

Environmental Health Service
Health Service Executive,
Dublin Mid Leinster,
Health Centre,
Dublin Road,
Longford
Phone 043 3350182 Fax 043 3346500

21st November 2019

Planning Section, Longford County Council, Aras an Chontae, Great Water Street, Longford.

Re: Notice of Review of existing Longford County Development Plan 2015-2021 and Preparation of new Longford County Development Plan 2021-2027

Dear Sir / Madam,

Please find enclosed the HSE submission report in respect of the above County Development Plan Review notification.

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Marie Matthews, Principal Environmental Health Officer, Unit 7A Lough Sheever Corporate Park, Robinstown, Mullingar, County Westmeath.

Principal Environmental Health Oncer





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Preparation of New Longford County Development Plan 2021-2027: Pre-Draft Stage

The Environmental Health Service is making this submission under the remit of Healthy Ireland and relevant health supporting strategies. Healthy Ireland is a framework for improved health and wellbeing. Its vision statement is 'A Healthy Ireland, where everyone can enjoy physical and mental health and wellbeing to their full potential, where wellbeing is valued and supported at every level of society and is everyone's responsibility'.

We have reviewed the key health strategies in the Healthy Ireland Framework and make recommendations to Longford County Council and to take this opportunity to incorporate the relevant health actions into the strategic planning of the spatial and built environment of the county. The overall aim of the submission being to improve the health and wellbeing of the population of Longford.

Development Plans: Guidelines for Planning Authorities, June 2007 http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Planning/FileDownLoad%2C14468%2Cen.pdf

Government guidelines issued to planning authorities state that Development Plans should:

- a) be a catalyst for positive change and progress,
- b) anticipate future needs on an objective basis,
- c) have a role in protecting the environment,
- d) create a framework within which sustainable development can be achieved,
- e) be consistent between plans and strategies at national, regional and local level,
- f) address diverse community needs.

Development plans provide a clear opportunity to incorporate health and its wider determinates into the planning process. Longford County Council should consider ways in which strategic planning can protect population health and how the built environment can be explored for opportunities that can maximise health gain.

County Longford Health Status

The creation of County Health Profiles is one of the key actions from the Healthy Ireland strategy which is our national framework for action to improve the health and wellbeing of the people of Ireland. Understanding health needs at a local level enables local action and creates an environment where every individual and sector of society can play their part in achieving a healthy Ireland.

County profiles help identify health priorities in areas and highlight health inequalities which may exist.

County Longford Health Profiles can be accessed at: http://hdl.handle.net/10147/584039

Key Facts for Longford:

- Is the 4th most deprived local authority area nationally, with 88% of its population either below average affluence or disadvantaged.
- County Longford has a high percentage of those with no formal or primary education of 19.3% (national average 15.2%), unemployment of 24.7% (national 19.0%), households which are local authority rented of 13.6% (national average 7.8%).
- The Traveller population of 1.9% is above the national rate of 0.7%
- The birth rate to females under 20 years of age of 17.1 % is above the national average of 12.3%.
- Cancer incidence is either average or below average for all cancers and the main causes of cancer except for male prostate cancer which is above the national average.
- Mortality rates for all deaths and the main causes of death are average or below the national average except for respiratory deaths which was the highest nationally in 2012.

The statics also show that Longford has a birth rate higher than the national average whilst lone parent households are also higher than the national average. It is essential that services and facilities that cater for the needs of younger members of the population are developed in the Longford area. Action must also be taken to ensure the current high depravation rates experienced in the county are reduced.

Get Ireland Active - National Physical Activity Plan for Ireland

http://health.gov.ie/wp-content/uploads/2016/01/Get-Ireland-Active-the-National-Physical-Activity-Plan.pdf

A key aim of the National Physical Activity Plan for Ireland is compiling a directory of publicly accessible sports/recreational and amenities facilities. The Strategic Development Plan should include a strategy for meeting this aim for County

Longford. All new facilities should be added to this directory and an audit should be carried out to ensure that all existing sites/facilities are entered.

A strategic aim for County Longford should be to increase the active school flag programme to at least another 20 schools in the county.

A strategic aim for Longford County Council should be to develop and establish processes that enable consultation with children and young people in the development and implementation of programmes in which they are involved, i.e. playgrounds, activity centres and public spaces. This is particularly important given the age profile of the County. Suitable facilities that cater for all age ranges, including teenagers, should be provided.

A strategic aim for development in Longford should be that all plans and development for Nursing Homes or Residential Care Facilities should include proposals for gardens and recreational activities. Physical activity should be integrated into long term care planning and practice.

Strategic development of Longford County should include:

- a) Opportunities for physical activity in the development of the built environment
- b) All development should promote cycling and walking. A network of cycle routes and footpaths should be planned and developed which aim to promote connectivity of housing/employment to town centres, park and recreational amenities
- c) Develop local and regional parks and recreational spaces that encourage physical activity.
- d) Prioritise the planning and development of walking and cycling and general recreational/physical activity infrastructure.
- e) Explore opportunities to maximise physical activity and recreation amenities in the natural environment.
- f) A framework for workplace health and wellbeing, including physical activity should be developed. Any possible health gain for employees should be explored and developed.
- g) The smarter travel workplaces initiative should be promoted. Sustainable or active modes of travel should be facilitated.
- h) Ensure planning makes provision for recreational facilities for staff in industrial estates and ensures connectivity of work to park and recreational activities.
- i) Support and develop 20 new walking groups in the County through funding of signage, upgrade of paths and lighting and resolving safety issues.
- j) Developing a standardised framework for publicly funded programmes designed to increase physical activity levels. Use public money to leverage

private funding to promote and develop physical activity and sport programmes.

Tobacco Free Ireland

http://static.rasset.ie/documents/news/tobacco-free-ireland.pdf

Longford County Council should take cognisance of the high mortality rates from respiratory illness identified in the Longford Health Statics and should take action to assist in decreasing smoking rates among the population of the county. A strategic aim of the Longford County Development Plan should be to:

- a) Implement the tobacco free playgrounds initiative.
- b) Promote tobacco free environments, parks, street environments, beaches, and public campuses and grounds

With regard to the protection of people from second hand tobacco smoke, all plans for development that include a designated smoking area should be forwarded to the Environmental Health Service prior to the planning decision.

Healthy Ireland - A Healthy Weight For Ireland

http://health.gov.ie/wp-content/uploads/2016/09/A-Healthy-Weight-for-Ireland-Obesity-Policy-and-Action-Plan-2016-2025.pdf

The Strategic Plan for Longford should include development of guidelines and support materials to reduce the obesogenic environment. Longford County Council should create environments that make the healthy choice the easy choice:

- a) Support community based initiatives that develop programmes which support healthy lifestyles and prevention of obesity in children and adults.
- b) Promote through planning and the built environment the benefits of healthy eating, physical activity and non-sedentary behaviour
- c) Improve availability of and access to healthier food choices. Support developments that aim to improve the health of the population.
- d) Support opportunities for increasing physical activity levels generally/ in the community through Local Sports Partnerships and supporting initiatives e.g. Parkrun, Longford Marathon, etc.
- e) Facilitate community gardens through identifying and releasing suitable publicly owned land.

Steering group report on a national substance misuse strategy

http://health.gov.ie/wp-content/uploads/2014/03/Steering Group Report NSMS.pdf

The Strategic Development Plan for Longford should include:

- a) A strategy to reduce and eliminate the reliance on alcohol sponsorship. Any public event or events on publicly owned lands or buildings should use alternatives to alcohol sponsorship
- b) Develop the provision of alcohol-free venues for young people, (e.g. Youth cafés / clubs, alcohol-free music and dance venues and sports venues) with:
 - a. the young people being centrally involved in the development and management of the programmes and venues;
 - b. late night and weekend opening; and increased access to school facilities in out of- school hours.

The National Positive Ageing Strategy

http://health.gov.ie/wpcontent/uploads/2014/03/National Positive Ageing Strategy English.pdf

A strategic aim for the development of County Longford should be to enable people as they age 'to get out and about' through the provision of accessible, affordable, and flexible transport systems in both rural and urban areas. This should include:

- a) Encourage the planning and development of health facilities in areas that minimise the likelihood of having to travel long distances.
- b) Provision of age-friendly public transport,
- c) Promotion of the integration of the Rural Transport Programme with other local transport services,
- d) Provision of public transport linkages to major health facilities and personal social services.
- e) Supporting the design and development of age friendly public spaces, transport and buildings.
- f) Designing age friendly urban environments (street lighting, footpaths, roads, public seating)
- g) Promote access (in terms of affordability, transport availability, accessibility of venue) to a wide range of opportunities for continued learning and education for older people.
- h) Promote the concept of active citizenship and the value of volunteering, and encourage people of all ages to become more involved in and to contribute to their own communities.
- i) Promote the development of opportunities for engagement and participation of people of all ages in a range of arts, cultural, spiritual, leisure, learning and physical activities in their local communities.

Suitable housing is a key aim in the National Positive Ageing Strategy and a key strategic aim for County Longford should be to:

- a) Carry out an assessment of housing need and provision and consider all housing options in development (i.e. social housing, sheltered housing; retirement villages).
- b) All residential development should incorporate the 'Universal Design' Principal to ensure housing can meet the needs of the occupants, regardless of their age, size, ability or disability. This will also ensure that the houses provided will meet their changing needs over time so that people can continue living in their own homes and communities as they get older or become disabled. Universal Design Guidelines For Homes In Ireland http://universaldesign.ie/Built-Environment/Building-for-Everyone/
 - This will also assist in implementing the Older People Remaining at Home (OPRAH) strategy.
- c) Implement a strategy that facilitates older people to live in well-maintained, affordable, safe and secure homes, which are suitable to their physical and social needs. Development should incorporate the principals outlined in the 'Design Out Crime' Document.
 http://www.designcouncil.org.uk/sites/default/files/asset/document/designers-Guide-digital-0.pdf

Time to move on from congregated settings — A strategy for community inclusion

http://www.hse.ie/eng/services/list/4/disability/congregatedsettings/congregatedsettingsreportfinal.pdf

The Strategic Development Plan for County Longford should:

- a) Improve community inclusion of people with disabilities in their local community and community based services.
- b) Improve greater connectivity between generic community based services and disability specific organisations. Facilitate their engagement as stakeholders.
- c) Focus on meeting the housing and accommodation needs of people with disabilities through a combination of purchased housing, new-build housing, leased housing or rented housing. A local re-housing plan should be prepared and jointly co-ordinated with the HSE, in collaboration with service providers. The plan should be based on best practice in including people with disabilities in local communities and should facilitate dispersed housing with personal supports.
- d) All residents in congregated settings should be assessed by the local authority to establish their eligibility and need for social housing support.

- e) Consideration should be given to reserving a certain proportion of dwellings for people with disabilities.
- f) Focus on supporting and sustaining people with disabilities to live in their own homes in the community through the provision of housing grants.
- g) Support people with disabilities to access employment and education opportunities.
- h) Support people with disabilities to access mainstream community services.

The Urban Design Manual - A Best Practice Guide

https://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Planning/FileDownLoad,19216,en.pdf

It should be the objective of Longford County Council to provide attractive, interesting and well used public realm and open spaces and to create a pedestrian centred environment with active, inviting public spaces and parks. Best practice should be implemented in the design of sustainable neighbourhoods. The 12 criteria outlined in the Urban Design Manual should be incorporated into the planning for urban areas in the Longford Development Plan.

The Environmental Health Service recommends that any proposed housing/residential development is made up of a variety of household types, tenures and typologies, thereby creating a range of lifestyle, affordability and lifespan choices. This should ensure sustainable development with a diversity and mix of uses. The EHS also recommends that development proposals for large housing or urban areas should be accompanied by a Design Statement. It is hoped this will provide coherency and quality in design and also ensure compliance with all the objectives of the Longford Development Plan.

It is also recommended that Longford County Council outlines an 'implementation and sequencing strategy' for the county or other similar initiatives which would identify and outline the key infrastructural requirements for an area and which would aim to ensure that the necessary infrastructure, facilities and amenities are provided in conjunction with residential development. This should ensure that development throughout the Longford County takes place in a planned, proportionate and sustainable manner.

Transport

Smarter Travel Policy

http://www.smartertravel.ie/sites/default/files/uploads/2012 12 27 Smarter Travel english PN WE B%5B1%5D 0.pdf

The Strategic Development Plan should:

- development to take place on brownfield/existing sites to consolidate urban growth and enable organic development of urban areas from the centre out.
- b) Specify a maximum permitted level of car parking for commercial sites, which have suitable public transport facilities and are within walking/cycling distance
- c) Set a general restriction of the future development of out-of-town retail centres except in exceptional circumstances and consideration of a similar requirement that parking charges be introduced for most existing centres.
- d) Require developments above a certain scale to implement viable travel plans which promote public transport and modes of active travel and which reduce
- e) Establish e-working centres to provide opportunities for people in rural areas and satellite towns to work from a location closer to home.
- f) Set a target that every school in Longford has a school travel plan to encourage students to take alternatives to the car. This should be supported with a strategic aim to develop safe walking and cycling routes to and from schools and other educational institutions as well as providing disability
- g) Provide facilities such as secure bike parking and changing/showering facilities at places of employment in public authorities to encourage staff to cycle.

To support smarter travel there should be a strategic aim to:

- h) Reprioritise traffic signals to favour pedestrians instead of vehicles, reducing waiting times and crossing distances at junctions.
- i) Create level grade crossings for pedestrians across junctions. Create larger traffic-free areas in urban centre. Ensure that 30 km/h zones are designated in central urban areas which accommodate motorised traffic.
- j) Widen footpaths where there are high pedestrian flows, particularly close to public transport nodes. Improve the surface quality of footpaths Provide appropriately designed safe, well-lit, direct, continuous facilities for
- k) Ensure State-owned lands such as canal towpaths, former rail lines, Coillte estates, etc. are made available for the development of walking and cycling
- I) Support private and public sector initiatives to establish car club schemes in Ireland. Provide on-road parking spaces to be designated for car clubs through appropriate signage.
- m) Establish park and ride facilities along major public transport nodes, at the periphery of major urban areas and at key public transport locations and nodes.

National Cycle Policy Framework

http://www.smartertravel.ie/sites/default/files/uploads/2013 01 03 0902%2002%20EnglishNS1274 %20Dept,%20of%20Transport National Cycle Policy v4%5B1%5D,95B1%5D,pdf

The Strategic Development Plan should include the needs of cyclists, and in particular:

- a) Implement measures to reduce the volumes of through-traffic, especially HGVs, in town centres and especially in the vicinity of schools and colleges.
- b) Introduce traffic calming measures / enforce low traffic speeds in urban areas, make junctions safe for cyclists.
- c) Support the provision of dedicated signed rural cycling networks building on Fáilte Ireland's Strategy to Develop Irish Cycling Tourism.
- d) Ensure that all surfaces used by cyclists are maintained to a high standard and are well lit and signposted.
- e) Provide secure cycling parking at all destinations of importance to the cyclist and aim to integrate cycling and public transport and the provision of cycling parking at all appropriate public transport interchanges.

f)Ensure that the urban road infrastructure (with the exception of motorways) is designed / retrofitted so as to be cyclist-friendly. Link up all existing cycle lanes.

Waste

A Resource Opportunity – Waste Management Policy in Ireland https://www.epa.ie/pubs/reports/waste/plans/Resource Opportunity2012.pdf

The Longford Development Plan should implement the Waste Hierarchy set out in the Waste Framework Directive and place prevention and minimisation at the forefront of any waste policy.

- a) Disposal of municipal waste to landfill should be a last resort.
- b) Implement waste prevention measures with local business and community groups.
- c) Include community waste prevention demonstration programmes, which provides skills to develop waste prevention within local communities.
- d) The use of easily accessible public recycling bins should be considered for public areas, paths and green spaces that will allow for adequate waste segregation and will encourage the use of the waste management hierarchy.
- e) Food waste reduction initiatives and incentives should be implemented in homes and in business.

f) A Reuse Policy should be developed in consultation with the national Procurement service and other relevant bodies, and implemented within public bodies in Longford to ensure that full consideration is given to feasible reuse options before embarking on the purchase of new goods.

Water

The strategic aim of Longford County Council should be to ensure the provision of safe secure drinking water and promote the reduction in waste and over use of water.

Water usage audits of public buildings should be carried and water conservation measures implemented.

To protect the ground water quality in the County there should be a strategic aim of ensuring all waste water treatment plants operate effectively with current and future demand. Waste water treatment facilities should be designed, located and installed in accordance with the appropriate guidance for waste water treatment.

Food

It should be a strategic aim from the Longford Development Plan to facilitate the production of more locally produced, high quality food.

Research 195: Health Benefits from Biodiversity and Green Infrastructure

http://www.epa.ie/pubs/reports/research/health/research195.html

Recreational, green spaces are a fundamental part of any development as they promote the health and wellbeing of residences who will occupy the accommodation and indeed the wider community. It is well established that there is a need to reconnect urban society with nature in order to promote health.

It is recommended that all future developments in County Longford are examined for the opportunity to integrate green infrastructure into the design at planning stage. Any potential for health gain should be explored and incorporated into all development and the built environment.

"For amenity purposes at least 9m2 /person of accessible open green space are recommended by the World Health Organization, however it is recognised that this may vary depending on the size of the city, the number of inhabitants and where boundaries are drawn" (Dzhambov et al., 2014).

It is recommended that the following proposals are considered when planning for parks and recreational areas:

- a) Green biodiverse spaces should be designed so that there is at least one within walkable distance from people's homes.
- b) Green spaces should be co-designed with communities and reflect local needs.
- c) Areas should be as large as possible with connections through flowery verges or linear habitats alongside paths and roads.
- d) Areas should be relatively open, but grass does not all have to be the same length. This design could suggest careful, rather than a lack of, management. Interpretative signage can explain the practice and highlight signs of nature to look out for.
- e) A few scattered trees or clumps of trees are preferable to dense planting of trees.
- f) Paths, recreational areas and places to relax and engage with nature should be incorporated from the start, to promote use and maintain a feeling of safety. It is recommended all proposed green areas are provided with paths for walking.
- g) Exercise areas, trails and paths need to provide maximum contact with green space, as this made exercise accessible and nature contact motivated people to walk more.
- h) Not all areas should be managed to the same intensity. Some parts near paths could be managed more to look tidy, whereas stakeholders recognised the value of incorporating wild areas, which could be further away from paths.
- i) Biodiversity areas can be designed to accommodate playgrounds and other amenity areas.

Biodiversity & Green Areas

It should be a strategic aim of the Longford Development Plan to bring biodiversity into the planning decision making process. A Biodiversity Action Plan should be developed which aims to conserve and restore biodiversity and ecosystem services in the wider countryside. Guidance on managing Biodiversity in strategic planning and urban areas is found in:

http://www.uep.ie/pdfs/guidelines complete.pd

All opportunities for green infrastructure should be explored and integrated into the design of public areas. Existing green areas should be preserved and utilised to their full capacity. New green areas should be provided. The provision of pedestrian and cycle routes through green areas should be a key provision of the design. The landscaping or 'greening' of these pedestrian/cycle routes should be considered at

design stage, not only in the interest of making them more attractive for use but also to facilitate the movement of fauna, creating ecological corridors and thus having a positive effect on biodiversity.

Sustainable Development

Our sustainable future — A Framework for Sustainable Development http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/Environment/Miscellaneous/FileDownLoad%2C30452%2Cen.pdf

The Dail had declared a climate and biodiversity emergency. We are the last generation that can impact the course of climate change and we must be very conscious of the need to manage effectively all activities which impact on our environment. It is essential the Longford Development Plan is integrated with the County Councils Climate Adaption Strategy (still in draft form) to ensure it is 'climate proof.' Specific actions that seek to combat, reduce or eliminate the emissions of greenhouse gases must be incorporated into the Development Plan.

All future development within Longford should be designed so as to reduce its carbon footprint. Environmentally friendly proposals such as the integration of public transport infrastructure, building typologies that minimise the use of energy, SuDS management initiatives, water recycling and conservation; and the integration and utilisation of open space should all be incorporated into the design stage of any development in the Longford area. It is recommended that all large development should document their energy efficiency proposals via a design statement at the planning stage.

The high volume of local authority housing which must be provided in the county provides Longford County Council the opportunity to be a leader in the promotion of innovative, low carbon, renewable energy design and technology. It is also recommended that Longford County Council carries out a carbon audit of its existing building stock and retrofits with more sustainable technologies.

Energy

Irelands Second National Energy Efficiency Action Plan to 2020 http://www.seai.ie/Publications/Energy Policy Publications/Energy Service Companies/Ireland%E2 %80%99s second National Energy Efficiency Action Plan to 2020.pdf

The Strategic Development Plan for County Longford should include spatial planning policies to reduce the need for commuting to and from work.

The Strategy should:

- a) Promote and facilitate the incorporation of energy efficient design into projects.
- b) Develop and implement an energy management programme for all public buildings.
- c) Develop new key skill sets in areas such as green procurement, carbon accounting, carbon management and energy management.

d) Support and promote the Better Energy Communities Scheme to enable communities around the country develop new and innovative, locally-based solutions to energy poverty.

Environmental Noise

The World Health Organisation (WHO) has identified Environmental Noise as an increasing cause of ill health and detrimental effect on health and wellbeing. http://www.euro.who.int/ data/assets/pdf file/0008/136466/e94888.pdf

It is recommended that a Noise Impact Assessment is carried out for any development proposals with the potential to give rise to significant noise impacts. Also, new developments must consider the impact of noise from existing noise sources. We recommend that environmental noise should be considered in the context of:

- a) New roads, railways, airports, industry or recreational activities adjacent to residential properties or noise sensitive premises such as schools or hospitals, or recreational spaces,
- b) New residential properties or noise sensitive premises such as schools or hospitals, adjacent to existing roads, railways, airports, industry or recreational activities;
- c) The development of mixed residential/commercial use buildings, and multipart Residential buildings;
- d) Public house, night clubs, restaurants or other recreational activities; and
- e) Industrial operations, workshops and factories.

It should be a Strategic aim of the Longford Development Plan to map noise and implement Noise Action Plans as per EPA Guidance: http://www.epa.ie/pubs/advice/noisemapping/epaguidancenotefornoiseactionplanning.html

Air Quality

The health statics outlined in the county health profiles identified that mortality rates from respiratory illness in Longford far exceed the national average. The Strategic Development Plan should have cognisance of this and should aim to reduce polluting emissions into air and increase the quality of air in County Longford by:

- a) Participating in, and facilitating national programmes of air quality monitoring,
- b) Working to develop and promote the Air Quality Index for Health,



d) Support and promote the Better Energy Communities Scheme to enable communities around the country develop new and innovative, locally-based solutions to energy poverty.

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	Develop Local Air Quality Management Plans that identify pollution 'hot spots and aim to reduce pollution through local action on emissions.	
Senio	Environmental Health Officer	Environmental Health Officer