

An Roinn Comhshaoil, Aeráide agus Cumarsáide Department of the Environment, Climate and Communications



Longford County Council Forward Planning Unit Áras An Chontae Longford, N39 NH56

11 January 2021

Re: Draft Longford County Development Plan 2021-2027 Your Ref: n/a Our Ref: 20/263

Geological Survey Ireland is the national earth science agency and has datasets including Bedrock Geology, Quaternary Geology, Geological Heritage Sites, Mineral deposits, Groundwater Resources, Geohazards and the Irish Seabed. These comprise maps, reports and extensive databases that include mineral occurrences, bedrock/mineral exploration groundwater/site investigation boreholes, karst features, wells and springs. Please see our website for data availability and we recommend using these various data sets, when undergoing the EIAR, planning and scoping processes. Geological Survey Ireland should be referenced to as such and should any data or geological maps be used, they should be attributed correctly to Geological Survey Ireland.

Dear Sir/Madam,

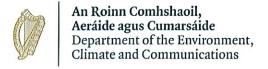
With reference to your email dated 27 October 2020, concerning the draft Longford County Development Plan 2021-2027, Geological Survey Ireland (a division of the Department of the Environment, Climate and Communications) welcome the opportunity to be included in the consultation process of the draft County Development Plan.

Geoheritage

The Geological heritage county audit for Longford was completed in 2015. The resulting report was an action of the County Longford Heritage Plan 2015-2021. We welcome the inclusion of County Geological Sites (CGSs) within the draft development plan under Chapter 12 Natural Heritage & Environment, Section 12.6, 'Geological Sites' and the County Longford Geological Sites map in Volume 2 Appendices.

The Geological Heritage Programme views the Local Authorities as critical partners in protecting, through the planning system, those CGS which fall within their county limits. In many cases these are often sites of high amenity or educational value, already zoned or listed in the plan. Listing in the CDP provides protection of the sites against potentially damaging developments that normally require planning permission, such as building, quarrying, landfilling or forestry. It is also important that the democratic process of public consultation and approval by councillors of the CDP means that stakeholders in the sites and all the local community can buy into the process. We commend the inclusion of specific County Policy Objectives (CPOs) relating to the county geological sites within the draft CDP.

Geological	Sites - County Policy Objectives
It is the Cou	inty Policy Objective to:
CPO12.20	Contribute towards the appropriate protection and maintenance of the character, integrity and conservation value of features or areas of geological interest listed in Table 12.5.
CPO12.21	Support the implementation of recommendations made in the County Geological Audit (2015) and facilitate a review of the Geological Audit.
CPO12.22	Consult with the Geological Survey of Ireland when undertaking, approving or authorising developments which are likely to impact on County Geological Sites or involve significant ground excavations.
CPO12.23	Contribute towards the appropriate protection of Geological Natural Heritage Areas that become designated during the lifetime of the Plan from inappropriate development.
CPO12.24	Encourage and promote, where appropriate, public access to geological and geomorphological sites and avoid inappropriate development through consultation with the Geological Survey of Ireland, subject to environmental and habitats assessment.





CPO12.3 Protect important geological or geomorphological sites in the County, including any sites designated or proposed to be designated as Natural Heritage Areas (NHAs).

In addition to these objectives relating specifically to geological sites, we note that the wind energy objective CPO 5.138 in Chapter 5 lists sites and elements to be considered in relation to the assessment of wind energy development proposals. Perhaps it would be possible to include the county geological sites for consideration under this objective.

CPO 5.138	Ensure that the assessment of wind energy development proposals will
	have regard to the following:
	 sensitivities of the county's landscapes;
	 visual impact on protected views, prospects, scenic routes, as well as local visual impacts;
	 impacts on nature conservation designations, archaeological areas and historic structures, public rights of way and walking routes;
	 local environmental impacts, including those on residential properties, such as noise and shadow flicker;
	 visual and environmental impacts of associated development, such as access roads, plant and grid connections;

We note under Section 12.6, 'Geological Sites', recommendation for the removal of the following sites from the CDP.

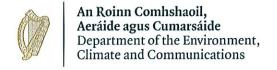
- 1. Ardnacassagh Quarry
- 2. Ballinamuck unconformity
- 3. Carrickateane Quarry
- 4. Coolcor Quarry
- 5. Esker North townland
- 6. Garrycam
- 7. Kilcourcey Quarry
- 8. Terlicken

It may be useful to include a note to clarify the context of this recommendation in so far as that while these sites were included in the previous CDP, they had not been audited and were based on a preliminary 'master list' of CGS. During the Longford County Geological Heritage Audit process, completed in 2015, they were assessed as unsuitable for County Geological Site status and were listed as rejected sites in Appendix 4 of the Geological Heritage of County Longford report.

CGSs have been adopted in the National Heritage Plan and will form a major strand of geological nature conservation to complement the various ecological and cultural conservation measures.

County Geological Sites are the optimal way of addressing the responsibility of each authority under the Planning and Development Act 2000 and its amendments, to protect sites of geological interest. It is important to note however, that management issues for the majority of geological heritage sites may differ from ecological sites, and in some cases development may facilitate enhanced geological understanding of a site by exposing more rock sections - for example, in a quarry extension. Consultation at the earliest stages can identify any issues relevant to an individual site or proposed development.

As always, we are available if you require any further information, please feel free to contact Clare Glanville (<u>Clare.Glanville@gsi.ie</u>).





Culture and Tourism

Over the past number of years geology has become a large part of Irish tourism. Ireland currently has three UNESCO Global Geoparks, and a number of other geotourism projects. These Geoparks, along with other tourism initiatives such as the Wild Atlantic Way, Irelands Ancient East, and Irelands Hidden Heartlands have bolstered tourism in various parts of Ireland and helped to increase its levels in areas that were previously not as popular with tourists. We would encourage Longford County Council to continue this trend, and to use the geological audit information making it easily available to the general public. We would encourage geology to be a significant part of any tourism initiative that may be introduced, particularly county policy objective CPO10.27:

CPO10.27	Facilitating the development of visitor infrastructure linked to natural
	and heritage environments, while ensuring that it does not detract
	from the status, quality and value of these environments.

Groundwater

In Chapter 12, 'Natural Heritage & Environment', Section 12.16, Groundwater Protection 'Groundwater Protection', we commend the inclusion of specific policy objectives to protect Longford's groundwater resources and groundwater protection schemes within the draft CDP, in particular county policy objective CPO 12.92:

CPO12.92	Support, where possible, the development and implementation of a Groundwater Protection Scheme in tandem with the Geological Survey
	Ireland (GSI).

We are pleased to see recommendation of the use of National Aquifer and Recharge mapping datasets in the environmental sections of planning and assessing individual projects.

Geological Mapping

We note reference to our Bedrock mapping and Quaternary and Physiographic mapping datasets in Section 4.8 'Soil', in the SEA Environmental and Flood report of the draft CDP. We are pleased to see recommendation of their use in the environmental sections of planning and assessing individual projects.

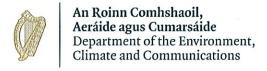
Geothermal Energy

We note Longford County Council's inclusion of geothermal energy as specific policy objectives in Section 5.8.4 'Geothermal Energy'. We would like to draw your attention to our recently published Geothermal Roadmap for a policy and regulatory framework for geothermal energy. We recommend use of our Geothermal Suitability maps to determine the most suitable type of ground source heat collector for use with heat pump technologies. For further information please see our geoenergy pages on our website or contact the Groundwater Programme of the Geological Survey Ireland directly.

Natural Resources (Minerals/Aggregates)

Geological Survey Ireland is of the view that the sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required.

In Chapter 16: Development Management Standards, Section 16.4.16.3 'Extractive Industry', we are pleased to see Longford County Council's assessment criteria for development management standards within the extractive industry, including:





DMS16.177	Encourage the rehabilitation and suitable re-use of disused pits and quarries where appropriate having regard to all appropriate environmental considerations.
DMS16.178	Consult with the Geological Survey of Ireland (GSI), with regard to any developments likely to have an impact on Sites of Geological Importance listed in the County Development Plan (see Chapter 12: Natural Heritage and Environment and Appendix 7: Natural Heritage and Environment).

The Geoheritage Programme tries to promote a partnership between geological heritage and active quarrying, with such measures as those outlined in the 'Geological Heritage Guidelines for the Extractive Industry', which can be downloaded here. This document, written in association with Irish Concrete Federation, acts as a comprehensive guide in the sustainable extraction of natural resources while preserving the geological heritage of Ireland. We note that it is stated in Chapter 9 that "The Council will also have regard to Guidelines for Planning Authorities on Quarries and Ancillary Activities 2004 (DoEHLG)". We would welcome the inclusion of the 'Geological Heritage Guidelines for the Extractive Industry' within this statement.

Geohazards

We welcome the inclusion in Section 4.8.4 'Landslides', Geological Survey Ireland's online mapping data sets for Landslide Events and Landslide Susceptibility and delineated in Figure 4.9 'Landslide Susceptibility and Previous Landslide Events' map in the SEA Environmental and Flood Report of the draft CDP.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me Clare Glanville (<u>Clare.Glanville@gsi.ie</u>), or my colleague Trish Smullen (<u>Trish.Smullen@gsi.ie</u>). Yours sincerely,

Dr. Clare Glanville

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