
Cover Letter

GRANARD AREA ZONING – DEVELOPMENT PLAN 2021 TO 2027

Granardkill Residents
c/o Judy Sheridan

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17th January 2021

Administrative Officer
Review of County Development Plan
Forward Planning Department
Chief Executive Officer
Longford County Council
Áras an Chontae
Great Water Street
Longford
N39 NH56

GRANARD AREA ZONING – DEVELOPMENT PLAN 2021 TO 2027

Dear Sir,

We wish to make a submission to the compilation of the above upcoming Plan. We wish to draw your attention to the headline objectives currently set out on your webpage under the Longford County Council Development Plan 2021 – 2027 and in particular to page one. Under the heading National and Regional Strategic Context paragraph two the first key principle listed is that this plan should provide **'Healthy placemaking by promoting people's quality of life'** we feel that zoning lands to Industrial in a long established Residential area will have an immense negative impact on our quality of life.

We would also refer you to **'Guidelines for Planning Authorities June, 2007'** issued by the Central Government. These Guidelines suggest that the current Granard Area Zoning may be in breach of many of the Recommendations/Objectives of the aforementioned Guidelines.

We refer in particular to Pages 26 to 30 (copy attached) of the above Guidelines which deals with Housing Strategy, Settlement Strategy, etc. These sections and pages show that existing small residential areas should not be incorporated into or diminished by industrial developments except in very exceptional circumstances. These exceptional circumstances do not apply in our case. Please refer to the pages attached.

We would now ask you to look at the attached proposed Zoning Map and in particular to Industrial Zoned areas denoted for ease of reference **'B', 'C', 'D' and 'E'** which totally surround Residential Zone **'A'** and Residential areas **'F' & 'G'**. Area E is heavily developed and further industrial wind turbine are proposed on area D which is totally unacceptable and

has been refused planning permission by Longford County Council and is currently subject to an appeal to An Bord Pleanála by the applicant – planning application 20/105 refers.

We would draw to your attention here that 400 plus citizens/residents comprising people in Granardkill, Granard and the surrounding areas, signed an Objection to the proposed industrial/ocean-sized industrial wind turbine (PL 20/105 Industrial Wind Turbine 169 M on an area 495 ft above sea level) being allowed in this area. The signed sheets are on file with Longford County Council.

Furthermore, please bear clearly in mind that the Granardkille area was *not* earmarked for Wind Farm development. See map on page 210 of Appendix to LCC County Development Plan 2015-2021. You will also note on that map that there is no Buffer Zone placed around Granard.

The above points are highly important and underpin our request to have the areas referred to in this submission re-zoned back to Residential, Agricultural, or Recreational use.

The area marked 'B' is zoned industrial and this site currently has Planning Permission for warehouse storage only. Numerous planning enforcement and environmental queries/complaints have been submitted to Longford Co Co and the EPA regarding the present usage of this site - planning applications 98/369 and 00/365 refer.

However, in the recent past planning was sought to develop the neighbouring site into a garage type structure with attached office area and was refused by both Longford Co Co and An Bord Pleanála after a long and sustained campaign by the local residents to prevent this development happening – planning applications 16/55 and 16/300 refer. The grounds for these refusals included conflicting with Longford CDP 2015-2021 policies ROADS 2 and ROADS 11, and it was determined 'the proposed development would endanger public safety by reason of traffic hazard' and 'it would adversely affect the operation and safety of the regional road network'. Other grounds for refusal included reference to Longford CDP 2015-2021 policies SW 3 and SFRA 5, and the proposed development being 'contrary to the proper planning and sustainable development of the area'. Therefore, realistically how can 'industrial' zoning in this area 'B' be considered?

Of major concern: Should these zoning decisions on 'D' be acted upon and planning permission granted for industrial units and further development be allowed on area 'B' as attempted under the recent planning applications, the result would be an immediate and alarmingly detrimental environmental impact on present residents' quality of life. In the past, outline planning permission was granted for four houses in Area 'B' and this type of development would be more appropriate – planning application 04/685 refers. These cannot proceed if the land zoning isn't changed from industrial.

This is a long established residential area (over 45 years) and any additional Industrial development will have a negative impact on the occupant's right to the peaceful enjoyment of the private open space associated with their property. In the longer term, residents would be sitting in the midst of an industrial development that would in effect totally destroy the quality of life. The visual amenity of the area will be severely affected along with property values, deeming them undesirable and unliveable.

Environmental Impact: Further development will have a negative impact on the environment with no consideration to the likely pollution dangers associated.

Noise pollution: Within this rural area with prominently residential property is not considered, unsociable hours are not adhered to currently.

Water Infrastructure: Non-domestic connections to the public watermain and to the public sewer will adversely affect services to neighbouring properties. Has the infrastructure the capacity to service the public water and wastewater system? Will additional Industrial development adversely affect the public waste water services provided to local properties/residences?

Foul sewer and public waste: Will additional Industrial development adversely affect the public sewer network, and the operation of both the pumping station located at Granardkill and the wastewater treatment plant at Granard? Will additional Industrial development adversely affect the public waste water services provided to local properties/residences?

Landscape character: Any potential industrial development will not be compatible with existing adjacent land uses, will impact on the surrounding properties and will not 'blend in' with the broader environment.

Traffic safety: We have concerns regarding the additional traffic movements within the area that would be generated by additional development. Increased traffic on an already busy regional road and will reduce road safety, especially in the mornings with local school traffic to the town of Granard and in particular to the nearby vocational school Árd Scoil Phadraig.

Tourism: A major tourism and amenity attraction featuring a "living model" of a Norman village is to be developed at the site of Granard Motte, a national monument. Additional industrial developments will hinder this tourism potential for the area.

We as citizens understand the need for commercial and industrial development. Several more appropriate locations are available within the area in accordance with Longford CDP (ECON 12) "The reuse of sites and/or existing building stock shall be encouraged where possible. Older commercial and light industrial structures shall be protected as appropriate". We strongly believe that any zoning should also be reviewed in the context of Longford CDP 2015-2021 policy ECON 13 "e. *Compatibility of existing adjacent land uses with the proposed*

development and mitigation measures to preserve and protect the amenity of the adjacent uses, should this be necessary."

We would therefore point out that the areas to the east of Granard town that are currently zoned Industrial (with outer inner relief road) and Commercial are double in size to those allocated to Housing in the Granard area. Why not encourage the development of these areas some of which are presently an eyesore rather than encroach on long established residential areas?

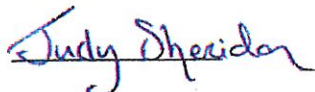
Have the number of vacant sites and units which are available in the area been considered? As the Department Guidelines advise of an evidence-based approach to the zoning of lands, we ask you to provide evidence of any specific need for additional Industrial zoned areas or its need to be in close proximity to a long established residential area? A buffer between industrial and other development zoning types does not seem to be allowed for, as required.

We reference LAP Granard 2006 – 2012 Page 22 - Under heading 'Policy and Objectives' - 'To zone sufficient land to facilitate an appropriate level of industrial and service activity, that increases the economic activity, viability and vibrancy of the town, without compromising the environmental, residential or amenity value of the area'

In conclusion we would like to state that we have serious concerns regarding the impact that the proposed zoning will have on our community. While it is acknowledged development and growth in certain areas may be necessary, we believe that further industrial development is contrary to the Longford County Development Plan as it is evident that further development cannot proceed without having a negative effect on the amenities of adjoining properties and its residents.

As these areas are in long term agricultural use surrounding long established residential areas, together with all the points we have made in this submission, we request that areas 'B' 'C' & 'D' on the drawing attached be rezoned to Residential, Agricultural or Recreational use by Longford County Council.

Yours Sincerely,



Judy Sheridan

On behalf of Granardkill Residents

Attachments

1. Copy of **Granard Zoning Map** in colour.
2. Copy of current issue of '**Guidelines for Planning Authorities**', pages 26-30.

NAME

SIGNATURE

JUDY SHERIDAN

J. Sheridan

KATHLEEN SHERIDAN

Kathleen Sheridan

MARY SHERIDAN

Mary Sheridan

JUNIOR STODD

Maureen Flood

Bronagh Flood

Bronagh Flood

EILISH McGRANEY

Eilish McGrane

PADRAIG McGRANEY

Padraig McGrane

NOREEN TULLY

NOREEN TULLY

NOREEN TULLY

NOREEN TULLY

EDWARD STOKES

Edward Stokes

BERNARD CLYNE

Bernard Cline

HILARY TULLY

Hilary Tully

ASHLING TULLY

Ashling Tully

REGINA TULLY

Regina Tully

BRIAN SHERIDAN

Brian Sheridan

NAME

SIGNATURE

MAGDA LAPCZYNSKA

M. Lapczynska

MARY WARD

Mary Ward

Patrick McGinley

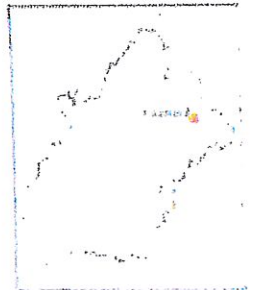
Patrick McGinley

Linda Higgins

Linda Higgins

Granard Zoning Map

County Development Plan 2001-2007



Legend

- Residential Development
- Residential (Rural)
- Residential (Urban)
- Residential (Special)
- Residential (Special)
- Commercial
- Industrial
- Agricultural
- Other

Notes:
 1. This map is a summary of the zoning map and should not be used for legal purposes.
 2. The zoning map is available for inspection at the Planning Department, Granard, Wick.



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

Translating the strategic vision:

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

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

Population Estimates

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

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

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

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

Housing strategy

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

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

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

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

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

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

Settlement Strategy

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

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

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

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

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

Land Use and Transportation Strategy

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

