

DCDE 70

Sheila Healy

From: Roger Garland [REDACTED]
Sent: Monday 18 January 2021 12:17
To: cdp
Subject: Review of Co Dev Plan
Attachments: sub to longford Draft January 2021.docx

Categories: Red Category

We attach our submission to the above.

Pl acknowledge receipt.

Our addresses is c/o [REDACTED]

Roger Garland
Chairman
Keep Ireland Open
<http://www.keepirelandopen.org>
[REDACTED]



SUBMISSION TO LONGFORD DRAFT DEVELOPMENT PLAN

The scope of our submission is limited to access to the countryside and directly related issues.

Other county plans

While you are **obliged to have regard to plans in adjoining** counties as per the Planning and Development Act 2000 Sec 9 (4), you may care to **take into account** plans in other counties particularly those within **the Eastern & Midland Region**.

We presume that you will be monitoring the provisions in Draft Plans which has commenced in **Cavan, DLR, Laois, Leitrim, Meath, Offaly, Roscommon, Sth Dublin, Westmeath and Wicklow** which have commenced and in **Fingal and Kildare** which are imminent and that you will liaise with their planners to ensure that the plans are compatible, where appropriate.

Counties in bold are adjoining or in the Eastern & Midland Region

The mention of a section in the Draft, without comment, indicates our support.

We are concerned that many of the excellent provisions in the 2015 Plan have not been carried forward to the Draft without any apparent reason. We will be referring to them in the course of our Submission. Therefore, we would ask you to look again to see if they could be included.

We note that some Pol Objs carry a rider *subject to the availability of resources*. We submit that as many Pol Objs involve a financial commitment it is invidious to single out any particular one.

FORMAT

Contents We submit that as well as the main Chpts you should include Sub-Sections.

Index We submit that you should provide an Index, as recommended in the Development Plan Guidelines (5.15), and that the page numbers where topics are primarily dealt with should be bolded. See Sth Tipp Clare DLR & Waterford.

Development Standards We submit that these should dealt with at the end of each Chpt as this would make the plan more user friendly. At the very least the Pol Chpts and Chp 18 should be cross referenced.

Layout We submit that this can be improved by sub-numbering or sub-lettering lists of points and paragraphs. The present layout creates difficulties when referring to particular points. Also the Chpt numbers should be placed on each page.

Volume 1

Chapter 5: Transport, Infrastructure, Energy and Communications

5.2.7 Cycling and Walking

4th & 5th paras

Cycling and Walking - Policy Objectives

CPO 5.55, 56 & 58

63 We submit that **this should be replaced by:** *Promote, facilitate, support and encourage the development, enhancement and expansion of safe cycle routes by facilitating the construction of cycleways. Support the development of the National Cycle Network and The National Cycle Network Scoping Study(2010) and enhance and maintain these routes with better signposting, lighting and road surfaces separated from vehicular traffic. Encourage the development of off-road cycling. Ensure that the upgrading of roads will not impact negatively on the safety and perceived safety of cyclists. Ensure that any dedicated cycle routes which are developed away from the main public carriageway are well lit. Routes should, where possible, follow off-road tracks and quiet country roads. Based on FI's Strategy for Development of Cycling Tourism Executive Summary(2007) 01 the Mori Survey 3rd pt 4.2.3, DoTT's NCPF(2009) OO Breadth of Interventions page 7 6th pt on right hand col & 7th & 8th pts, Obj 5 & Pol 5.6, Offaly 4.6 STAP 08 1st line & 7.14 LAO 03, Westmeath 8.13 O 8 1st sentence 1st phrase, 2nd sentence last phrase & last sentence 1st phrase, Kildare 6.5.2 ST 17 1st phrase, Leitrim 3.10.8 Obj 113 and many other plans.*

64 We submit that **this should be replaced by:** *Support, promote, establish and actively encourage the provision, development, extension and design of off road interlinked cycleways and walkways, including medium and long distance walkways and particularly those with historic and cultural associations in, conjunction with the Irish Sports Council, IW and other stakeholders to link with a strategic network of trails from residential areas, open spaces and existing or new public rights of way to facilitate the creation of a secure and safe greenways network to provide access to scenic, lakeshore and river features and to link with adjoining counties, including cross border counties in partnership with their councils, the state, private and voluntary sectors. Based on Cavan 9.6.1 RTO19 1st para 1st phrase & 2nd para, Westmeath 3.16 O 3, Louth 6.5.11 EDE 23 1st sentence, Roscommon 8.7.1 Pol 8.39, Wicklow Vol 1 7.4 T29 and many other plans.*

66

67 We submit that **this should be replaced by:** *Signpost and waymark walking and cycle routes with appropriately designed quality signage and information boards and public lighting where considered appropriate. Based on Wicklow Vol 1 7.4 T29 2nd line, Kildare 14.12 CR 10, Roscommon 8.7.1 Pol 8.37 and many other plans.*

We submit that **you should include additional provisions:**

WALKING

Table We submit that **you should include a Table with maps of Way-marked Ways** of medium/long-long distance walking routes, Greenways, Sli na Slainte, heritage/historic walking trails, pilgrim paths, paths to mass rocks and holy wells, looped walks, hillwalks, forest walks and other defined walking trails with accompanying maps and a data base should be set-up and up-dated as new trails emerge. See DLR App 8, Louth Map 7.2, Roscommon 8.7.1 T 8.2 & M 17 and many other counties.

To this you should add: ***Following the adoption of the Plan a temporary register of additional routes shall be maintained and should be included in the web site pending inclusion in the next Plan.***

Policy Objectives

1 Promote and facilitate the continuing development of a regional and local network of Ways and Permissive Access Routes that provide a network of long distance walking, running and hiking trails and routes. Encourage the re-routing of existing trails off public

roads. Based on **Sth Dublin** 9.4.0.3 1st sentence 1st phrase, **DLR** 4.1.2.16 Pol LHB17 1st sentence 1st phrase and other plans.

Note *In contrast to public rights of way, **long distance walking routes exist on a permissive access basis** and are not to be confused with designated public rights of way as consent can be withdrawn at any time by the landowner.* Taken from **Sligo** 6.7.4 Permissive Trails.

2 *In view of the obesity and diabetes crisis, support, improve, develop, upgrade and facilitate **Slí na Sláinte** routes. These should be waymarked/signposted, where feasible.* Based on **Kildare** 6.5 WCO 5 last pt, **DLR** 4.1.2.16 Pol LHB17 last phrase & Text below Pol 2nd sentence & **Westmeath** 8.13 O 13 last phrase.

3 *Promote walking through the development and expansion of a network of **safe walking trails** within towns and villages and their environs. Such routes can link with existing waymarked trails, Sli na Slainte and the Green Infrastructure Network and existing or new public rights of way.* Taken from **Fingal** Chpt 5 Obj RF113.

4 *Support the provision of proposed long distance walking trails that **provide access to scenic uplands** and riverine features.* Taken from **Fingal** Chpt 5 Obj RF115.

5 *Research and map existing network of **traditional paths** used for leisure purposes to determine their legal status.* Taken from **Carlow** 8.11.10 Obj 3 2nd pt.

6 *Employ a full time **Walks Officer** at an appropriate senior level.*
Note Many counties employ one.

7 *The Council will co-operate with relevant agencies, both public and private, including the National Trails Office, NWMWAC, Coillte, the Heritage Council, adjoining councils and local landowners, to **support the development, maintenance, facilitation and enhancement** of medium and long distance **hiking/walking routes**, community walks and off-road trails particularly in the uplands. This will include consultation with adjoining councils with a view to promoting routes extending beyond the county boundary.* Based on **DLR** 4.1.2.16 para under Pol 2nd & 3rd sentences, **Laois** 5.13 TM21 1st sentence, **Meath** 4.6.8 ED OBJ9(Draft 4.28.5 ED POL 76) & **Westmeath** 3.14 P-GT 7 5th line(Draft 6.8 CPO 6.58 1st phrase).

8 *Lobby the appropriate Government Department to agree and implement a scheme to **indemnify private landowners** with regard to recreational users of their land.* Taken from **Action Plan for Rural Development** 2017 Pillar 3 Act 176.

9 *Ensure the **protection** of and co-ordinate the continuation of **strategic walking routes** and trails.* Taken from **Cavan** 9.6.1 RTO3 10 1st phrase.

10 *Preserve and **protect** the integrity of existing public walking and access routes(including long distance walking routes) which contribute to the general amenity by prohibiting the intrusion of development along these routes particularly those in scenic and high amenity areas and along inland waterways.* Based on **Louth** 6.5.11 EDE 22, **DLR** 4.1.2.14 LHB15, **Kildare** 14.12.2 RW 2, **Offaly Draft** 6.7 TRP32 in line 2 and many other plans.

11 ***Protect listed walks** from development that creates or has the **potential to create disamenities**.* Taken from **Cavan** 9.6.1 2nd para.

12 *Take the potential **impact of proposed development** into account when considering/assessing applications for permission in the vicinity of established walking*

routes that might impinge on walking routes(including long distance) or potential walking routes. Taken from Sligo 6.7.4 Established walking routes 2nd & 3rd sentences.

13 Protect access routes to upland walks and public rights of way. Taken from Laois 5.10 RUR14.

14 See Chpt 13 Green Infrastructure 13.10 Green Infrastructure Climate Change Actions A13 7.

15 Identify existing walking routes prior to any new planting, infrastructural development and any energy/telecommunications or golf course developments. Taken from Offaly Draft 6.7TRP-33.

CYCLING

We submit that **you should include a Table of Cycle routes with maps.** See Roscommon 8.7.1 Table 8.2 Map 17 and other counties

To this you should add: **Following the adoption of the Plan a temporary register of additional routes shall be maintained and should be included on the web site pending inclusion in the next Plan.**

16 Cycle routes should be designed using current thinking and best practice from experience in other locations, lower speed limits and priority over motorised transport to ensure road safety for pedestrians and cyclists. Taken from Roscommon 8.7.1 42 2nd sentence.

17 Assign an officer at appropriate senior level as a "Cycling Officer". Taken from DoT's NCPF(2009) Pol 17.3.

To which you should add before officer, full-time

Has: **Fingal**(part time) **Meath** and other counties.

18 Promote and facilitate the development of cycle routes in accordance with the **National Cycle Network Scoping Study 2010.** Taken from Louth 6.5.11 EDE 21.

19 Support the development, maintenance and enhancement of and routes in co-operation with Sports Council, NTA, NTO, NWMWAC, Heritage Council and other bodies to develop cycle touring routes including those linking with adjoining counties particularly in areas of high amenity. Based on Westmeath 8.13 O 8 1st sentence last phrase, Kildare 14.12. 1 CR12and other plans

20 Produce cycle maps. Taken from NCPF 2009 Pol 6.2 1st sentence & Westmeath 8.13 O 8 last sentence 2nd phrase.

21 Support community, authority or agency led projects that would deliver identified strategic cycling links. Taken from Laois 6.1.1 TRANS38 1st phrase.

22 Support the policies of the National Cycle Framework 2009.

Taken from Limerick County 6.10.3 Obj COM 026.

WALKING & CYCLING

23 Encourage and support the enhancement and extension of existing walking and cycle routes by utilising links from residential areas, parks and open spaces and existing and new public rights of way to facilitate the creation of a secure green network to provide access to scenic lakeshore and river features. Taken from Cavan 9.6.1 RTO 19 1st phrase.

24 Support, promote, facilitate and the development of a comprehensive/integrated Greenway **Network in** accordance with the DoTT Strategy for Future Development of Greenways linking parks and public open spaces to Regional and National Greenway Networks and maximise connectivity to existing greenways through linkages to walking and cycling infrastructure. Work with the NTA, adjoining councils and all stakeholders to develop a co-ordinated approach to the selection, delivering and servicing of future greenway, in order to achieve improve external linkages, to achieve maximum impact and connectivity and to provide alternative routes for pedestrians and cyclists. Based on **NPF App 1 Obj 22, Kildare 5.19 EO 49, DLR 4.2.2.7 Pol OSR8, Laois 4.2 OBJ6, Meath Draft 5.7.6 MOV OBJ 30** and many other plans. Also Chpt 10 10.10 CPO.54 1st phrase.

25 Walking and Cycling will be promoted, developed, facilitated and encouraged in accordance with initiatives contained in "Smarter Travel 2009" by improving existing cycleways and by developing a network of safe maintained and guarded cycle routes and footpaths on existing roads. Ensure, where possible, that cycleways and footpaths are effectively separated from major vehicular carriageways. Provide, promote, improve and extend the network of off road cycle and walking routes on all new road improvement/redesigned schemes including regional, local distributor and local collector roads and on roads being up-graded, to ensure personal **safety**, particularly at night and a more convenient, pleasant, attractive environment. Support the installation of infrastructure measures e.g new/wider pavements, road crossings, retrofitted, if necessary, which would facilitate and encourage safe walking and cycling. Based on **Smarter Travel 2009 - 2020 Cycling and Walking** 1st para 2nd sentence last phrase, **Cavan 9.6.1 RTO20 1st & 2nd** sentences, **Laois 6.1.1 TRANS40 & 41, Meath 6.9 POL 22, Kildare 6.5 WC 2, Louth 7.4 TC 22, Roscommon 8.7.1 pol 8.37 2nd line & 42 1st sentence, Wicklow Vol 1 9.1.3, Dublin City 8.5.4 MTO10** and many other plans.

26 Provide, create, promote, plan, support, maintain, enhance, encourage, extend, facilitate and support the development and improvement of walking, rambling and cycling in conjunction/co-operation the Irish Sports Council, walking and cycling groups, landowners, farmers, local groups and communities by identifying/defining more dedicated walking and cycling routes(named) to enable the creation of a high quality, coherent, pleasant, integrated and comprehensive dedicated off road countryside joined up network of local and regional cycling/walking routes, footpaths, greenways, particularly in rural areas between settlements, that link communities to key destinations and amenities, including looped walks, local walks, community walks medium/long distance walks and established rights of way, through open spaces, strategic green corridors(including river corridors) and other off-road routes), particularly those with historic associations or other areas of interest and maximise their potential. Expand and extend existing routes by utilising links from residential areas to provide access to lakeshores, rivers and scenic and investigate the provision of dedicated cycle and pedestrian routes along routes of high amenity. Based on **DPG 3.5 Box 3 B Infrastructure 3rd pt, Dev Smarter Travel 2009 - 2020 Cycling and Walking 1st para in line 6, Cavan 9.6.1 RTO3 1st phrase, Laois 4.3 NRA21 1st phrase, 5.11 TM20 & 7.19 LS5, Kildare 14.12.1 CR 4, Meath 4.6.8 2nd para 1st & 2nd sentences, 4.6 POL 40 1st sentence 2nd line & 4.6.8 ED OBJ9, Westmeath 3.14 P 7 5th line, 2015 Plan 5.1.3 PED 3 & 5, Sth Dublin 4.5.0 Pol 6.1 & 6.3.0 Pol 3.1, Roscommon 8.7.1 pol 8.36 1st sentence, Louth 7.4 TC 24, Wicklow Vol 1 7.4 T29 1st phrase & 9.1.3 TR11 1st phrase, Leitrim 3.10.7 Obj 109** and many other plans.

27 Encourage and **support sensitive development** which provides for the provision of **access** to natural habitats and heritage features. Taken from **Meath 4.6 Obj 42 1st phrase.**

28 Seek opportunities for the development of suitable walking routes, cycle tracks and bridle paths along **historic access routes**. Explore the potential of inter-county trails such as the **Tain Trail**. Augment existing networks and trails at key heritage sites. Based on **Action Plan for Rural Development 2017** Pillar 3 Action 200, **2015 Plan 4.5 & 5.1.3 PED 3: 2nd sentence 1st phrase**.

29 **Support** the policies of National Cycle Policy Framework- DoTT's **Smarter Travel**. Taken from Limerick County 6.10.3 Obj COM 026.

30 Provide adequate **car parking** and/or lay-bys for walkers and cyclists, (from your local knowledge name important locations) and other appropriate points to facilitate access to amenity/scenic areas from 9am until dark. Based on **Laois 5.11 TM20, Kildare 14.12.1 CR 14 1st phrase, 2015 Plan 6.4 AM 3and many other plans**.

Notes

1 The **absence of car parks** can cause unnecessary friction between landowners and recreational users.

2 The primary **responsibility** for the provision of **car parking** lies with Councils.

31 Establish new Walkways and cycle routes on a **legal and permanent basis**. Taken from **Sth Dublin 2.2.14 2nd 15th para 1st line**.

32 Develop a strategy to underpin the **funding** for the development and extension and enhancement of walking/cycling trails, greenways, including off-road trails, inter-county waymarked walking and cycle routes, the Royal Canal and the Tain Trail, through the Action Plan for Rural Development 2017, DoTTS, NTA, Heritage Council and associated transport agencies and LEADER. Based on **Action Plan for Rural Development 2017** Pillar 3 Action 167, **Laois 5.11 TM25 3rd phrase, Westmeath 3.14 O 6, Sth Dublin 4.5.0 Action and many other plans**.

33 Ensure that **walking and cycling routes** and the public footpaths network are **maintained** and where feasible improved. Based on **Roscommon 8.7.1 Pol 8.37, Meath 4.6.8 2nd para 1st sentence, Cavan 9.6.1 RTO3 last phrase and other plans**.

34 **Protect** the integrity, extent, scenic quality, visual setting and functionality of **Greenways** and walking and cycle routes. Based on **2015 Plan 6.5.11 EDE 22 and other plans**.

35 **Protect** the routes of, and **prohibit development** which would hinder the creation and development of **future Greenways**, walking and cycling routes including those identified in the Plan. Taken from Donegal 11.3 P 13 2nd pt.

36 Ensure that development proposals **protect the routes of potential linkages** such as linear paths footpaths trails, greenways and cycleways through a site where the Council considers that an opportunity to provide a linkage to or between adjoining areas. Taken from Donegal 5.1.2 P31.

37 **Protect** established **walking and cycling routes** and keep them free from development which would adversely impact upon them. Taken from **Cavan 9.8.1 RTO18 1st phrase**.

38 Engage with the **CPO** process, where required, in order to facilitate timely delivery of the **Greenway Programme**. Taken from **Meath Draft** 5.7.6 MOV OBJ 31.

39 Continue to maintain and further enhance walking and cycling trails striving to achieve **National Trails accreditation** and other standards as set by Sport Ireland in partnership with local communities and landowners. Taken from **Westmeath Draft** 6.8 CPO 6.59.

40 Promote the principles of "**Leave No Trace**" in all trail information panels, promotional materials and events and use all statutory procedures to deter negative environmental impact resulting from use of our trails and outdoor recreation amenities. Taken from **Westmeath Draft** 6.8 CPO 6.66.

5.7 Energy Networks Infrastructure

5.7.2 Gas Network

We submit that **this topic is fundamentally different from Electric Network and that A CPO 5.120 should be repositioned in a separate list of Policy Objectives AND**

B 121 the reference to gas in line I should be repositioned.

119 last phrase We submit that **this should be replaced by:** *Recognising that overhead powerlines can have a significant impact on the visual character of an area, ensure that lines do not **impact** on the **natural environment**. Minimise their obstructive impact and obtrusiveness by avoiding areas of high amenity, high landscape value, scenic importance, sensitivity or sites and areas of nature conservation and areas of archaeological interest, NHAs, SPAs, SACs, National Monuments, by integrating with their surroundings. Safeguard Natura sites and the sensitive, open character of high amenity. The route has been identified with due consideration for environmental impacts. Ensure that where impacts are inevitable mitigation factors have been included. Proposed development must be consistent with international best practice. Based on **Kildare** 6.12.2 TN 4 last phrase, **Sth Dublin** 10.2.10 Obj 1, **Westmeath** 10.13 last para 2n to 4th pts(**Draft** 10.29.12nd to 4th pts) & 10.14 P ELE1 last phrase(**Draft** 10.29.2 CPO 10.157 last phrase), **2015 Plan** 5.5.1 pt & 3rd pt 1st phrase, **Meath** 11.15.4 2nd & 4th pts, **Leitrim** 3.11.4 Pol 127 last pt, **Roscommon** Pol 4.59 last phrase, **Laois** 6.6.3 ELEC 4 and many other plans.*

123 We submit that **the 1st sentence should be replaced by:** *The undergrounding or re-routing of transmission lines (including telephone and TV cables) shall be considered first as part of a detailed consideration and evaluation of all available options. Where technically feasible and environmentally appropriate, HV and other powerlines(including existing powerlines) and associated equipment should be placed underground to reduce the visual impact on the natural environment especially in sensitive areas or areas of high visual amenity to preserve significant landscape, impact on Euro sites, NHAs, sites of nature conservation, possible interference with or damage to areas of archaeological importance or significant views from the visual intrusion of energy infrastructure and cooperate with other agencies as appropriate. Protect areas of recognised landscape importance and significant views from visually intrusive large scale energy transmission infrastructure by using alternative routing. They shall be designed so as not to cause to or minimise as far as practicable, detrimental harm to scenic areas or designated vulnerable landscapes. Development must be consistent with international best practice and national guidance. Integrate with surface treatment schemes where possible. Demonstrate that where impacts are identified mitigation feature have been provided/included. Based on **Louth** 9.2 EnCo 5, **Kildare** 8.12.2, **Meath Draft** 6.15 INF 50 and many other plans.*

2nd sentence

We submit that **you should include additional Pol Objs:**

1 Energy transmission infrastructure must follow best practice in their siting and design with regard to the least environmental impact of landscape protection **and** possible interference with or damage to heritage sites, areas of archaeological importance, pNHAs, SACs, SPAs or sites of natural conservation. Minimise as far as practical harm to areas of scenic or vulnerable landscapes. Taken from Nth Tipp 7.13.7 2nd sentence & **Meath Draft** 6.15 INF POL 43.

2 Ensure that development must integrate with their surroundings and must not result in **negative/adverse impact** on visual amenities or the natural environment. Where impacts are inevitable mitigation has been taken into account must be provided for in, in respect of Natura Sites, networks must comply with Art 6 of the Habitats Directive. Based on **Sth Dublin** 10.2.10 Obj 2 and many other plans

3 A VIA shall be submitted. Taken from Galway County 13.9 DM Standard 31a) last sentence.

4 Landscape Impact Assessment shall be submitted where a proposed **development** is located in lands in **high amenity areas** and shall be screened for potential impacts on **Natura 2000 sites**. Taken from **Sth Dublin** 10.2.10 Pol 12.

5.8 Renewal Energy - Policy Objectives

CPO 5.124, 125, 127 to 131 & 133 & 134

We submit that you **should include additional Pol Objs:**

1 Developments must be suitably located. Taken from **Louth** 9.4 EnCo 9 in line 2.

2 The development, including, any ancillary facilities or buildings of renewable energy resources such as solar, wind and hydro, considered individually or taking into account their scale and layout, their incremental/cumulative effect due to other proposals, the degree to which impacts are highly visible over a vast area, their visual impact on the environment and quality/scenic landscape as well as local visual impacts, impacts on archaeology, should not create a hazard or nuisance, including the risk land instability and take into account the character and appearance of the surrounding area, the openness and visual amenity of the countryside, landscapes, protected areas such as NHA's, SPA,s SAC's and sites of historic or archaeological interest or in proximity to National Monuments. Development will be subject to suitable locations and will only be permitted where they will not have an adverse impact on the environment including natural heritage and the protection of amenities and landscapes. Based on **Fingal** 12.10 DMS138 1st sentence 2nd phrase (ii) & (vi), **Meath** 8.1 EC POL 3 last phrase (**Draft** 6.15 INF OBJ 39) & **DLR** 8.2.10.1 2nd para last sentence 2nd, 3rd & 4th pt 1st phrase.

5.8.1.2 Micro and Community Wind Energy Development

2nd para last sentence We submit that **this should be upgraded to a Pol Obj.**

5.8. Wind Energy - Policy Objectives

CPO 5.135 to 137

138 1st to 3rd pts & 4th to last pts, 140 & 141

We submit that **you should include Maps** showing the **degree of acceptability** from prohibition to preferred including areas in adjoining counties considered unsuitable: See Cork County Fig 9.2.

We submit that **you should include additional Pol Objs:**

1 Undertake an analysis of suitable areas for wind energy and prepare a map showing the Landscape Suitability for Wind Energy Development in accordance with national guidelines including section 3.5 of the Wind Energy Guidelines(2006) and any subsequent revisions and as recommended in the LCA. Based on Roscommon 4.6 Obj 4.55 1st phrase and other plans.

2 Prepare a Wind Energy Strategy within the one year of the adoption of the adoption of the Plan. See 9.3.9 Wicklow Vol 1 9.5.3 Wind Energy CCE 6 1st phrase and many other plans.

3 Restrict large scale wind energy structures in the rural hinterland and mountain areas to protect their overriding visual and environmental values. Taken from Sth Dublin 10.27 Pol 9.

5.8.2 Solar Energy - Policy Objectives

CPO 5.142 last sentence

143 last phrase

145 1st to 3rd, 6th, 9th & last pts

We submit that you **should include additional Pol Objs:**

1 Make representations to the appropriate government department to make **Planning Guidelines** for ground mounted solar farms.

2 Development must have no significant **adverse impact** on the surrounding natural environment and amenities. There is a presumption against their being located in sensitive areas such as Natura 2000 sites. Development must have regard to its effect on scenic routes, its possible cumulative effect and the potential for mitigation through screening with hedges. Based on Sth Dublin 11.7.5 3rd pt, Laois 6.6.1.3 Ground Mounted Arrays last paragraph sentence 1st phrase, Fingal 7.3 Obj EN12 last phrase, Kildare .7 SE 2 5th pt & 10th pt 5th line, Westmeath Draft 10.24 CPO 10.199 last phrase and other plans.

3 All applicants should include a LIA dealing with possible **impacts on any existing rights of way** or established walking routes. Taken from Kilkenny 10.5.3 Landscape Impact Assessment 1st para 1st sentence.

4 Ensure that proposals must consider the **visual impact**, particularly on raised/elevated sites and the impact on archaeology and areas of natural heritage. Taken from Westmeath Draft 10.24 CPO 10.141 2nd, 6th & 9th pts.

5.8.3 Hydro - Energy Policy Objectives

All

5.9.1 Telecommunications Technologies - Policy Objectives

CPO 156 last phrase

159 While we support this we submit that **public rights of way in line 2** merits a separate Pol Obj: *Require the identification of Public Rights of Way and established walking routes prior to any new telecommunication developments (including associated processes) which will be prohibited if they impinge or impact thereon, on recreational amenities or public access to the countryside or on the natural environment.* Taken from **Sth Dublin 7.4 Obj 6.**

Note Pending a complete listing of public rights of way, walking routes, as prospective rights of way, should be protected.

160

We submit that **you should include an additional Pol/Obj:** *Ensure that the location of telecommunication infrastructures should minimise and mitigate any adverse impacts on public rights of way and the natural environment.* Taken from **Westmeath Draft 10.30.2 CPO 10.173.**

Chapter 6: Regeneration

6.4.4 Regeneration - Policy Objectives CPO 6.43

Chapter 7: Placemaking

7.14.12 Burial Grounds Policy - Objectives

CPO 7.63 We submit that this should be replaced by: *Protect, preserve, enhance, conserve and maintain archaeological, historic and cultural value of graveyards and their settings and historic burial grounds (including those identified in the RPM) and those in the guardianship of the Council through improved access and preserve their heritage value Encourage and promote local involvement and community stewardship in the care, upkeep, maintenance, management rehabilitation and conservation of these graveyards in accordance with legislation, best conservation practice and heritage principals and best practice guidelines. Maintain all burial grounds in the Council's charge in good condition.* Based on **Roscommon 8.8 Pol 46, Laois 4.2.4 BG3, Leitrim 3.4.5 1st para 1st sentence & Pol 28 1st phrase, Westmeath Draft 14.e CPO 14.9** and many other plans.

Chapter 8 : Economic Development

8.7.6 'Just Transmission' - Policy Objectives CPO 8.87

Chapter 9: Rural Economy

9.3.2 Agriculture

We submit that **you should include an additional para: Commonage** and other rough grazing land should be regarded primarily as **an important recreational, environmental and amenity resource.** Based on Galway City 4.6.2 1st para 1st sentence 1st phrase & Kilkenny 6.2 Commonage Land 2nd sentence. See also **Leitrim 3.7.2 2nd para** under Pol 61 1st phrase.

Agriculture - Policy Objectives

CPO 9.16 We submit that **you should add:** *Protect and conserve rural amenities, archaeological and natural heritage, visual amenities and landscape from adverse impacts of agricultural practices and development particularly in high amenity areas and ensure that it is appropriate in nature and scale, ensure that they do not have an undue negative impact on the scenic/visual amenity of the countryside and its appearance and character and*

integrate into the landscape and Developments and practices must be necessary for the efficient use of the farm and must ensure that they are conducted in a manner consistent with the protection of the environment, must not be detrimental to important archaeological and heritage features and in line with national legislations and relevant guidelines. Identify mitigating measures where required. Based on Laois 5.10 RUR13, Offaly 10.6 RDO4, Meath Draft 9.6 RUR POL 25 last phrase & and other plans.

17

We submit that you **should include additional Pol Objs:**

1 *Recognise and support the role of **farmers as custodians** of the natural resources of the countryside and of rural landscapes.* Taken from **Cavan** 3.5 EDO6 1st sentence 1st phrase.

2 *Promote, at national level, the adoption of a **Land Use Strategy**.*

Note: All EU countries(including Ireland) are under increasing pressure from the EU to comply with various EU Directives. In response to this Scotland adopted a Strategy in 2011. See the 2014 Report of the Joint Oireachtas Committee on Agriculture, Food and Marine page 10.

9.3.3 Forestry - Policy Objectives:

CPO 9.21 We submit that:

A *the 2nd & 3rd lines be merged with 22 and replaced by: Promote forestry development of appropriate nature and scale while ensuring that such development does not have a negative impact on the countryside or obstruct public rights of way, traditional walking routes and the provision of recreational facilities, cause pollution or degradation of wildlife habitats, natural waters or areas of ecological importance. Development must not be visually obtrusive in the landscape so as to ensure that it is compatible with protection of the environment and is appropriate in its character, and that it is carefully managed to so that it doesn't result in damage to visual amenity or have a negative visual effect on the rural environment, natural heritage and character of the countryside and that it must enhance and be in harmony with the landscape. Protect and safeguard scenic and exposed/elevated landscapes, nature conservation areas, geological sites, monuments, NHAs, Euro Sites(SACs and SPAs) and other designated sites, archaeological or other historical or heritage features.* Based on **Laois** 5.10 Afforestation last sentence, **Wicklow** Vol 1 5.6 Forestry FYP2 2nd pt, **Roscommon** 3.4.2 Pol 3.44 1st sentence & 9.35 1st para 1st & 2nd pts, **Fingal** 5.3 Obj RF86, **Kildare** 10.4.5 last para 2nd sentence, **Westmeath Draft** 9.13 CPO 9.47 from which in line 1 to SPA's in line 3 & 50, **Offaly Draft** 3.14 CAEP 60 3rd & 4th pts & 61 and many other plans. **AND**

B We support the rest of the Pol Obj.

24 & 25 We submit that **these should be merged replaced by:** *Recognising the contribution that forestry makes to wellbeing, develop, promote, provide, protect, improve and encourage the provision of greater public access to new and existing forestry, both state and private, for recreational activities such as walking, hiking, cycling, and other non-noise generating activities and the provision of nature trails, as part of connected network of walking and cycle routes, bridle paths in cooperation/consultation with Coillte, the Forest Service, private landowners, local interest groups and other relevant stakeholders and agencies.* Based on **Smarter Travel 200 9-2020** Act 17 2nd sentence page 45, **Cavan** 3.9 2nd para 2nd para 5th pt 1st phrase & 8.5.3 NHEP17 Woodlands 1st phrase, **Westmeath** 3.41 P 4, 6.21 P 10 & 6.23 P 12 1st phrase, **Laois** 5.10 RUR4, **Meath** 9.7.8 OBJ7, **Sth Dublin** 4.3.9.x and many other plans.

We submit that you **should include additional Pol Objs:**

1 Retain **existing rights of way** and **identify them** and established walking routes before planting commences and maintain them as rights of way/walking Routes. Based on **Cavan 3.9 EDP15 & EDO 31 & Westmeath Draft 9.14 CPO 9.52**

2 Recognising the recreational potential of forestry, including Coillte's "open forest" policy, protect and encourage **access** to forestry and woodlands, in co-operation with Coillte, private landowners and other stakeholders for walking routes (including long distance and looped walks), nature trails and hiking. Based on **Westmeath 3.41 P F4, Meath Draft 9.7 RUR POL 30** and many other plans.

Note This also applies to Woodlands See Chpt 12 Natural Heritage & Environment 12.12.

9.3.7 Extractive Industry - Policy Objectives **CPO 9.37**

38 We submit that **the last phrase should be merged with 39 1st to 7th pts and replaced by:** *Recognising that the development for aggregates/mineral extraction, processing and associated developments can impose adverse impacts on amenities, ensure the protection, conservation, preservation and safeguarding of recorded monuments and areas in their vicinity, World Heritage Sites(including Tentative Sites), NHA's,(pNHAs), Euro Sites(existing and proposed), Nature Reserves, archaeological sites and features, natural heritage, natural environment, the road network, features of natural beauty or interest and prescribed sites, geological sites, sensitive and areas of geological/geomorphological or historic interest, areas importance of for the conservation of flora and fauna and biodiversity value and areas of high scenic amenity, zones or archaeological potential, important acquires and sensitive groundwater resources, from inappropriate development that might be detrimental to them. Applicants must recognise that the aggregates(stone and sand/gravel deposits and mines) concrete products industry have a particularly sensitive role. Development must be carried out so that it minimises adverse effect on the environment and visual and natural amenities to the greatest possible extent must be carried out during all life cycle stages, whether in respect of new quarries or extensions to existing ones and development will be prohibited if the quality of the environment or landscape, particularly sensitive landscape, is adversely affected or there is a reduction of the visual amenity of areas of high amenity. All working should be landscaped either by the retention of existing vegetation or by screening.* Based on **Sth Dublin 4.7.0 Obj 1 & 2, Roscommon 3.4.4 last para 1st phrase, 3.57& 9.34 1st para 1st sentence 1st & 5 pts, Laois 8.5 DM69 f), Meath 10.12 RD POL 27 & 11.14 1st para 2nd sentence(Draft 5.10 REDP-16), 2013 Plan 4.6 MA 2m), Cavan 3.8 EDP6 & 7, Offaly 2.8.6 3rd para & 2.9 RDP 14 1st & 2nd sentences, Wicklow Vol 3 App 13 Extractive 1 Industry 1st para** and many other plans.

last pt We submit that **this should be replaced by:** *Restrict development of aggregate extraction, processing and associated concrete production which could impinge or impact on matters of public importance, public rights of way or walking routes and satisfactorily address the potential impact on recreational activities.* Based on **Kildare 10.7.8 EI 5 last pt, Westmeath 3.43 P-E11 11 last pt(Draft 9.15 CPO 58 last pt)**and many other plans.

41 & 42

We submit that **you should include additional Pol Objs:**

1 *Applications for new development for aggregate extraction, processing and associated processes, shall **identify existing public rights of way** and walking routes which may be*

impacted on or are adjacent to the development site. They shall be kept free from development as a Rights of Way/Walking Route. Taken from Cavan 3.8 EDO25.

Note

Pending a complete listing of public rights of way, walking routes, as prospective rights of way, should be protected.

2 Require that *development proposals* on or in proximity to a quarry site should investigate the nature and extent of the risks *associated with the development together with appropriate mitigation.* Taken from Roscommon 3.4.4 Pol 3.56.

9.4 Rural Economic Climate Change Actions

A9.2 to 6.

We submit that you **should include an additional Sub Sec: Commercial Developments in the Countryside**

Pol Objs

1 Only grant *planning permission* for new buildings or the expansion of existing industrial business enterprises in the countryside where the location is suitable and that the proposal would not be viable at an alternative location and where the development would not cause a detrimental impact, erode rural character and is compatible with neighbouring land use. Any new building will be required to respect the appearance of and character of the landscape not be acceptable where it is unduly prominent in the landscape, where it results in build-up of development when viewed with existing and/or approved building or where the impact of the ancillary works, including the creation of visibility splays would damage rural character or impact negatively on the environment or which fails to protect Natura Sites, conservation areas, natural heritage or the environment or fails to protect and improve or is injurious to amenities(including visual amenities) . Buildings should be kept simple and finished with material appropriate to rural settings and should reflect the size, scale and pattern of development in the area. Buildings of excessive height will not be permitted and should be sited to make use of existing hedgerows and topography to provide natural screening. Based on DLR 3.2.2.3Pol RET-3 last sentence last phrase, Laois 5.9 RET18 last phrase & 8.DM25(1) to (4), Roscommon 3.2.1 Pol 3.2 last phrase, Westmeath 3.2.8 1st pt and many other plans.

2 Ensure that economic *development that is urban in nature should be located in urban areas.* Taken from RSES EMR RPO 4.82.

Chapter 10: Tourism

We submit that you **should suffix Recreation to better reflect its contents**

10.5.3 General Tourism Development - Policy Objectives CPO 10.7 & 8

10.8 History and Ancient Sites - Policy Objectives CPO 10.34

10.9 Lakes, Bogs and Waterways - Policy Objectives CPO 10.51

52 We submit that:

A The reference to *Islands* in line 3 should be repositioned in Chpt 12: Natural Heritage and & Environment 12.8 Inland Lakes, Waterways and Broad Zones

AND

B We support the rest of the Pol Obj.

**10.10 Greenways, Cycling and Walking - Policy Objectives
54, 56 & 57**

58 We submit that this should be repositioned in Chapter 5: Transport, infrastructure, Energy & Communications 5.2.7 Cycling and Walking as an additional Pol Obj.

59 to 63

66 As for 58 above

We submit that **you should include additional Pol Objs:**

1 Support development, in co-operation with various stakeholders to promote, preserve, improve, encourage *public access* to lakes, riversides, uplands and other areas that have been traditionally used for outdoor recreation and extend *recreational amenities* including riverside and canal walks and walking and cycling routes. Based on **2000 Planning and Development Act** Sec 10(2)(j), **Meath 4.6 POL 40 & Westmeath 3.14 P 7** down to recreation & 7.13 P 1 3rd line and many other plans.

2 Promote and encourage the *recreational use* of rivers and the development of blueways which provide opportunities for walkers, cyclist and canoers. Taken from **Wicklow Vol 1 7.4 T34** 1st sentence 1st phrase.

3 Protect and preserve recreational attractions such as scenic beauty, woodlands and waterways, natural heritage, the character and distinctiveness of scenic landscape and the environmental quality. It will normally only permit development where it won't result in damage to sites of nature conservation or important features of archaeological heritage, will not cause harm to the appearance and character of the landscape and can be readily absorbed into its surroundings by taking advantage of existing vegetation and/or topography, where the enjoyment of the countryside isn't adversely affected by the nature, scale, extent, frequency or timing of the proposed activities including any noise likely to be generated and any ancillary development shall be small in scale, designed to a high standard and sympathetic to environment in its setting, layout and landscaping. Based on **Wicklow Vol 1 7.3 Strategic Objs 8th & last pts** and other plans.

4 Ensure that *golf course development* does not impinge on existing public rights of way and walking routes by identifying them prior to development. Taken from **Sth Dublin 11.5.5(ii)** last para & **Kildare 14.12.2 RW 3.**

Note Recreational users and golfers don't mix! While there are rights of way over golf courses, they aren't satisfactory as walkers run the risk of being hit by golf balls and golfers are distracted by people talking and moving about.

5 Development proposals for *Noise Generating Sports* will not normally be permitted unless there is no conflict with the enjoyment of areas used for informal recreation. Taken from **Kilkenny 7.7.2** last para 3rd pt.

6 Adopt Bye-laws banning the use of motor bikes and quads (except for bona fide agricultural purposes) in privately- owned areas of rough grazing (including commonage) and motorised para gliders.

Note Louth & other counties have adopted bye-laws.

7 Develop public open spaces and that have good connectivity and are accessible by safe, secure **walking** and cycle **routes**. Taken from 4.11.5 CPO 4.35.

7 Protect the landscape from inappropriate development by ensuring that developments and other activities associated with tourism or recreational activity do not cause damage, be detrimental to or detract from the traditional character or appearance of areas of scenic or visual amenities and ensure that the layout, design and associated infrastructure are of highest quality. Developments must be sensitively located, and be sympathetic in manner with the environment, heritage and amenities. They must ensure the protection, maintenance and conservation of amenities, be compatible with their intensity, scale, and balance and ensure that are not located where they would be detrimental to environmentally sensitive landscapes. Ensure the highest quality standards of design and materials so that there are no significant adverse impact on Natura 2000 sites, historic or archaeological sites, maritime heritage or the countryside generally.. They must be integrated, assimilated and absorbed into the landscape to take advantage of natural screening and topography. Based on **Sth Dublin** 4.50 ET Pol 5 Obj 1 last phrase, **Roscommon** 3.5 Pol 77, **2015 Plan** 6 TOU 1 & 7, **Kildare** 5.22 ECD40, **Fingal** 5.3 Rural Tourism Obj RF112 1st sentence, **Wicklow** Vol 1 7.4 T2, **Westmeath** 3.14 P 3 last phrase (**Draft** 6.5 CPO 6.25), **Meath** 4.6.8 ED POL 27 1st phrase, **Leitrim** 2.2 Pol 1d) 1st phrase and many other plans.

8 Tourism and recreational development shall be assessed against the nature and scale appropriate to the character of the area and shall be located to be visually sympathetic to its surroundings. Taken from **Wicklow** Vol 3 App 1 4 Tourism & Recreation, General criteria for tourism and recreational development 1st pt 1st sentence & 2nd pt 1st sentence.

10.12 Tourism Climate Change and Associated Actions

A.10 & 2

We submit that you should include an additional Chapter: **Heritage**.
Reason Heritage applies to both **Natural and Built and Cultural Heritage**

Pols Objs

1 Publish a list with maps of heritage sites which are open to the public. Taken from **Westmeath Heritage Plan** 4.2.

You should add: *and post on the Council's web-site.*

2 Prepare and implement a strategy for access to heritage routes by identifying, promoting and supporting the development of a network of heritage trails, with a focus on publicly accessible heritage sites and attractions in co-operation community groups, landowners and other stakeholders incorporating features of heritage interest. Based on Heritage Plans in **Sth Dublin** 2.4.(i), **Westmeath** 4.4 & 3.2.10, **Wicklow** 2.1 and other heritage plans.

County Heritage Plan

Text See 11.4.7 Longford County Heritage Plan 2019 to 2024

We submit that you should include **Pol Objs**:

1 Support, deliver, implement and promote the implementation of the County Heritage Plan and work in partnership the Heritage Council, NPW, the relevant Government Department, the Heritage Forum(if any) and the community during the lifetime of the Plan.

Based on **2015 Plan** 11.4.7 last sentence, **Sth Dublin** 9 Pol1 Obj 2, **Meath** 9.4 last para 1st sentence, **Laois** 7.2 last sentence 1st phrase, **Louth** 5.2 Pol HER1 and many other plans.

2 Review/Update the County Heritage Plan over the lifetime of the Plan in partnership with the County Heritage Forum relevant stakeholders and the community. Based on **Meath** 9.4 last para last sentence, **Kildare** 13.3.3 last sentence, **2015 Plan** 6.2 HER 2 1st sentence and many other plans.

3 The Council will work with the Heritage Forum In order to **deliver the objectives** and actions of the Plan to protect the natural heritage and implement, promote and support and actively work in partnership with all relevant stakeholder, the Heritage Council, OPW, NPWS, NMS, community groups and the public, the aims and objectives contained in the Plan and any revision thereof. To which you should add: See our web-site (insert address). Based on **Laois** 7.2 last sentence & 7.4 OBJ11 1st phrase, **Fingal** 9.1 Obj NH01 & **Meath** 9.4 last para 1st sentence.

Chapter 11: Built and Cultural Heritage

We submit that you should include **Archaeological** in the title to better reflect its contents.

11.4.7 County Heritage Plan 2019 -2014

We submit that **this should be repositioned in proposed additional Chpt: Heritage**

11.6 Architectural Heritage- Policy Objectives

All

11.7.1 Record of Protected Structures - Policy Objectives

All

11.7.2 Architectural Conservation Areas - Policy Objectives

All

11.7.3 Historic Gardens, Demesne and Designated Landscape - Policy Objectives

All

11.7.4 Vernacular Architecture - Policy Objectives

All

11.7.5 Industrial and Agricultural Heritage - Policy Objectives

All

11.9 Archaeological Heritage - Policy Objectives

CPO 11.45, 46, 47 & 49 We submit that **these should be merged and replaced by:** Council recognises the importance of promoting, encouraging and securing/ensuring the protection, conservation, preservation, sympathetic enhancement, safeguarding and appropriate management of sites, settings and features of archaeological/historic interest including the protection of their intrinsic value, character, integrity, context and settings of National/Recorded Monuments or newly-discovered archaeological sites and/or sub-surface archaeological remains, known and unknown, including those identified in the RMP, RHM & SMR and sites and features of historic interest and National Monuments that are the subject to Preservation Orders, in the ownership or guardianship of the State or the Council and by implementing the provisions of the Planning and Development Act 2000(as amended) and other statutory and other relevant policy decisions. Development, either above or below ground, taking place within or adjacent to sites should be designed to ensure that it will not seriously detract from, impact upon or damage features of historic or archaeological interest,

shall respect their character and settings. Proposed developments which would be seriously injurious to the settings, character of sites or RPMs, including in particular, those within a 20m radius of National Monuments, will not be permitted and those within 75m will be discouraged. Ensure that development, within adjacent to or in the vicinity of an archaeological monument shall not detrimental to its character be or setting by reason of its bulk or detailing and shall be sited and designed in a manner which minimises its impact settings, is resisted. Extend this protection to cover additions or alterations that may arise during the adoption of this Plan and to newly discovered remains and features. Protect and preserve all archaeological sites and monuments included in the RMP, any sites of and features of historic or archaeological interest and any subsurface e arch features that may be discovered during the development. Protect, where appropriate, the character and setting of any unrecorded archaeological site from inappropriate development. Based on **2000 Planning & Development Act** Part 11 *Development Plans* Chpt 1 Sec 10(2)(c) 1st phrase, **DPG** Archaeological Heritage 4.26 1st para last sentence last phrase & 4.28 General Policies on Archaeology 2nd para last sentence, **Sth Dublin** 9.1.0 Archaeological Heritage Pol 2 Obj 2 & 3, **Laois** 7.4 OBJ3 1st phrase, **Westmeath** 5.33 OAH1 & 8(**Draft** 14.3 Pol Obj 14.7), 14.3 Pol Obj CPO 14.5 1st phrase & CPO 14.6 1st sentence, **Offaly** 7.19 AAH P08 1st sentence & **Draft** 10.10 BHP-33 , **Fingal** 10.2 Obj CH0 7, **Wicklow** Vol 1 10.2.2 Archaeology Objectives, BHI 1st phrase & 3, **2015 Plan** 6.2 HER 1 & 8.2.1 1 ARC 1 last sentence 1st phrase, **Louth** 5.9.1 HER 21 1st sentence, **Roscommon** 6.7 Obj 6.22, **Meath** 9.6.9 OBJ 7 1st sentence any other plans.

48

50 We submit that **this should be merged with 52 and replaced by:**

1 Recognising the importance of archaeology and National Monuments as part of our heritage, promote, enhance, facilitate, encourage, support, improve and protect public access to National Monuments, Archaeological Sites, castles, sites of historic interest and to archaeological landscapes, in the direct ownership, guardianship or control of the Council, and/or the State or private ownership, including those listed in the RMP, in co-operation with landowners. Based on

Laois 7.4 1 OBJ1 & 2 1st sentence, **Leitrim** 1.10.2h), **Roscommon** 3.5 Pol 3.75 1st phrase, **Sth Dublin** 9.4.0 Pol 16 Obj 4, **Meath** 9.6.9 POL 6(**Draft** 8.6 HER OBJ 5), **Offaly** 7.19 AAHP-07, **DLR** 6.1.2.1Pol AH1 & last para, **Wicklow** Vol1 10.2.2 BH4, **2015 Plan** 6.2.1 ARC 8, **Laois** 7.9 ARC 12, **Kildare** 12.9.1 AH 8 and many other plans.

51

53 We submit that **this should be replaced by:** *Protect and secure the **preservation in situ**, or in exceptional cases, preservation by record of all archaeological remains and sites of historic importance such as National Monuments, Recorded Monuments, their settings, caves, features and context in accordance with Sec 12 of the National Monuments(Amendment) Act 1994 and in accordance with the recommendations of the Framework and Principles for the Protection of Archaeological Heritage DAHG(1999) or any superseding national policy document in accordance with proper planning and sustainable developments. Based on **Planning and Development Act 2000 1st Sch Part IV Environment and Amenities** 6, **Sth Dublin** 9.1.0 Pol 2 Obj 1, **Leitrim** 3.9.8 Pol 106 and many other plans.*

54 & 55

We submit that **you should include additional Pol Objs:**

*1 Promote, provide, develop and encourage directional **signage** to archaeological sites and National Monuments listed in the RMP in partnership with key stakeholders. Based on **DLR** 6.1.2.1 1st para,*

Kildare 12.8.4 AH 9, Laois 7.4 OBJ 2 last sentence & Co Heritage Plan Obj 2.11.

2 Traditional access routes will be **designated as public rights of way**. In other cases, routes will be acquired by agreement with landowners or by way of compulsory powers. Taken from Laois 7.4 OBJ2 2nd & 3rd sentences.

3 **Ensure the protection** and preservation in situ all archaeological sites and features of historic interest discovered/**identified subsequent to the publication of the RMP**. Based on Meath Draft 8.6 HER POL 2 1st phrase, Westmeath Draft 14.3 CPO 14.6 last sentence, Offaly Draft 10.10 BHP-38 last phrase & Limerick County 7.5.2 Obj EH 026. See also Leitrim Obj 96.

4 Support and promote the **protection** and appropriate management of **monastic sites**. Taken from Offaly Draft 10.10 BHP-42.

11.11 Built and Cultural Heritage Climate Change Context and Associated Actions All

We submit that you should include an additional Sub Sec: Mass Rocks/Holy Wells

Pol Obj

Preserve, **protect** and, where necessary, enhance mass rocks and holy wells. Taken from Nth Tipp 8.4.5(iii).

Chapter 12: Natural Heritage & Environment

12.4 General Natural Heritage- Policy Objectives

We submit that you should add to the Title **Environment and the Uplands and Access to the Countryside** to better reflect the contents

1 1st sentence We submit that **this should be this should be replaced by**: *Recognising the important role of the environment through diversity, quality, integrity and quality of life by promoting the protection, conservation and enhancement of the natural environment by **prohibiting** intrusive **development** that would detrimentally impact on natural heritage which could or might have a negative impact on natural amenity and recreational assets, natural heritage features or archaeology or might unduly damage or take away from its character and by implementing the provisions of the Planning and Development Act 2000(as amended). Promote appropriate enhancement of the natural environment as an integral part of development. Engage with stakeholders, including local communities and statutory authorities to identify, protect, conserve, preserve, manage, enhance, maintain, safeguard, facilitate, maintain and, where appropriate, restore, visual and scenic amenities, the rich quality and character of the natural heritage features and the natural environment including rivers, streams, wetlands and woodlands, scenic areas and the general amenity of the countryside and in recognition of its importance as a non-renewable resource, from intrusive development that would detrimentally impact on it, while maximising the recreational amenity and quality of life by the provision of visual relief from the built environment. Avoid unnecessary harm and reduce its effect where it cannot be avoided by replacing like with like. Promote best practice with regard to heritage conservation and management. Based on DPG 3.5 Box 3: Suggested Structures and Content of Development Plans Environment, Heritage & Amenities last pt, **2000 Planning & Development Act** Part 11 *Development Plans* Chapt 1 Sec 10(2)(c) 1st phrase, **NPF** Pol Obj 60, **Kildare** 13.4 NH 1 1st sentence, **2015 Plan** 6.2.2 NHB 2, **Meath** 4.6.8 POL 29, **DLR** 4.1.3.1 Pol LHB19 1st sentence 1st phrase, **Wicklow** Vol 1 10.3 Natural Heritage Strategy 4th pt and many other plans.*

2nd sentence

2 We submit that **this should be replaced by:** *Recognizing the role played by natural amenities and landscapes as major resources as part of our heritage, identify, provide, support, maintain, actively promote, encourage, protect, preserve, improve, safeguard, manage and enhance public access to heritage sites and features, natural heritage and amenity areas, including Natura 2000 sites, nature reserves, uplands, moorlands, forests, rivers, lakes, valleys, scenic areas, areas of natural beauty and other natural amenities for active recreational activities such as hill-walking, which have been traditionally used for outdoor recreation, and to the countryside generally, by creating a meaningful network of access routes as the opportunity or need arises. This will be done in co-operation, consultation and consensus with state agencies, landowners, community groups other interested bodies.* Based on **Meath** 4.6 ED POL 42 1st phrase, **Laois** 4.3 NRA6 1st phrase & 9 & 5.11 TM29 1st phrase, **DLR** 4.1.1.1 LHB 1, **Roscommon** Pol 3.7.5 1st phrase, **Wicklow** Vol 1 10.3.7 NH40 1st phrase, **Offaly Draft** 6.7 TRP-18 1st sentence 1st phrase and many other plans.

3 We submit that this **should be repositioned in 12.6 Geological Sites and merged with CPO 12.20**

4

We submit that **you should include additional Pol Objs:**

1 Designate traditional walking routes to the uplands as public rights of way. Taken from Sligo 6.7.4 POR 16 last phrase. See also **DLR** 4.1.1.1 Pol LHB1 & **Kildare** 14.12.2 CR 11.

2 Impose "Precautionary Principles" which are an integral component of planning policies on environmental and heritage matters. Where uncertainty exists regarding the potential impact of a proposed development on natural heritage, full account shall be taken of these Principles. Taken from **Carlow** 9.1 Heritage Pol 1 5th pt.

3 Adopt a regional approach to the protection, conservation and management of the environment in co-operation with neighbouring counties. Taken from **Leitrim** 1.10.2 g) 1st phrase.

4 Preserve the open character of commonage land and other hill land and secure access over paths and tracks through consensus with landowners. Taken from **Wicklow** Vol1 10.3.7.

5 Encourage and support sensitive development which provides access to natural habitats subject to nature conservation considerations. Taken from **Meath** 4.6 POL 42.

6 Develop directional signage to publicly accessible sites in partnership with key stakeholders. Taken from **Co Heritage Plan** Obj 2.11.

12.5.3 European Sites and Appropriate Assessment 2nd & 3rd paras

12.5 Designated Sites - Policy Objectives

CPO 12.5 We submit that **this should be merged with 8 replaced by:** *Protect, conserve, preserve, enhance, maintain and, where necessary, restore the integrity of all Sites, including areas adjacent thereto, designated or proposed, under National and European legislation and in other relevant International Conventions and Agreements and Processes*

and other sites that may be proposed for designation during the lifetime of the Plan, by prohibiting development which might damage or be harmful to or result in serious dereliction or disturbance or which could have a significant adverse effect on the integrity of a Site and maintain and develop linkages between them. Support, in co-operation with statutory authorities, the management of proposed or designated sites to achieve conservation objectives. Protect and maintain the favourable conservation status/value and where necessary the restoration of designated or proposed sites. When assessing development proposals ensure the protection and conservation and enhancement of wildlife habitats. Based on **Cavan** 8.4.2 NHEP9, **Roscommon** 7.1 Strategic Aim for Designated Sites 1st para & 7.1 Pol 1, **Meath** 9.7.2.2 POL 5, **Offaly** 7.3 NHP-01 & 03, **2015 Plan** 6.2.2.3 NHB 6 1st para Preamble and many other plans.

6 & 7

8 We submit that the reference to **Statutory Nature Reserves** in line 3 should be repositioned in an additional Pol Obj entitled: **Ramsar Sites, Statutory Nature Reserves, Biogenetic Reserves, and Wildfowl Sanctuaries**

9 to 13

14 We submit that **this should be replaced by:** *Maintain, and, where necessary, restore, the conservation value of Sites. All developments, plans and projects that have the potential to have a negative adverse impact of a Natura Site or which could result in the deterioration of any habitat, will be subject to Habitats Directive Assessment and should be in accordance with best practice and guidance. Comply fully with Art 6(3) & (4) of the Habitats Directive(as transposed into Irish law by the EU Habitats Regulations 1997 and subsequent amendments) and S.177A of the Planning and Development Act(2000 – 2010) or any superseding legislation to ensure the protection, management, enhancement and improvement of the network of Euro Sites, including any additional Sites that may be proposed during the lifetime of the Plan, by assessing and screening and, where warranted, by prohibiting developments of plans, programme projects within, near or immediately adjacent, which could have significant adverse direct, indirect or secondary impacts,(either individually, cumulatively or in combination with other plans) on the conservation objectives and qualifying interest of a Site, due to their size, scale or land take, resource requirements, emissions(disposal to land, water or air) , transportation requirements, duration of construction , decommissioning or from any effects either individually or in combination with other plans or programmes shall be permitted either individually or in combination with other plans unless there imperative reasons such as overriding public interest of a social economic nature and adequate compensatory measures have been identifies and put in place to ensure and that it can be established that there is no feasible alternative or less damaging solutions. Sites should be afforded the highest level of protection in accordance with the relevant Directives and legislation. Promote the favourable conservation status of habitats and protective species including those listed under the Birds Directive, the Wildlife Acts and the Habitats Directive. Based on **Planning and Development Act 2000** Part 11 Plans and Guidelines Chpt 1 *Development Plans* 10.(c) 3rd line, **Sth Dublin** 9.3.1 Objs 1 & 2, **Kildare** 13.5 NH4 & 5, **Offaly** 7.3 NHP-04 1st phrase, **Louth** 5.4 Pol HER 5, **Leitrim** 3.8.3.1 Pol 77 & 78, **Cavan** 8.4.2 NHEP9, **Westmeath Draft** CPO 12.6 and many other plans.*

We submit that **you should include additional Pol Objs:**

1 Protect their integrity of proposed or designated **SAC,s**. Development in, near or which could adversely affect a Site should avoid any significant impact on features for which the site is designated or proposed and only consider development proposals within or affect a Site if it can clearly demonstrate that the development will not have a significant adverse effect on it. Identify and afford appropriate protection to new Sites. Based on **Roscommon**

7.1 Special Areas of Conservation 2nd para 1st sentence, **Cavan** 8.4.1 Special Areas of Conservation 1st para 2nd sentence & **Fingal** 9.2 Obj NH16.

2 Protect those sites identified as **candidate SACs** as well as other sites that may be identified during the lifetime of the Plan. Taken from **Leitrim** 3.8.3.2 Obj 62.

3 Development in, near or which could **adversely affect a SPA** should avoid any significant adverse impact on the features for which the site has been designated or which could affect its integrity. Council will take appropriate steps to avoid the deterioration or disturbance of habitats or species contrary to the Habitats Directive and in particular will protect plant and animal species. Based on **Roscommon** 7.1 Special Protection Areas last para 1st sentence, **Cavan** 8.4.1 2nd para 1st sentence and other plans.

4 Recognising their importance, and in accordance with relevant legislation, actively promote the conservation and protection of the proposed or designated NHA,s and only consider development proposals within or affecting a Site if it can clearly demonstrate that the development will not have a significant adverse effect on it. **Protect, enhance and** conserve the character and integrity of designated or proposed **NHAs** including those that may be identified and designated during the lifetime of the Plan and maintain their conservation value, by avoiding/resisting proposed development in, near or adjacent to Sites which could result in their deterioration or which are likely to have a significant adverse effect (direct, indirect or cumulative) on features for which the sites were designated or prosed for designation. Ensure the protection of the ecological, visual, recreational, environmental and amenity values. Ensure that any development is designed and sited as to minimise its impact on landscape values. Maintain the conservation value of Council owned land within designated or proposed Sites and promote the conservation value of adjoining council-owned land. Based on **Sth Dublin** 9.3.2 Text & Obj 2, **Lois** 7.10 OBJ1, **Kildare** 13.5 NH 7 1st phrase & 8 1st phrase, **Westmeath** 5.6.1 P- NHA-1 & 4, **Leitrim** 3.8.3.4 Pol 79 and many other plans.

5 Assess all proposed **developments** in order to determine if they are **likely to impact** directly, indirectly or cumulatively on designated natural heritage sites in accordance with relevant legislation. Taken from Waterford City 10.4.2 Objs 6th pt & Carlow 9.1.1 Pol 2 5th pt.

6 Maintain or restore the favourable **conservation condition** of designated or proposed site **under the control of the Council**. Taken from **Roscommon** 7.1 Obj 1.

7 When **assessing development proposals** provide for the **protection, conservation and enhancement of wildlife habitats and designated sites**. Taken from Nth Tipp 4 Pol HERT 29: Designated Sites last phrase.

Other Designated Sites

8 Protect and conserve the integrity of and maintain the favourable conservation status and conservation value of **Ramsar Sites, Statutory Nature Reserves, Biogenetic Reserves, and Wildfowl Sanctuaries** under the Convention of Wetlands of International Importance (especially Waterfowl Habitat) and other National and European legislation and International Agreements and maintain and /develop **linkages** between them. Prohibit development which would damage or threaten their integrity. Based on **Fingal** 9.2 OBJ NH17 1st phrase, **Kildare** 13.5 NH 8 1st phrase, **Offaly** 7.4 NHO-02 and many other plans.

12.6 Non- Designated Sites - Policy Objectives **CPO 12.15 & 16**

17 We submit that **this should be repositioned in 12.5 Designated Sites and merged with proposed Pol Obj 8.**

8 We submit that **this should be repositioned in Chapter 14: Landscape Character**

19

12.6 (2nd one) Geological - Policy Objectives

CPO 12.20 We submit that **this should be replaced by:** *Recognising the importance of Geological Sites, work with stakeholders, to protect sites or features of geological or geomorphological interest or importance from inappropriate development by **prohibiting development** at, or in their vicinity, or which threaten their existence, integrity or conservation value. Identify, **protect**, enhance, maintain, manage, conserve, and where appropriate, restore their character and pro mote their preservation (including sites that may become designated during the lifetime of the Plan, in interest of protecting our geological heritage as listed In Table 12.6 Based on **Planning and Development Act 2000 1st Sch Part IV** Environment and Amenities 6, **DLR 4.1.3.9 Pol LHB27, Kildare 13.9 NH 16, Sth Dublin 9.70 Pol 19, & NHO9 Leitrim 3.8.3.8 Objs 71 & 72 & Pol 82, Laois 13.13 P99, Cavan 8.5 NHEO12, Wicklow Vol 1 10.3 Natural Heritage Strategy 3rd pt, Westmeath 5.8 P2, Fingal 5.3 COUNTY GEOLOGICAL SITES Text 4th sentence & 9.3 Obj NH30, Offaly 7.2.13 last para 1st sentence & 7.3 NHP16, Roscommon 7.2 Obj 23 1st phrase and many other plans.***

21 & 22

23 We submit that **this should be merged with 20.**

24 We submit that:

A the 1st phrase should be replaced by: *Promote, encourage, facilitate and support access and public rights of way to geological and geo-morphological features of interest inter in consultation with landowners(where appropriate).* Based on **DLR 4.1.3.19** last para and many other plans. **AND**

B 2 last phrase

Co-ordinate the continuing development of strategic walking routes, trails and other countryside recreational opportunities. Taken from **Cavan Geological Heritage Obj 8.5 NHEO11.**

We submit that you **should include an additional Pol Obj:** *Develop **directional signage** to publicly-accessible geological sites sites in partnership with key stakeholders.* Taken from **Co Heritage Plan Obj 2.11.**

We submit that you **should include an additional Sub Sec: Eskers**

Pol Objs:

1 *Increase cycling and **pedestrian access** and maintain esker heritage.* Taken from **Westmeath 5.10 2 & Offaly Draft 4.16 BLO-6** last phrase.

2 ***Protect**, preserve and conserve the landscape and natural heritage and geo-diversity values of esker systems from inappropriate development.* Taken from **Laois 7.22 ESK1 1st sentence & Offaly Draft 4.16 BLP- 11 1st phrase.**

3 *Ensure that any plan or project affecting eskers is adequately addressed with regard to their potential impact on the landscape and the environment and that **applications** for quarrying activity in proximity to eskers having regard to their potential to impact on the landscape, the environment and amenity value designated status of the eskers and conserve them from inappropriate development in the context of the overall esker system*

Based on **Laois** 7.22 ESK1 2nd sentence, **Roscommon** 7.3 Obj 7.19, **Offaly Draft** 4.16 BLP 12 and other plans.

12 7 Wetlands, Turloughs, Watercourses and Fens - Policy Objectives **CPO 12.25 & 26**

27 We submit that **this should be replaced by:** *Protect, conserve, preserve, manage and enhance wetlands(including fens and turloughs) from infilling, fragmentation, degradation and protect and conserve their quality, character and features. Resist development (including land reclamation) which would destroy, fragment and degrade wetlands, coastal wetlands, estuarine marshland and control adjacent development by the use of buffer zones.* Based on **Offaly** 7.3 NHP 11, **Fingal** 5.3 Obj RF 98 1st sentence & 7.2 Obj SW01, **Cavan** 8.5.2 NHEP16, **2015 Plan** 5.3.2 SFRA 3, **Sth Dublin** 7.2.0.9 and many other plans.

28 & 29

We submit that **you should include an additional Pol Obj:** *In partnership with the NPWS, WI and other stakeholders facilitate **public access** to wetlands and support and protect the recreational and amenity potential of wetlands.* Based on **Meath** 9.7.10 POL21, **Co Heritage Plan** Obj 1.6 and other plans.

12.8 Inland Lakes, Waterways and Broad Zones - Policy Objectives **Surely you should delete *Inland* from the Title!**

CPO 12.30, 31 & 33, 34

35 We submit that **this should be replaced by:** *Require that **land adjacent** to river and canal banks and lakeshores be reserved/preserved for public access as an undisturbed buffer zone between new development and river corridors and other water bodies to encourage increased public access and recreational opportunities.* Taken from Sth Tipp 6.3.4 Pol AEH7.

36

37 We submit that **this should be replaced by:** *Work with WI to protect, enhance, preserve and restore the built and natural heritage and landscape character of the Royal Canal and its associated structures including the maintenance of the broad zone of at 100m on either side of the Canal. This shall include the natural setting the Canal and its views and prospects. Ensuing that development is appropriately managed by incorporating a visual assessment zone of 500m on each bank in which all development proposals are assessed for their impact on landscape character and adverse impacts on natural heritage, settings, or its and recreational potential, including promotion, facilitation, maintenance and development of public use of the towpath for walking and cycling in consultation with WI, NPWS, adjoining Councils and other agencies.* Based on **Kildare** 5.9.5 ECD 32, **Westmeath** 5.16 P 7 & 10 & 6.11 O RCC1 & **Meath** 4.6.8 2nd para.

38 to 40

41 We submit that **this should be replaced by:** *Protect and enhance the landscape character and heritage of the Islands in lakes and rivers and their historic, cultural and scenic importance from inappropriate development whether on the islands themselves or at locations that interferes with their integrity and setting.* Based on Donegal 7.1.3 P16 1st sentence 1st phrase.

We submit that you **should include an additional Pol Obj**: *Support and promote, with the co-operation of private landowners, **public access** to islands.* Taken from Sligo 4.4 P TOU 8.

We submit that you **should include a Table of Existing or potential riverside and lakeside walks/cycle routes.** See Kildare 5.9.5 ECD 29.

We submit that you **should include additional Pol Objs**:

1 *In partnership with the NPWS, WI, Councils, community groups and other relevant stakeholders, provide, protect, promote, encourage, develop, maintain, facilitate, increase and improve **public access** to the inland waterways and inter-related recreational opportunities, including riparian/waterway corridors.* Based on **National Heritage Plan 4.17, RSES EMR REGIONAL POLICY OBJECTIVES RPO 4.4, Fingal 9.2 Obj NH25 1st phrase, 2015 Plan 6.2.2.7 ILW 3 2nd line, Leitrim 3.10.3 Obj 100, DLR 4.1.3.7 Pol LHB25 2nd sentence, Westmeath Draft 6.7 CPO 6.44 1st phrase and many other plans.**

2 *Recognising the importance of rivers and riparian corridors and buffer zones for their natural amenity and scenic values, **provide** promote, develop and facilitate/accommodate **access for walking**, cycling tracks and other compatible activities along inland waterways including rivers and canals to facilitate the creation of linear parks, in co-operation with landowners, WI, NPWS, Government Departments, community groups and other councils.* Based on **Lois 7.19 LS17 1st phrase, Louth 7.4 TC 25, Leitrim 3.6.3 Obj 29, Kildare 14.12.1 CR 7, Westmeath Draft 6.7 CPO 648 1st phrase** & many other plans.

3 *Support and facilitate the development of **Greenways and Trails** along (named) rivers.* Taken from **Sth Dublin 4.5.0 Pol 6 Obj 1.**

4 ***Identify existing** accesses to lakes shores and riverbanks within the life time of the Plan.* Taken from Mayo Vol 1 Chpt 4 Access to Heritage & Amenities AC 01a.

5 *Recognising the importance of inland waterways, both navigable and non-navigable, work with State Agencies, landowners, local communities and other relevant groups/stakeholders to **protect**, manage, maintain, preserve, conserve, improve and enhance waterbodies and watercourses, rivers(named), streams, river valleys, lakes, springs and associated undeveloped riparian strips/zones, buffer zones distinctive linear sections of water corridors and the amenity of the shoreline of river corridors, canal and river banks, river and stream valleys and riverine wetland areas, fens and turloughs, wildlife habitats from degradation and damage and the visual impact of dispersed and highly visible development that could adversely affect them by compromising their visual integrity, recreational, amenity, natural heritage, geological or landscape character values and the natural characteristics and features and recognise and promote them as natural environmental assets, and maintain them free from inappropriate development to ensure that public use is not prejudiced by incompatible uses. Keep them in an open state and in a natural condition by discouraging land filling culverting or realignment and in certain instances by uncovering existing culverts. Any existing blockages to permeability such as redundant buildings should be resolved where possible.* Based on **Dublin City 23.9 2nd para 2nd sentence, Kildare 14.8.5 WC 3 & 14.9.2 WV 3, Sth Dublin 8.2.0 Obj 4 1st phrase, Leitrim 4.1.1 4th para 8, Cavan 8.9 NHEP21 1st phrase, Fingal 9.2 Obj NH24 & 9.2 Obj NH25 3rd line, DLR 4.1.3.7 LHB25 1st sentence 1st phrase & 1st para below Pol 1st sentence last phrase & last para below Pol 4th pt, Westmeath 5.16 P RLC3(Draft 12.16 CPO 12.49), 2015 Plan 5.3.2 SFRA 3, 6.2.2.7 ILW 3 1st phrase, 8 & 9 1st sentence, Meath Draft 8.13 HER POL 47** and many other plans.

6 All proposed developments shall be in accordance with the Birds and Habitats Directives and other relevant EC Directives. Taken from Clare CDP.9.13.

7 Protect and maintain the amenity and recreational value of walking and cycling routes by prohibiting the intrusion of development along these routes. *Seek to ensure that new development will not have a negative impact on established walking routes and public rights of way along inland waterways.

*It would be better if Seek to was omitted. Based on

Westmeath 5.16 P RLC14 2nd sentence, **Kildare** 14.12.2 RW 2 and other plans.

8 Normally only permit proposals for development associated with water sports adjacent to waterways(including inland lakes)where the proposed facilities are compatible with existing use of water including non-recreational uses, which will not result in damage to important features of archaeological heritage or Natura Sites, can be satisfactorily integrated into the landscape or will not have an unacceptable impact on visual or environmental amenities especially in areas of high amenity or scenic importance. Based on **Laois** 8.5 DM 34, 1, 2 1st phrase & 3 1st phrase & 4 and other plans.

9 As Water sports cover a wide range of activities from tranquil uses such as sailing, canoeing, rowing and sail boarding to powered activities such as water-skiing and powerboat uses, the Council may require management plans for particular areas to address the compatibility of such varying demands. Taken from Carlow 8.11.9 2nd para 1st sentence & Kilkenny 7.3.4.1 2nd para.

10 Adopt bye laws prohibiting or restricting jet-skiing, water skiing and any other noise generating activities within one year of the adopt of the Plan. Adapted from **Leitrim** 3.10.3 4th para.

Note Mayo has adopted bye laws

11 When considering development applicants relating to activities such as the use of jet-skis and power boats have regard to the recommendations of any national guidelines which may come into force with respect their potential impacts on nature conservation. Taken from **Roscommon** 7.3 Obj 7.14.

12 In areas adjacent to inland waterways, lakes, canals, rivers, where planning permission is sought, the applicant must ensure that full public access to waterways is retained or conditions may be attached requiring retention of this access to facilitate creation or extension of walking/cycle routes. Taken from **2015 Plan** 6.2.27 ILW 5 2nd sentence.

13 Adopt a regional approach to the protection of watercourses in co-operation with neighbouring counties. Taken from **Leitrim** 1.10.2 g) 1st phrase.

14 Require that development along rivers set aside land for pedestrian routes that could be linked to established settlements. Taken from Carlow 8.11.10 Pol 5 2nd pt 1st phrase.

15 The line of development within river valleys shall be strictly controlled so as to maintain the integrity of the natural topography. The maintenance of natural river banks shall be required to be without physical or visual encroachment. Taken from **Dublin City** 23.9 1st para 2nd sentence.

16 Potential applicants will ensure that full public access to lands along waterways which are in private ownership. Taken from **Dublin City** 23.9 2nd para last sentence.

17 Protect, enhance and improve existing public rights of way and, where possible, provide additional access to inland waterways including lake shores, river banks, through the

acquisition of land for public rights of way and parking and lay-by facilities, through agreement with existing landowners*. Taken from **2015 Plan** 6.2.2.7 ILW 5 1st sentence & 6.
*You should add: *or by the use of compulsory powers*

18 Reserve land adjacent to canal and river banks and other waterbodies **to promote and facilitate the creation of** waterside **linear parks** to link with existing parks and open spaces and to facilitate the provision of **walking/cycling routes** along canals and watercourses. Based on **Dublin City** 23.9 1st para 1st sentence, **Leitrim** 3.10.3 2nd para 1st phrase, **Westmeath** 3.16 P 8 1st phrase & 6.2.7 O 5 1st phrase.

19 **Promote** the natural, historic and **amenity value** of watercourses to address the **long term management** and **protection** and strengthen **regional links**. Taken from **Sth Dublin** 8.20 Pol 3.

CANALS

20 Provide public access to canal corridor, where feasible, In co-operation with WI, NPWS and community groups, encourage, promote and use the potential of **canal towpaths** for designated walking and cycle routes, both as recreational amenities and the promotion of links with any designated walking cycling routes, existing or proposed. Based on **Smarter Travel 2009-2020** Act 17 2nd sentence page 45, **2015 Plan** 6.2.2.7 ILW 10 1st sentence & **Kildare** 5.9.5 ECD 29 & **Westmeath** 5.16 P 4 5th line,

21 Ensure the conservation of canal corridors and require that **developments abutting the canal** relate to the context of the adjacent environment and contribute to its overall amenity. Taken from Galway City Pol 4.3 8th para 1st phrase.

ROYAL CANAL

22 Promote public use and facilitate and develop the towpaths along the Royal Canal as a **Greenway** in order to expand recreation and ensure their integration with other strategic trails including those in adjoining counties in co-operation/consultation with WI, NPWS, other relevant agencies and adjoining councils. Based on **Action Plan for Rural Development** 2017 Pillar 3 Act 168 1st phrase, **Kildare** 5.9.5 ECD 33 & 5.19 EO52, **Westmeath** 3.19 O TI & & 5.16 P 11 & **Fingal** 6.9 Obj ED69.

23 Pursue the **redevelopment of the towpath for pedestrian/cycle use** to link with NCN at Mullingar via established cycle routes in Westmeath. Based on **Co Heritage Plan** Obj 2.5 & **2015 Plan** 5.1.3 PED 8.

24 Work with WI to **protect**, enhance, preserve and restore natural heritage and landscape character of the Royal Canal by ensuring that development is appropriately managed by incorporating a visual assessment zone of 500m on each bank in which all development proposals are assessed for their impact on landscape character and adverse impacts on natural heritage, settings, or its views and prospects and recreational potential, including promotion, facilitation, maintenance and **development of public use of the towpath for walking and cycling** in consultation with WI, NPWS, adjoining Councils and other agencies. Based on **Kildare** 5.9.5 ECD 32, **Westmeath** 5.16 P 7 & 10 & 6.11 O RCC1 & **2015 Plan** 6.2.2.7 ILW 12.

LAKES

25 Promote, extend, develop and facilitate the provision of increased **access** to lakes and lakeshores to extend public walking and cycling routes. Based on **Westmeath** 3.16 P 6 1st phrase, 6.27 O 2 & 7.13 O 8 and other plans.

26 Maintain the amenity value of major lakes and their environs by restricting and regulating development that would prejudice use of these areas. Taken from **Cavan 8.8.1 NHEO33 1st phrase**.

27 Develop a walk around Lough Ree in co-operation with Longford & Roscommon County Councils and other relevant bodies within 3 years of the implementation of the Plan. Taken from **Westmeath 3.20.1 O WB7**.

RIVERS

28 Promote and develop the towpaths along the River Shannon Navigation to expand recreation and in co-operation with WI.

Taken from **Action Plan for Rural Development 2017 Pillar 3 Act 168 1st phrase**.

29 Protect and preserve the landscape of the River Shannon and floodplains, including the callows and views of special interest, from inappropriate development. Taken from **Offaly 7.9 AHAP 01(Draft 4.16 BLP-19 1st phrase & 7.13 LAP 05**.

12.9 Peatlands Policy Objectives

All

We submit that **you should include additional Pol Objs:**

1 Protect, conserve and manage the character, appearance, heritage and amenity values of peatland landscapes by promoting high environmental standards in conjunction with the BnM, NPWS, Coillte, IPCC and NGOs. Based on **Laois 7.19 LS44, Meath 9.7.6 1st para 2nd sentence, Offaly 2.12 TP 06, Leitrim 3.8.3.2 Obj 63 & Obj 74, Westmeath 5.12 P O 3** and many other plans.

2 The Council recognises the importance of raised bogland as a major natural, archaeological and amenity resource and will liaise with the relevant Government departments and NGOs to try to secure the conservation of original peatland areas. Taken from **Nth Tipp 4.8 Peatlands 2nd para**.

3 Exercise control of peat extraction, both individually and cumulatively, which would have significant impacts on the environment. Taken from **Westmeath Draft 12.17 Pol Obj CPO 12.58**.

4 Support the provision of outdoor pursuits and walking and cycling routes. Taken from **Offaly Draft 4.16 BLP 16 1st phrase**.

12.10 Mid Shannon Wilderness Park - Policy Objective.

1 2.11 Biodiversity and Nature Conservation – Policy Objectives

12.12 Trees, Woodlands and Hedgerows - Policy Objectives. CPO 12.61

62 We submit that this should be replaced by: *Protect woodlands and groups of trees and ancient woodlands, especially native and broadleaf species, from inappropriate development that would impact adversely on them and affect their amenity and biodiversity value. Manage and promote the preservation and enhancement of the existing network of woodlands as they contribute to the environment including landscape character and landscape conservation. Where appropriate, protect mature groups of significant trees that are not protected under TPOs.* Based on **Laois 7.13 NH 22 1st phrase, Kildare 9.2 Obj NH27,**

Fingal 9.2 Obj NH27, Wicklow 10.3.3 NH 14 1st phrase, Offaly Draft 4.16 BLP-22 1st phrase and many other plans.

63 to 70

12.13 Native Species - Policy Objectives

12.14 Prevention of Pollution - Policy Objectives

12.16 Water Quality and Ground Water Protection - Policy Objectives

12.18 Air Quality - Policy Objectives

All

12.19 Noise and Light Pollution - Policy Objectives

All

12.20 Soil Protection - Policy Objectives

All

12.21 *Natural Heritage and Environment – Climate Change Actions*

A 12.1 to 6

7 We submit that you should insert after *Fracking, shall be prohibited.*

8 & 9

Chapter 13: Green Infrastructure

13.5 General Green Infrastructure - Policy Objectives

All

13.6 New Green Infrastructure - Policy Objectives

All

13.7 Network of Blueways, Greenways and Peatways - Policy Objectives

CDP 13.14 & 15

16 We submit that this should be repositioned in Chpt 10 Tourism as an additional Pol Obj.

18 We submit that this should be repositioned in Chpt 5 Transport, Infrastructure & Communications 5.2.7 Cycling and Walking and merged with proposed additional Pol Obj 24.

19 We submit that this should be repositioned in Chpt 12 Natural Heritage & Environment 12.8 Inland Lakes, Waterways and Broad Zone Areas and merged with Pol Obj CPO 13.19.

13.8 Green Infrastructure Strategy - Policy Objectives

All

13.9 Public Rights of Way

We submit that this should be repositioned in an additional Chpt and that it should be completely re-written as it fails to differentiate between Public Rights of Way on one hand and walking routes and trails on the other hand.

Text

1 *Public Rights of Way have existed over the centuries and constitute an important **recreational amenity**. They enable the enjoyment of high quality landscape, natural and archaeological heritage and provide valuable links to natural assets and amenities such as rivers lakes, bogs, forests and places of natural beauty. Based on **Fingal Chpt 5 5.3** Public Rights of Way 2nd para 1st sentence and many other plans.*

2 *A PROW or highway is a physically defined route over which the public have a **right of passage** even if the route is not in public ownership. It is described as "a user as of right" and confers an unrestricted right of the general public to pass and repass at all times of the day or night and at all seasons without notice to, or permission from the landowner. The most common characteristic of a PROW is that it follows a defined route which may be subdivided amongst different branches. Based on **Wicklow Vol 1 10.3.8 2nd para 2nd & 4th** sentences & last sentence 1st pt and other plans*

3 *The **listing** and mapping of public rights of way will **preserve Public Rights of Ways for recreational** purposes. Taken from Kerry 9.10 2nd para last sentence.*

4 *The Planning and Development (Amendment) Act 2000 makes it mandatory that the preservation of a public right way which give access to seashore, mountain, lakeshore, riverbank and other place of natural beauty or recreational utility which public right of way shall be identified both by marking them on at least one of the maps forming part of the development plan and by indicating their location on **a list appended to the development plan**. Taken from **Cavan 8.10 1st para** last sentence, **Sth Dublin 9.4.0 Text 1st para 1st** sentence & **Offaly Draft 6.6. 2nd para**.*

5 ***Section 14 of the Planning and Development Act 2000 sets out the formal process for designating rights of way in development plans**. The scope of these statutory provisions is grounded on identification of existing routes over which PROWS are deemed to exist. The inclusion of PROW objectives for their preservation provides greater protection for such routes under development management provisions of planning legislation whilst also restricting the scope of certain exempt development. Taken from **Wicklow Vol 1 10.3.8 3rd** para.*

6 *The listing of public rights of way is an urgent matter as the lack of certainty on access has not only affected the rights of local people but has been the major cause of **the failure of walking tourism** to reach its full potential in this country.*

7 *The county development plan will include a **list of public rights** of way in accordance with the **2010 Planning and Development (Amendment) Act Sec 7(b)(ii)(o)**. The list must be drawn up in accordance with the wording in the Act.*

Notes:

1 *The wording in the Planning Act is quite clear: Each new development plan must fulfil the above requirement and no deferment will be permitted. See DOCELG letter to all Councils of 25/10/12 (PL 09/12).*

2 ***Counties who have complied so far:** Cavan 8.10 Table 8.4, Clare App 6, DLR App G, Donegal Part B App 3 T 15, Meath App 14, Kerry Vol 2 App 6, Kilkenny App D, Offaly Draft 6.6 Table 6.1, Roscommon 8.7 Map 19, Sligo 6.7.4 Public rights of way Table 6.A, Sth Tipp 6.3.7 3rd para, Westmeath Draft App 8, Wicklow Vol 1 Table 10.3.*

8 *It is suggested that the **list of public rights of way** should be compiled by following this modus operandi: Place an advert in local papers seeking submissions from the public to identify public rights of way which give access to seashores, mountains, lakeshores,*

riverbanks or other places of natural beauty or recreational utility. Identify existing rights of ways, paths, and access points to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity. Identify access points to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity which the Council have maintained or repaired with a view to identifying public rights of way. Carry out a desktop analysis of public records, maps, aerial photographs and newspaper accounts to identify reputations of public rights of way. Once the list is compiled, advertise and put it on display. The public will be invited to make submissions on the validity of the public rights of way. Endeavor to verify and list the public rights of way and begin the formal process for designating rights of way under Section 14 of the Planning and Development Act 2000 (as amended). Vary the Plan to include the list and map showing the public rights of way. Taken from **Cavan** 8.10 NHEO45.

9 If an **Interim list** is included in the Plan the following should be appended to the list or provided in the written statement: *This is not an exhaustive list and the omission of a right of way from this list shall not be taken as an indication that such a right of way does not exist.* Taken from **Sligo** 6.7.4 Public rights of way para below Table, **Meath** 9.7.9 2nd para 2nd sentence, **Cavan** 8.10 last para last sentence & **Offaly Draft** 6.6. last para.

We submit that **you should include Pol Objs:**

1 Identify Public Rights of Way prior to any new planting, infrastructural development of any new energy/telecommunications developments. Taken from Carlow 8.12 pol 6 2nd pt.

2 See **Draft 13.9 Public Rights of Way - Policy Objectives** CPO 13.30.

3 Identify and map, on an ongoing basis, public rights of way and incorporate them in the Plan by way of a **Variation**. Where appropriate links to established public rights of way in adjoining counties will be identified. Taken from **Westmeath** 7.15 O 1.

4 In accordance with the provisions of either Sections 206 or 207 of the Planning and Development Act 2000 encourage and facilitate **the creation of additional rights of way** and extend existing ones for pedestrian or amenity reasons, by investigating named areas to facilitate the development of waymarked ways and looped walks, by undertaking a review/survey of green links and cycling routes and by bringing forward proposals within two years of the adoption of the Plan, either by agreement or by the use of compulsory powers, for the creation of public rights of way, particularly in areas of high amenity and recreational importance and to the Royal Canal, uplands, lakeshores, river banks, forests, heritage and scientific sites, areas of historic, archaeological and recreational importance and National Monuments, to create a meaningful network. Promote their greater use. Provide linkages from built up areas to the countryside and the coast and link with public rights of way in adjoining counties. Based on **Wicklow** Vol 1 10.3.8 NH47 last sentence, **Sth Dublin** 9.4.0 Action, **Westmeath** 7.15 O 3 1st sentence and excluding 2nd phrase, **2015 Plan** 6.4 1st sentence 1st line, **DLR** 4.1.2.13 LHB14 2nd & 3rd pts, **Leitrim** 3.10.7 Obj 108, **Fingal** 5.2 Obj RF118 1st line and many other plans.

5 Ensure the provision of, and where necessary, improve **signposting** and waymarking on all public rights of way. Based on **Westmeath** 7.15 O 4, **Fingal** 5.2 Obj RF120 and other plans.

Notes

1 Walkers need to know of their existence to encourage usage

2 integrity of rights of rights of way. **Signage would alert local residents to planning applications affecting the**

3 Directional signage during the course of the route would prevent **involuntary trespass on private property** and prevent walkers getting lost which might impinge on **walker safety**.

6 Designate Pilgrim Paths as public rights of way.

Note We submit that as these Paths have been walked for many centuries their case for designation is surely irrefutable.

7 Identify mass paths and routes to holy wells, mass rocks and penal mass stations and consider designating them as public rights of way.

8 Encourage the provision, for the common good, of a network of Public Rights of Way to traditional outdoor amenities, including heritage sites and features of archaeological interest, national monuments, hills, rivers, forests, lakes, geological and geomorphic systems, water corridors, places of natural beauty and other natural amenities. Taken from **Westmeath** 7.15 P 1 1st sentence 2nd phrase.

9 Promote the preservation, protection, enhancement, maintenance and improvement, for the common good of all public rights of way particularly those giving access to lakes, river banks, geomorphological features of heritage value and other places of natural beauty or recreational utility/activity by ensuring that development doesn't impinge thereon. Based on **Sth Dublin** 9.40 OBJ 1 1st phrase, **DLR** 4.1.2.3 LHB14 1st pt, **Louth** 7.5 TC 29 1st phrase, **Roscommon** 8.6 Obj 8.5 & 8.7.1 Pol 8.36 4th line, **Leitrim** 3.10.7 Obj 109, **Meath Draft** 8.16 HER POL 51, **Offaly Draft** 6.7 TRP-32 in line 2 and many other plans.

10 Prohibit development and keep free from obstruction public walking routes and public rights of way, particularly those lakeshores, riverbanks or other places of natural beauty or recreational activity and take legal action if necessary, to prevent any attempt to close them off. Based on **DLR** 4.1.2.13 LHB14 4th pt and other plans.

11 Look favourably on planning applications which include proposals to improve the condition and appearance of existing rights of way. Taken from **DLR** 4.1.2.13 LHB14 6th pt, **Laois** 7.21 PRW5 2nd phrase, **Carlow** 8.12 Pol 6 7th pt & **Kildare** 14.12.2 RW 4.

12 Existing Public Rights of Way and established walking routes **shall be identified** prior to any new forestry planting, new **infrastructural**, energy/telecommunications or golf course **developments**. Taken from **Kildare** 14.12.2 RW 3 & **Offaly Draft** 6.7 TRP- 33.

13 Development will not be permitted where a public right of way **might be prejudiced**, unless specific arrangements are made for suitable **alternative linkages** and that the developer can demonstrate that the level of amenity is maintained by:
(i) the footpath/bridleway being diverted by the minimal practical distance and the route continues to be segregated from vehicular traffic;
(ii) Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it.
(iii) the diverted route is of at least equal character and convenience. Based on **DLR** 4.1.2.3 LHB14 5th pt, **Laois** 7.21 PRW6, **Leitrim** 4.5.12 and other plans.

14 Where, in the interests of proper planning and development, the extinguishment of an existing right of way becomes expedient, the Council may require the provision of a suitable alternative. Taken from Galway City 4.5.1 4th para 3rd sentence.

15 The Council will utilise its relevant statutory powers to preserve as practicable the **character** of listed public rights of way for amenity purposes. Taken from **Wicklow** Vol 1 10.3.8 NH46 1st sentence.

16 Protect and promote Greenways and consider designating them as public rights of way. Taken from **Laois** 7.21 PRW5 1st phrase.

17 Preserve and maintain existing public rights of way in order to link amenities. Taken Based on Sth Tipp 6.3.7 Access and Public Rights of Way 1st sentence & Offaly Draft 6.6 1st para 2nd phrase.

13.10 Green Infrastructure Climate Change Actions

A 13.1 to 4

5 We submit that **this should be repositioned in Chpt 5 Transport, Infrastructure Energy & Communications 5.2.7 Cycling and Walking as an additional Pol Obj to be placed in Walking.**

Chapter 14: Landscape Character

We submit that you should delete *Character* to better reflect its contents.

14.5 Table 14.1 Landscapes Character Types and Sensitivity

Figure 14.1 Landscape Character Areas

Landscape - Policy Objectives

CPO 14.1 & 2

3 We submit that **this should be merged with 4 and replaced by:** *Protect, conserve,, maintain, safeguard, identify, enhance and ensure the preservation of the uniqueness of a landscape type and the visual integrity, scenic quality, general amenity and the visual quality of areas of intrinsically important and outstanding, highly sensitive, designated, natural, unspoilt and open landscapes, the natural environment scenic areas, high amenity areas and the environs of archaeological or historic sites from intrusive, inappropriate, injurious or unsympathetic new, or additions to, existing developments and reinforce their character and promote their distinctiveness by prohibiting development where it could unduly impinge or impact on or be detrimental to such landscapes or would be injurious to, or detract from natural amenities or introduce incongruous landscape elements.* Based on **2015 Plan** 6.1.1 2nd para 1st sentence, **Fingal** Chpt 9 Obj 36, **Louth** 3.10.7 1, **Sth Dublin** 9.20 Pol 7, **Kildare** 14.8.1 LA 1 1st phrase, **Westmeath** 6.23 P HAA1 & 5, **Cavan** 8.7 NHEO25 1st sentence & 2nd sentence 1st phrase, **Meath** 9.8.6 OBJ 1 2nd phrase and many other plans.

14.6 Landscape Character Areas

14.6.1 Landscape Unit 1- Northern Drumlin Lakeland Policy Objectives

CPO 14.10 to 13

14.6.2 Landscape Unit 2 - Northern Upland Policy Objectives

CPO 14 & 18

We submit that you **should include an additional Pol Obj:** *Preserve, maintain, enhance important landscapes and protect the amenity value, visual integrity of upland areas. Discourage inappropriate development in open countryside and prohibit developments which are likely to have material adverse visual impacts, either individually or cumulatively, on the character of the uplands. Ensure that development will not materially interfere or detract from scenic uplands and that particular regard is had to potential impacts of new developments and require that proposed developments demonstrate that every effort has been made to reduce visual impacts(including excessive bulk and inappropriate siting) and that visually prominent sites have been avoided to minimise visibility from scenic routes, walking trails, public amenities, settlements and roads. Have particular regard to the potential impacts of development on sensitive upland areas and consider the difficulty of establishing and*

maintaining screening vegetation. Based on **Laois** 7.19 LS01 1st phrase & 30, **Kildare** 14.8.3 LU 1, 4 & 5 and many other plans

14.6.3 Landscape Unit 3 - Shannon Basin /Lough Ree Policy Objectives **CPO 4.19, 20 & 22**

14.6.5 Landscape Unit 5 - Inny Basin Policy Objectives **CPO 14.30**

14.7 Protected Views and Prospects **CPO 14.36**

14.8

We submit that **you should include additional Pols Objs:**

1 *Provide and increase managed public access to interesting and attractive landscapes or to semi-natural and landscape amenity areas for recreational purposes.* Based on **Fingal** 9.2 High Amenity Zoning last pt, **Dublin City** 10.5.2 GIO9 and other plans.

2 *Preserve the status of traditionally open/unfenced landscapes including commonages and other hill land.* Based on **Wicklow** Vol 1 10.3.7 NH42 1st phrase and other plans.

3 *Adopt a regional approach to the protection of the landscape in co-operation with neighbouring counties.* Taken from **Leitrim** 1.10.2 g) 1st phrase.

Landscape Character Climate Change Actions **A 12.1 to 6**

7 We submit that **you should insert after Fracking, shall be prohibited.**

8 to 10

We submit that you **should include an additional Sub Sec: Fencing Of Hitherto Open Land**
Text

1 *It is a requirement of the Planning Regulations 2001 Art 9(l)(a)(x) that the fencing or enclosure of land open to or used by the public during the ten years preceding such fencing or enclosure for recreational purposes or as a means of access to any seashore, mountain or other place of natural beauty or recreational utility, requires planning permission.* Taken from **Kilkenny** 6.2 Fencing 1st sentence.

2 *Wire fencing constitutes visual pollution and destroys the "away from it all" feeling which makes upland areas such an attraction.* Taken from **Kilkenny** 6.2 Fencing 2nd sentence.

3 *There has been a large increase in the amount of new fencing in upland areas. Barbed wire has been used in most of this new fencing, which, in the absence of stiles or gates, makes access for recreational users of our countryside almost impossible. Traditional hill-sheep farming rarely required fencing, but since the introduction of AEOS, sheep-farmers must, in certain circumstances, stock-proof their land. The challenge is to ensure that such fencing will be done in a manner that will meet the requirements of AEOS without impinging on access for walkers and other recreational users.*

Pol Obj

As new **fencing of land open to or used by the public** during the ten years preceding is not exempt development in accordance with Art 9(l)(a)(x) of the Planning and Development

Regulations the following criteria will be used when considering planning applications for new fencing of hitherto open land : Fencing, particularly in upland, highly scenic or amenity areas, will not normally be permitted unless such fencing is essential to the viability of the farm. The nature of the material to be used, the height of the fence, and in the case of a wire fence the type of wire to be used will be taken into account. Stiles or gates at appropriate places will be required. Barbed-wire will not be used for the top line of wire. Based on Fingal Chpt 5 Obj RF1 and many other plans

Note As **fencing** may have a **cross-county dimension** it is important that this development plan should be in conformity with those in adjoining counties.

Chapter 16: Development Management Standards

16.4 General Development Management Standards

16.4.16 Rural Enterprise

16.4.16.2 Development Management Standards - Forestry a), b) & d)

16.4.16.3 Extractive Industry

Development Management Standards - Extractive Industry DMS 16 175

176 a) to g), i) & j

177 & 178

We submit that **you should include an additional DMS: *visual impact on sensitive landscapes***. Taken from **Louth** 3.8.1 Development Management Criteria 1st para 2nd pt.

16.4.17 Renewable Energy Developments

16.4.17.1 Wind Energy last sentence

We submit that **you should include an additional Obj: *In assessing individual energy proposals, the Council will take into account the impact on the environment, landscape, public rights of way and walking routes, NHAs, SPAs, areas of scenic importance and its cumulative impact and, where impacts are inevitable, mitigating factors.*** Taken from **Meath Draft** 11.10 DM OBJ 146.

16.4.17.2 Solar Energy 2nd to last sentences

Development Management Standards - Renewal Energy DMS 16.181 a) e) & e) to l)

182

We submit that **you should include an additional Sub Sec: *Energy Network: In the assessment of individual proposals the following will be taken into account: The impact on the environment and landscape, public rights of way and walking routes, the protection of NHAs, SPA,s and SACs, areas of scenic importance and proximity to national monuments, its cumulative impact and, where impacts are inevitable, mitigating features.*** Taken from **Meath Draft** 11.10.3 DM OBJ 154

16.4.18 Development Management Standards - Telecommunications

DMS 16 184

16.4.20 Tourism and Recreation

1st para

2nd para 1^s , 2nd , 4th & last pts

Development Management Standards - Tourism and Recreation

DMS 16.187 1st to 3rd pts

188 & 189

16.4.21 Built and Cultural Heritage

All

16.4.21 Protected Structures

Development Management Standards - Protected Structures

DMS 16.109

16.4.21.2 Architectural Conservation Areas

Development Management Standards- Architectural Conservation Areas

All

16.4.21.3 Development Management Standards - Archaeology

All

16.4.22 Natural Heritage Protection

16.4.22 Development Management Standards - Natural Heritage Protection

All

16.4.23 Landscape Character

Development Management Standards - Landscape Character

All

Appendices

6 Built and Cultural Heritage

7 Natural Heritage and Amenities

8 Green Infrastructure

9 Landscape Character

OVERVIEW

The Draft fails to comply with, have regard to or take into account:

Planning & Development Acts

Plans in adjoining counties(including Draft)

DoECLG Guidelines

Heritage Act 1995

National Heritage Plan

RSES

Development Plan Guidelines

KEEP IRELAND OPEN

Jan 2021