there are sufficient lands zoned in Longford Town to cater for the population and housing provision during this Plan period.

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

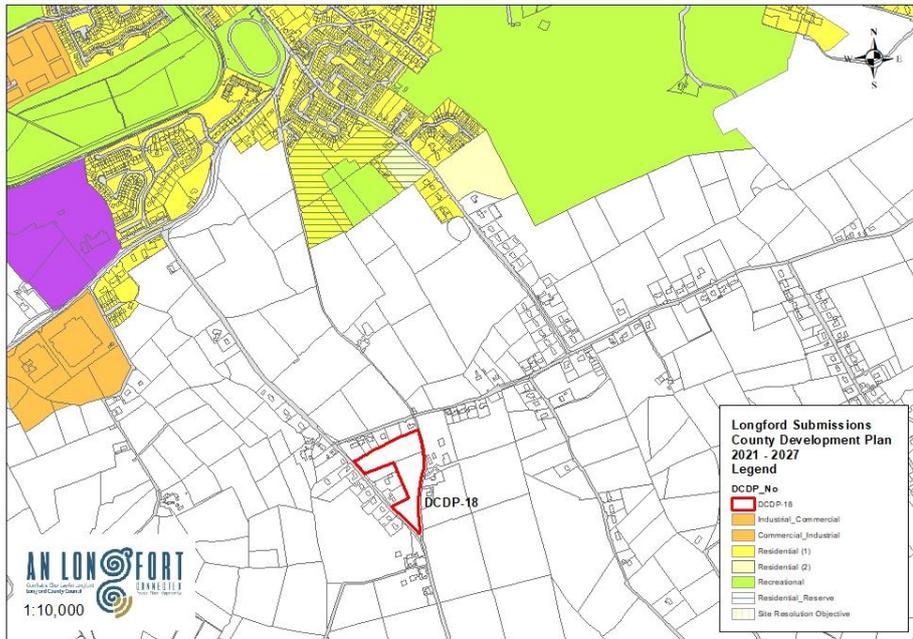
Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements over the use and development of identified greenfield sites.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional zoning to be included as part of the Plan at this time. The addition of these lands would result in a housing and population growth that would be considered unsustainable over the lifetime of this plan and it is therefore recommended that the lands not be zoned for residential purposes as part of the Plan.

Chief Executive's Combined Recommendation

With respect to submission DCDP-67 no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-18



Submission DCDP-18 relates to the zoning of lands from agricultural / non zoned lands to New Residential. The subject lands site is in private ownership and has a stated area of 2.34 hectares. The site is located to the south of Longford Town in the townlands of Lissduff and accessed via the Moydow / Ferafad Road. The lands are in agricultural use and are situated outside of the town envelope boundary of Longford. The submission includes an outline scheme for residential development and includes a draft site layout plan which includes a 64 unit development including a mix of 36 no. 1 bed, 16 no. 4 bed, 10 no. 3 bed and 2 no. 4 bed units.

The rationale supporting this submission includes:

1. The site is considered to be unsuitable for use as agricultural lands due to its modest size, proximity to traffic.
2. Proposed southern by-pass linking the N4 to the N63/N5 via Ballymakeegan Bog with improved access to this side of the town and improved connectivity and servicing.
3. Proposed development would have no impact on prospects or views.
4. Subject site has water supply and foul sewer is reasonably proximate to the subject lands.

Planning History: There are two recent planning files related to the subject site

- PL 16/278 permission refused for 2 two storey dwelling houses with detached garages, wastewater treatment systems and associated site works, new entrance gates and boundary fence/wall, and ancillary works.
- ABP 305304-19 (PL 19/169) permission refused for the construction of two storey dwelling house with detached garage, waste-water treatment system and associated site works, new entrance gates and boundary fence/wall, and ancillary works.

Chief Executive's Response

The intention of the submissions and the re-zoning of agricultural lands to New residential is acknowledged. Longford Town is defined as a 'Key Town' in the Draft Plan. It is considered that there are sufficient lands zoned in Longford Town to cater for the population and housing provision during this Plan period.

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period; whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

The subject lands located within the townland of Lisduff are located outside of the designated and defined settlement envelope of Longford town and the subject site is zoned agricultural lands in the current plan. The zoning of additional residential greenfield lands outside of the settlement boundary and envelopes would be contrary to National Planning Policy NPF, Regional Policy as defined in the RSES and the draft Longford County Development Plan which seek to promote the consolidation of existing settlements and provide more compact forms of urban growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. The development strategy for these settlements is to provide for sustainable live-work patterns to strengthen same and to improve local employment, services and sustainable transport options to enable the towns and villages to become more self-sustaining during this Plan period.

The SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development. Cumulatively, in-combination with all other zoning proposals contained within other submissions, additional potential adverse significant effects would be

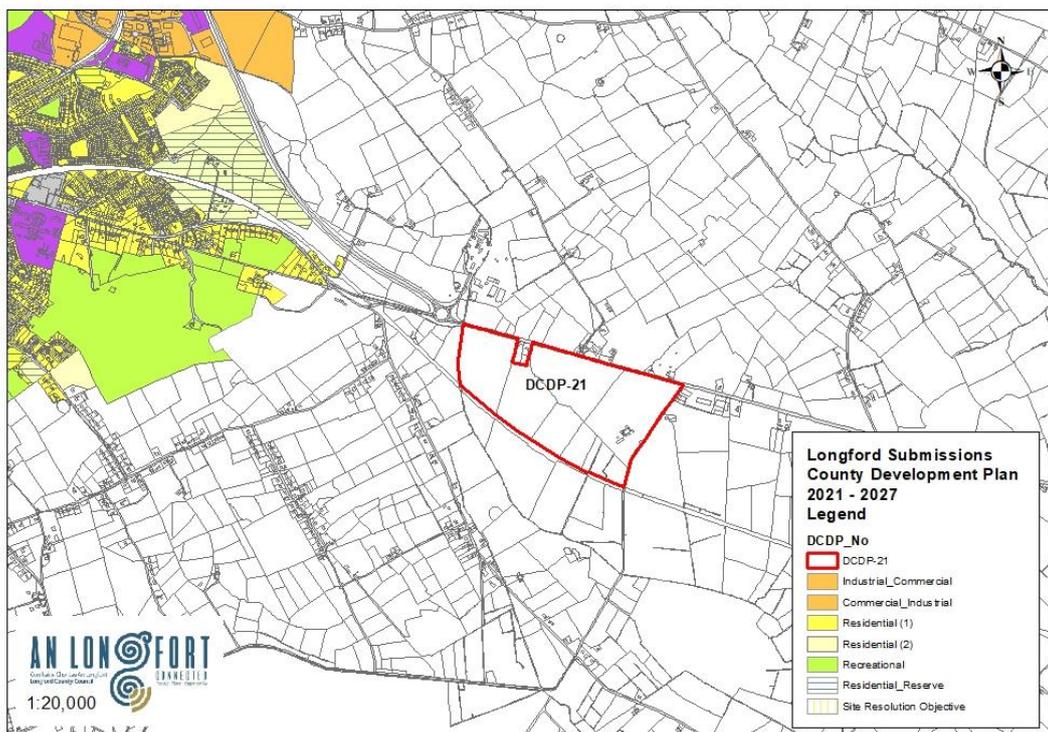
likely on various environmental components and full SEA (with associated time and resource requirement) would be required on proposed material alterations arising.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan. The addition of these lands would result in a housing and population growth that would be considered unsustainable over the lifetime of this plan and it is therefore recommended that the lands not be zoned for residential purposes as part of the Plan.

Chief Executive’s Recommendations

With respect to the above submission, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-21



Submission DCDP-21 refers to the zoning of lands located along the national road N4, the cluster of industrial and commercial buildings are the subject of a proposed Longford County Council Part8 planning application designed to improve road safety and reduce the number of access points onto the national road. The submission requests that the lands be zoned “Industrial / Commercial / Warehousing”.

The rationale supporting this submission includes:

1. Zoning the lands “Industrial / Commercial / Warehousing” will create significant industrial development opportunities and therefore employment for the County.
2. The submission acknowledges the existing situation with a number of businesses clustered and located along the N4 and in close proximity to the local road the L5167.
3. The national road N4 has a speed limit of 100km/ph.
4. The proposed works under the Part 8 scheme are reviewed.
5. Proposed that vehicles may not be able to safely make the turn without straying across the median line of the L5167. Proximity of the L5167 and the N4 will give rise to risk of collision at the entrance to existing businesses.
6. Propose a revised design of the junction in order to provide adequate and improved sightlines and sufficient turning.

Chief Executive’s Response

The intention of the submission and the proposed zoning of additional lands “Industrial /Commercial/Warehousing” is acknowledged.

The subject lands are located outside of the town envelope boundary of Longford town and are located along the national road N4. It is the objective of the Council to zone lands within the envelope of existing settlements as defined in the settlement hierarchy which seek to promote the consolidation of existing settlements and provide more compact forms of urban growth.

As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. The development strategy for these settlements is to provide for sustainable live-work patterns to strengthen same and to improve local employment, services and sustainable transport options to enable the towns and villages to become more self-sustaining during this Plan period.

The proposed modifications to the road layout for the Part 8 scheme should be directed to the Roads and Transportation Section of the Council.

Chief Executive’s Recommendations

With respect to the above submission DCDP-21, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-19

No map is included with the Submission DCDP-19 (TII), however included within the motion it specifically makes reference to the proposed settlement zonings for Longford Town and recommends the following:

- Review the proposed Longford Town Settlement Plan to ensure that necessary supporting infrastructure and transport interventions are included in the Settlement Plan prior to adoption in order to safeguard the strategic function of the national road network in accordance with previous agreements and commitments related to both the Longford Town Northern Environs Local Area Plan and the Southern Environs Local Area Plan.
- Traffic/trip demand generated by proposed development on lands zoned outside the line of the existing N4, i.e. to the east side, should be assessed to ensure that such traffic can be catered for in a manner that is complementary to and consistent with safeguarding the strategic transport function of the N4, national primary road, pending delivery of N4 Mullingar to Longford Scheme.
- Review the proposed Settlement Plan to incorporate the National Development Plan national road scheme objective related to the N4 Mullingar to Longford Scheme and reserve lands required for the scheme free from development in accordance with the requirements of official policy.
- TII would welcome consultation on the Longford Town Local Area Plan process having regard to the significant national road interactions that exist.

Chief Executive Response:

The Council acknowledge the Submission and the comments regarding the Longford Town Settlement. The Council have undertaken a review of all of the settlement plans as part of the consideration of Submissions (in particular, but not only the OPR) and this exercise has resulted in a fundamental review of the land zonings for Longford town and all of the settlements.

This review has included a consideration of the available infrastructure including roads. The Council has subsequently re-drawn the zonings as a consequence and has considered and protected the strategic function of the national road network.

The Council has included a specific policy objective (Chapter 5) which seeks to protect the study area and the study area for national road projects with the settlement zoning plans to identify and show the reserved lands and protected sites; and the study area map for the proposed road is also included in the Plan.

CPO	<i>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.</i>
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Furthermore, in respect of the proposed Longford Town LAP and the Local Transport Plan (LTP) the Draft Plan has policy objectives included in Chapter 5 of the Plan regarding these Plans and the requirement to consult at the earliest stages with the NTA and the TII.

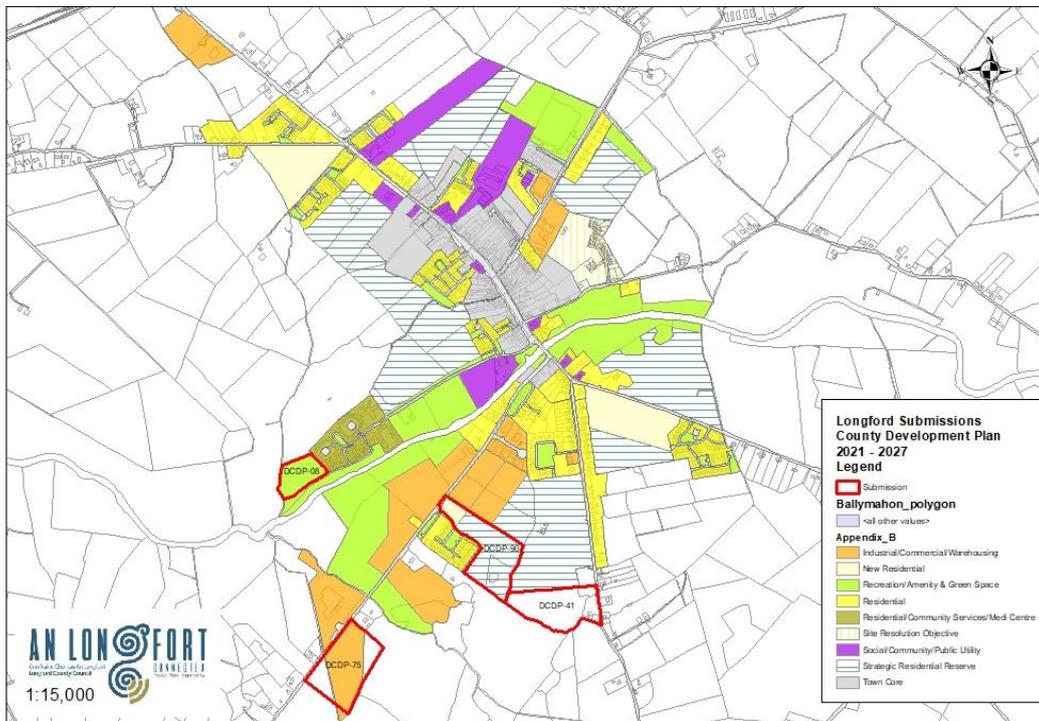
Chief Executive Recommendation

No further changes are proposed to the Draft Plan as a consequence of this Submission. To reference the comments and recommendations made in respect of Chapter 5 and the policy objectives referencing the National Roads and the Longford LAP and LTP.

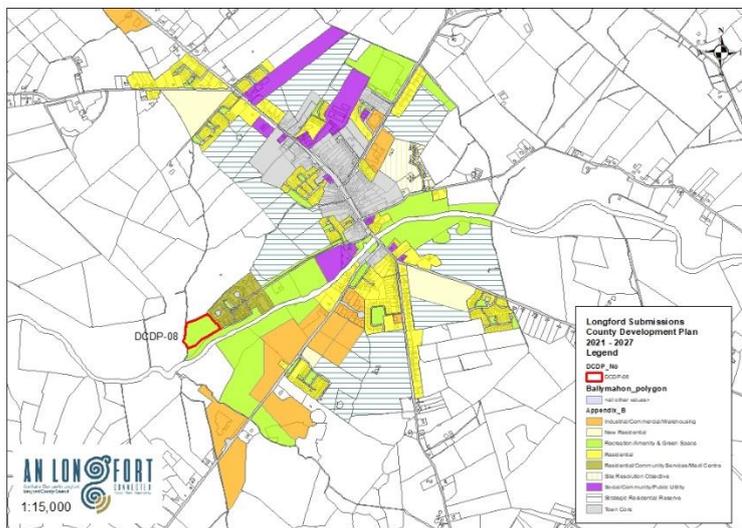
The submission also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

10.2 BALLYMAHON

Submissions Reference No: DCDP-08, DCDP-41, DCDP-75, DCDP-90



Submission DCDP-08



Submission DCDP-08 requests a change of land zoning to ‘Proposed Residential’ from ‘Recreational / Amenity & Green Space’ on the subject land to the south west of Thomond Hall, Ballymahon in the Draft Longford County Development Plan 2021-2027.

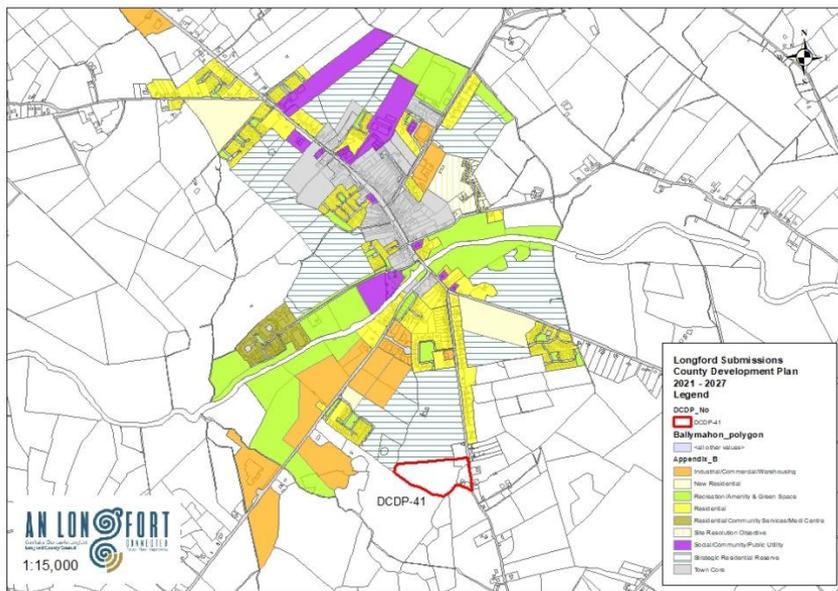
The rationale supporting this submission includes:

1. Improved access to River Inny;
2. Existing service and infrastructure provision;
3. Provide high quality housing adjoining the existing and established Thomond Hall;
4. It is not appropriate to zone lands 'Proposed Residential' use to facilitate the town's growth as a self-sustaining principal town and main service centre for south Longford.

Planning History:

There are no recent planning application relating to the subject lands. There are older planning applications where permission was refused by An Bord Pleanála.

Submission DCDP-41



Submission DCDP-41 requests a change of land zoning to 'Strategic Residential Reserve' from un-zoned lands on the subject land at Creevaghbeg, Ballymahon in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

1. Land in private ownership;
2. Adjoins existing Strategic Residential Reserve.

Planning History

The subject lands relating to DCDP-08 initially formed part of a larger site for the proposed construction of a nursing home, retirement village and residential estate (planning application 04/976) and subsequently granted by An Bord Pleanála.

A later planning application for a residential development and health spa Ref. No. 06/1079 on the subject lands was later refused by Longford County council and subsequently by An Bord Pleanála citing an incoherence with the zoning objectives set down by the development plan

Chief Executive's Combined Response

The intention of submissions DCDP-08 and DCDP-41 to zone additional residential lands at the periphery of the settlement boundary is acknowledged.

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

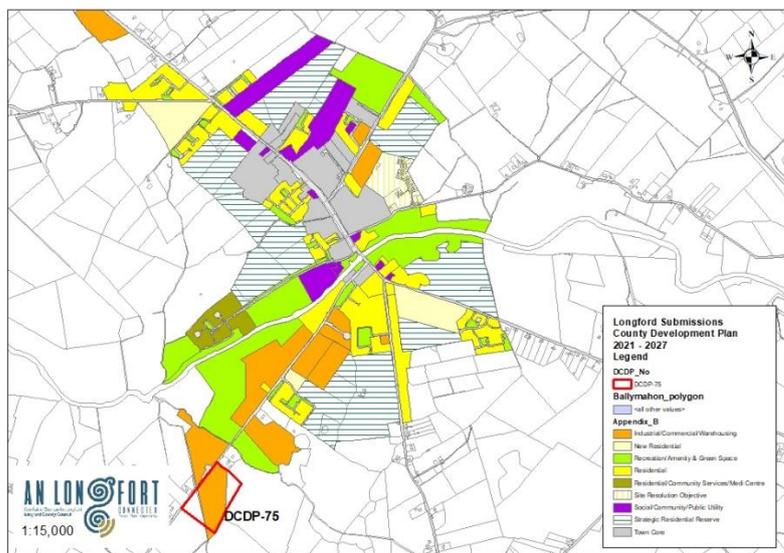
Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. These greenfield sites, removed from the established settlement boundary do not provide for brownfield or the sequential development of the town and in this regard, it is not considered that the proposed lands, in this instance, fulfil this objective. The SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development. Cumulatively, in-combination with all other zoning proposals contained within other submissions, additional potential adverse significant effects would be likely on various environmental components and full SEA (with associated time and resource requirement) would be required on proposed material alterations arising.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time. The addition of these lands would result in a housing and population growth that would be considered unsustainable over the lifetime of this plan and it is therefore recommended that the lands not be zoned for residential purposes as part of the Plan.

Chief Executive’s Combined Recommendation

With respect to the above submission, no changes are recommended relating to DCDP-08 and DCDP-41. This response to the two sites also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-75



Submission DCDP-75 requests the extending of existing land zoning to ‘Industrial / Commercial / Warehousing’ to encompass adjoining, un-zoned lands at Rathmore, Ballymahon in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

1. Principle of commercial use established from Keepak opposite;
2. Previous successful planning history;
3. Land in private ownership;
4. Existing service provision (incl. Gas).

Planning History

Planning permission was previously granted on site for the construction of a warehouse, and outline permission for 3 no. light industrial buildings, and 2 no. office buildings, but has since expired (Planning Ref. No. 01/802).

Chief Executive’s Response

The intention of submissions DCDP-75 to zone ‘Industrial/Commercial/Warehousing’ at the periphery of the settlement boundary is acknowledged.

Lands relevant to this submission amount to approximately five hectares, of which circa 70% is already zoned 'Industrial / Commercial / Warehousing'. This existing zoning suitably follows existing and established field boundaries within the submissions land holding, as opposed to irregularly traversing boundaries.

Furthermore, the subject site exists entirely within the current National Route Corridor: N55 Ballymahon to Athlone Corridor.

The NPF and RSES promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. This greenfield site does not provide for brownfield or infill development or the sequential development of Ballymahon, considering the existence of alternative suitable sites within the existing village envelope.

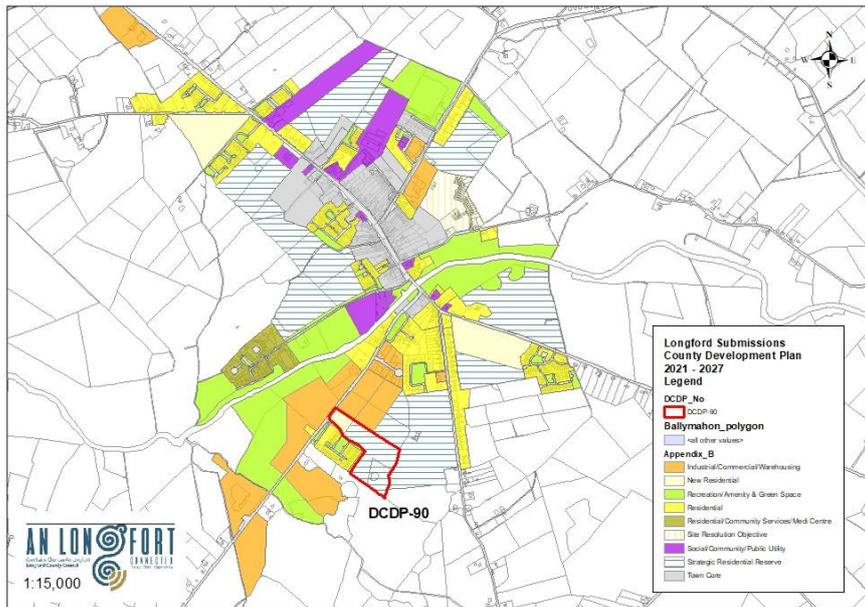
The SEA report considers that Zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development. Cumulatively, in-combination with all other zoning proposals contained within other submissions, additional potential adverse significant effects would be likely on various environmental components and full SEA.

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

Chief Executive's Recommendation

With respect to the above submission DCDP-75, no changes are recommended as a result of this submission. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-90



Submission DCDP-90 requests a change of land zoning to ‘Proposed Residential’ from an existing and predominantly zoned ‘Strategic Residential Reserve’ lands at Creevagh Beg, Ballymahon in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

1. Facilitate a zoning that is of an extent that is economically viable to develop;
2. Land in private ownership;
3. Relieve existing development pressure on local housing demand;
4. Existing service provision;

Planning History

Planning permission was previously refused on site Planning Ref. No. 00/658 for the construction of residential housing development and retail on a larger site, but subsequently granted planning permission on the subject site for the construction of 153 no. dwelling houses, 10 no. apartments, shop and creche relating to Planning Ref. No. 04/1140, with the residential element having been partially complete.

Chief Executive’s Response

The intention of submissions DCDP-90 to zone additional residential lands at the periphery of the settlement boundary is acknowledged.

Notwithstanding the history associated with the site, it is considered that there is no justification for rezoning the subject lands ‘Proposed Residential’ as it would impact on the residential amenity of the existing property in the vicinity.

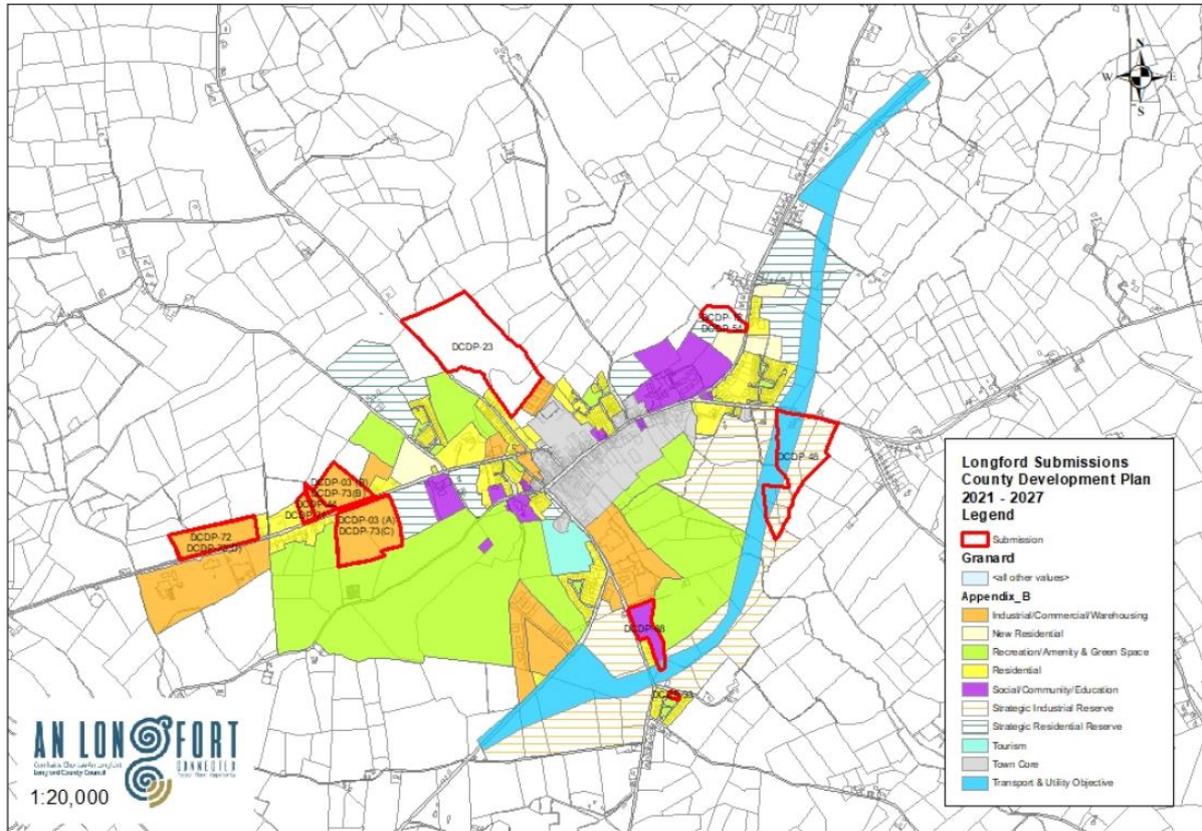
The SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development.

Chief Executive's Recommendation

With respect to the above submission, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

10.3 GRANARD

Submission Reference No: DCDP-03, DCDP-19, DCDP-23, DCDP-33, DCDP-15, DCDP-54, DCDP-44, DCDP-48, DCDP-73, DCDP-88 Granardkille: DCDP-71, DCDP-72



Submission DCDP-33

DCDP-33 requests a change of land zoning from “Recreation/Amenity and Green Spaces” to “Residential” on lands on Higginstown residential estate to the south of the town centre.



The rationale supporting this submission includes:

1. The lands are in private ownership and fenced off from the areas of open space serving the existing and built out residential estate.
2. The land is serviced with individual foul sewer, surface water and water supply connections.
3. These lands previously had the benefit of outline planning permission for 4 no. dwelling houses and were intended to form part of the “Higginstown” residential estate.

Chief Executive’s Response

The intention of the proposed motion is acknowledged.

The subject site has been the subject of a recent planning application (PL17/262) which was refused permission for the proposed development of 4 residential units on the subject site.

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

Granard is defined as a ‘Self Sustaining Town’ in the RSES. Such towns are considered ‘towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining’. It is considered that there are sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period.

Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time. The addition of these lands would result in a housing and population growth that would be considered unsustainable over the lifetime of this plan and it is therefore recommended that the lands not be zoned for residential purposes as part of the Plan.

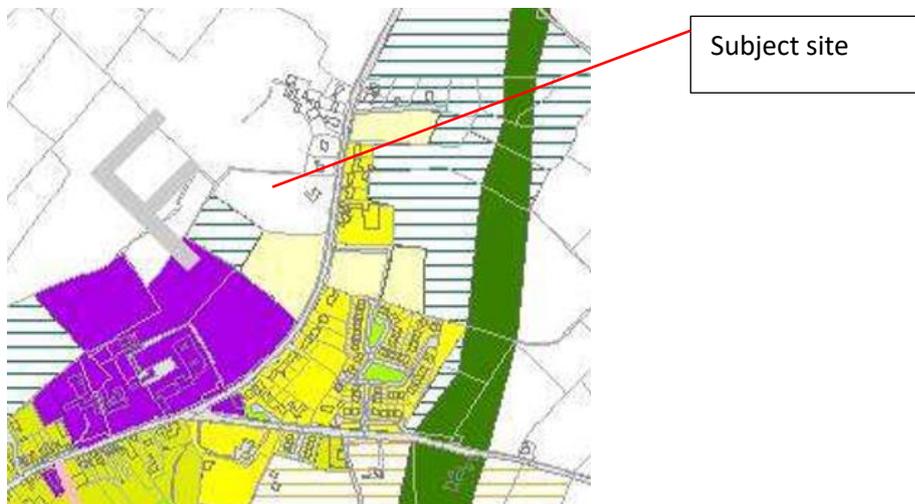
Chief Executive's Recommendations

With respect to the above submission, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submissions DCDP-15 and DCDP-54

DCDP-15 and DCDP-54 requests a change of land zoning from non-zoned lands agricultural lands to "Residential" on lands to the north-east of the town centre and located along the national road N55. The subject site has a stated area of 1.35 hectares and is currently agricultural farmlands.

Both submissions (DCDP-15 and DCDP-54) relate to the same subject site and are for the same person.



The rationale supporting this submission includes:

1. The lands are located in Granard and adjacent to a proposed new residential site located to the south.
2. The site is within easy walking distance of the Granard town and all local amenities.
3. The site fronts onto a main national road N55.
4. All utility connections are available at the site – including mains sewerage, mains water, electricity, broadband and gas.

Chief Executive's Response

The subject site is located outside of the defined boundary of Granard to the north-east and the subject site is not zoned in the Draft Plan. The lands are agricultural farmlands. Granard is defined as a 'Self Sustaining Town' in the RSES. Such towns are considered 'towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'. It is considered that

there are sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period.

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. These greenfield sites, removed from the established settlement boundary do not provide for brownfield or the sequential development of the town and in this regard, it is not considered that the proposed lands, in this instance, fulfil this objective. The SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time. The addition of these lands would result in a housing and population growth that would be considered unsustainable over the lifetime of this plan and it is therefore recommended that the lands not be zoned for residential purposes as part of the Plan.

Chief Executive's Recommendations

With respect to the above submissions (DCDP-15 and DCDP-54), no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-48

DCDP-48 relates to agricultural lands located along and to the south of the Ballyjamesduff Road (R194) regional road and to the east of the town of Granard. The lands are zoned Strategic Residential Reserve and Transport & Utility Objective.



The rationale supporting this submission includes:

1. There is demand for new housing locally.
2. Recently constructed housing development also on lands zoned Strategic Residential Reserve and Transport & Utility Objective.

Chief Executive's Response

The subject site is identified and zoned as Strategic Residential Reserve with an additional zoning Transport & Utility objective. The subject site is being held in order to facilitate a much needed by-pass for the town and once the new link road has been built to provide an opportunity for potential subsequent residential development for the town at a point in the future once other residential sites have been utilised. Granard is defined as a 'Self Sustaining Town' in the RSES. Such towns are considered 'towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'. It is considered that there are sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period.

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth.

As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. These greenfield sites, removed from the established settlement boundary do not provide for brownfield or the sequential development of the town and in this regard, it is not considered that the proposed lands, in this instance, fulfil this objective. The SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time. The addition of these lands would result in a housing and population growth that would be considered unsustainable over the lifetime of this plan and it is therefore recommended that the lands not be zoned for residential purposes as part of the Plan.

Chief Executive's Recommendations

With respect to the above submission, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-88

DCDP-88 requests a change of land zoning from "Social / Community / Education" to "Residential" on the subject lands located to the south of Granard located along the local road L1077. The lands are immediately to the west of the existing and established Granard Sports Complex. The subject lands have a stated gross area of 2.16 Hectares.



The rationale supporting this submission includes:

1. The subject site is located within the development envelope of Granard.
2. The subject site is serviced with mains sewerage and main water.
3. Planning has been granted on the site under PL18/306 for 26 no. residential units on the subject site (Granted 14/10/2019 and expires 13/10/2024) subject of a material contravention of the Longford County Development Plan 2015-2021.
4. There is demand for new housing locally.

Chief Executive's Response

The subject site is identified and zoned as Social / Community / Education and designated to build on and support the existing Granard Sports Complex located to the east of the site and the proposed link road Transport & Utility objective to the south of the site – intended to provide the south and east by-pass of the town. The subject site is being held in order to grow and develop the range and variety of sports and community facilities in order to support the growth and development of the town.

The Council acknowledge that the subject lands were granted planning permission under PL18/306 for 26 no. residential units on the subject site (Granted 14/10/2019 and expires 13/10/2024) subject of a material contravention of the Longford County Development Plan 2015-2021. As such it is considered appropriate for the site to be re-zoned to New Residential as a consequence of the planning permission.

Chief Executive's Recommendations

CE ZO-01

To amend the land zoning objective for the subject site. To remove the zoning for "Social / Community / Education" and to apply "Existing Residential" zoning.

Industrial / Commercial / Warehousing

Submissions DCDP-03 and DCDP-73

DCDP-03 and DCDP-73 requests a change of land zoning from Industrial/Commercial/Warehousing zoning to an alternative land use of either “Residential – Agricultural – Recreational uses” on the subject lands located to the west of Granard located along the regional road R194 and refers to lands marked B, C and D on the attached plan.



Chief Executive’s Response

The intention of the proposed motion is acknowledged.

The subject lands zoned B, C and D on the plan submitted within the motion were zoned for Industrial purposes within the current Longford County Development Plan 2015-2021. The amount of lands zoned for industrial and industrial / commercial development as part of the Draft Plan having been assessed and the quantum of lands deemed appropriate to enable the settlement of Granard to achieve its planned and proposed future growth and has been based upon the existing pattern of industrial development in the area.

Within the vicinity of the subject lands the existing industrial, commercial and warehousing uses are established and the direct links onto the important regional road R194.

It is identified that some Industrial Uses are established on the lands marked B. The Council acknowledge (Please see Submission DCDP-71) that a buffer be provided between the existing industrial development and the residential lands to the west of the subject site.

Following the Submissions and that of the OPR the Council have undertaken a review of the lands zoned and an infrastructure assessment of the area. Following this review the quantum of lands zoned on the outskirts of the settlement have been reviewed and revised.

Chief Executive's Recommendations

The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

CE ZO-02

To amend the land zoning objectives for the subject sites.

- Land marked B – the Industrial zoned lands will be retained. However, the size of the lands reduced in order to provide a buffer with the residential lands to the west. Land to be de-zoned and left Agricultural.
- Lands marked C – the industrial zoned lands to be retained as Industrial / Commercial and remain unaltered.
- Lands marked D – the industrial zoned lands located to the west of the Town of Granard and north of Kiernan Milling along the regional road R194 to be de-zoned and the Industrial zoning removed and the lands to be left un-zoned and assumed Agricultural as a consequence.

Submission DCDP-71

Submission DCDP-71 requests a change of land zoning from Industrial/Commercial/Warehousing zoning to an alternative land use "Residential" on the subject lands located to the west of Granard located along the regional road R194. The subject lands are to the north of the R194 and to the west of existing commercial/warehousing uses and to the east of a residential dwelling.



The rationale supporting this submission includes:

1. The land is best suited for Residential Use as it's a natural extension of a long established pattern of residential development in the area.
2. Outline planning permission was previously granted for residential development in the area (04/685).
3. Further Industrial development would have a negative effect on the amenities of adjoining properties and its residents.

Chief Executive's Response

The subject lands zoned A on the plan submitted within the motion were zoned for Industrial purposes within the current Longford County Development Plan 2015-2021 and proposed in the future Plan. The amount of lands zoned for industrial and industrial / commercial development as part of the Draft Plan has been assessed and the quantum of lands deemed appropriate to enable the settlement of Granard to achieve its planned and proposed future growth.

Following the Submissions and that of the OPR the Council have undertaken a review of the lands zoned and an infrastructure assessment of the area. Following this review the quantum of lands zoned on the outskirts of the settlement have been reviewed and revised.

Part of the subject lands and site includes an existing industrial building and complex and is an established use. However, it is acknowledged that the size and the extent of the lands goes beyond the site and up to the boundary of the residential lands. It is proposed to de-zone a section of the lands to the west of the industrial unit in order to provide a suitable buffer between the lands identified.

Chief Executive's Recommendations

The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

CE ZO-03

To amend the land zoning objectives for the subject site.

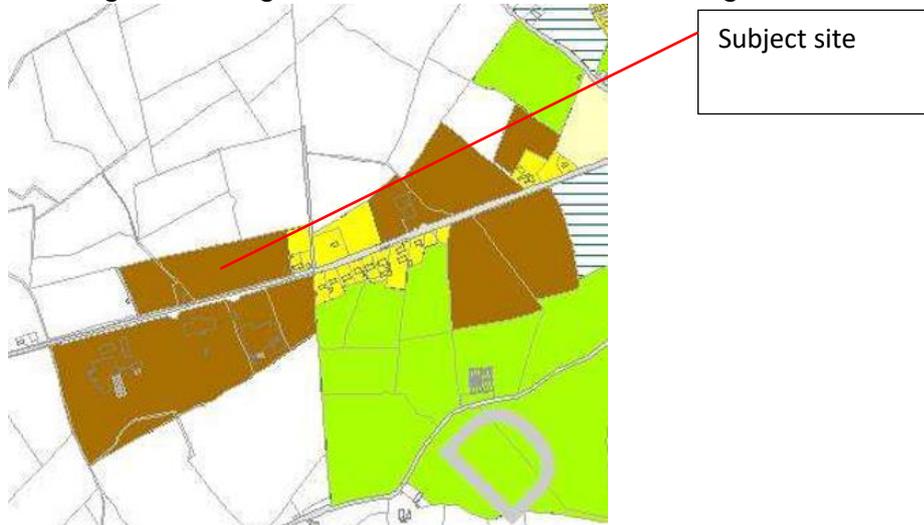
The existing industrial complex will be retained as lands zoned Industrial/Commercial/Warehousing and the lands to the west de-zoned and assumed Agricultural.



Aerial Photo for info purposes only

Submission DCDP-72

DCDP-72 requests a change of land zoning from Industrial / Commercial / Warehousing lands to Agricultural/Residential lands. The subject lands are located to the west of Granard town centre and located along the regional road R194 which connects to Longford town. The lands in question are situated to the north of the R194 and located adjacent and west of the existing residential section of lands zoned housing containing three number detached housing units.



The rationale supporting this submission includes:

1. Under National and Regional Strategic context the Plan should aim to provide 'Healthy placemaking by promoting people's quality of life. The zoning of the industrial lands adjacent to the residential properties will have a negative impact on the quality of life of these residents.

Chief Executive's Response

The subject lands submitted within the motion were zoned for Industrial purposes within the current Longford County Development Plan 2015-2021 and proposed in the future Plan. The subject lands are located adjacent to the existing residential dwellings. The Council have reviewed the quantum and the extent of the lands zoned Industrial / Commercial / Warehousing within the town of Granard. Further the Council has assessed the site servicing facilities including wastewater treatment and sewerage and public watermains. The subject lands are considered to be located further to the west of the existing town and located on un-serviced lands. As such it is proposed to de-zone the lands and remove the Industrial / Commercial/ Warehousing zoning objective and to have it zoned Agricultural or no zoning objective.

Chief Executive's Recommendations

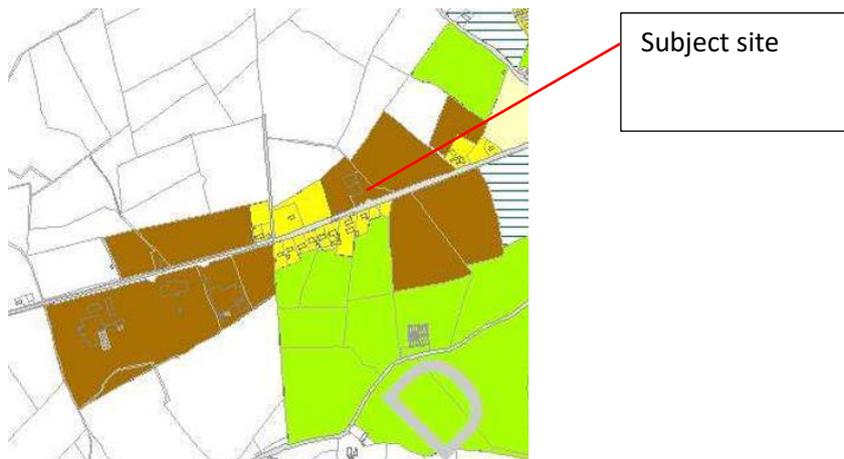
CE ZO-04

To amend the land zoning objectives for the subject site.

The lands zoned Industrial/Commercial/Warehousing to be de-zoned and assumed Agricultural. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-44

Submission DCDP-44 relates to lands located along the R194 regional road and to the west of the town of Granard. The Submission was received from the owners of the existing Industrial unit.



The rationale supporting this submission includes:

1. The lands have been used for industrial/commercial and warehousing uses for a considerable period of time.
2. The site has an established planning history associated with the use.
3. The site has significant road frontage onto the regional road and provides ease of transportation of goods.

Chief Executive's Response

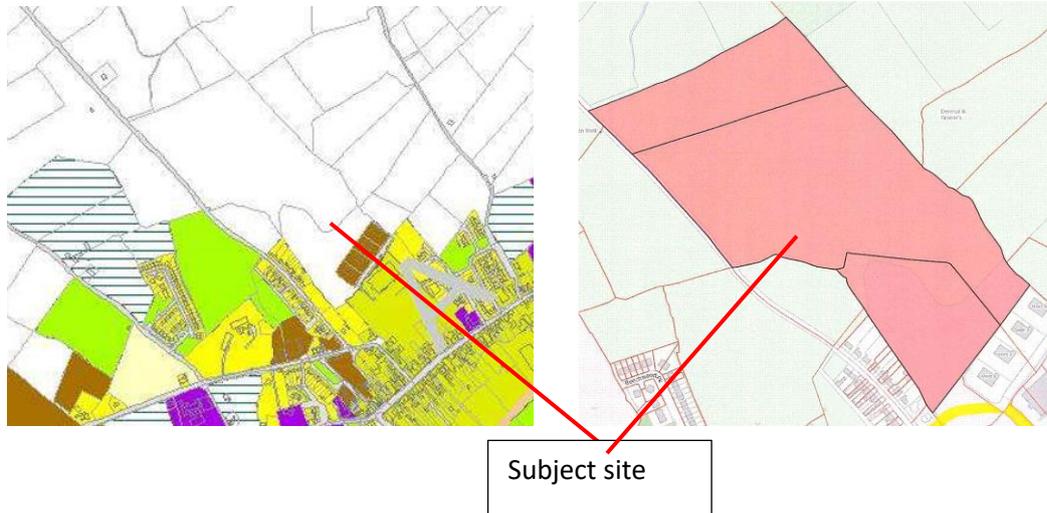
The issues raised in the submission are noted in relation to these lands and in this regard the subject lands are already zoned "Industrial/Commercial/Warehousing" under the Draft Plan in line with the request as set out under the submission. In light of previous submissions DCDP-03 and DCDP-73 and DCDP-71 the Council have acknowledged the existing industrial complex on the subject site and have proposed to retain this site with the industrial/commercial zonings but to reduce the amount of lands within the area to create a buffer to the residential lands further to the west of the site.

Chief Executive's Recommendations

With respect to the above submission, no changes are recommended.

Submission DCDP-23

DCDP-23 requests a change of land zoning from non-zoned lands agricultural lands to “Industrial/Commercial/Warehousing” on lands to the north of the town centre.



The rationale supporting this submission includes:

1. The lands are a natural extension of the existing commercial estate which contain 4 no. industrial units.
2. The lands can be easily serviced with a relatively recently constructed internal access road with foul sewer, surface water and watermain services located and terminating at the south-eastern boundary of the lands in question.
3. There are no / limited vacant industrial or warehousing units in the town of Granard and re-zoning these lands for the use will create industry and employment in the Granard area.

Chief Executive’s Response

The subject lands are not zoned within the current Longford County Development Plan 2015-2021 and are identified as a greenfield site to the north of the town centre. Granard is defined as a ‘Self Sustaining Town’ in the Draft County Development Plan. Such towns are considered ‘towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining’. It is considered that there are sufficient lands zoned in this settlement, to cater for the Industrial and Commercial Development provision during this Plan period.

It is an objective of the Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. This greenfield site does not provide for brownfield or infill development of Granard, considering the existence of alternative suitable sites within the existing town envelope. It is considered that there are sufficient lands provided for in the Draft Plan for Industrial/Commercial lands for the duration of the Plan, given the anticipated demand and Granard’s position within the overall Settlement Hierarchy.

The amount of lands zoned for industrial and industrial / commercial development as part of the Draft Plan has been assessed and the quantum of lands deemed appropriate to enable the settlement of Granard to achieve its planned and proposed future growth in accordance with the Core Strategy and settlement hierarchy of Longford.

The SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development. Cumulatively, in-combination with all other zoning proposals contained within other submissions, additional potential adverse significant effects would be likely on various environmental components and full SEA (with associated time and resource requirement) would be required on proposed material alterations arising.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional industrial/commercial zoning to be included as part of the Plan at this time.

Chief Executive's Recommendations

With respect to the above submissions, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP – 19



DCDP-19 (TII) concerns lands zoned Industrial/Commercial located to the south of the settlement, which includes part existing industrial and commercial development and a section of additional lands which front onto the national road N55.

The TII suggests that the subject lands should be considered and a review of the proposed access for the undeveloped Industrial/Commercial/Warehousing proposed, to ensure adherence to the provisions of official policy.

Chief Executive's Response

The intention of the proposed motion is acknowledged.

The subject lands were zoned for Industrial purposes within the current Longford County Development Plan 2015-2021 and proposed in the future Plan. The Council has undertaken a review of lands zoned for Industrial and Commercial development within the settlement and undertaken an infrastructure assessment of the lands. Whilst the Council acknowledges the existing industrial estate development within the immediate vicinity of the site, the Council does accept the concerns raised by TII in respect of the intensification of the access onto the national road; and further the potential for additional access points to be required onto the national road. The Council therefore proposes to de-zone the lands from industrial /commercial to agricultural lands (no zoning).

Chief Executive Recommendation

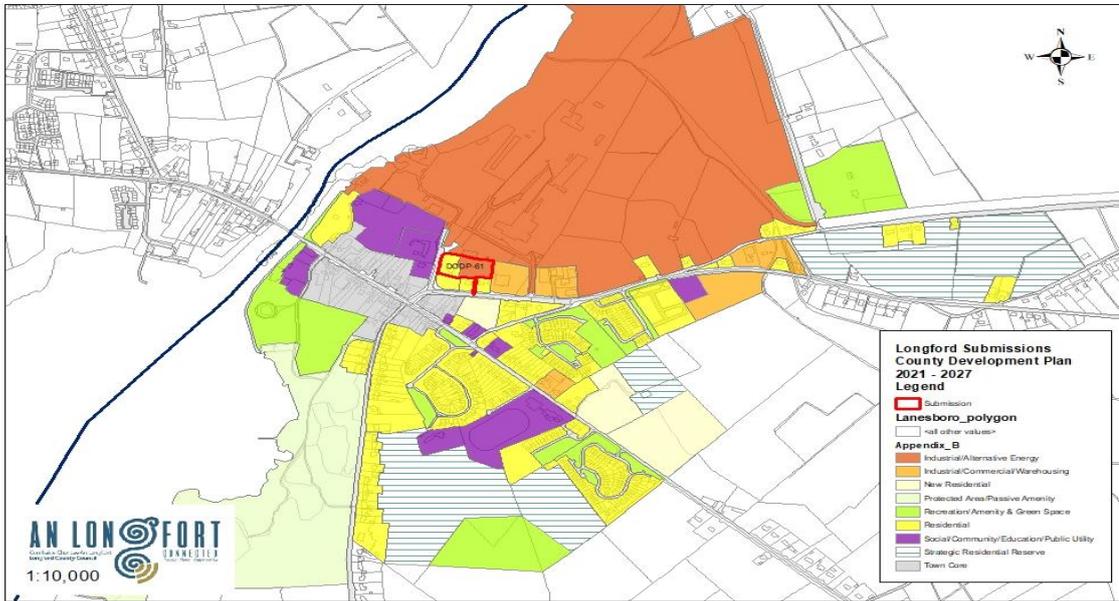
The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

CE ZO-05

To de-zone the subject lands and leave as un-zoned lands / agricultural lands.

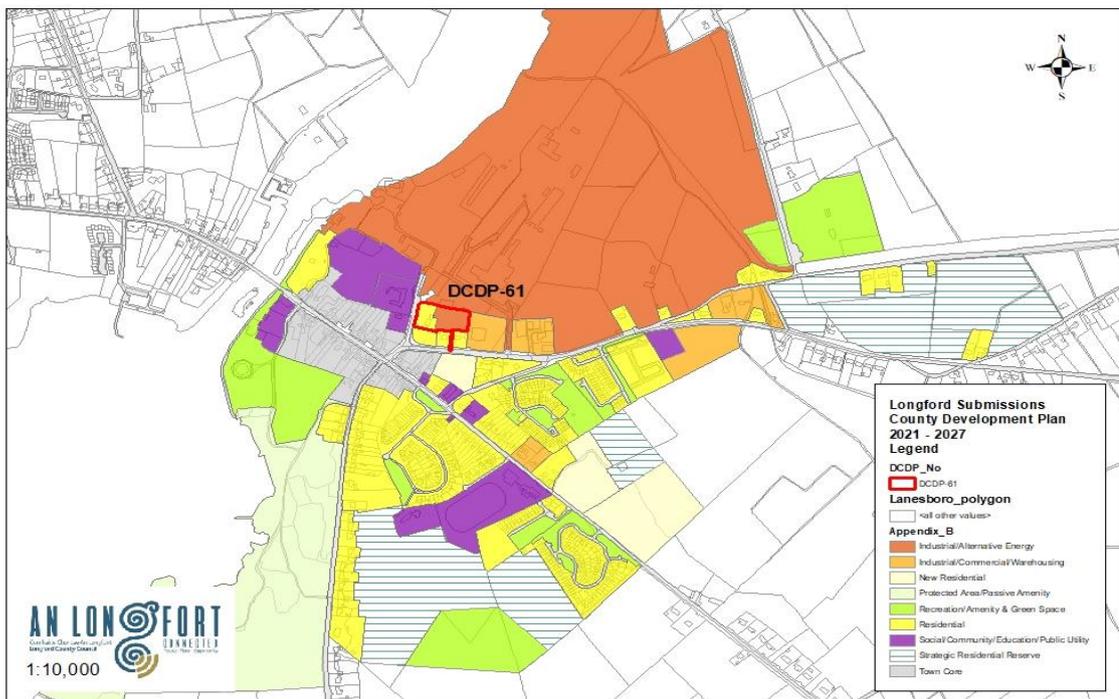
10.4 LANESBOROUGH

Submissions Reference No: DCDP-61.



Submission

DCDP-61



Submission DCDP-61 requests a change of land zoning to 'Proposed Residential' from part 'Industrial / Alternative Energy' and part 'Residential' on the subject land at Lanesborough in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

1. Facilitate a zoning that is of an extent that is economically viable to develop;
2. Land in private ownership;
3. Closing down of Lanesborough Power Station;
4. Existing service provision;
5. Proximity of nearby amenities.

Planning History

Planning permission was previously granted on site (Planning Ref. No. 01/443) for the construction of 2 no. industrial units on the 'Industrial / Alternative Energy' element of the subject site but has since expired.

Chief Executive's Response

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 development plan. This assessment is underpinned by the Housing Needs Demand Assessment (HNDA) as required by the National Planning Framework (NPF). Such an approach will negate the need for unplanned material contravention scenarios as previously encountered due to the absence of available suitable lands for development.

Approximately 40% of the area defined within the subject lands are already zoned 'Residential', while the remainder of the subject lands forming a fractional part of a much larger 'Industrial / Alternative Energy' use facilitating the previous Lanesborough Power Station use, and now no longer in operation.

The subject land's proximity to Lanesborough town centre, and current location alongside an existing residential development to the south, positively contributes to compact growth in accordance with National Planning Objective (NPO) 3c of the NPF.

Furthermore, the location of the subject lands also falls within the CSO (Central Statistics Office) defined settlement boundary and therefore classified as brownfield lands, and in accordance with recommendations by the Office of the Public Regulator (OPR), correctly follows a tier approach to zoning.

Chief Executive's Recommendation

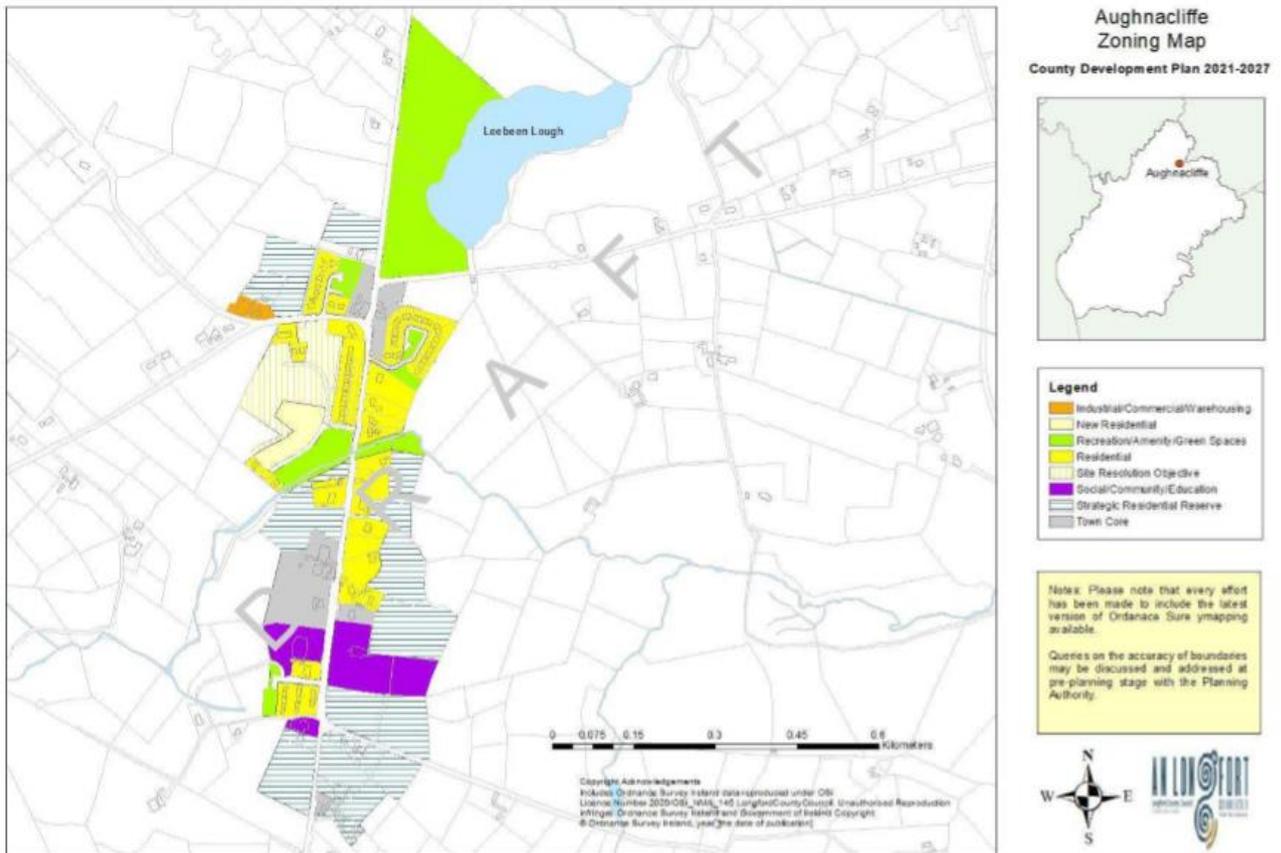
With respect to the above DCDP-61, the following changes have recommended as a result of the corresponding submission.

CE ZO-06

With respect to the above DCDP-61, modify the 'Industrial / Alternative Energy' zoning contained within the subject site, to 'New Residential'.

10.5 AUGHNACLIFFE

Submission Reference No: DCDP-11, DCDP-25, DCDP-55, DCDP-87



Submission DCDP-11

DCDP-11 requests the zoning of lands to “Residential” on lands to the south (approx. 200m) of the settlement centre. The subject site is not identified on the settlement map within the Draft County Development Plan. The subject site fronts onto the L1044 and a private road access and includes a vacant derelict dwelling and has a stated area of 0.31 hectares.

Chief Executive’s Response

The intention of the proposed motion is acknowledged, although it is noted that there are no details included with the submission, other than the map of the subject lands.

The subject site has been the subject of a planning application (PL12/63) which was granted and then subject to an extension of duration which was also granted until 20/05/2022.

It is considered that there are sufficient lands zoned residential in this settlement, to cater for the population and housing provision during this Plan period. The amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of defined settlements.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time and the extension of the settlement boundary to include and encompass the subject site not appropriate.

Chief Executive's Recommendations

With respect to the above submissions, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-25



Subject lands

Submission DCDP-25 requests a change of land zoning from “Recreational/Amenity/Green Space” to “Residential” on lands located within the settlement boundary of Aughnacliffe and in the existing residential estate known as Lios na Criose, Rathmore, Aughnacliffe.

The rationale supporting this submission includes:

1. The subject lands formed part of the residential development known as Lios na Criose and granted permission under planning reference PL04/569 for the construction of 24 residential units to be serviced by an on-site wastewater treatment system.
2. The on-site wastewater treatment system was decommissioned and removed when the site was connected to the public sewer and wastewater treatment plant for Aughnacliffe.
3. The subject site is now a fenced off and overgrown piece of land and a potential area of anti-social behaviour.

Chief Executive’s Response

The subject lands are located within an existing residential estate and located within the settlement boundary of Aughnacliffe, and appropriately serviced with public watermain and foul sewerage.

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

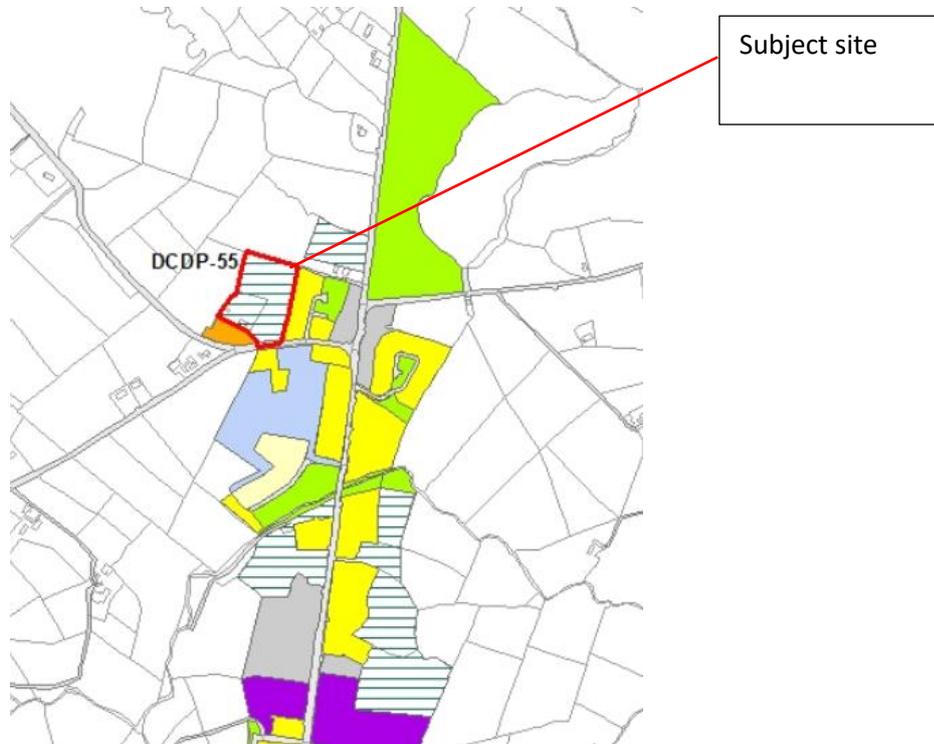
Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional lands zoned recreation/amenity to be included as part of the Plan at this time. It is considered that there are sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period.

Chief Executive’s Recommendations

With respect to the above submissions, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-55

DCDP-55 requests a change of land zoning from “Strategic Residential Reserve” to “Residential” on lands located within the settlement boundary of Aughnaclyffe. The subject lands have a stated area of 1.28 hectares and are held in the ownership of the submitter.



The rationale supporting this submission includes:

1. PL19/87 was granted on appeal by An Bord Pleanála (Ref. PL14.306372) for 28 no. residential units at Forthill, Aughnaclyffe exhausted the sole remaining lands of residential development potential.
2. Aughnaclyffe will require increased housing provision as the settlement exhibited very high rates of population growth between 2011 and 2016 and is identified as a local employment centre in the Economic Development Hierarchy.
3. The subject lands have remained within the defined development envelope of the settlement.
4. The lands are serviceable by an established and existing public water main, public sewer and storm water network.
5. The referenced lands are sandwiched between an existing and established residential development to the east known as the Dolmens and existing and established Industrial/Commercial/Warehousing lands to the west (National Fireplace Distributors).
6. The site is located some 80m west of Aughnaclyffe town core and approximately 200m from the public amenity known as Leebeen Park.
7. The existing lands offer no /limited agricultural value.

Chief Executive's Response

The subject site is located within the defined village envelope of Aughnaccliffe and is zoned Strategic Residential Reserve and the lands are currently in agricultural use. The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

The SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development. Cumulatively, in-combination with all other zoning proposals contained within other submissions, additional potential adverse significant effects would be likely on various environmental components and full SEA (with associated time and resource requirement) would be required on proposed material alterations arising.

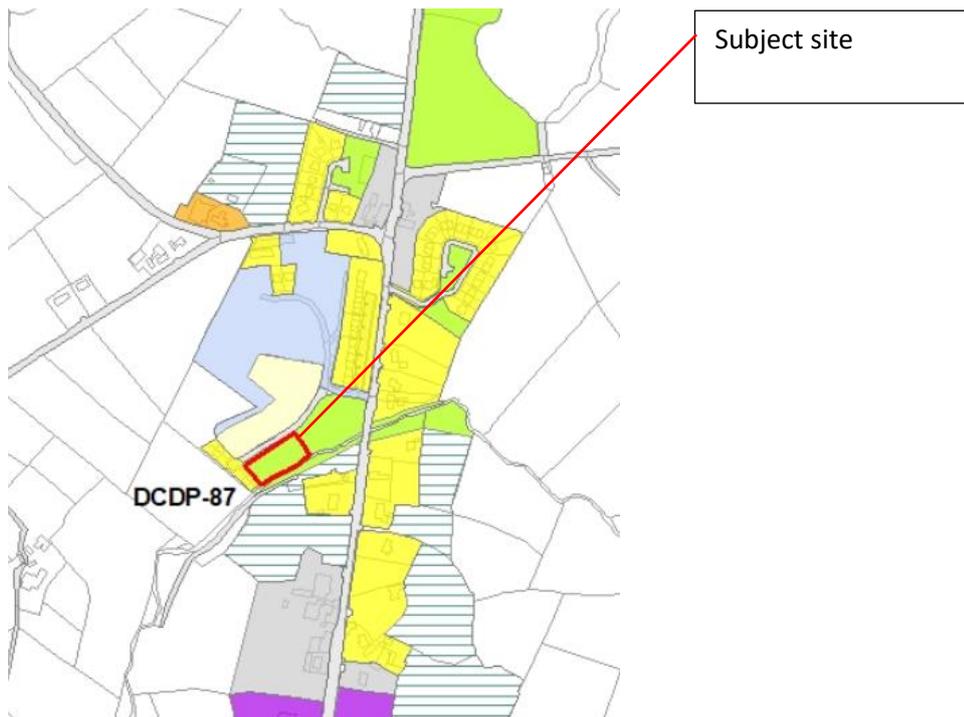
Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time. It is considered that there are sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period and that the lands remain zoned Strategic Residential Reserve.

Chief Executive's Recommendations

With respect to the above submission, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-87

Submission DCDP-87 requests that the current Site Resolution land use zoning be maintained "Site Resolution" and that an overall site plan be agreed for the subject site. The subject site has a stated area of 0.35 hectares and forms part of the larger Forthill residential development site which was granted approval on appeal to An Bord Pleanála PL19/87 (Ref. PL14.306372) for 28 no. residential units and is unfinished.



The rationale supporting this submission includes:

1. The subject lands form part of the residential development known as Forthill estate. Maintaining the “Site Resolution” zoning will enable the completion of the subject site and lands.
2. As part of the planning file ref PL19/87 large areas of previously approved residential areas have been approved to now be landscaped and planted.
3. Phased development of the site and extensive landscaping has been agreed and the addition of more recreation/green area will require a redesign of the current proposals.

Chief Executive’s Response

The subject lands are correctly zoned “Recreation/Amenity/Green Space” and not as stated Site Resolution Objective in the submission. The zoning of the lands recreation/amenity/green space reflects the large area of housing development to the immediate north of the site (Forthill Estate) and the close proximity of the proposed new area of public open space to the east of the site and the stream to the immediate south of the subject site.

The subject lands did not form part of the development site area for the granted planning file PL19/87. The proposed inclusion of the site as “Site Resolution Objective” would potentially impact the amount of land allocated for residential development within the settlement.

The quantum of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy.

The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

It is considered that there are sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. The SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development. Cumulatively, in-combination with all other zoning proposals contained within other submissions, additional potential adverse significant effects would be likely on various environmental components and full SEA (with associated time and resource requirement) would be required on proposed material alterations arising.

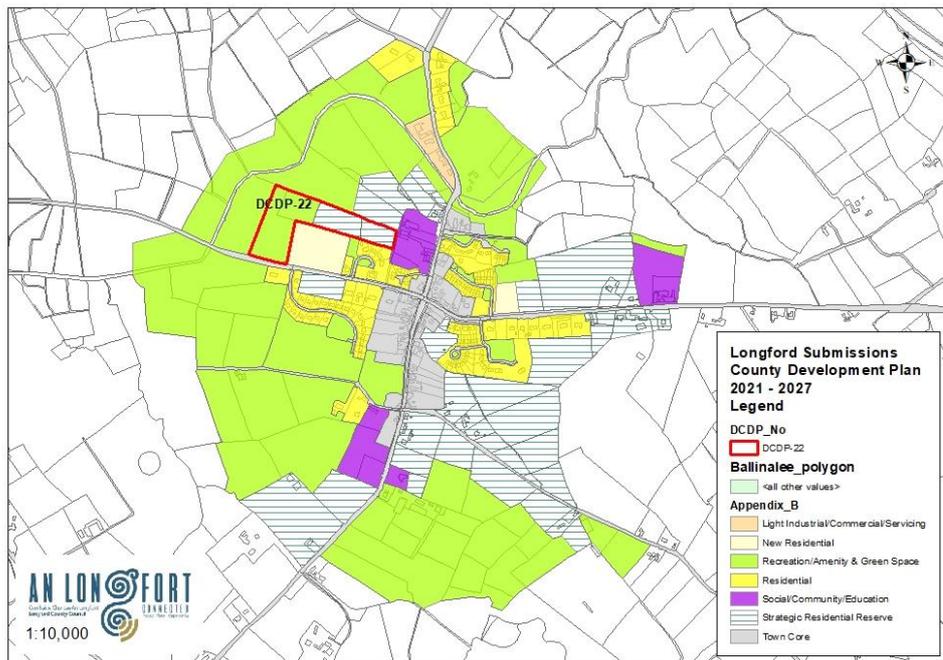
Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time. The addition of these lands would result in a housing and population growth that would be considered unsustainable over the lifetime of this plan and it is therefore recommended that the lands not be zoned for residential purposes as part of the Plan.

Chief Executive's Recommendations

With respect to the above submission, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

10.6 BALLINALEE

Submission No: DCDP-22, DCDP-26, DCDP-27, DCDP-28, DCDP-30, DCDP-31



Submission DCDP-22

DCDP-22 requests the zoning of lands to “New Residential” from part “Strategic Residential Reserve” and “Recreation/Amenity & Green Space”. The subject lands are located to the west of the village core and are currently agricultural lands. The lands are accessed from the regional road R194 and are adjacent to and behind lands which were granted permission for residential development under planning reference PL19/212. Developing the lands would continue the section of new residential on the west side of the village envelope.

The rationale supporting this submission includes:

1. The subject lands are well connected into the village core via existing pavements along the regional road R194 and via the proposed village park through to the church grounds.
2. The proposed development would link into the New Residential lands recently granted permission under planning reference PL19/212 in a co-ordinated way.
3. The subject lands can be easily serviced with foul sewer, surface water and watermain networks all of which are located in the adjoining public road on to which the lands front.

Chief Executive's Response

Ballinalee is defined as a 'Serviced Rural Settlement' in the Draft Plan. Such serviced rural villages have a limited level of services. The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements over the use and development of identified greenfield sites.

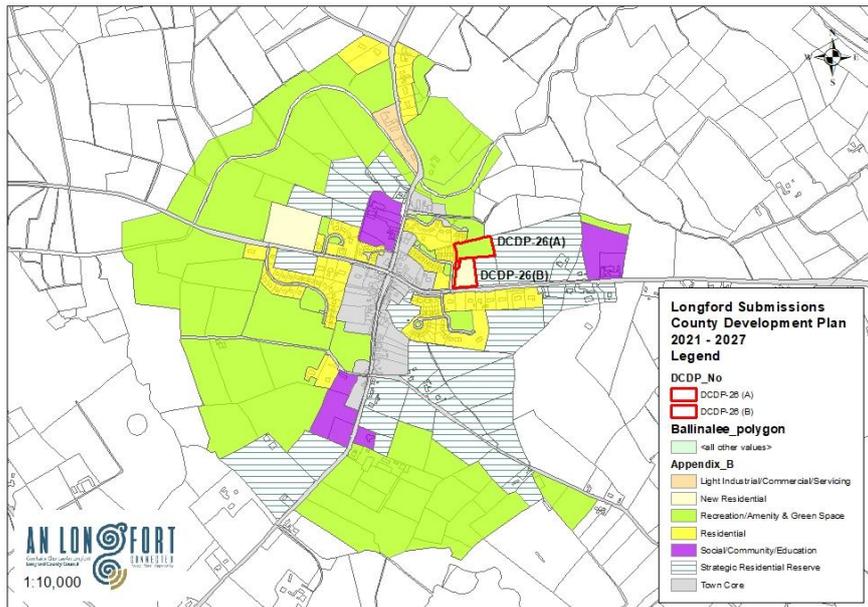
The SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development. Cumulatively, in-combination with all other zoning proposals contained within other submissions, additional potential adverse significant effects would be likely on various environmental components and full SEA (with associated time and resource requirement) would be required on proposed material alterations arising.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time. The addition of these lands would result in a housing and population growth that would be considered unsustainable over the lifetime of this plan and it is therefore recommended that the lands not be zoned for residential purposes as part of the Plan.

Chief Executive's Recommendations

With respect to the above submission, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP - 26



DCDP-26 relates to zoning of lands New Residential Reserve, Strategic Residential Reserve and Recreation/Amenity & Green Space. The subject lands are located to the east of the village core and are currently agricultural lands located to the north of the regional road R194 to Granard. The submission promotes that the New Residential lands located along the regional road be moved to the rear of the site on part of the lands zoned Recreation/Amenity & Green Space and that the Strategic Residential Reserve Lands be moved to the lands that were zoned New Residential along the road frontage.

The rationale supporting this submission includes:

1. The subject lands are in the sole ownership of the submitter.
2. The lands are well connected into the village core via existing pavements along the regional road R194.
3. The subject lands can be easily serviced with foul sewer, surface water and watermain networks all of which are located in the adjoining public road on to which the lands front.

Chief Executive's Response

Ballinalee is defined as a 'Serviced Rural Settlement' in the Draft Plan. Such serviced rural villages have a limited level of services. It is considered that there are sufficient lands zoned in Ballinalee to cater for the population and housing provision during this Plan period.

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes which seeks to promote consolidation of existing settlements and more compact forms of growth.

Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements over the use and development of identified greenfield sites.

The SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development. Cumulatively, in-combination with all other zoning proposals contained within other submissions, additional potential adverse significant effects would be likely on various environmental components and full SEA (with associated time and resource requirement) would be required on proposed material alterations arising.

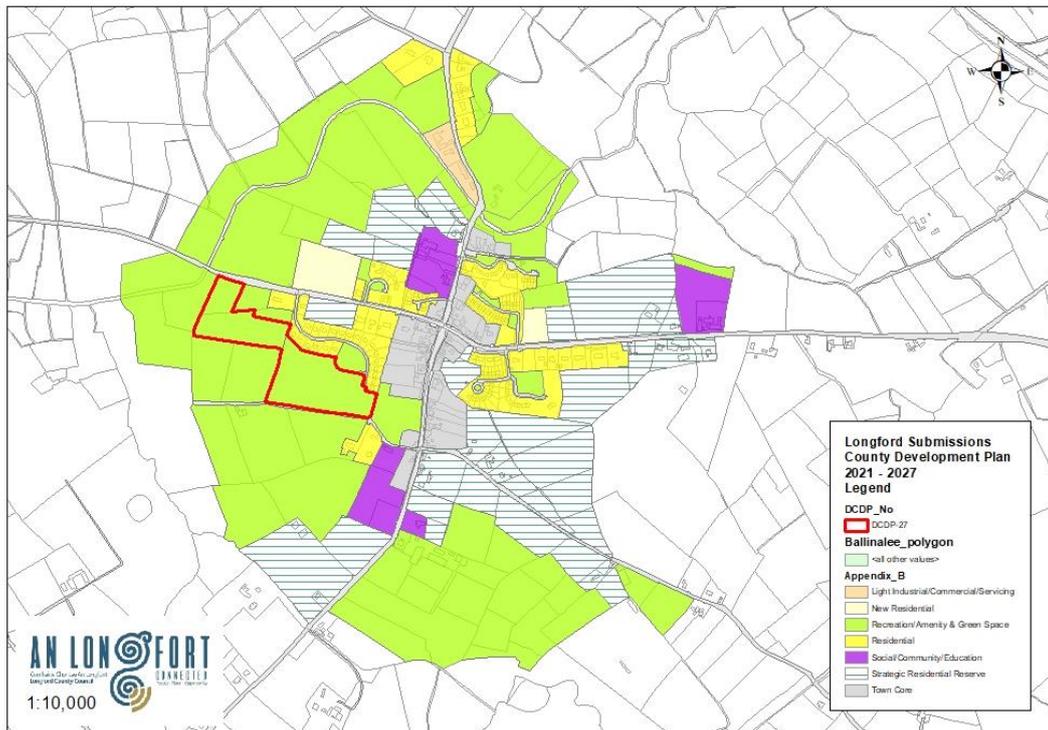
Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time.

Chief Executive's Recommendations

With respect to the above submission, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-27

Submission DCDP-27 relates to the proposed re-zoning of lands from Recreation/Amenity & Green Space to New Residential (low density housing). The substantial area of agricultural lands are located to the west of the village envelope and are agricultural lands.



The rationale supporting this submission includes:

1. The subject lands are in sole ownership.
2. The subject lands can be easily serviced with foul sewer, surface water and watermain networks all of which are located in the adjoining public road on to which the lands front.
3. The lands are in agricultural use and could be developed for residential low density housing if the zoning is changed.

Chief Executive's Response

Ballinalee is defined as a 'Serviced Rural Settlement' in the Draft Plan. Such serviced rural villages have a limited level of services. It is considered that there are sufficient lands zoned in Ballinalee to cater for the population and housing provision during this Plan period. The subject lands are zoned recreation/amenity/green space and provide an important break to the existing residential development on the west side of the settlement.

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy.

The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

It is considered that there are sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements over the use and development of identified greenfield sites.

Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements over the use and development of identified greenfield sites.

The SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development. Cumulatively, in-combination with all other zoning proposals contained within other submissions, additional potential adverse significant effects would be likely on various environmental components and full SEA (with associated time and resource requirement) would be required on proposed material alterations arising.

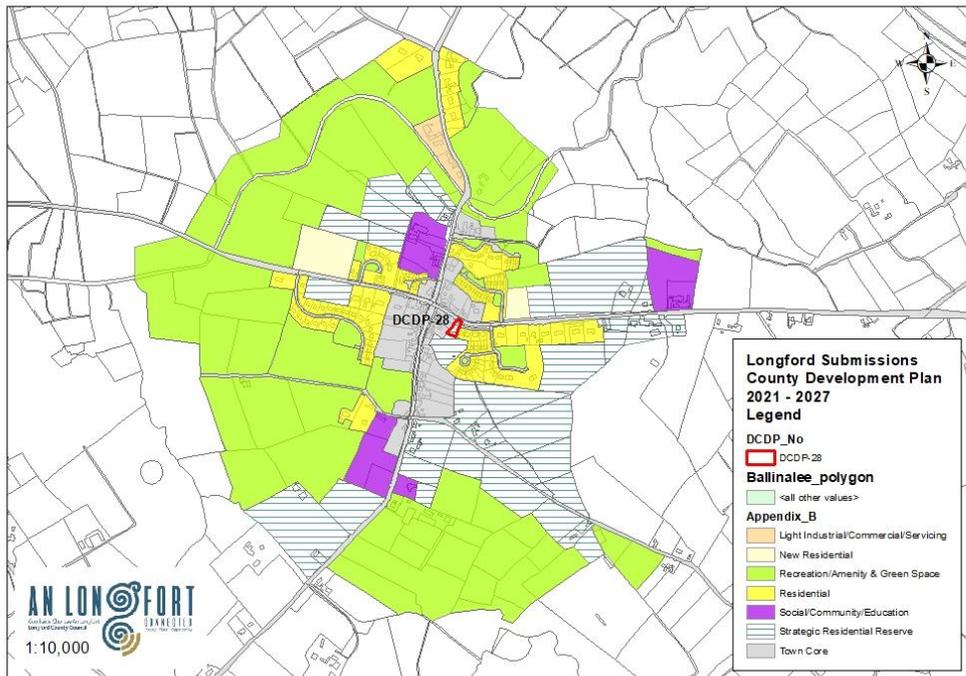
Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time.

Chief Executive's Recommendations

With respect to the above submission, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-28

Submission DCDP-28 refers to the proposed re-zoning of the lands from Strategic Residential Reserve to Town Core. The subject lands are a relatively small section of lands (zoned Strategic Residential Reserve) that are adjacent to lands zoned town core to the west and existing residential lands to the east.



The rationale supporting this submission includes:

1. Zoning the lands Town Core will ensure that the infill development site will be completed and enable the provision of a footpath link through to France Road located to the south and on to the local football pitch amenity to the south of the village.
2. The subject lands can be easily serviced with foul sewer, surface water and watermain networks all of which are located in the adjoining public road on to which the lands front.
3. The lands were previously zoned for development in a previous County Development Plan 2003-2009.

Chief Executive's Response

The intention of the motion and the proposed revised zoning of additional lands is acknowledged.

The subject site forms part of a larger area of Strategic Residential Reserve lands located to the south of the village envelope, with the subject lands providing a strategic connection onto the site from the public road; and would prevent the strategic development of the lands identified. The zoning of the larger section of lands Strategic Residential Reserve is considered essential as the small section identified in this submission provides the access to the lands.

Ballinalee is defined as a 'Serviced Rural Settlement' in the Draft Plan. Such serviced rural villages have a limited level of services. It is considered that there are sufficient lands zoned in Ballinalee to cater for the population and housing provision during this Plan period.

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

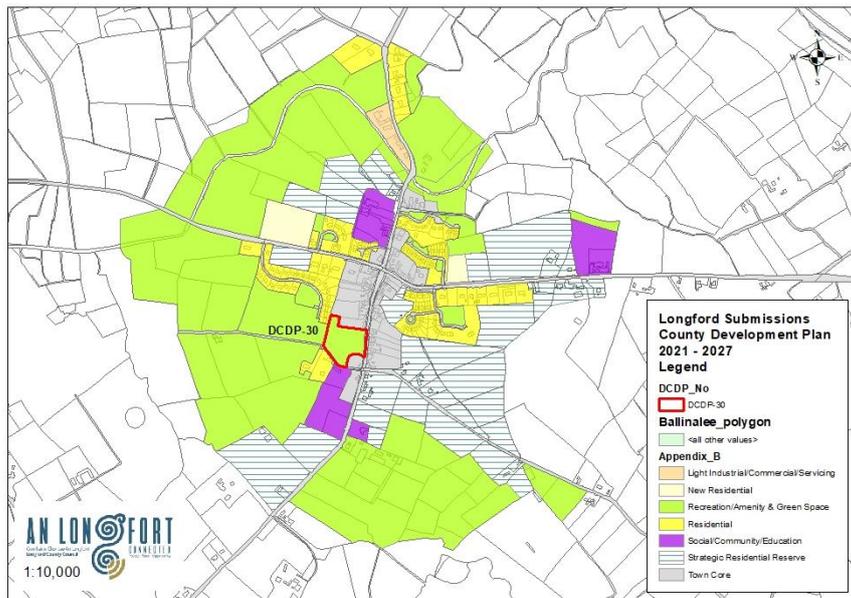
It is considered that there are sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth.

Chief Executive's Recommendations

With respect to the above submission, no changes are recommended.

Submission DCDP-30

DCDP-30 relates to the re-zoning of lands from Recreation/Amenity & Green Space to Town Core. The subject lands are agricultural and farmed lands located to the south of the village envelope and located along the local road the L1056 towards Moat Farrell and are adjacent to existing Town Core lands zoned to the immediate north and south of the subject site.



The rationale supporting this submission includes:

1. Zoning the lands Town Core will ensure that the continued infill development of lands connecting up lands already zoned town core along the local road L1056 into the town
2. The subject lands can be easily serviced with foul sewer, surface water and watermain networks all of which are located in the adjoining public road on to which the lands front (L1056).
3. The lands were previously zoned for development in a previous County Development Plan 2003-2009.

Chief Executive's Response

The intention of the motion and the proposed revised zoning of additional lands Town Core is acknowledged.

The subject site forms part of a larger area of Recreation/Amenity & Green Space lands located to the south of the village envelope.

Ballinalee is defined as a 'Serviced Rural Settlement' in the Draft Plan. Such serviced rural villages have a limited level of services. It is considered that there are sufficient lands zoned in Ballinalee to cater for the population and housing provision during this Plan period.

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

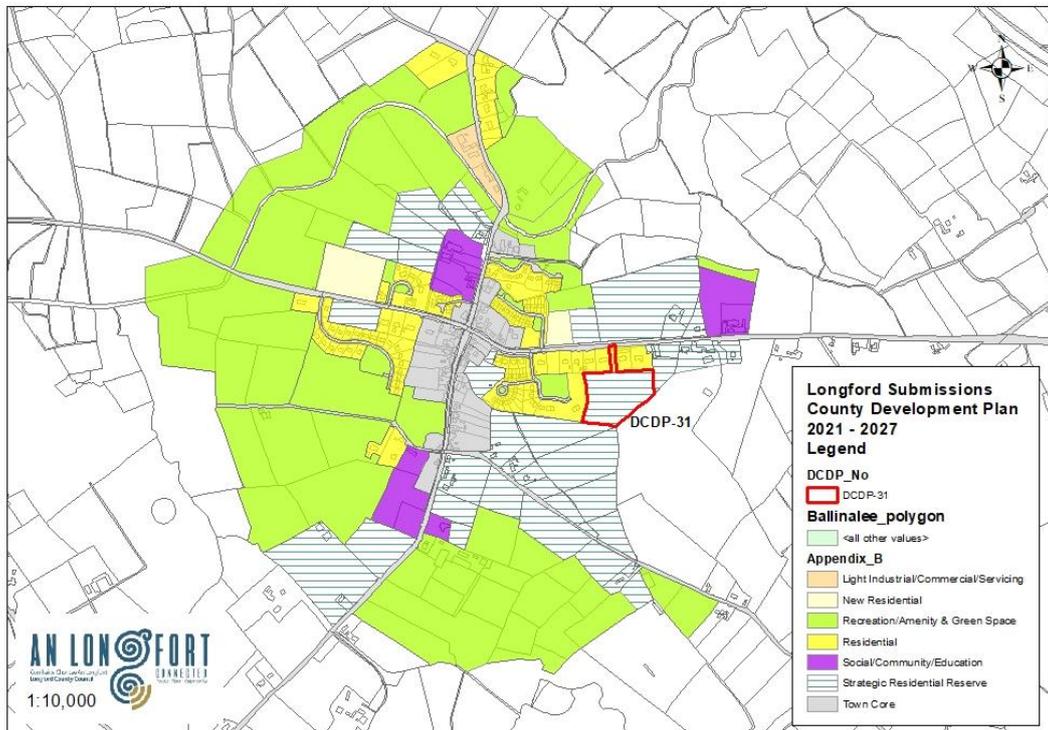
The SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development. Cumulatively, in-combination with all other zoning proposals contained within other submissions, additional potential adverse significant effects would be likely on various environmental components and full SEA (with associated time and resource requirement) would be required on proposed material alterations arising.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional town core zoning to be included as part of the Plan at this time, especially as the subject lands are agricultural lands.

Chief Executive's Recommendations

With respect to the above submission, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-31



DCDP-31 relates to the proposed re-zoning of the subject lands from Strategic Residential Reserve to New Residential. The subject lands are located to the east of the settlement envelope of Ballinalee (approximately 200-250m). The subject lands are located to the south of the regional road R194 to Granard.

The rationale supporting this submission includes:

1. Zoning the lands New Residential will ensure the joining up of existing and already built out residential developments along this stretch of the regional road and located within the existing village envelope.
2. The subject lands can be easily serviced with foul sewer, surface water and watermain networks all of which are located in the adjoining public road on to which the lands front (L1056).
3. The lands were previously zoned for development in a previous County Development Plan 2003-2009.

Chief Executive's Response

The intention of the motion and the proposed revised zoning of lands New Residential from Strategic Residential Reserve is acknowledged.

The subject lands although located within the settlement envelope are located to the periphery of the settlement.

Ballinalee is defined as a 'Serviced Rural Settlement' in the Draft Plan. Such serviced rural villages have a limited level of services. It is considered that there are sufficient lands zoned in Ballinalee to cater for the population and housing provision during this Plan period.

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. The zoning of this greenfield would not accord with this stated principle and objective and would therefore be at odds with the NPF and national policy.

The SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development. Cumulatively, in-combination with all other zoning proposals contained within other submissions, additional potential adverse significant effects would be likely on various environmental components and full SEA (with associated time and resource requirement) would be required on proposed material alterations arising.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional town core zoning to be included as part of the Plan at this time, especially as the subject lands are agricultural lands.

Chief Executive's Recommendations

With respect to the above submission, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

DCDP-52 (Coillte)

No map was included with the Submission DCDP-51 acknowledges and supports the Core Strategy included within the Draft Plan which actively promotes the consolidation growth and compact development of the Counties towns and villages. The Submission identifies the land estate and the lands in the town of Ballinalee which are zoned Strategic Residential Reserve (SRR) *“to provide for the longer term housing needs of the town”*.

DCDP-51 welcomes the continues designation of these lands and suggests that the Council consider bringing these lands forward in any future review of the Core Strategy of the County Development Plan 2017-2023.

The Submission also suggests that the Council consider the provision of planning policies/land-use zoning objectives to support the provision of development on Coillte lands.

Chief Executive’s Response

The intention of the motion and the zoning of the lands in the ownership of Coillte as Strategic Residential Reserve is acknowledged. Ballinalee is defined as a ‘Serviced Rural Settlement’ in the Draft Plan. Such serviced rural villages have a limited level of services. It is considered that there are sufficient lands zoned in Ballinalee to cater for the population and housing provision during this Plan period.

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

It is considered that there are sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. The zoning of this greenfield would not accord with this stated principle and objective and would therefore be at odds with the NPF and national policy.

Furthermore, the SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development.

Cumulatively, in-combination with all other zoning proposals contained within other submissions, additional potential adverse significant effects would be likely on various environmental components and full SEA (with associated time and resource requirement) would be required on proposed material alterations arising.

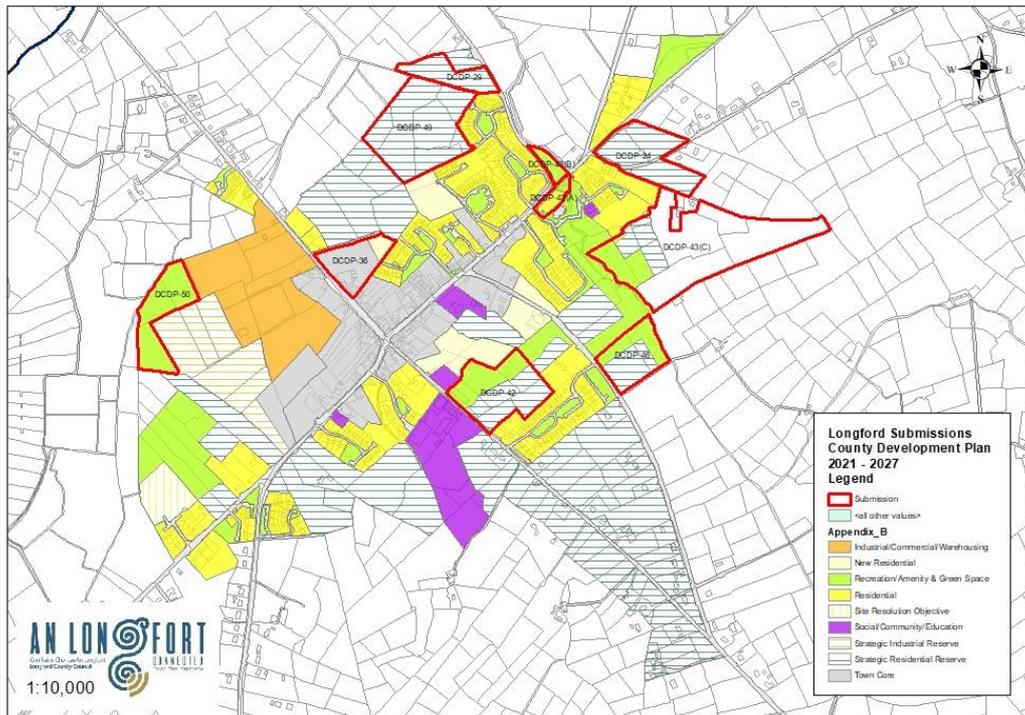
The Council has undertaken a review of the quantum of lands identified in the town. The Council has sought to reduce the number of SRR sites and to consolidate the area of proposed development around the town/village core. The settlement has sufficient lands zoned new residential and will not consider re-zoning the lands and may remove or reduce the area of the lands identified as SRR as consequence.

Chief Executive’s Recommendations

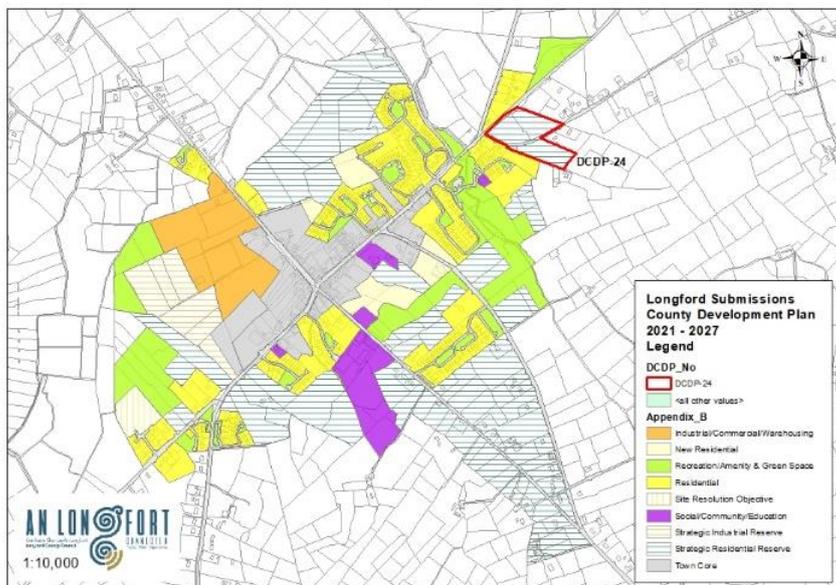
With respect to the above submission, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

10.7 DRUMLISH

Submissions Reference No: DCDP-04, DCDP-24, DCDP-29, DCDP-36, DCDP-42, DCDP-43, DCDP-46, DCDP-49, DCDP-50, DCDP-60.



Submission DCDP-24



Submission DCDP-24 requests a change of land zoning to 'Proposed Residential' from part 'Strategic Residential Reserve' and on the subject land at Derawley, Drumlish in the Draft Longford County Development Plan 2021-2027.

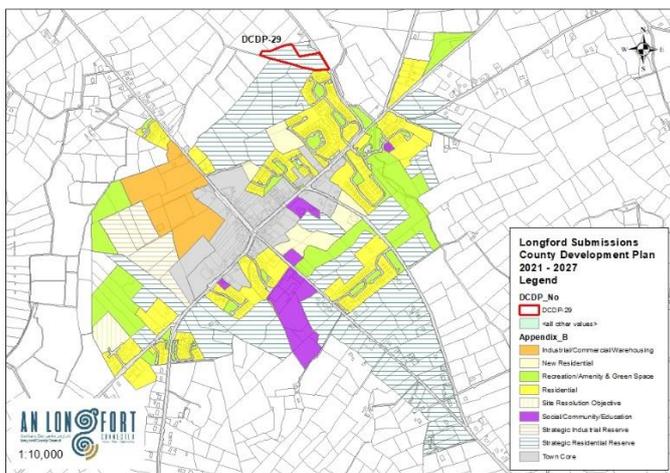
The rationale supporting this submission includes:

1. Improve accessibility via recently completed footpath;
2. Connectivity to existing amenity walkways;
3. Poor agricultural use;
4. Access to adjacent service provision.

Planning History

Planning permission was previously granted on (Planning Ref. No. 07/333) for the construction of 20 no. dwellings on the subject site relating to DCDP-24 but has since expired.

Submission DCDP-29



Submission DCDP-29 requests a change of land zoning to 'New Residential' from 'Strategic Residential Reserve' on the subject land at Drumlish in the Draft Longford County Development Plan 2021-2027.

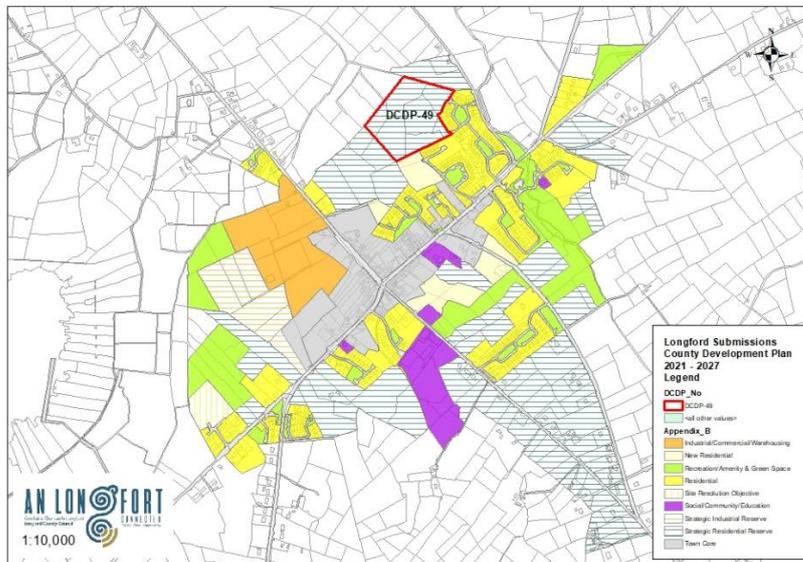
The rationale supporting this submission includes:

1. Proximity to Longford Town;
2. Incorrectly identifying the proposed zoning to residential as constituting infill development;
3. Developing within existing development envelope;
4. Meeting national housing demand;
5. Existing service provision and capacity;
6. Adjacent to existing and established residential estate;

Planning History

There are no recent planning applications relating to the subject lands.

Submission DCDP-49



Submission DCDP-49 requests a change of land zoning to ‘New Residential’ from ‘Strategic Residential Reserve’ on the subject land at Drumlish in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

1. Proximity to Longford Town;
2. Incorrectly identifying the proposed zoning to residential as constituting infill development;
3. Developing within existing development envelope;
4. Meeting national housing demand;
5. Existing service and access provision and capacity;
6. Adjacent to existing and established residential estate.

Planning History

A previously granted planning permission (Ref No. 16/89) traversing the subject lands made provision for wastewater treatment plant and discharge pipe.

Chief Executive’s Combined Response

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford’s Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

It is considered that there are sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements.

These greenfield sites, removed from the established settlement boundary do not provide for brownfield or the sequential development of the town and in this regard, it is not considered that the proposed lands, in this instance, fulfil this objective.

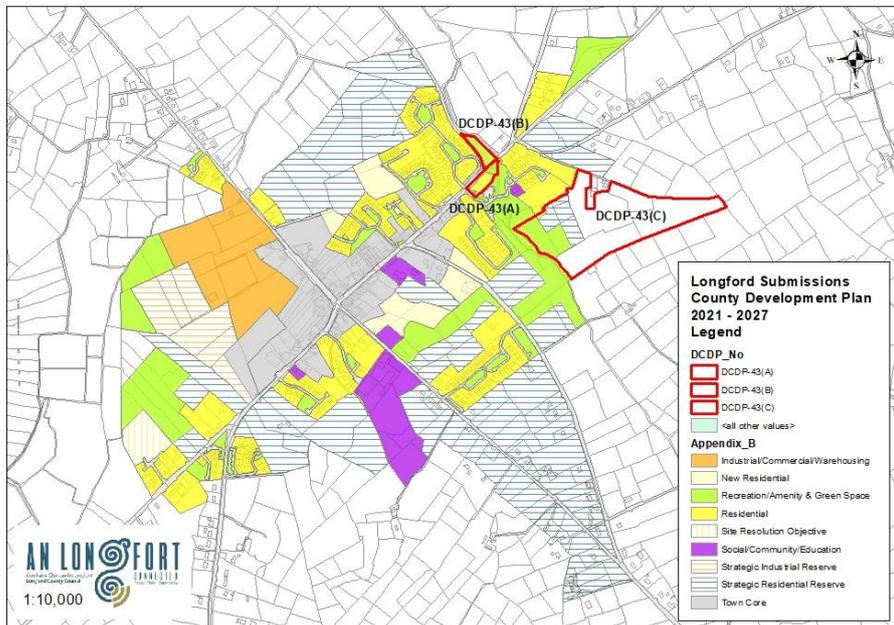
The SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development. Cumulatively, in-combination with all other zoning proposals contained within other submissions, additional potential adverse significant effects would be likely on various environmental components and full SEA (with associated time and resource requirement) would be required on proposed material alterations arising.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time. The addition of these lands would result in a housing and population growth that would be considered unsustainable over the lifetime of this plan and it is therefore recommended that the lands not be zoned for residential purposes as part of the Plan.

Chief Executive's Combined Recommendation

With respect to the above submission DCDP-24, DCDP-29, and DCDP-49, no changes are recommended as a result of these submissions. These sites also need to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-43



Submission DCDP-43 requests a change of land zoning to 'Town Core' including and encompassing lands currently zoned in part to 'Residential', but largely an un-zoned parcel of land with containing a small segment of 'Recreational / Amenity and Green Space' and 'Strategic Residential Reserve' lands at Drumlish in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

1. Development concentration around the original Mill building;
2. Improved access to Mill River amenity;
3. Access to recently completed public footpath;
4. Existing lands hold minimal agricultural value;
5. Access to existing service provision.

Planning History

Multiple planning applications relate to the subject lands including 06/355, 11/181 relating to DCDP-43B (expired), 04/1269 and 08/69 for restaurant / bar relating to DCDP-43A (expired), and 06/354 (expired), and 18/28 relating to DCDP-43C and DCDP-43A inclusive for residential purposes.

Chief Executive's Response

The intention of the submission relating to DCDP-43 is acknowledged.

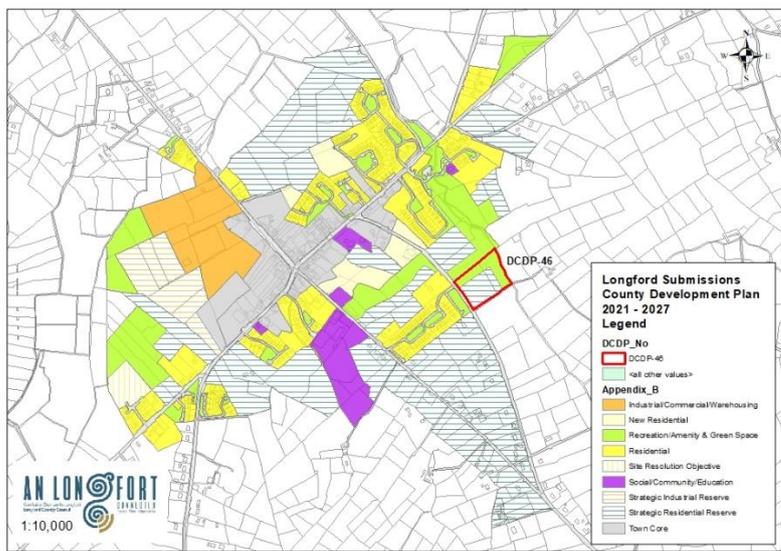
The proposal to re-designate existing, predominantly un-zoned lands to the eastern periphery of Drumlish village, and already divided from the existing and established 'Town Core' by a band of 'Recreational / Amenity & Green Space', is considered

inappropriate and would run counter to the principle of compact growth, and see a disjointed Town Core and increased sprawl into countryside. The largely greenfield site does not provide for brownfield or infill development of the sequential development type and when considering the existing and more alternative suitable sites within the village envelope.

Chief Executive’s Recommendation

With respect to the above submission DCDP-43, no changes are recommended as a result of this submission. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-46



Submission DCDP-46 requests a change of land zoning to ‘Site Resolution Objective’ from part ‘Strategic Residential Reserve’ and part ‘Recreation / Amenity & Green Space’ on the subject land at Drumlish in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

1. Historical planning permission approved;
2. Remediation of existing brownfield lands;
3. Future provision of village walkway;

Planning History

Planning permission was previously granted on site for the retention of a disposal site (Planning Ref. No. 05/364), and a later application granted for the construction of 20 no. dwellings, (Planning Ref. No. 06/692) but withdrawn under An bord Pleanála appeal.

Chief Executive’s Response

The subject site is classified brownfield and desirable for residential, yet its location existing on the periphery of Drumlisk village and divided by a band of 'Recreational / Amenity & Open Space'.

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford's Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

It is considered that there are sufficient lands zoned in this settlement, to cater for the population and housing provision during this Plan period. Furthermore, the amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements.

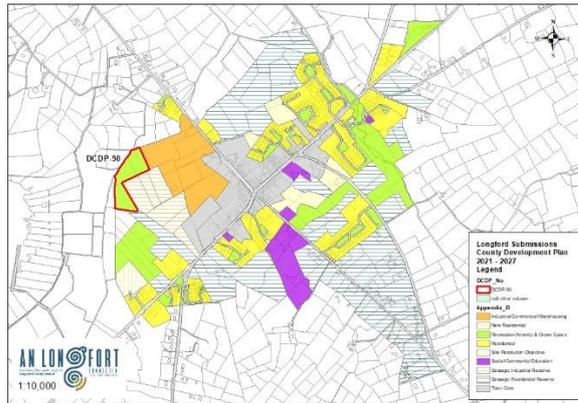
These sites, removed from the established settlement boundary do not provide for the sequential development of the town and in this regard, it is not considered that the proposed lands, in this instance, fulfil this objective. Further, the SEA report considers that zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development. Cumulatively, in combination with all other zoning proposals contained within other submissions, additional potential adverse significant effects would be likely on various environmental components and full SEA (with associated time and resource requirement) would be required on proposed material alterations arising.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time. The addition of these lands would result in a housing and population growth that would be considered unsustainable over the lifetime of this plan and it is therefore recommended that the lands not be zoned for residential purposes as part of the Plan.

Chief Executive's Recommendation

With respect to the above submission DCDP-43, no changes are recommended as a result of this submission. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-50



Submission DCDP-50 requests a change of land zoning to ‘Industrial / Commercial / Warehousing’ from ‘Recreational / Amenity & Green Space’ the subject land at Drumlish in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

1. No access to land for recreational purposes;
2. Historical planning permission for industrial use;

Planning History

Planning permission was previously refused (Planning Ref. No. 05/341) but later granted (07/358 and Extension of Duration 12/214) on part thereof the subject lands, comprising of the construction of an industrial / business park and wastewater treatment plan, but has since expired.

Chief Executive’s Response

The lands subject to this submission are located on the western edge of Drumlish village and are currently inaccessible by road. The current Recreational / Amenity & Open Space offers a lever of protection to the settlement of Drumlish. It is considered that Drumlish benefits from a more than adequate, existing supply of undeveloped industrial land zoning, and notably within the landholding of the submitting applicant.

The NPF and RSES promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. This greenfield site does not provide for brownfield or infill development or the sequential development of Drumlish, considering the existence of alternative suitable sites within the existing village envelope.

The SEA report considers that Zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development.

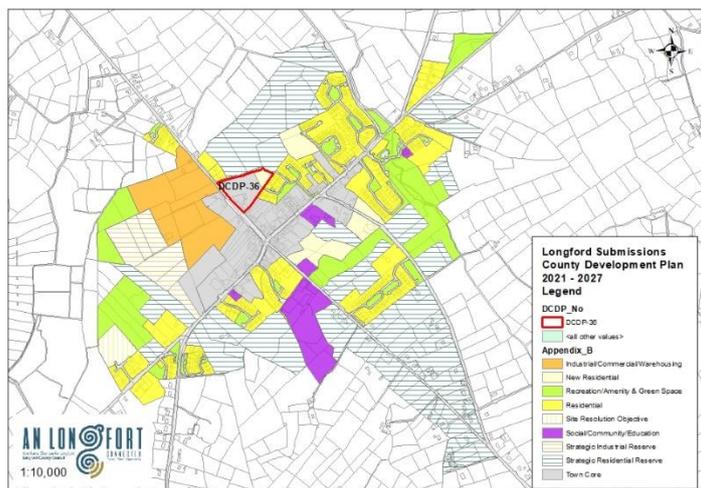
Furthermore, Drumlish within the Draft County Development Plan exists under a tier settlement hierarchy that includes Longford Town, Edgeworthstown, Ballymahon and Lanesborough and which all strategically benefit from national road and/or train station access.

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

Chief Executive’s Recommendation

With respect to the above submission DCDP-50, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-36



Submission DCDP-36 requests a change of land zoning to ‘Industrial / Commercial / Warehousing’ from ‘Town Core’ and part ‘New Residential’ on the subject land at Drumlish in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

1. Long standing commercial (meat processing) use on site.

Planning History

Previous planning application relating to site have included for the demolition of an existing residential building (Planning Ref. No. 02/433) and more recently relating to the demolition of existing single storey building for the provision of a two-storey office/administration building (Planning Ref. No. 19/325).

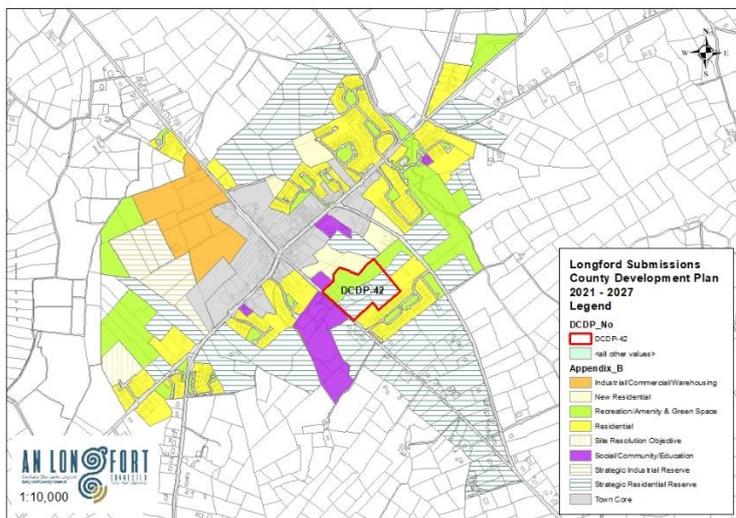
Chief Executive's Response

Appreciating the existing and established nature of industrial/commercial/ warehousing use on site, the available necessary infrastructure, the location of the subject lands; it is considered appropriate for the sustainable development of the settlement that the site be zoned for industrial / commercial / warehousing use.

Chief Executive's Recommendation CE ZO-07

With respect to the above submission DCDP-36, the site be zoned for Industrial/Commercial/Warehousing purposes to reflect its existing use on the site.

Submission DCDP-42



Submission DCDP-42 requests a change of land zoning to 'Residential' from 'Strategic Residential Reserve' and 'Recreation / Amenity & Green Space' equally divided on the subject land at Drumlish in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

1. Proximity to Drumlish National School, Community Centre and local playing pitches;
2. Existing public footpath connectivity;
3. Adjacency to 'New Residential' and 'Residential' zoned lands;
4. Facilitate the provision of a village walkway;
5. Adjoining public service / infrastructure provision.

Planning History

There are no recent planning applications relating to this site.

Submission DCDP-60 requests multiple changes of land zoning to include subject lands mapped at Drumlish in the Draft Longford County Development Plan 2021-2027 as follows:

- No. 1. to 'Social, Community and Education' from 'Residential'
- No. 2. to 'Community Car Park' from 'Recreation / Amenity / Open Space';
- No. 3. to 'Social / Community / Education' from un-zoned lands;
- No. 4. to 'Recreation / Amenity and Green Space' from 'Strategic Residential Reserve';
- No. 9. to remain as 'Strategic Residential Reserve';
- No. 10. to 'Social / Community / Education' from 'Site Resolution Objective';
- No. 11. to 'Industrial / Alternative' from un-zoned lands previously accommodating landfill.

Planning History

- No. 1. & 2. There are no recent planning applications relating to this site;
- No. 3. Previous planning granted for extension to existing cemetery (Planning Ref. No. 12/262);
- No. 4. Previous planning permission granted for retention of disposal site (05/364);
- No. 9. Previous planning permission granted for 20. Dwellings (Planning Ref. No. 07/333);
- No. 10. Previous planning application refused for retail / commercial, creche and 22 no. apartment and 81 houses;
- No. 11. There are no recent planning applications relating to this site.

Submission DCDP-60 makes additional reference to specific requests at Drumlish in the Draft Longford County Development Plan 2021-2027 as follows:

- No. 5. Encourage the reoperation of the 'The Mill';
- No. 6. Extenuation of existing footpath of Old School Road to junction of Hill St.;
- No. 7. Upgrade of existing footpath along Main St. and Mohill Road;
- No. 8. Completion of Bishop O'Higgins Trail connecting Barraghbed to Mohill;
- No. 12. Proposed footpath extension not clearly defined;
- No. 13. Propose improvement works to multiple structures and elements within village envelope.

Sustainable Community – Development of Drumlish Village as 'Energy Sustainable Community'

The rationale supporting each, numbered element of the submission includes:

- No. 1. Accommodating more amenity space for community use;
- No. 2. Improved car park provision;
- No. 3. Future graveyard provision;
- No. 4 & 9. Unconfirmed;

- No. 5 & 8. Community amenity;
- No. 6 & 7. Pedestrian safety;
- No. 10. Provision of Medical Centre;
- No. 11. Future provision of solar panel farm;
- No. 12. Improved connectivity;
- No. 13. Village presentation.

Sustainable Community. To aid the provision and development of sustainable energy, electric vehicle provision, solar laundromats, and LED lighting provision.

Chief Executive's Response

- No. 1. Subject site is currently zoned 'Strategic Residential Reserve'. Zoning provision for any potential St. Mary's National School expansion already exists, and more appropriately to the south east of the proposed;
- No. 2. Proposed use sits on an existing strategically important Recreational / Amenity / Green Space' perimeter to Drumlish and its use further deemed unsuitable due to its location on the opposite roadside;
- No. 3. The proposed land exists some 300m north of the village envelope. The full extent of the graveyard extension granted planning permission 12/262 remains undeveloped and therefore inadequate demonstration of increased need;
- No. 4. Already separated from the village by a band of 'Recreational / Amenity & Green Space', combined with its previous use as a disposal site, considered the subject site to be more suitable for the expansion of the adjacent 'Recreational / Amenity & Green Space'.
- No. 5, 6, 7, 8, 11, 12, 13 are considered overtly development specific to address within the Draft CDP settlement zoning,
- No. 9. Adjacent to existing residential, maintain the current zoning 'Strategic Residential Reserve' zoning is considered appropriate;
- No. 10. Lying adjacent to the existing 'Town Core', the opportunity to convert the existing parcel of land from 'Site Resolution Objective' to 'Town Core' is considered more appropriate than specific 'Social / Community / Education' use.

Sustainable Community

The Draft CDP follows the overachieving principles set out within the National Planning Framework, including UN Sustainable Development Goals, those contained within Chapter 9 relating to 'Realising Our Sustainable Future' and rooted in the National Strategic Outcomes (NSO) of 'Compact Growth', 'Sustainable Mobility' and 'Transition to a Low Carbon and Climate Resilient Society'. Therefore, it is considered that no restriction current existing within the Draft CDP that would prevent Drumlish championing the delivery of a sustainable community – to include the installation of specific elements identified.

Chief Executive’s Recommendation

With respect to the above submission DCDP-60:

No. 1, No. 2, No. 3, no changes are recommended.

CE ZO-08

No. 4. Modify the ‘Strategic Residential Reserve’ along the Old School Road to un-zoned land;

No. 4, No. 5, No. 6, No. 7, No. 8, No. 9, No. 10 no changes are recommended.

No. 10, 11, 12, 13 and Sustainable Communities, no changes are recommended.

These sites also need to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report – see Part 1.

Submission DCDP-04

DCDP-04 has not identified the proposed zoning sought on two separate sites both currently identified as un-zoned lands at Corraubaun, Drumlish and at Ennybeg, Killoe in the Draft Longford County Development Plan 2021-2027.

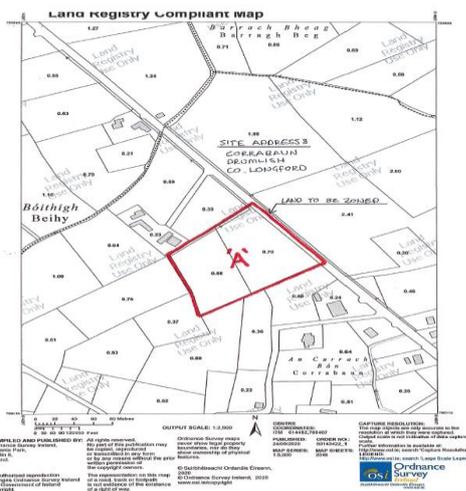


Fig. 10.1. Subject Site DCDP-04 at Corraubaun, Drumlish Outlined in Red Above

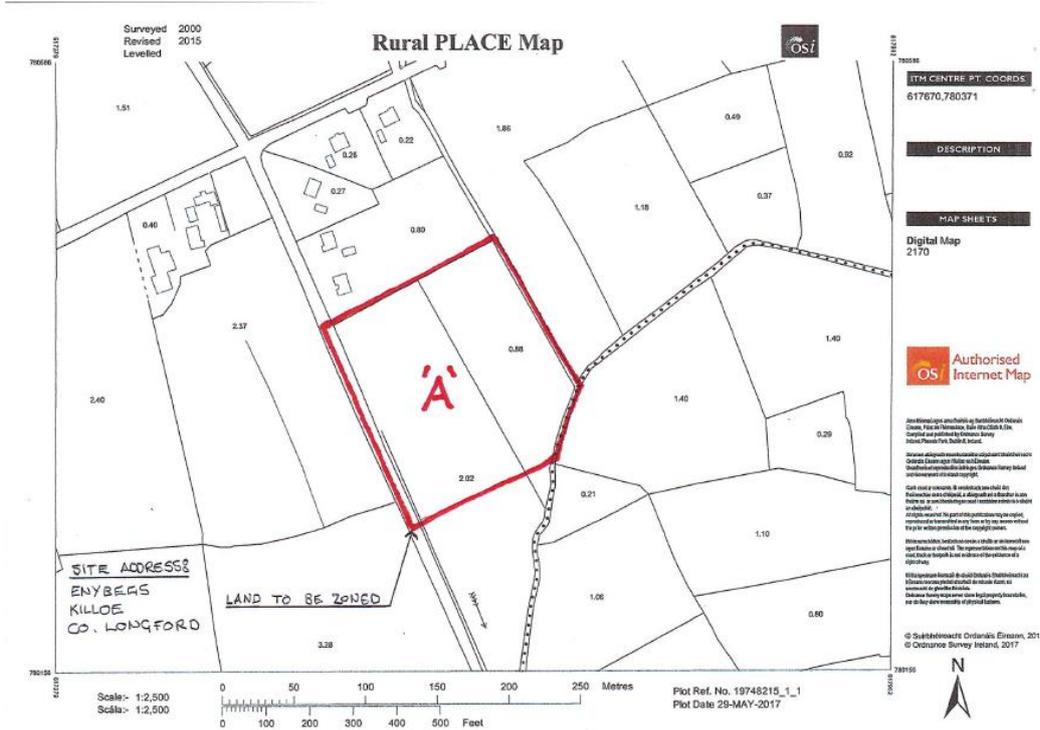


Fig. 10.2 Subject Site DCDP-04 at Ennybegs, Killoe Outlined in Red Above

The rationale supporting this submission includes:

1. None expressed

Planning History

There are no recent planning applications relating to the subject lands.

Chief Executive’s Response

The subject site relating to Corraubaun, Drumlish existing some 450m outside of the Drumlish development envelope.

The subject site relation to Ennybegs, Killoe exists outside of the Ennybegs Development Envelope and within the current National Route Corridor: N4 Longford to Mullingar Study Area.

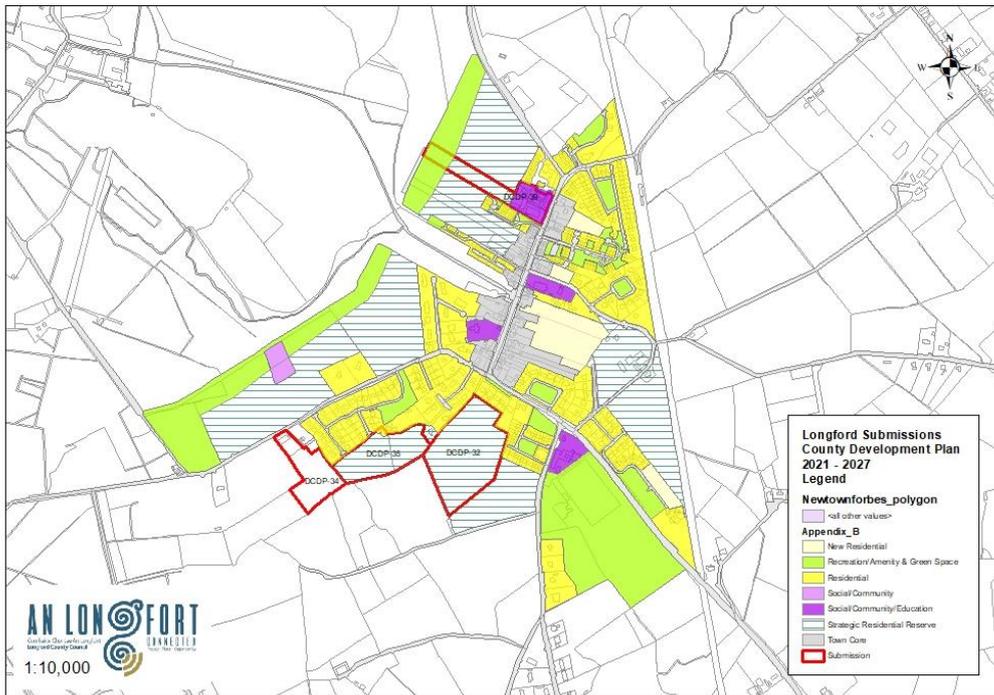
Neither sites are considered appropriate for any form of development zoning.

Chief Executive’s Recommendation

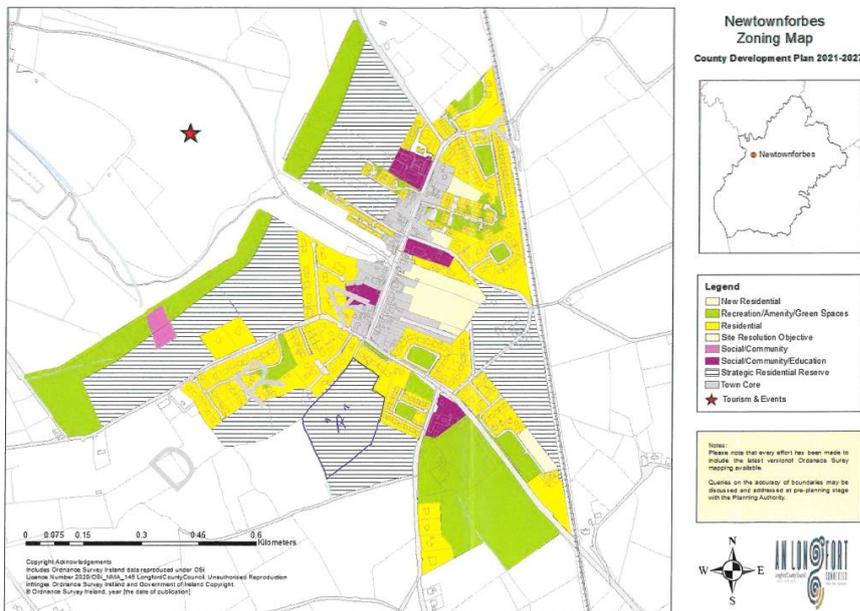
With respect to the above submission, no changes are recommended.

10.8 Newtownforbes

Submissions Reference No: DCDP-32, DCDP-34, DCDP-35, and DCDP-39.



Submission DCDP-32



Submission DCDP-32 requests a change of land zoning to 'New Residential' from 'Strategic Residential Reserve' at Newtownforbes in the Draft Longford County Development Plan 2021-2027.

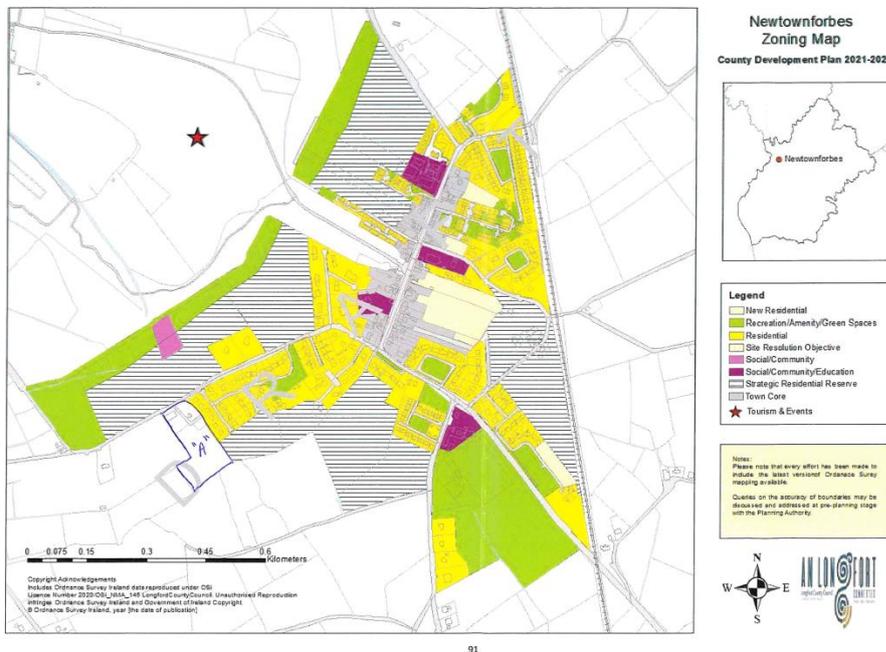
The rationale supporting this submission includes:

1. NPO 3a intention to concentrate a sizable portion of development in existing settlements, *“delivering 40% of all new home nationally, within the built-up footprint of existing settlements”*;
2. Opportunity to generate more jobs and activity within existing village;
3. Incorrectly identifying the subject site as desirable, ‘Infill’ development;
4. Meeting local housing demand.

Planning History

There are no recent planning applications relating to this site.

Submission DCDP-34



Submission DCDP-34 requests a change of land zoning to ‘Strategic Residential Reserve’ from un-zoned lands at the subject land at Newtownforbes in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

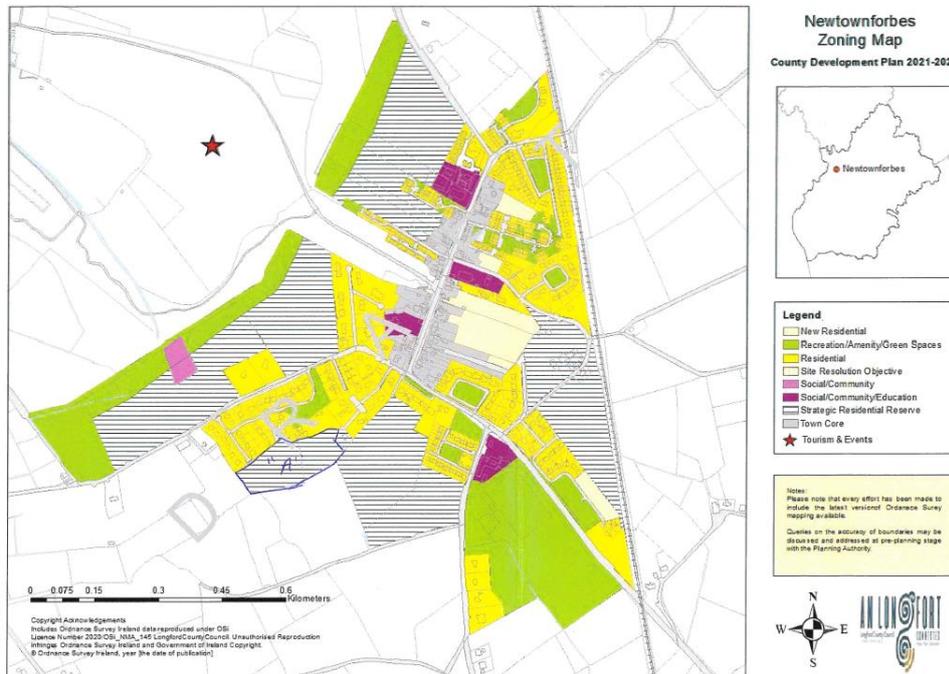
1. Facilitate surface water and vehicular traffic arrangement to ‘Strategic Residential Reserve’ zoned lands opposite.

Planning History

There are no recent planning applications relating to this site.

Submission DCDP-35

Submission DCDP-35 requests a change of land zoning to 'Residential' from 'Strategic Residential Reserve' at the subject land at Newtownforbes in the Draft Longford County Development Plan 2021-2027.



The rationale supporting this submission includes:

1. NPO 3a intention to concentrate a sizable portion of development in existing settlements, *“delivering 40% of all new home nationally, within the built-up footprint of existing settlements”*;
2. Opportunity to generate more jobs and activity within existing village;
3. Incorrectly identifying the subject site as desirable, ‘Infill’ development;
4. Meeting local housing demand.

Planning History

- Outline planning permission refused for 5 no. dwellings (Planning Ref/ No. 00/334).
- Planning permission was granted for 2 no stable blocks and 2 no. exercise paddocks (Planning Ref No. 00/587);
- Planning permission was refused for 3 no. dwellings (00/807)
- Outline planning permission granted for 1 no dwelling (Planning Ref No. 01/219);
- Outline planning permission refused for 6 no dwellings (Planning Ref No. 02/11);
- Outline planning permission refused for 1 no. dwelling (Planning Ref. No. 03/157).

Chief Executive's Combined Response

It is considered that Newtownforbes benefits from a more than adequate, existing supply of undeveloped residential land zoning, and notably within the landholding of the submitting applicant.

The NPF and RSES promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. This greenfield site does not provide for brownfield or infill development or the sequential development of Newtownforbes, considering the existence of alternative suitable sites within the existing village envelope.

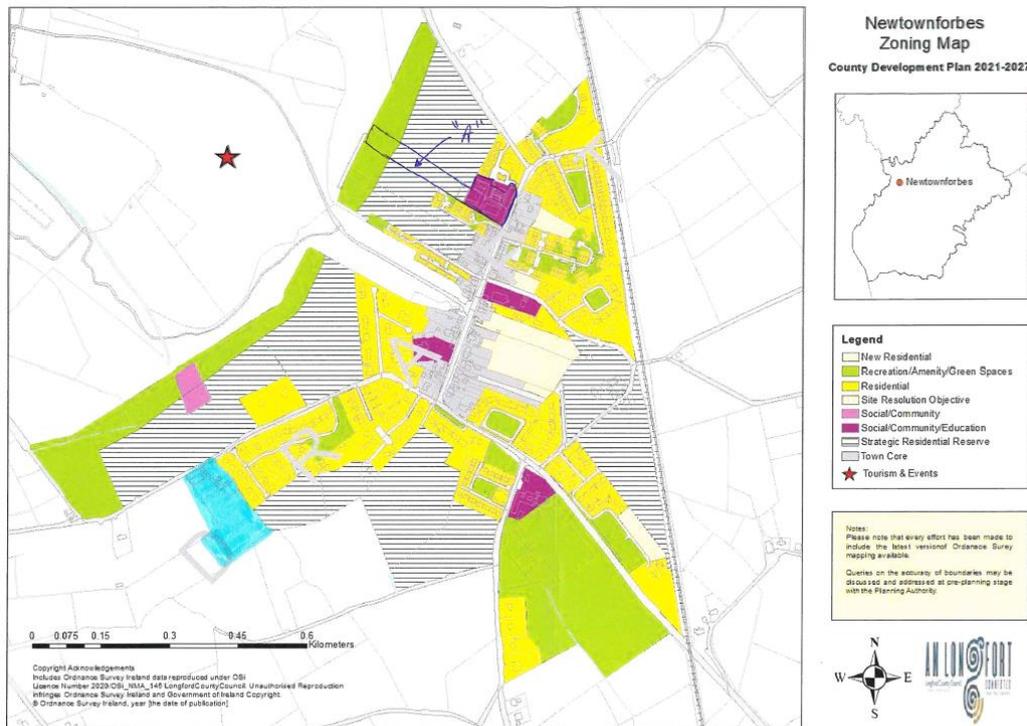
The SEA report considers that Zoning lands in response to this submission would be premature and would not wholly align with objectives relating to sustainable development.

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

Chief Executive's Combined Recommendation

With respect to submission DCDP-32, DCDP-34 and DCDP-35, no changes are recommended as a result of this submission. These sites also need to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

Submission DCDP-39



Submission DCDP-39 has not identified the proposed zoning sought at Newtownforbes in the Draft Longford County Development Plan 2021-2027.

The rationale supporting this submission includes:

1. NPO 3a intention to concentrate a sizable portion of development in existing settlements, *“delivering 40% of all new home nationally, within the built-up footprint of existing settlements”*;
2. Opportunity to generate more jobs and activity within existing village;
3. Incorrectly identifying the subject site as desirable, ‘Infill’ development;
4. Meeting local housing demand.

Planning History

Planning permission refused for demolition of exiting building and construction of mixed-use development (Planning Ref. No. 05/481);

Chief Executive’s Response

Subject lands include Recreation/Amenity/Green Space, Strategic Residential Reserve, and Social/Community/Education, with the majority falling with the zone of notification (Zone ID R163401) relating to the historical town of Newtown Forbes (Entity No. LF02058).

The prominent location of the subject sites and adjoining Main Street is considered more appropriate and relevant to its current use, and for the future and sustainable development within the village core to encourage improved amenity, reduced traffic hazard, etc. The Council will favour and promote the development of such sites for residential, community, and, if deemed appropriate, mixed use purposes or a combination thereof.

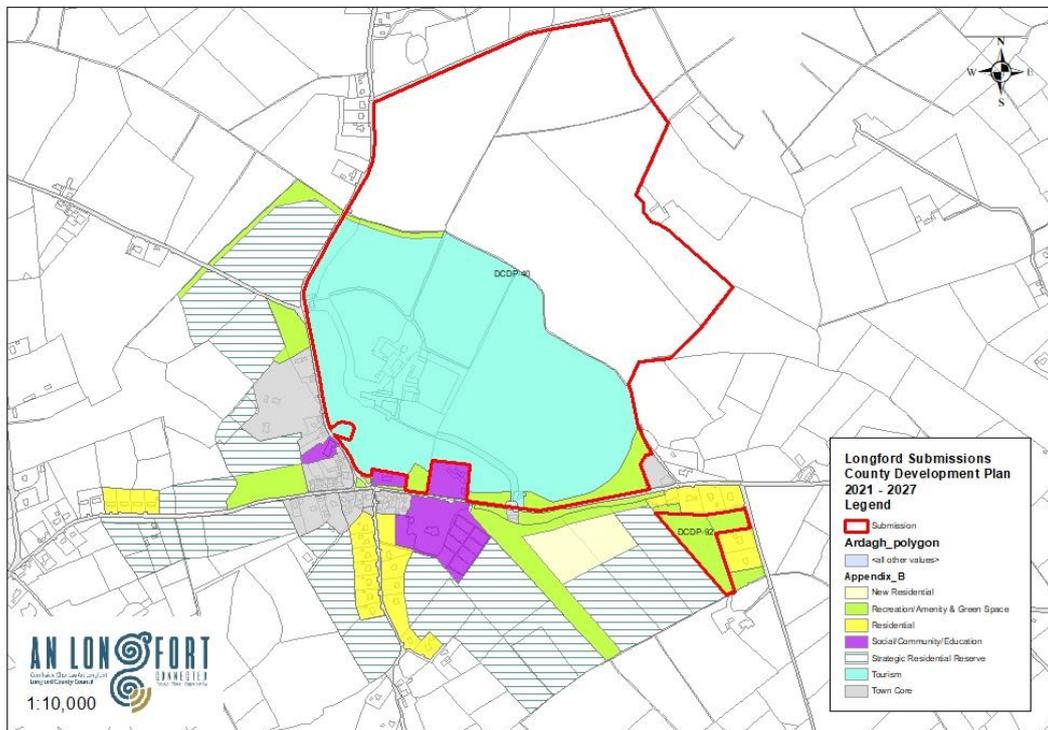
The promotion of development on such sites is encouraged to achieve effective density, consolidation and compact growth and to target the reversal of rural decline in the core of small towns which are stated objectives of the NPF. It is considered that the subject site offers the potential for the delivery of a mixed-use scheme to strengthen the commercial base of the town, together with the provision of residential development, taking advantage of the site's prime location in the town centre with potential pedestrian and vehicular connections to the Main Street, and opportunity to unlock backland development.

Chief Executive's Combined Recommendation

With respect to the above submission, no changes are recommended as a result of this submission. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

10.9 ARDAGH

Submission Reference No: DCDP-40, DCDP-92



Submission DCDP-40

DCDP-40 requests a change of land zoning from “Tourism” and the identification of two gate houses and the main dwelling house Ardagh House should be zoned as “Residential”. The submission further requests that the definition of Tourism lands should be extended in order to include agricultural lands.

The rationale supporting this submission includes:

1. The two gate houses are currently in residential use.
2. The owners of the occupied gate house propose to renovate the Ardagh House as a residential dwelling.
3. The definition of the land zoning should be changed in order to include Agricultural use, the landowners farm the lands and use the outbuildings for agricultural purposes. The landowners are proposing to construct a milking parlour on the site.

Chief Executive’s Response

The zoning of the lands as “Tourism” within the Ardagh settlement is intended to protect the amenity value of the subject lands and the protected structures including the architecturally important structures located on-site including the main house and the gate houses as identified in the submission.

The proposed zoning of Tourism lands seeks to extend the accessibility to the subject lands and providing opportunities to consider the renovation and protection of the subject lands and buildings.

The use of the lands for agricultural purposes would be considered a complementary and appropriate use for the lands. Any proposed development and extension of the agricultural activities as suggested would need to be considered on its merits and in respect of the land holding and ownership of the prospective applicant.

The zoning of the subject lands for Tourism uses was a legacy from the previous County Development and was proposed to seek the alternative use of the Ardagh House. The Council consider that the proposed zoning of the lands Tourism to not be required and the lands re-zoned to Agricultural use, given the existing use of the lands.

However, the existing Ardagh House and the two gate houses be zoned existing residential in order to reflect their existing use.

Chief Executive's Recommendations

CE ZO-09

Remove the "Tourism Use" zoned lands in Ardagh and de-zone the identified lands to Agricultural use to reflect the existing use of the lands.

To zone Ardagh House and the two gate houses as existing residential use.

To zone lands to the south of the Ardagh House as recreation/amenity in order to protect the view of the House from the centre of the village.

Submission DCDP-92

DCDP-92 requests the re-zoning of lands zoned Recreation/Amenity/Open Space to New Residential lands. The subject lands have a stated area of 1.82 hectares and are located to the east of the settlement envelope.

The rationale supporting this submission includes:

1. To allow for the suitable expansion of the settlement envelope with phased development.
2. The allocation of lands would help to reduce the pressure of 'One-off dwellings' in the surrounding Ardagh area.
3. The only other zoned residential lands in the settlement envelope are on farmlands considered to not being available during the lifetime of the plan.
4. New residential in the location could provide for small scale serviced residential with mains sewerage and water supply and be integrated into the local area.
5. The existing settlement envelope has no vacant residential units and needs a phased progression to develop units to meet local needs.
6. The use of the lands as Recreation/Amenity/Green Space is disconnected from the village settlement.

Chief Executive's Response

Ardagh is defined as a 'Serviced Rural Settlement' in the Draft Plan. Such serviced rural villages have a limited level of services. It is considered that there are sufficient lands zoned in Ardagh to cater for the population and housing provision during this Plan period.

The amount of lands zoned for residential development as part of the Draft Plan is underpinned by the Longford Core Strategy and accompanying Housing Strategy. The Core Strategy and Housing Strategy are evidence based, using robust and verified methodologies, that define the housing and population requirements for County Longford for the Plan period, whilst maintaining consistency with National and Regional Policy (namely NPF and RSES). Based on these housing and population requirements, the Draft Plan provides an evidence-based rationale for the extent of lands zoned for residential purposes.

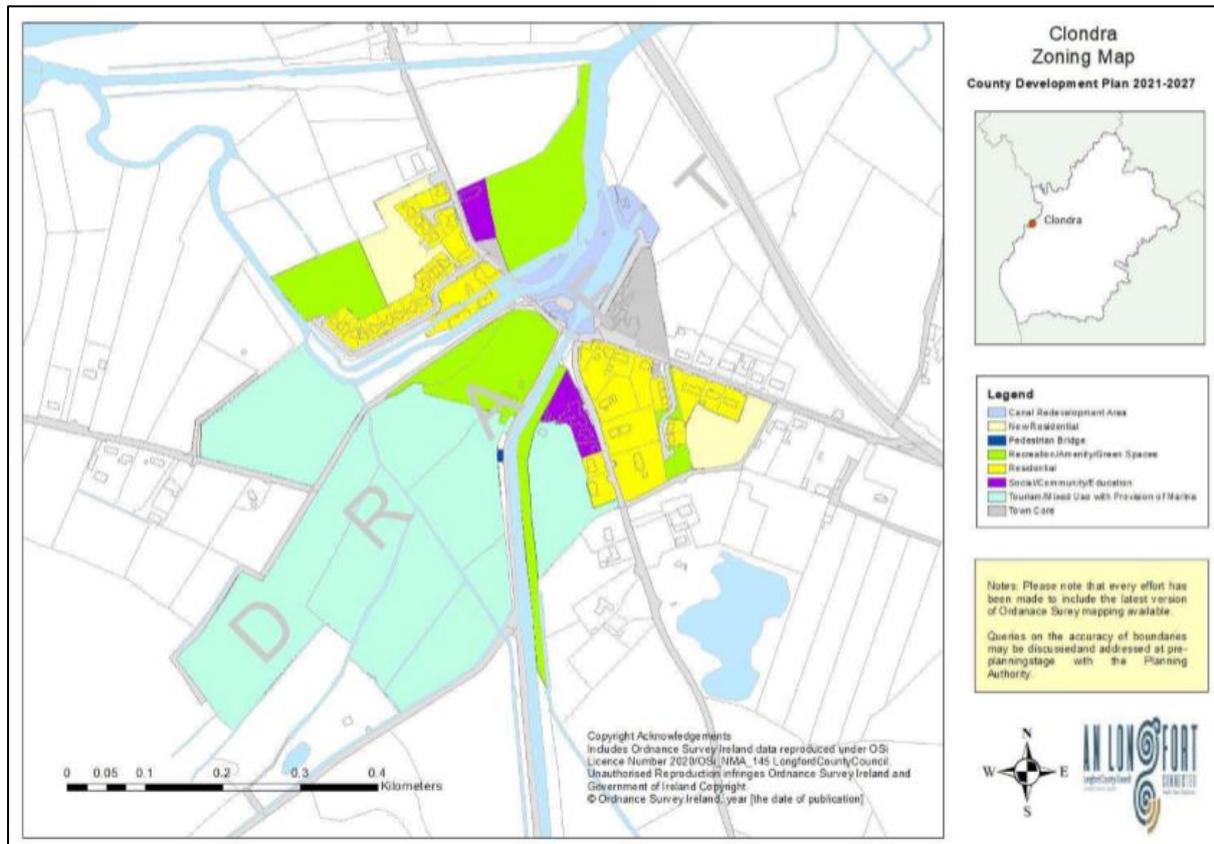
Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time. The addition of these lands would result in a housing and population growth that would be considered unsustainable over the lifetime of this plan and it is therefore recommended that the lands not be zoned for residential purposes as part of the Plan.

Chief Executive's Recommendations

With respect to the above submission, no changes are recommended. The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

10.10 CLONDRA

Submission Reference No: DCDP-12



DCDP-12

Submission DCDP-12 requests that the current land use zoning Tourism/Mixed Use with provision of Marina be removed.

The rationale supporting this submission includes:

1. There is already a marina a mile away in Tarmonbarry and therefore no/limited need.
2. The marina at Tarmonbarry has access to the Shannon which is more appealing, with plenty of berths, amenities and housing.
3. Clondra is a small traditional village, it has an existing harbour and canal which should be the focus of any future tourist development.
4. The zoned lands in Clondra flood and have poor road access.

Chief Executive's Response

The intention of the submission is acknowledged.

The concerns about the flooding issues are noted and the restricted access to the subject lands are duly noted. The Council in addition note and are aware of the comments from the OPR in respect of the identified over zoning of lands within Clondra and other settlements.

As a consequence it is considered appropriate to consider the de-zoning of the lands “Tourism/Mixed Use with provision of Marina” to additional areas of Recreation/ Amenity/Green Spaces and the remaining balance of the subject lands to the south-west of Clondra and liable to flooding to be de-zoned and left as agricultural lands.

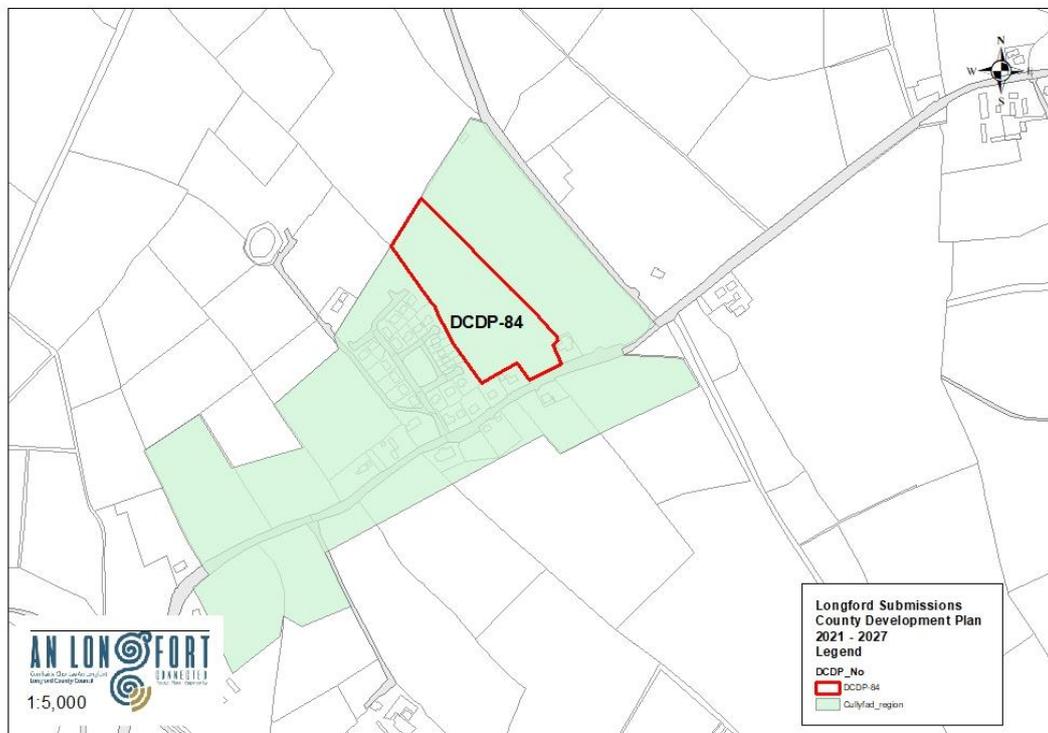
Chief Executive’s Recommendations

CE ZO-10

Remove the “Tourism/Mixed Use with provision Marina” zoned lands in Clondra and de-zone the identified lands to Agricultural use.

10.11 CULLYFAD

Submission Reference No: DCDP-84, DCDP-85



Submissions DCDP-84 and DCDP-85 refers to the proposed identification and use of lands for sporting and recreational use and request the potential zonings of land for recreational and amenity purposes.

Chief Executive's Response

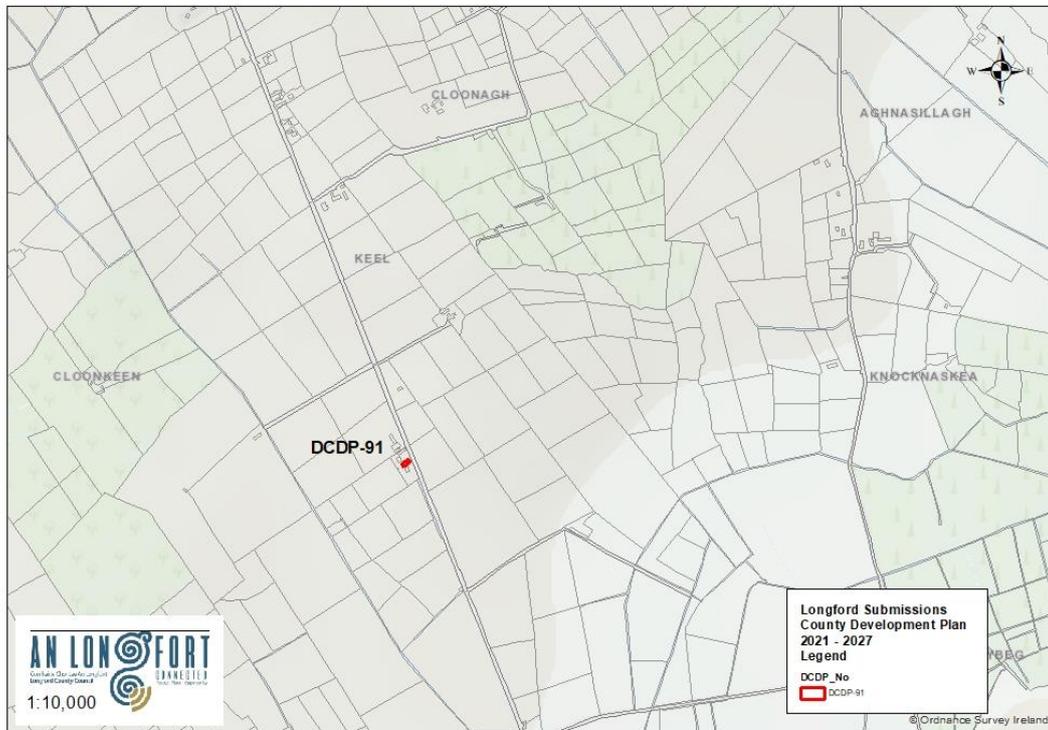
The identification and allocation of community facilities such as recreational/amenity uses is supported within the defined Development Envelope. The development envelope maps for the smaller settlements are not intended to identify and detail all of the zoning areas due to their small scale and nature.

Chief Executive's Recommendations

With respect to the above submission, the proposed use for recreational and amenity is acknowledged, and no changes are recommended.

10.12 KEEL

Submission Reference No: DCDP-91



Submission DCDP-91

Submission DCDP-91 requests that Keel House (ref 13401918) be removed from the list of Protected Structures in order to allow for the safe removal and redevelopment of the building using the reclaimed old stone and materials. Subject site has a stated size of 3.65 hectares. The subject site and lands contain the subject house and out house structures and an adjoining neighbouring more modern single storey bungalow. Keel House is included on the NIAH and has a Ref No. 13401918 – Architectural Historical Social, Keel National School. The NIAH report states that the date of the building is approximately c1830 and was the former School Master’s House. Detached five bay two-storey former house.

The rationale supporting this submission includes:

1. The unstable condition of the building and proximity to family home
2. Protected Structure report relates to the use rather than to the character of the building and distinguishing architectural features
3. Replacement building with suitable re-use of material and marking of the site would be a more suitable long term plan to retain the heritage.

Chief Executive's Response

The Council is legally required and is committed to the identification and the protection of Protected Structures and the recording of these onto the Record of Protected Structures.

The RPS is a live register and amendments including additions and deletions from it can be made as a result of the review of the County Development Plan under Section 12, and outside of said process under Section 55 of the Planning and Development Act (as amended). In the preparation of the Draft County Development Plan the aforementioned register and Record of Protected Structures were reviewed and the list of properties agreed. It is acknowledged that the County has a modest amount of protected structures and that the Council is therefore committed to the protection and retention of all heritage assets within the County.

In respect of the identified structure the Council has reviewed the list of structures and it is identified and acknowledged that the subject structure is not included on the Council's register of the RPS.

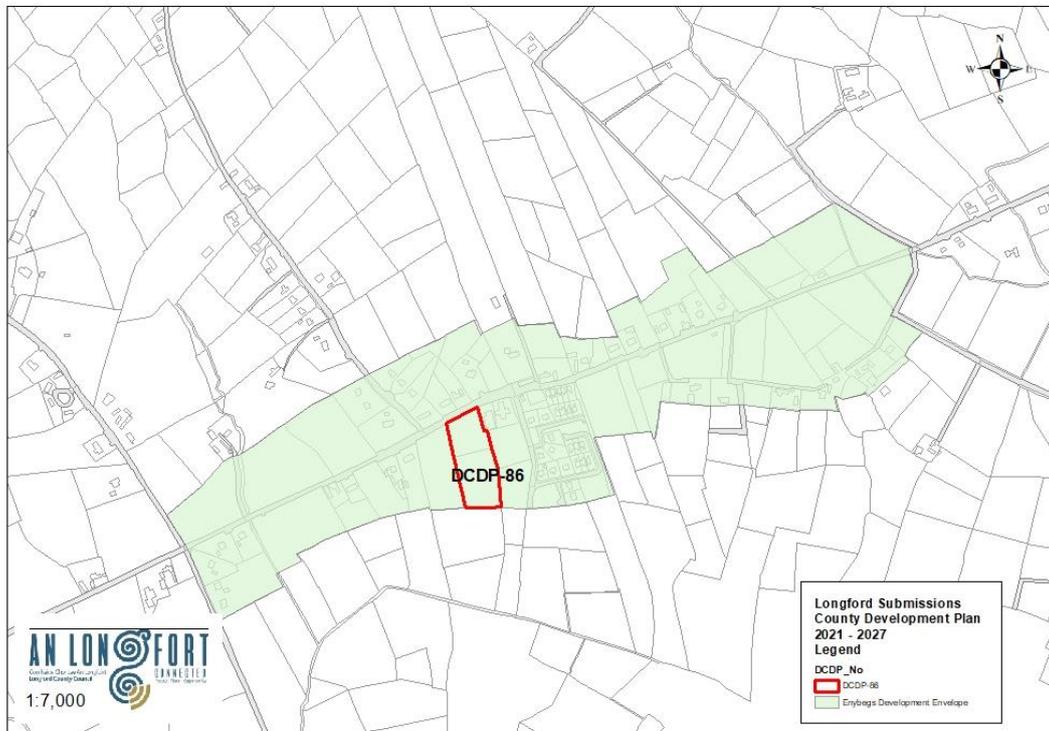
It is noted that the structure is included on the National Inventory of Architectural Heritage (NIAH) which has a detailed architectural record of buildings and structures of interest for the whole of the State. It is this national list which informs the Council's RPS local list.

Chief Executive's Recommendations

With respect to the above submission, no changes are recommended.

10.13 KILLOE

Submission Reference No: DCDP-86



Submission DCDP-86 refers to the zoning of lands for recreational use and the provision of an area of off-street parking.

Chief Executive’s Response

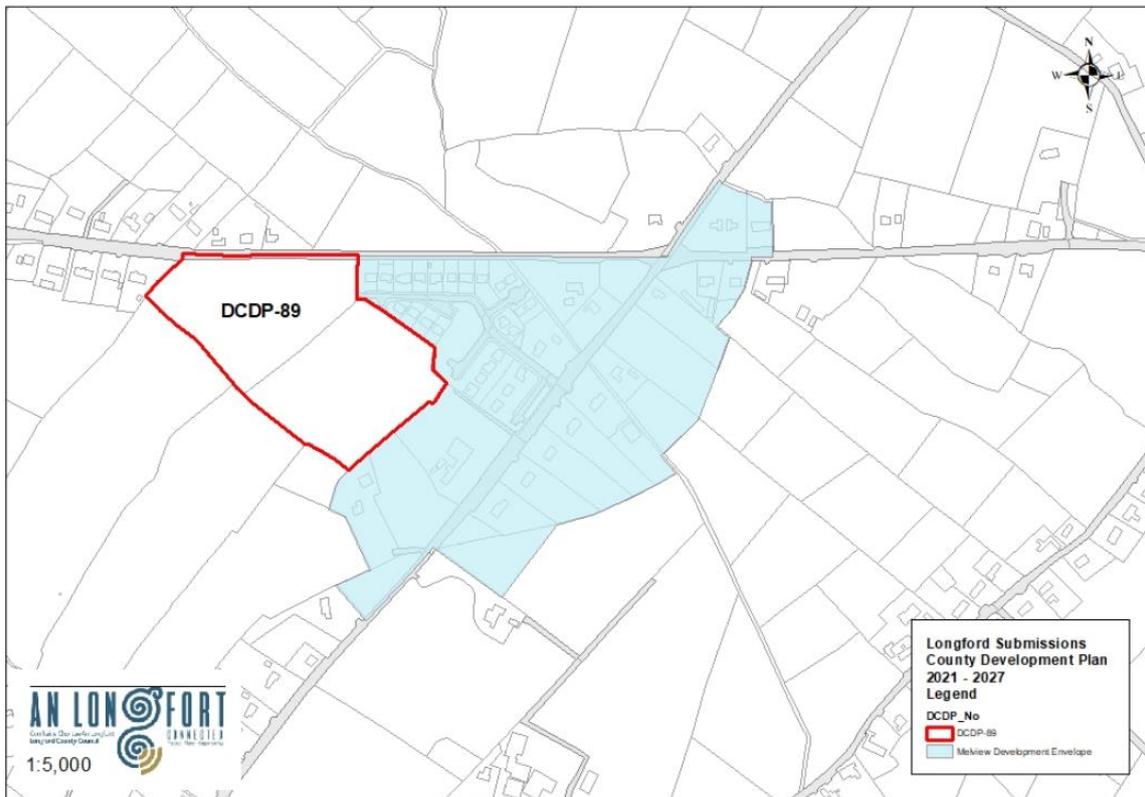
The identification and allocation of community facilities such as recreational uses is supported within the defined Development Envelope. The development envelope maps for the smaller settlements are not intended to identify and detail all of the zoning areas due to their small scale and nature.

Chief Executive’s Recommendations

With respect to the above submission, no changes are recommended.

10.14 MELVIEW

Submission Reference No: DCDP-89



Submission DCDP-89 requests that lands to the west of defined settlement envelope be zoned 'New Residential'. The subject lands have a stated site area of 4.55 Hectares and the current zoning in the County Development Plan 2015-2021 has no zoning applied to the lands. The subject lands are located to the west of the existing Melview Close a development of 26 no. large residential units, along the local road L-1011. The subject site is approximately 1.8km to the north of Longford and 2.9km to the east of Newtownforbes.

The proposal suggests the re-zoning of the lands highlighted to allow suitable expansion of the area with phased development and to provide lands for small scale New Residential where lands are available for development in the area for locals to reduce the pressure of 'one-off dwellings' in the countryside.

Chief Executive's Response

The subject site is located outside (to the west) of the defined Rural Settlement Boundary of Melview and the lands in agricultural use. Melview is defined as a rural settlement cluster and the areas contained within each identified village envelope zoned for '*small scale residential reflective of the existing character of the settlement*

and limited local level services such as post offices, neighbourhood shops, schools etc. The draft plan further states that residential development in these areas will be only permitted at a small scale, reflective of the character of the existing settlements. Small-scale residential development which will alleviate the pressures for one-off housing in the open countryside will be permitted in these areas. These areas will cater for local need, in a similar manner to current one-off housing policy (and in accordance with the provisions of the Sustainable Rural Housing Guidelines).

It is considered that there are sufficient lands zoned residential in this settlement, to cater for the population and housing provision during this Plan period. The amount and location of zoned lands required was also guided by the NPF and RSES requirements to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of defined settlements.

Having regard to the above, it is considered that there is no evidence-based need or planning rationale for the proposed additional residential zoning to be included as part of the Plan at this time and the extension of the settlement boundary to include and encompass the agricultural lands is not appropriate.

Chief Executive's Recommendations

No change recommended.