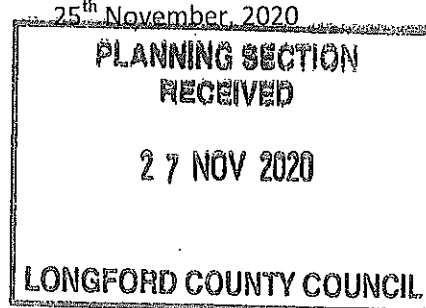


Administrative Officer
 Review of County Development Plan
 Forward Planning Department
 Aras an Chontae
 Great Water Street
LONGFORD N39 NH56



GRANARD AREA ZONING - DEVELOPMENT PLAN 2021 – 2027

Dear Sir/Madam,

By this letter I wish to inform you that I am making a submission for urgent consideration and inclusion in the Development Plan 2021-2027. That is, I request a re-zoning back to Residential, Agricultural or Recreational use of Areas 'B' and 'C' on attached color map.

Longford County Council's web page for Longford Development Plan 2021-2027 states on its opening page under the title "National and Regional Strategic Context" that it has a strategic vision based on three key principles, the first of these is:

- Healthy placemaking by promoting people's quality of life.

I regret to say that I have seen scant (over a period of years now), if any, working evidence of this in practice because it is blocked by systemic issues. More on Systemic Issues will follow below.

ZONING

The "*Guidelines for Planning Authorities*" (pages 25-30) issued by the Central Government (copy attached) raises important points for your attention with regard to present zoning of this area. A reading of these Guidelines shows that the present Granard Area Zoning is in breach of many Recommendations and Objectives set out by Central Government. The pages in question (25-30) deal with Housing Strategy, Settlement Strategy, etc.

Significantly, the pages referred to above say that existing small residential areas should not be incorporated into or diminished by industrial developments, except in very exceptional circumstances. These exceptional circumstances do not apply in our case.

Kindly examine the attached current Zoning Map in color (copy attached). Look closely at Industrial Zoned areas C, B, D and E which totally surround Residential Zone A, and also surround Low Density Residential areas F & G. Area E is heavily developed, but a further enormous ocean sized Industrial Wind Turbine of 169 M is proposed nearby. The Granardkille area is 495 ft above

sea level. So, an enormous turbine (PL 20/105) of 169 m, or 557 ft added to 495 ft, the height that Granardkille is above sea level, gives us a turbine height which is quite incredible. This is totally unacceptable and has been refused Planning Permission. However, it is now with An Bórd Pleanála for further consideration.

The area marked 'B' is industrial and this site currently has Planning Permission for *furniture storage only*. Despite this, in the recent past, planning was sought to develop this site into a major HGV staging facility to service the milling operations on areas D and E. It took an extremely long, difficult and sustained effort by the residents to prevent this development happening. **The present usage of this site is in breach of its granted Planning Permission for *furniture storage only*.**

Reminder

"Healthy placemaking by promoting people's quality of life" is the first key point on LCC's web site for Longford County Development Plan 2021-2027.

Therefore, it is of the utmost concern that should these zoning decisions on area 'C' get acted upon and Planning Permission granted for industrial units, and should further development be allowed on area 'B', as was attempted under the recent Planning Applications, the result would be an immediate and alarmingly detrimental and environmentally unhealthy impact on present residents' quality of life. In the longer term residents would be hemmed into an industrial development that would totally destroy the value of their homes and make them undesirable and unliveable.

The above can scarcely be described as **"Healthy placemaking by promoting people's quality of life"**.

One understands the need for commercial and industrial development. Therefore, please note that the areas to the **East of Granard town are currently zoned industrial** (with outer inner relief road) **and Commercial**, and are double in size to that allocated to **Housing in Granard area**.

Therefore, in view of the above facts, it is rational, logical and environmentally positive from every point of view, especially promotion of tourism which will bring much needed revenue to the area i.e., (the costly development of the Motte and Norman Heritage Park - historical preservation; and the protection of the Donors' substantial funding, E640,000 for the Norman Heritage Park, plus E2.8 million for creation of the Motte project), **that the above-mentioned areas East of Granard town that are already industrially zoned areas (some of which are currently bad eyesores and will be negative for tourism) get developed.**

Again, the above development will encourage tourism which will benefit the Granard area, as well as the broader positive of bringing tourists to the adjacent areas, and even toward the West. The tourism industry will be much needed nationally following the post-Covid internationally fractured economy, as well as helping to offset the sharp economic fall-out from Brexit in this country. **Therefore, the development of the already industrially zoned areas East of Granard is a**

positive forward-directed action rather than a narrower development that will destroy a long-established residential area, and undermine residents' "healthy placemaking and quality of life".

I therefore request that areas 'B' and 'C' be re-zoned back to Residential, Agricultural, or Recreational use.

**LINKAGES BETWEEN THE FOREGOING SECTION OF THIS SUBMISSION
& SYSTEMIC ISSUES OBSERVED IN THE PLANNING PROCESS 2016-2020**

There are systemic issues in the entire Planning process.

Having returned to my place of birth after many years abroad these systemic issues have been, and are, striking to me.

The Forward Planning is of note because the **re-zoning** of the above Areas mentioned at head of this letter had already taken place **on two different dates/years prior to 2016**, and in years close to and affected by the Banking Financial crash, when people were badly distracted. No one in this residential area saw those once-only Notices in the public newspaper. They would scarcely expect to suspiciously be on the look-out for such an alarming change in their long-standing residential neighbourhood.

Furthermore, no resident heard about the re-zoning through any of the Public Participation Network groups (PPNs), of which there are 56 in the County. Nor were they alerted by any other public body or by appropriate individuals. To anyone from another country/jurisdiction this is dumbfounding. Libraries in this County do refer inquiries re Planning to the website concerned. They no longer necessarily publicly display Notices. Many people do not know how to drill down many times and in complex searches in computers (if they own one) to find such information, even if they had divine inspiration warning them to do so. No concerned public Administrative Body was apparently struck by such an absence of response from the affected neighbourhood of long-standing families, who are reasonably well-informed people. This also means that the less well-off in our society are cut off from information that concerns them, on this or any other urgent matter. Transparency and accountability impact governance.

There are **major systemic concerns** in all of this **from 2016** onward to the present time. They need to be taken on board and addressed.

The Planning Notices we are concerned with here and which highlight systemic issues started in 2016 with Planning Application **PL16/55**.

- **PL16/55** was deemed withdrawn on **22/11/2016**
- **PL16/300 Planning Notice** was published on **2/12/16** and a sign appeared **on the site on 12/12/2016** in the same inaccessible spot where **PL16/55** had been above a narrow grass margin across a busy road with no pedestrian crossing. Nor could Drivers view it, much less notice if it had yellow on it, which indicates a new Planning Notice, due to its placement.

- **The arrival of PL16/300 happened right in front of Christmas and New Year** when no one would have time to notice or check for a once-only Planning Notice in the Longford Leader. Nor would it be expected so soon following the refusal of PL16/55. Fortunately, I caught it.
- **On 20/12/2016** the file on PL16/300 became available for viewing and copying.
- I examined the file in LCC headquarters. The file included a letter dated 14/12/2016 from Mr. Mark Cunningham in which he emphatically mentioned 3 times that the site under review for PL16/300 had been re-zoned to "Industrial". **This shows the Re-zoning was of high importance.** The same was also noted on Longford County Council Planning Application Form which was located in the inside cover left side of public file under 17: Development Details, p.6. 'Yes' is ticked in answer to the question: "Does the application relate to a development in a Strategic Development Zone?"
- **PL 16/300 was refused on 25/10/17**

The above points serve to highlight the importance of the careful Forward Planning that is present in all of this. It also highlights the systemic problems that are present, particularly with regard to re-zoning, all of which is linked to **PL 20/105**.

All of the points above with regard to Planning Applications are linked to **PL 20/105 (Industrial Wind Turbine 169M)** the Planning Notice for which appeared during the last Covid lockdown. One was fortunate to see it.

With regard to Planning Application **PL20/105** I would assume that LCC had prior consultation with Kiernan Milling or their agents, either on-site or in LCC offices, before such an unusual application was submitted. If so, why was this project encouraged to go ahead bearing in mind the devastating impact this would have on the Granardkille residents and indeed on the town of Granard's attempts to build tourism (The Motte project funding E2.8 million and the Norman Heritage Park funding E640,000) and bring much needed revenue to local traders. It is normal practice when a Wind Turbine project of this scale is proposed that impacts so drastically on living neighbourhoods that some form of public consultation should take place. It did not.

Of concern also is the action by Longford County Council in removing Anti-Industrial Wind Turbine posters from public lamp posts. This was a very partisan act and leads to an assumption that a precedent has been set. In other words, individuals or companies who do not support a particular political party may now consider that they are justified in seeking the removal of such party election posters from lamp posts or other publicly owned structures.

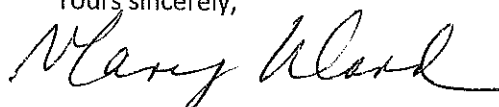
We are now at the end of 2020 and heading into a new County Longford Development Plan 2021-2027. The last one 2015-2021 appeared for purchase on 14/10/2016 and contained maps showing the re-zoned areas in our long-standing residential neighbourhood. We await the upcoming one which is, we believe, due to appear perhaps January 2021.

In view of the case outlined above, I again request that areas **'B' and 'C' on attached color map be re-zoned back to Residential, Agricultural, or Recreational use.**

I am mailing this letter and attachments by Registered Mail to ensure safe delivery and for tracking purposes.

Thank you in advance for your help and assistance in this matter.

Yours sincerely,

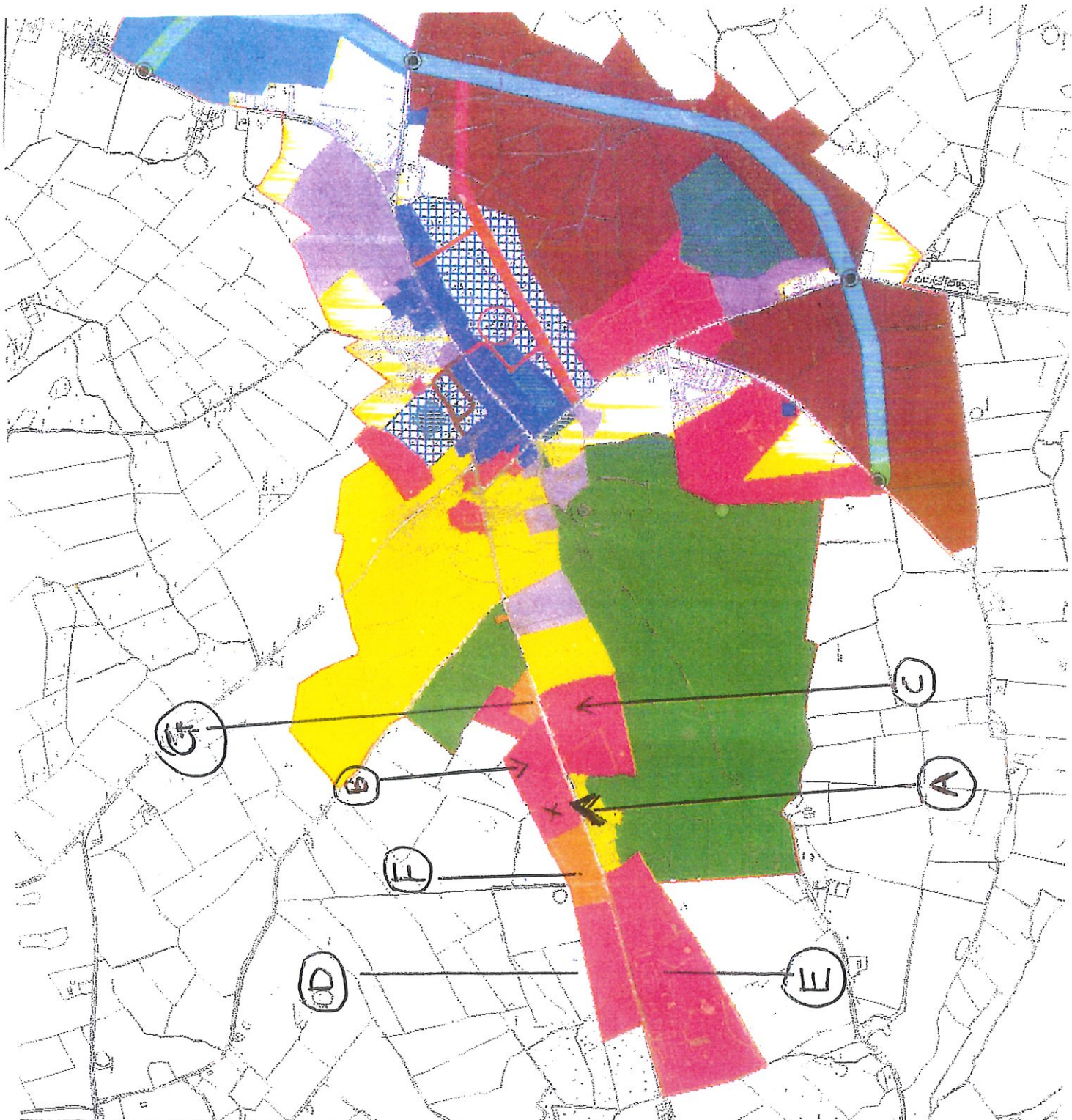
A handwritten signature in black ink that reads "Mary Ward". The signature is written in a cursive style with a long horizontal flourish at the end.


















Mary Ward

Attachments:

Color map showing Granardkille zoned areas

Pages 25-30 ***Guidelines for Planning Authorities***

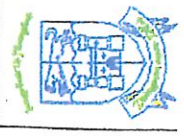


-  Residential
-  Low Density Residential
-  Residential with Outer Relief Road
-  Industrial
-  Industrial with Outer/Inner Relief Road
-  Backland Development with Provision of Inner Relief Road
-  Social/Community/Education
-  Recreational
-  Commercial/Residential
-  Zoned Parking
-  Outer Relief Road
-  Inner Relief Road
-  147m Contour Line
-  Zone of Protection: Baker's Fort
-  Roundabout
-  Fire Station
-  Local Access Road

Granard Zoning Map

Map Scale: 1:10,000

Planning Department
 Longford County Council
 Area 4a Charles
 Grand Street
 Longford
 (043) 68281
 www.longford-coco.ie



Integration of environmental considerations into the plan at an early stage of its evolution is vital if the plan is to set out an overall strategy for proper planning and sustainability as required under Section 10 (1) of the Act. Matters such as the environmental carrying capacity for various types of development in different areas should be a leading consideration in determining both development opportunities and development limitations. Consideration of the capacity of the environment to accommodate development will include matters relating to the availability of water services, capacity for integrating future development with public transport networks, conserving ground water quality, integrating landscape considerations into locational considerations and protection of the natural and built heritage. The process of Strategic Environmental Assessment is considered in more detail in planning guidelines issued by the Department in November 2004. The key requirement is that environmental considerations should be integrated into the preparation of a development plan from the beginning rather than leaving the assessment of the effects of the plan on the environment until the end of the plan-making process.

Translating the strategic vision:

3.6 Development plans are positive policy instruments intended to both manage and influence change in our surroundings in achieving their objectives. The drafting of plans should reflect this positive role of plans in clearly highlighting where sustainable and effective development opportunities lie and identifying what needs to happen to ensure that these opportunities are realised. Translating the overall strategy of a development plan into detailed policies and objectives will require consideration of a number of key themes that are interrelated and overlap. While it is not intended that these guidelines would cover all themes in detail, some of the key topics include the following:

- Housing strategy
- Settlement strategy embracing both urban and rural areas
- Land use and transportation strategy
- Retail development strategy
- Economic development
- Integration of environmental and heritage considerations

Population Estimates

3.7 It is important that development plans for counties, gateways, hubs and other large towns should closely reflect – and make adequate provision for – the scale of population growth in the most recent relevant population projections. While these projections may relate to a longer period than the 6-year life of the development plan, and will depend to some extent on economic and migration trends at national level, development plan estimates should not be based solely on projections of historic trends within the area.

Analysis of such trends forms the starting point. However, planning authorities will need to take account of such factors as natural increase rates, average household size, the age structure of the population, and whether there is net migration into or out of the area. Such detailed analysis of Census and other data might best be carried out in a pre-plan working paper, whose main conclusions could be summarised in the plan itself.

A number of factors need to be taken into consideration when determining the location and quantity of land to be zoned. The Regional Planning Guidelines provide regional population growth and target projections. Existing demographic trends will then need to be seen in the policy context set by the Regional Planning Guidelines. Projected population growth over the life of the new plan should be such as to support the achievement of Regional Planning Guidelines objectives. These growth projections should in turn inform the housing strategy (see below), and particularly the estimate of the likely future needs for housing in the area. The analysis may pinpoint the need for particular housing types e.g. for older people. Demographic analysis will also help to identify the likely size of the labour force in the area, and thus the demand for new jobs.

Population estimates in development plans for smaller urban centres will be largely based on analysis of recent trends, but should also reflect any relevant Regional Planning Guideline policies i.e. they should have regard to the overall scale of development envisaged for the region and the particular role of the town within the region.

Housing strategy

3.8 Section 95(1) of the Act requires that a development plan shall set out a strategy for the purposes of ensuring that the housing needs of the existing and future population of the area are provided for. The Housing Strategy is a key starting point in framing development plan objectives. Therefore, every effort must be made by both the planning and housing sections of local authorities to ensure that an up-to-date Housing Strategy is in place to inform the development plan preparation phases and that the period for which the Housing Strategy and the development plan are in force coincide at all times, as required under the provisions of section 94 of the Act. Reference to the Housing Strategy or a summary of its key forecasts and provisions should include, at an early stage in the written statement of the development plan:

- The broad quantum of population, household formation and housing demand likely to arise in the planning authority's area over the plan period,
- The breakdown of that quantum in terms of housing provision for the private housing and social/affordable sectors,
- The breakdown of that quantum in terms of housing provision in both urban and rural areas.

Quantifying future housing needs sets the scene for elaborating later in the development plan on where additional housing would be best located in the context of settlement and transport strategies. Quantifying housing needs and identifying locations for additional housing within an objective, needs-driven framework, is a key way in which the objectivity and robustness of development plans and local plans can be assured. In addition, the housing, settlement and transportation strategies should each support and reinforce each other. The Housing Policy Framework: Building Sustainable Communities (DoEHLG, 2007) sets the overall policies and objectives for sustainable communities and should be central to the development of housing strategies.

(Detailed advice on the preparation of housing strategies is provided in the guidelines for planning authorities on Part V of the 2000 Act).

3.9 The likely length of the housing strategy suggests that it should be incorporated into the development plan as an appendix. However, the written statement in the main text of the plan should:

- Specify exactly how the housing strategy is incorporated into the development plan written statement e.g. as an appendix of the plan,
- Include an **objective** to secure implementation of the housing strategy and,
- Include an **objective** requiring that a specified percentage of the land zoned for residential use, or for a mixture of residential and other uses, be made available for the provision of social and affordable housing.

Settlement Strategy

3.10 Working within the estimates of future housing need established through the housing strategy, county development plans need to clearly identify the most appropriate settlement structure which the wider aims and objectives of the plan are working towards. In this context, the settlement strategy needs to be responsive to issues such as sustainable development, efficient transport, labour force and employment projections, population projections and balanced regional development. Also, development plans should encourage means of overcoming any deficiencies in existing settlement patterns, by promoting consolidation, densification and introduction of new uses.

Working within the framework established by the NSS at national level and Regional Planning Guidelines at regional level, the settlement strategy within the development plan will normally take the form of:

- (1) A statement of the settlement hierarchy ranging from, as appropriate, the city/very large town level, the medium-sized town level, county towns, other towns, smaller towns and villages.
- (2) A statement outlining the planning authority's aims and policies in relation to the various categories and levels of towns in relation to (a) scale/population (b) main development functions, and (c) future development priorities.

- (3) A statement outlining the overall approach to settlement in rural areas working from the policy framework established in section 5.3.2 of the NSS and the Planning Guidelines for Sustainable Rural Housing (2005).
- (4) A statement outlining the justification for the settlement strategy on the basis of planning issues such as existing settlement patterns, the need to adapt or alter settlement patterns, achieving balanced regional development, strategic locations by virtue of proximity to key transport corridors or nodes, the availability of, or capacity to provide, water services, education requirements or other socio-economic objectives relevant to planning considerations.
- (5) A simple, clear and diagrammatic concept map that illustrates the interrelationships between:
 - The county, city or towns wider spatial context,
 - The location of the different elements of the settlement structure,
 - The main transport and other infrastructure corridors, including public transport services as well as nodes such as ports, airports or key intersections between main routes,
 - Other key features such as main rivers and landscapes.

The development plan should ensure that the underlying aims of its settlement strategy are linked with and support relevant policies and objectives elsewhere in the plan e.g. transport, water services and environmental protection.

Land Use and Transportation Strategy

3.11 There are clear overlaps and opportunities for synergy between the areas of land use policy and transport. Integrated land use and transport planning has a key role in delivering social, economic, and environmental sustainability. By seeking to influence the location, scale, density, design, and mix of land uses, and thus shape patterns of development, planning can help to facilitate an efficient transport and land use system by: