

Environmental Health Service, HSE Dublin Mid-Leinster, Health Centre, Dublin Road, Longford, Co. Longford N39KR23

Administrative Officer,
Review of County Development Plan,
Forward Planning Department,
Áras An Chontae,
Great Water Street,
Longford.
N39 NH56

15th January 2021

Re: Draft Longford County Development Plan 2021-2027

Dear Sir/Madam,

Please find enclosed the Environmental Health Service consultation report in relation to the Draft Longford County Development Plan 2021-2027.

The following HSE departments were notified of the consultation request for this development plan on 3rd November 2020.

- Emergency Planning Brendan Lawlor
- Estates Helen Maher
- Assistant National Director for Health Protection Kevin Kelleher / Laura Murphy
- CHO Pat Bennett

If you have any queries regarding this report please contact me at Environmental Health Service, Health Centre, Dublin Road, Longford, Co. Longford N39KR23

Yours Sincerely,

Paul McGuinness

Paul Me guimen PEHO

Principal Environmental Health Officer



Re: Draft Longford Development Plan 2021-2027

The Environmental Health Service (EHS) is making this submission under the remit of Healthy Ireland and relevant health supporting strategies (listed in Appendix 1). Healthy Ireland is our national framework for action to improve the health and wellbeing of the people of Ireland. Our aim is to maximise the health gain for the population of Longford by recommending key health actions which we feel could be incorporated into the Longford Development Plan.

The Environmental Health Service commends Longford County Council for the draft development plan 2021-2027. Many objectives outlined throughout the plan are closely aligned with the objectives of the above mentioned health strategies. Proposals promoting active transport, sustainable housing for all, increasing the use of green infrastructure and climate adaption and mitigation measures will have an added bonus of improving the health of the population.

Climate

Chapter 3 of the Development plan discusses climate change, however it is noted and welcome that climate action is a cross cutting theme of the entire development plan with each individual chapter concluding with a number of climate actions.

Table 3.1 and Table 3.2 identify the climate mitigation and adaptation measures proposed in the development plan. To ensure progress is achieved on these targets it is recommended that an accompanying implementation plan is adopted which sets out specific actions, responsibilities and timeframes to ensure measurable progress on climate action is achieved.

There is a need to adopt a strategic approach to monitoring the effectiveness of the climate action as outlined in the Development Plan. Longford County Council needs to provide measurable targets aimed at reducing carbon footprints, transport emissions, energy demands, flood risks and infrastructure vulnerability in the county.

Longford County Council's commitment to partner and collaborate on climate action initiatives with local community groups, local enterprise and local schools and higher-level institutions is welcome. Longford County Council should strive to be a leader on climate action. CPO 3.18 states Longford Councty Council will "Provide training on climate mitigation measures". This should not be reserved for Council staff but training should be extended to the agriculture, construction and industry sector. It is recommended that Longford County Council also implement education strategies for the general public and build innovative initiatives for local citizen engagement, particularly with young people.

Sustainable Agriculture

Data shows that agriculture is the largest emitter of greenhouse gasses (GHG) accounting for 33% of total emissions – CSO & EPA data, Irelands Total greenhouse gas emissions 1990 – 2017. Action must be taken by Longford County Council to address these emissions and it is recommended that the Council takes a leadership role in influencing and promoting the behavior change which is fundamental to achieving our decarbonisation goals. CPO 3.7 aims to "Encourage innovation and facilitate the development of pilot schemes that support climate change mitigation and adaptation measures, especially in the energy and agriculture sectors". Specific objectives which promote sustainable farming practices within the county should be included in the development plan and Longford County Council should implement policies to help reduce greenhouse gas emission from agricultural practices. The council should also work with the agricultural sector providing education based programmes which highlight the relevant climate and sustainability action required.

Clean Energy

Energy GHG emissions, at 19%, remained stable over the period 1990 to 2017 and did not decline. Longford County Council must create opportunities for alternative, cleaner sources of energy within the county. CPO 3.10 states the council will "Work in collaboration with the Sustainable Energy Authority Ireland and relevant stakeholders to deliver a number of sustainable energy communities throughout the County". This is a welcome objective and the council should identify suitable sites and implement timelines for achieving this objective. A

specific renewable energy strategy or other similar initiative could be implemented which identifies areas of the county which have the potential for renewable energy production and which could be further investigated. All renewable energy options including wind, solar, biomass and geothermal energy should be explored and facilitated. A5.17: "Source all building electricity demands from a renewable resource only", A5.18: "Actively participate and achieve the targets as set out by the Sustainable Energy Authority of Ireland (SEAI) Public Sector Energy Efficiency Strategy" and A5.19: "Commission the feasibility study of Lanesborough becoming Ireland's first, 'Low Carbon Town'" are also all welcome initiatives for which targets for implementation should be set.

Sustainable Industry

Longford County Council should develop educational initiatives and work in conjunction with industry to ensure more sustainable and more environmentally-respectful production cycles. Longford County Council should consider hosting climate action workshops and energy audits in an effort to bring about the necessary behavioural change required to achieve our decarbonisation goals. It is also recommended that Longford County Council leads by example and implements the following measures:

- 1. Promote and facilitate the incorporation of energy efficient design into projects.
- 2. Develop and implement an energy management programme for all public buildings to ensure energy efficiency i.e. the big switch off.
- 3. Develop new key skill sets in areas such as green procurement, carbon accounting, carbon management and energy management.

Construction

It is recognized that there is a need for the construction sector to use cleaner materials and to incorporate more energy efficient design. Longford County Council should assist contractors to calculate their carbon footprint both in the use of their building materials and the construction methods applied. Mechanisms for reducing or offsetting their carbon footprint should be outlined. Information provision on the use of green construction materials and how to develop low carbon buildings would assist this process. Objective A4.5 which aims to "Prioritise the principle of Passivhaus or equivalent standard in accordance with current Design Guidelines of the County Development Plan, or those deemed acceptable by the Planning Department" is welcome. Longford County Council should also specifically require new developments to ensure that

the location, layout and design of the new development accommodate predicted future climate change impacts.

Sustainable Mobility

Longford County Council recognizes it has to promote more sustainable means of transport. Transportation GHG emissions doubled over the period 1990 (10%) to 2017 (20%) and reliance of car transport has increased in Ireland. CPO 3.13 "Seeks to ensure primacy for transport options that provide for unit reductions in carbon emissions. This can most effectively be done by promoting public transport, walking and cycling, and by actively seeking to reduce car use in circumstances where alternative options are available." Whilst this is a welcome objective, Longford County Council need to implement specific measures to ensure it is achieved. A list of road improvement works were outlined in Section 5.2. of the development plan. It is disappointing to see that a similar list of pedestrian ways or cycle lane improvement works were not identified or outlined.

CPO 5.55 states the council will "Work with the relevant statutory bodies and other relevant stakeholders, to improve on the existing level of infrastructure and facilities for walking and cycling." Longford County Council needs to identify and list these works and set aside funding for them.

To achieve the above it is recommended that Longford County Council carries out a permeability audit in towns and villages to fully establish the existing pedestrian and cycle infrastructure and to highlight areas where investment can be made to form a coherent network. Connectivity issues must be resolved, linking housing, large employment centers, educational facilities and town centers. It is also recommended that a 'quality audit' of these routes is carried out to ensure they are safe, well lit and enticing for users. The landscaping or 'greening' of these pedestrian/cycle routes should be considered, 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. Public consultation and engagement is critical, the council must listen to and address the opinions and concerns members of the public may have.

It is recommended that safe and segregated cycle and pedestrian facilities are also provided in conjunction with any new roads or road improvement works as outlined in the development plan. This will provide additional options for active travel between towns and villages in County Longford. The objective A5.7, for Longford County Council to "Prepare a feasibility study (to include route options)

for a cycle route on approach and through each town within its functional area" is a welcome proposal and a set timeline for its completion should be implemented.

With regard to public transport some small scale initiatives Longford County Council could invest in to improve the customer experience include; schemes to provide quality bus corridors, carry out improvements to bus shelters, bike parking at public transport nodes, rented bike facilities at train, bus and tourist areas, provide real time travel information and integrated ticketing. A list of works needs to be identified and it is recommended that Longford County council reserves a portion of its budget to ensure such initiatives are implemented.

Common commuter routes in the county should be identified. The Council should ensure public transport options are available on these routes and provide park and ride facilities to serve these routes. The council should consider an advertising campaign to ensure the public is aware of the availability of such facilities as they arise. It is recommended that designated or free car parking spaces are reserved for car sharing or 'go' cars.

It is recommended that tourism is also considered alongside transport measures. The possibility of safe active travel routes or public transport access to all tourist destinations should be considered and facilitated if possible to reduce levels of emissions from car usage. Secure bike parking should be provided at all tourism amenities.

Eliminating Pollution

Longford County Council needs to implement measures to cut pollution rapidly and efficiently. Objective CPO 3.16 which aims to "Complete a detailed local survey and audit of greenhouse gas emissions for the County in order to effectively target and reduce greenhouse gas emissions in a targeted approach at the County level and support the development of a Regional Inventory of GHG Emissions" is a most welcome initiative which will enable reductions on GHG emission to be measured over a period of time.

Sustainable Food Systems

It is recommended that Longford County Council consider the development of a Food Strategy for Longford, to help develop the food economy, examine food resilience, food waste, food security and food poverty. Improvement in these

areas would contribute to the health and wellbeing of residents, create employment and enhance Longfords food tourism potential. A food strategy would link in with Food Wise, the Government's 10 year plan for the agri food industry which endeavors to enable it to act more strategically and achieve recognition in the internal marketplace.

Food Wise 2025 also recommends the creation of civic and festival markets in our major cities and towns. It is recommended that Longfrod County Council identifies and reserves suitable serviced space for markets. The sourcing of production units and the creation of shared hubs and community kitchens are options that should also be explored. The development of the strategy above would also link in with Failte Irelands Food Strategy which endeavors to increase the perception of Ireland as a food destination and also with the National Plan for Jobs to address brexit challenges.

Green Infrastructure

Section 12.11 discusses Biodiversity and Nature Conservation with Longford County Council outlining a range of policy objectives to protect, conserve and improve biodiversity in Co Longford. CPO13.10 aim is to "Develop a green infrastructure network for urban areas, connecting both natural and semi-natural corridors including green spaces, open spaces, rivers and canals. Enhancements along natural features may include the provision of riparian buffers and wild areas for pollination". It is recommended that all urban areas are examined for ways in which biodiversity can be improved. The 'greening' of pedestrian walkways and cycleways has already been suggested. Other initiatives that could be implemented to improve the appearance and function of towns include tree planting, small pocket parks, green walls, small nature/wildlife reserves, wildflower meadows or urban gardening and allotments.

It is also recommended that all developments in urban areas should incorporate landscape plans which aim to increase green, permeable surfaces for drainage while also enhancing conditions for pollinators and promoting biodiversity.

CPO13.3 aims to "Resist development that would fragment or prejudice the County's strategic green infrastructure network." All potential green, recreational and open space areas should be identified and protected in the proposed 'Green Infrastructure Strategy'. Longford County Council should implement measures to

facilitate the connection or linking of all green recreational areas. The connection routes themselves should create 'green ecological corridors' through which the public can access the recreational facilities. Existing brownfield/vacant sites should be identified as opportunities to implement green areas. Longford County Council should allow for the possibility of land being developed not for buildings but for green space as a necessary part of the infrastructure of the developed area. The council's proactive efforts in relation to the preservation and establishment of rights of way are welcomed. The provision of insurance is often cited as a barrier in granting public access to amenities/ recreation. The council should implement a mechanism for addressing high insurance costs of access of the general public to green local amenities.

CPO 5.37 objective is to "Encourage the use of materials and engineering solutions that optimise natural surface water drainage as part of Sustainable Urban Drainage Systems (SUDS) associated with large scale car parks". All surface car parking should be companied by landscaping plans which outline measures for planting and sustainable drainage. All existing car parks and urban centers in Longford should be examined and a programme of remedial planting carried out to improve natural rainwater assimilation capacity.

Objective A4.6 will "Require all residential schemes outside of 'Town Core' zoned lands, to responsibly plant and maintain 1 no., native tree (e.g. Willow, Alder, Birch, Scots Pine, Holly, Sessile Oak) of a girth greater than 20cm, within the confines of the proposed site, per dwelling". It is recommended that all construction within the county, regardless of where it is, should be requested to implement a landscape plan highlighting how they will implement suds drainage proposals and planting to protect biodiversity and support pollination.

Employment

Longford County Councils targeted initiatives and use of the Climate Action fund and Just Transition fund to attract investment and employment in areas identified as unemployment 'black spots' are welcome. Unfortunately Longford has the highest unemployment rate in the country at 19.6%, well above the national average of 12.9% (last CSO figures 2016). This is an important health determinant; higher healthy life expectancy is strongly correlated with higher employment rates, particularly for men.

To address this there will also be a need to attract larger employers in existing population centers. This can only be achieved through better regional accessibility including better transport links and technology and digital connectivity.

It is essential that planning of employment services also takes into consideration the health and wellbeing of workers.

It recommended that all future employment developments and existing large scale employment sites and industrial estates are examined for sustainable and active travel options and retrofitted as necessary, with the following:

- 1. Strong cycle and pedestrian links to town centres and to parks and/or recreational facilities to improve connectivity.
- 2. Secure bike parking facilities
- 3. Shower facilities for staff should be considered.
- 4. Recreational amenities that promote the health and wellbeing of employees on future employment sites should be considered. Any opportunity to promote physical activity and possible health gain for staff should be explored.
- 5. The quality of design and landscaping of these sites is also of the upmost importance as it is well established that there is a need to reconnect urban society with nature in order to promote health. Options such as soft landscaping, walking trails that maximise contact with green spaces, water features, wildlife gardens to increase biodiversity, outdoor seating facilities are just some proposals that should be considered.

The Environmental Health Service recommends Longford County Council strongly supports the provision and establishment of co-working hubs and enterprise spaces in towns and villages in the county. To ensure progress is made with this objective it is recommended that suitable facilities are identified in the county's designated 'Self-Sustaining Growth Towns' and utilized for such a purpose. Again the location of these hubs is of crucial importance and connectivity to town centers by modes of sustainable and active travel should be a key consideration.

Social Inclusion and Health Inequalities

Longford is the 4th most deprived local authority area nationally, with 88% of its population either below average affluence or disadvantaged. It has a high percentage of those with no formal or primary education of 19.3% (national

average 15.2%), and 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%. (Source - County Longford Health Profiles http://hdl.handle.net/10147/584039)

It is imperative that Longford County Council promotes dialogue with marginalised groups to try and address health inequalities and that they implement initiatives to develop a more socially inclusive society

Housing

Despite focus on Social housing there is still a national and local problem with regard to homelessness. Recent Focus Ireland figures identify that Longford has 8 adults in official homeless emergency accommodation and 496 households on the social housing waiting list. This situation may well now be exacerbated by job losses and pay reductions in the current economic climate. It is clear that the provision of Women's Refuge places are deficient nationally and locally in line with the Istanbul Convention.

We would welcome more focused solutions to the need for emergency accommodation. HAP caps appear to be posing a supply problem in larger towns along with private rental shortages, thereby resulting in greater demand for emergency accommodation. It is acknowledged that the long term solution is to increase the supply of homes however in the interim adequate provision of temporary/emergency accommodation is required which is distributed throughout the county. It is felt that there should be a time limit set in policy regarding the length of time people can spend in emergency accommodation before suitable accommodation is provided.

Elderly

Longford County Councils objective CPO 4.53 which aims to "Provide housing appropriate to the needs of the elderly (in accordance with the Longford Age Friendly Strategy 2015-2020 and any subsequent strategies), persons with disabilities, lone parents, Travellers, and the homeless" is welcome. There needs to be a range of options in housing provision for the elderly, not just an emphasis on care homes as has previously been the case throughout the country. It is recommended that sites in towns and villages in Longford are

identified and earmarked for age friendly settlements. The Council use of Universal Design principles and life-long adaptability in new housing developments is also welcome.

Further measures Longford County Council could implement to meet the needs of the elderly would be the provision of age friendly parking arrangements. To reduce social isolation it is recommended Longford County Council invests in and provides a functioning rural public transport system as outlined in CPO 5.2. The success of this initiative should not be merely measured in financial terms but viewed as a necessary health measure. Longford Co Council should also consider the promotion of 'age friendly initiatives' in local towns and villages in the county.

Other health aims which could be included in the development plan to improve health gain for the elderly cohort include

- 1. Supporting the design and development of age friendly public spaces, transport and buildings.
- 2. Designing age friendly urban environments (street lighting, footpaths, roads, public seating)
- 3. 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.
- 4. 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.
- 5. 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

People with Disabilities

The strategic Development Plan for County Longford should:

1. Focus on meeting the housing and accommodation needs of people with disabilities through a combination of purchased housing, newbuild 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.
- All residents in congregated settings should be assessed by the local authority to establish their eligibility and need for social housing support.
- 3. Consideration should be given to reserving a certain proportion of dwellings for people with disabilities.
- 4. Focus on supporting and sustaining people with disabilities to live in their own homes in the community through the provision of housing grants.
- 5. Support people with disabilities to access employment and education opportunities.
- 6. Support people with disabilities to access mainstream community services.

Younger People

It is the general experience of the EHS that younger children are better catered for with playground facilities but adolescents and older people are not well provided for.

Longford County Council should consider providing a range of facilities such as skate parks, graffiti/art walls, playing courts, meeting areas etc. to cater for adolescent. The EHS suggests suitable sites are identified for youth cafes or similar facilities and that specific funding is put aside for these multifunctional community spaces which should aim to provide sports, music and drama activities. They should be developed as 'alcohol-free' venues with

- 1. the young people being centrally involved in the development and management of the programmes and venues;
- 2. late night and weekend opening; and increased access to school facilities in out of- school hours.

Connectivity and transport issues to these facilities should also be considered by Longford County Council.

It is also recommended that Longford County Council establish processes that enable consultation with young people in the development and implementation of programmes in which they are involved, i.e. playgrounds, activity centers and public spaces. Specific measures that tackle isolation and exclusion of young people from minority backgrounds should also be implemented.

Obesity

Currently, in Ireland, six in ten adults and one in four children are overweight or obese (Department of Health, 2013; Layte and McCrory, 2009; 2011). According to World Health Organization forecasts, Ireland could top the European league tables in the coming years (WHO, 2015). Due to societies health inequalities it is proven that communities from a lower socio-economic background suffer increased rates of obesity.*Health Inequalities Report 2018. More action needs to be taken to address the rising levels of overweight and obesity that are placing an increasing burden on individuals and society.

Longford County Council can influence and regulate the built environment to improve health and reduce the extent to which it promotes obesity. An assessment of food outlets in every town and village in Longford should be carried out to ensure that choices of healthy food options are equally available and to prevent a proliferation of fast food outlets. Providing easy access and choice to healthier food options should be promoted as outlined in government policy. The environment in which we live impacts on the choices that we make and Longford County Council should create environments that make the healthy choice the easy choice by doing the following:

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

It should also be a strategic aim from the Longford Development Plan to facilitate the production of more locally produced healthy, high quality food and implement a food strategy for the county as discussed previously in this report.

Waste

Section 5.6 discusses Waste Management within the county. Longford County Council should implement measures and set targets to reduce its own waste. Other waste measures which could be implemented include:

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

Water

The Council should have regard to the National Biodiversity Plan 2017-2021 in its protection of water sources, in its Water treatment plants and facilities under its control. The restoration of freshwater ecosystems should be considered as part of water source protection work which needs to be biodiversity sustainable. There needs to be more meaningful engagement with the agricultural sector affected by the location of water sources and catchment areas on their land to move towards a more mutually beneficial working relationship which will benefit the basin management plans and would hopefully also help in the move towards reducing the use of pesticides and nutrient losses as expected under the European Green deal.

While bearing in mind the need to conserve water especially during drought periods the EHS would like to see public drinking water facilities become available in public areas during the lifetime of this plan. This would be subject to the public water supply being adequate for community needs. The implementation of free water refills schemes in towns and villages in the county should also be considered.

Noise

CPO12.99 aims to "Support the Implementation of the Longford Noise Action Plan 2018-2023 (and any revision made thereto)". CPO12.101 is to "Require the submission of a Noise Impact Assessment for all developments likely to introduce noise generating uses in proximity to noise sensitive uses". Both objectives are welcomed by the Environmental Health Service. We recommend that Longford Council should apply WHO/Europe's Night Noise Guidelines for Europe when assessing planning with potential noise implications. This guidance published in 2009, provides governments with stronger justifications for regulating exposure to night noise and clear guidance on desirable limits. According to these guidelines, annual average night exposure should not exceed 40 decibels (dB), corresponding to the sound from a quiet street in a residential area. Persons exposed to higher levels over the year can suffer mild health effects, such as sleep disturbance and insomnia. Long-term average exposure to levels above 55 dB, similar to the noise from a busy street, can trigger elevated blood pressure and heart attacks. By recommending that countries introduce limits on night noise, the guidelines complement the 2002 European Union Directive on Environmental Noise.

It is also recommended that the noise environment within the county is measured and mapped. In particular, quiet areas should be identified and Longford County Council should implement measures to specifically protect theses quiet noise environments. The council could encourage public participation in this process through the use of 'the HushCity' App or other similar citizen science initiatives.

Monitoring and Implementation

Section 6 of the 'Development Plans: Guidelines for Planning Authorities, June 2007' outline requirements for monitoring and evaluation. Setting out the measurement criteria should be an integral part of the development plan process and vague or ambiguous statements should not be included in the development plan. I could not locate clear proposals for the monitoring and implementation of the objectives outlined in the draft Longford development plan 2021-2027.

The progressive nature of the Longford County Development plan will only be considered a success if it is effectively implemented.

Longford County Council must define criteria by which development in the county can be monitored to assess compliance with the objectives of the Development Plan. The council should develop and publish specific performance indicators which establish how progress is quantified and measured. It is recommended that the local communities are involved in the monitoring process.

The EHS recommend progress should be constantly measured throughout the timeframe of the plan. It is acknowledged that a progress report is required after 2 years and a review must be carried out after 4 years. The results of these reports should be made public. Longford County Council should highlight and promote areas where progress is being made and also examine areas where less was achieved and investigate the reasons why. Any barriers to the implementation of the key aims and objectives should be identified.

Lisa Maguire

Environmental Health Officer

Lisa Magnive

Paul Mc Juimes PEHO Paul Mc Guinness

Principal Environmemntal Health Officer

Appendix 1: Healthy Ireland and Health Supporting Strategies

The National Positive Ageing Strategy

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

Steering group report on a national substance misuse strategy http://health.gov.ie/wp-content/uploads/2014/03/Steering Group Report NSMS.pdf

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

