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6 August, 2021

Admin Offices
Forward Planning Unit / Draft Co. Development
Longford County Council Plan
Great Water St 2021-2027
Longford N39 7628

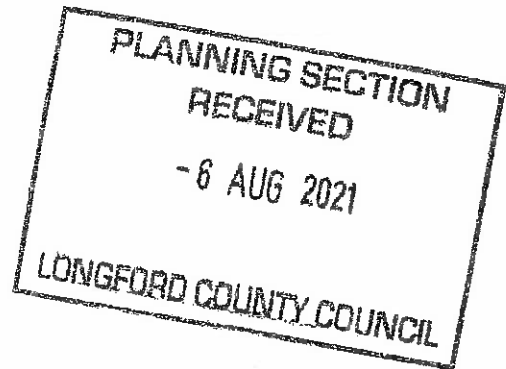
Attached is my submission for
Draft Development Plan 2021-2027
+ 3 attachments.

Thank you for your help
& assistance.

Mary Walsh

1ST August, 2021

Administrative Officer
 Draft County Development Plan
 Forward Planning Unit
 Longford County Council
 Áras an Chontae
 Great Water Street
LONGFORD N39 NH56



MARY WARD ~~XXXXXXXXXXXXXXXXXXXX~~

Submission for Filing with respect to:

***Notice of Proposed Material Alterations to the
 Draft Longford County Development Plan 2021-2027
Longford Leader, 9th July, 2021***

I refer to Notice of Proposed Material Alterations¹ (copy of relevant pages attached) to the Draft Longford County Development Plan 2021-2027.

I draw your attention in particular to Chief Executive's Report, p.67, part. 2² (copy attached) to Submissions DCDP-03 and DCP-73 with special reference to the 'Land Zoned C', and 'Land Zoned B'.

The CEO's report states: 'The amount of lands zoned for industrial and industrial/commercial development as part of the Draft Plan having been assessed and the quantum of lands deemed appropriate to enable the settlement of Granard to achieve its planned and proposed future growth and has been based upon the existing pattern of industrial development in the area'.

The above is off-base and inaccurate. Why would a 40-year old residential area be attempted to be encircled by industrial zones and healthy green spaces destroyed when derelict and empty industrial sites already exist closeby?

¹ Material Alterations: Draft Plan, Vol. 2: Appendices, pages 15-21

² Chief Executive's Report, Part 2, pages 67, 68

Attached are 8 photos of industrially zoned sites in and around the town of Granard. They have been so zoned for a very considerable time. These sites are derelict and are appalling eyesores. They are offensive to the image of Granard and its tax paying citizens/residents who over countless generations have contributed positively to the life and commerce of the town and its surrounding pleasant and deeply historical areas. Their ancestors lived that history.

These derelict sites existed as 'zoned industrial' at the time the Granardkille green areas were zoned over to industrial. They predate that potentially very damaging and encircling switchover.

Further, the words "*.....and has been based upon the existing pattern of industrial development in the area*" in the CEO's report, p 67, raise logical and rational debate as to possible accuracy when one looks at the photos of 'industrial zoned areas' that already exist and show dereliction and total neglect **and no 'existing pattern of industrial development'**. Rather the reverse!

The photos speak for themselves. They are marked:

Industrial – Barrack Lane 1 – Photo taken 8/7/21
 Industrial – Barrack Lane 2 – Photo taken 8/7/21
 Industrial – Barrack Lane 3 – Photo taken 8/7/21
 Industrial – Barrack Lane 4 – Photo taken 8/7/21
 Industrial – Fire Station Site 1 – Photo taken 8/7/21 (Teemore Estate)
 Industrial – Fire Station Site 2 - Photo taken 8/7/21 (Teemore Estate)
 Industrial – Fire Station Site 3 - Photo taken 8/7/21 (Teemore Estate)
 Industrial – Fire Station Site 4 – Photo taken 8/7/21 (Teemore Estate)

I wish to underscore here that LCC was made aware of the concerns of residents/homeowners in Granardkille from **at least 2016**. I quote below my own and one group correspondence (20th November, 2019) with LCC re Planning (which I personally believe has systemic issues) to underscore my concerns.

Previous Documents/Submissions that Flagged already existing Industrial areas in/around Granard Town & other concerns – with dates

In connection with the zoning to industrial of previous green space/agricultural space in/adjacent to Granardkille 40-year old residential area, below see submissions (with dates) made to LCC that flagged attention to same. Therefore, LCC was aware of residents' concerns.

1. **20th April, 2016**

My Objections to PL 16/55 (Refused), No. 6 pointed out that if permitted it would "prevent new homes being built".

2. **18th January, 2017**

My Objections to PL 16/300 (Refused), pages 2 and 3 responds at length to the presence of already existing industrially zoned areas. Reference is also made to the EPA Act 1992 and to the fact that safeguards are now nationally and internationally deemed necessary to guard against environmental hazards through pollution.

My Objections to PL 16/300 also pointed out that

Residents/Homeowners/Taxpayers **were unaware** of the zoning over to industrial of the green spaces in their 40-year old residential area, so it got passed without objection!

3. **I draw your attention to a Submission by Granardkille Residents on “Public Consultation Issues Paper – September 2019”** on Notice of Review of existing Longford County Development Plan 2015-2021 & Preparation of new Longford County Development Plan 2021-2027. The Submission was delivered to LCC Planning Section **20th November, 2019**, and stamped accordingly. I have a copy on file. I am sure that it is also present in the file Draft Longford County Development Plan 2021-2027, so no need to attach it in full to this Submission.

20TH November, 2019

The Issues Paper ‘Key Questions’ asked in relation to “5.0 Settlement Strategy and Housing (Page 5 of Issues Paper)” :

How can we ensure the sustainable use of residential zoned lands?

Granardkille Residents’ submission/response said:

QUOTE Respect the dignity and entitlement of those green residential/agricultural areas already existing (so necessary from a climate change point of view too) and avoid infringing on them or surrounding them by unhealthy and perhaps dangerous, industrial development/associated road/home safety concerns, particularly when there are already pre-existing black spots within a short distance which were and are zoned to industrial, and where no residential area exists. UNQUOTE

4. **29th March, 2021**

My Objections to PL 2144 (under consideration), page 5, **QUOTE Bigger Picture:** Over the passage of years, one became aware of an overall bigger picture/forward planning emerging in our area. It has included:

- (a) Zoning to Industrial of green parts of our Residential Amenities without the knowledge of residents who could not therefore take action and object. **This was decided and done, despite:**

(b) The pre-existence east of Granard (closeby to Granardkille) of areas that were then and are now already industrially zoned areas (some of which were/are currently bad eyesores. These eyesores will be negative for tourism and the Norman Village project as well as the historical Motte project (both of which are costly expenditures - E640,000 and E 2.8 million respectively). These already pre-existing industrially zoned areas could be used with great benefit to this community and urban Granard (Tourism), rather than choosing the destruction of a pre-existing 40-year old residential and long-in use agricultural area. **This is clearly a choice of a narrow good rather than a common good of the entire community and its surrounds. UNQUOTE**

Without fully informed citizens and their informed and concerned input, transparency, accountability and good governance are negatively impacted. Democracy itself is damaged.

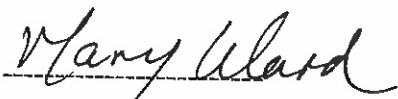
Further, Grist says³ ‘The legislation specifies that there is no presumption in law that any land zoned in a particular development plan shall remain so zoned in any subsequent plan’.

Therefore, the lands at ‘Area C’ and the remainder of ‘Area B,’ excluding the HGV compound, should be rezoned to agricultural (as they previously were), or residential.

The foregoing would then be in accordance with LCC’s web page for Development Plan 2021-2027 under the title “National and Regional Strategic Context”, it states that it has a strategic vision based on three key principles: The first of these being **“Healthy placemaking by promoting people’s quality of life”**. As things stand this stated strategic vision is being grievously contravened.

Again, I put it to LCC that Area C and the remainder of Area B, excluding the HGV compound, get rezoned to agricultural (as they previously were), or to residential.

Thank you.



Mary Ward

~~CONFIDENTIAL~~

1/8/2021

³ Grist, Berna. *An Introduction to Irish Planning Law*, Second Edition, Institute of Public Administration (IPA), Dublin 4, 2012, p. 16.

Attachments:**1.**

8 photos of existing derelict industrially zoned areas Granard

Industrial – Barrack Lane 1 – Photo taken 8/7/21

Industrial – Barrack Lane 2 – Photo taken 8/7/21

Industrial – Barrack Lane 3 – Photo taken 8/7/21

Industrial – Barrack Lane 4 – Photo taken 8/7/21

Industrial – Fire Station Site 1 – Photo taken 8/7/21 (Teemore Estate)

Industrial – Fire Station Site 2 - Photo taken 8/7/21 Ditto

Industrial – Fire Station Site 3 - Photo taken 8/7/21 Ditto

Industrial – Fire Station Site 4 – Photo taken 8/7/21 Ditto

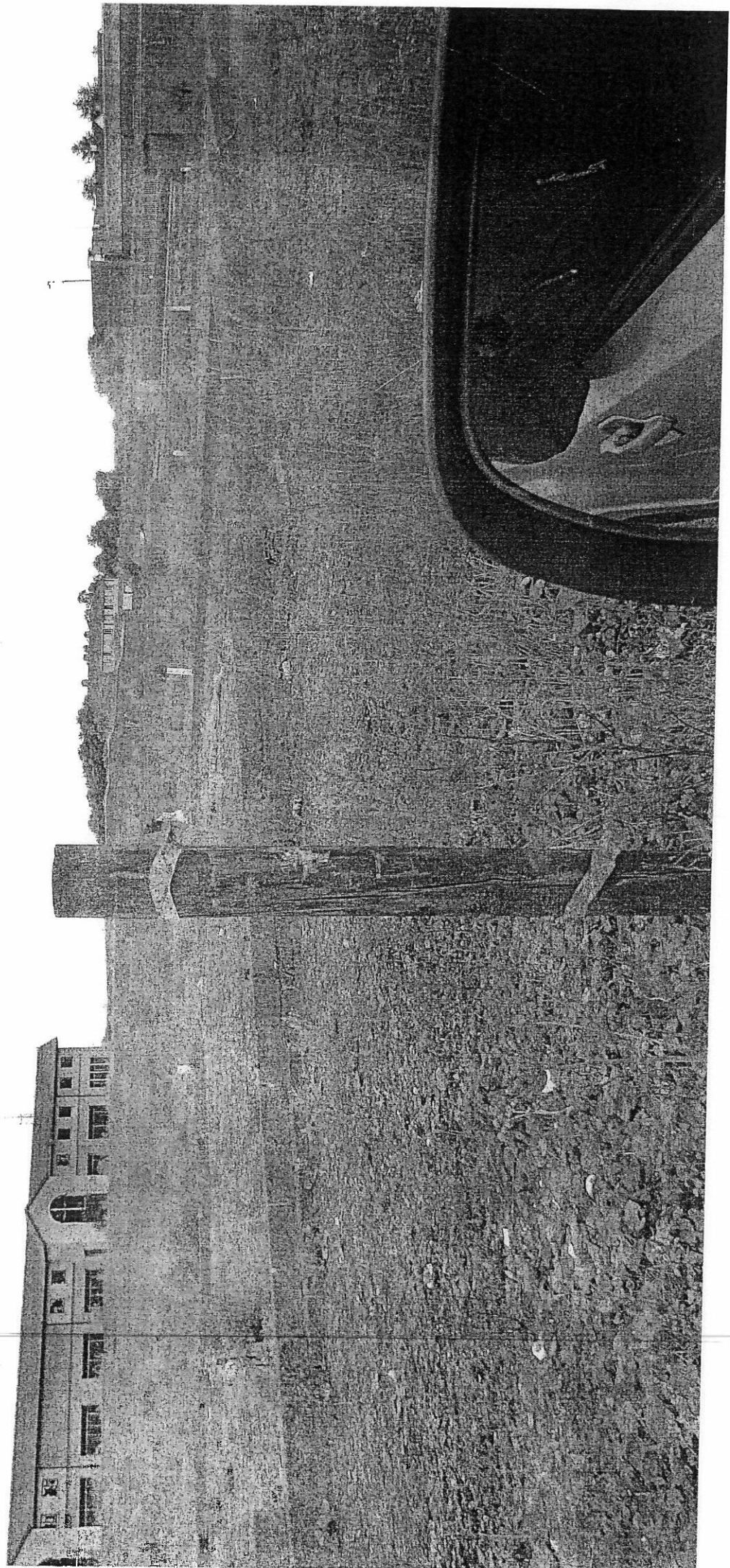
2. Copy of *Chief Executive Report: Part 2*, pages 67 and 68

3. Copy of *Material Alterations: Draft Plan, Vol. 2: Appendices*, pages 15-21

4. Granardkille Residents' Group Submission on "Public Consultation Issues Paper – September 2019", stamped by LCC on 20th November, 2019.

This is not attached hereto because it is already on file with LCC for inclusion in file on 'Draft County Longford Development Plan 2021-2027.

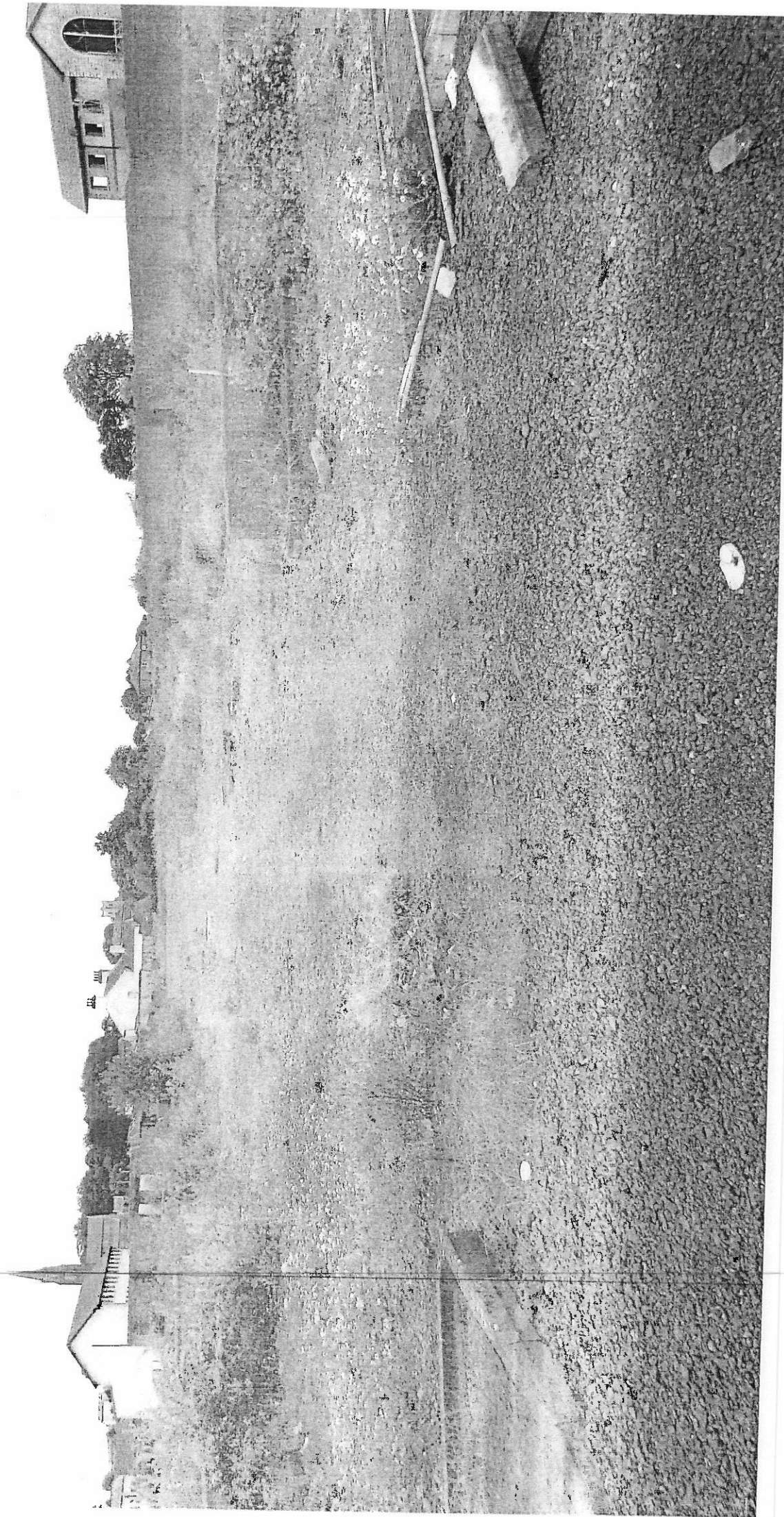
Sturtevant - BIRKENHEAD LANE 1
E/7/2021



Undeveloped -

BHRENTAK LANE 2

8/7/2021



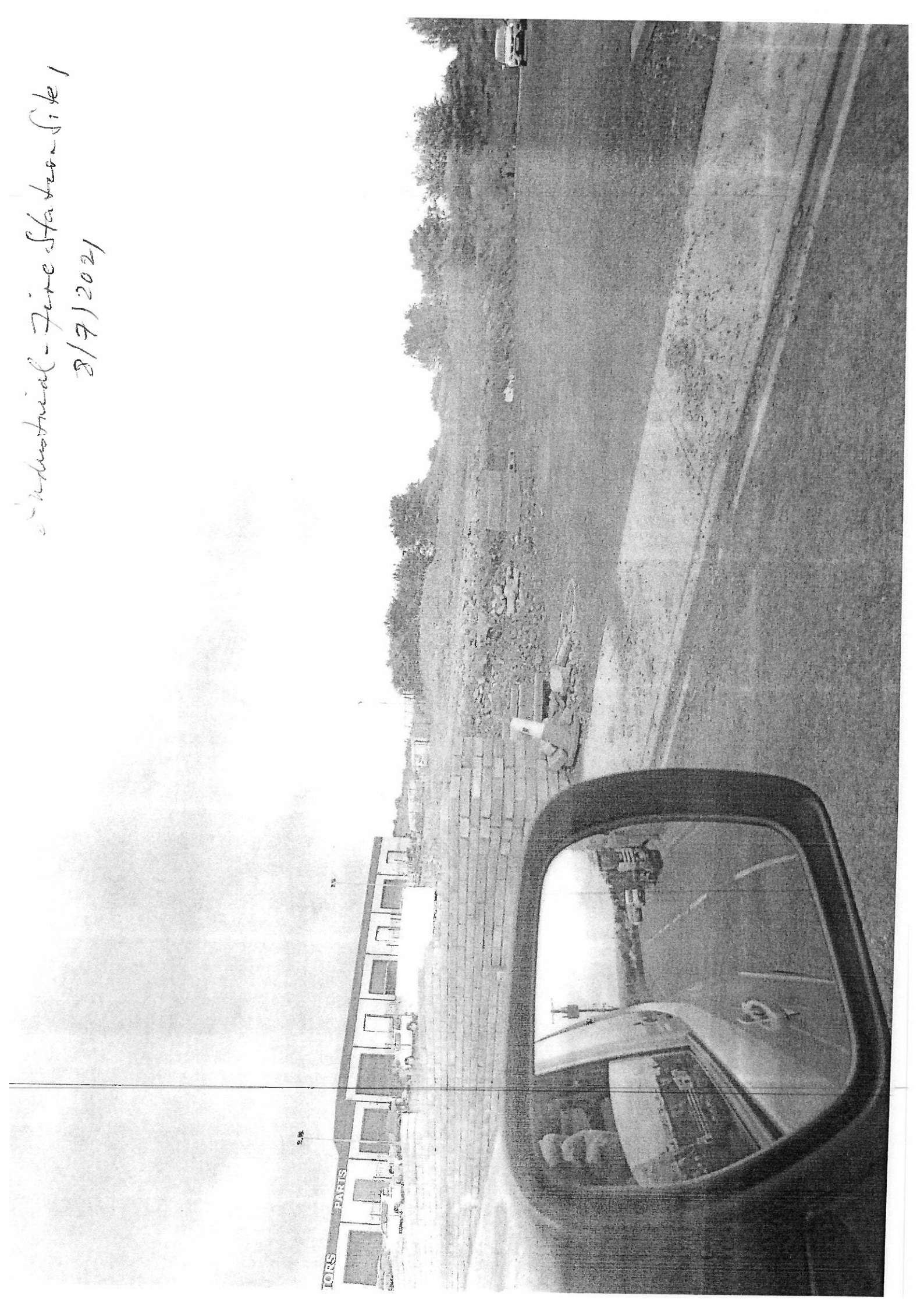
identical - Brecksteck Lane 3
8/9/2021



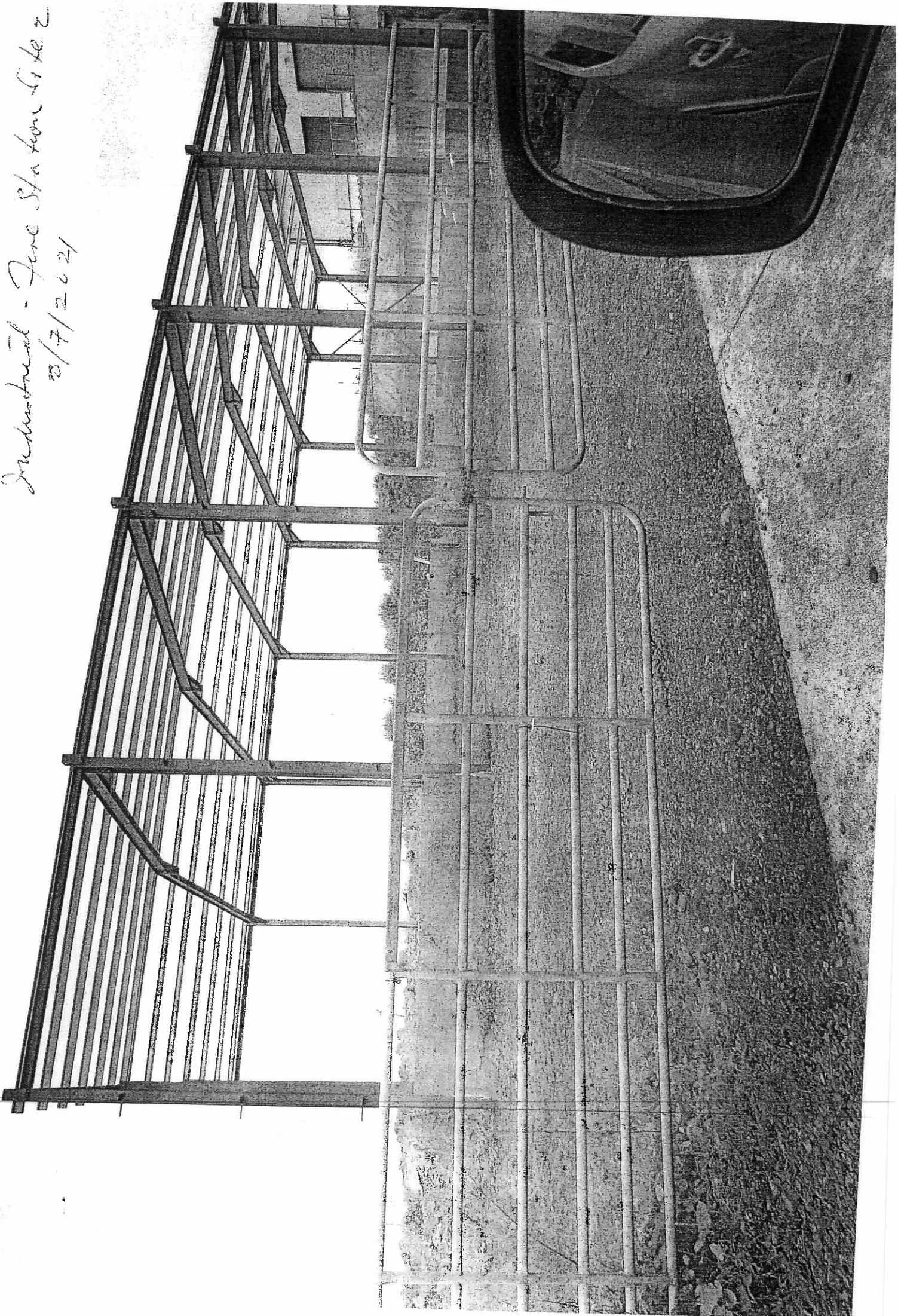
Sudamtrail - BARRACK LANE 4
8/7/2021



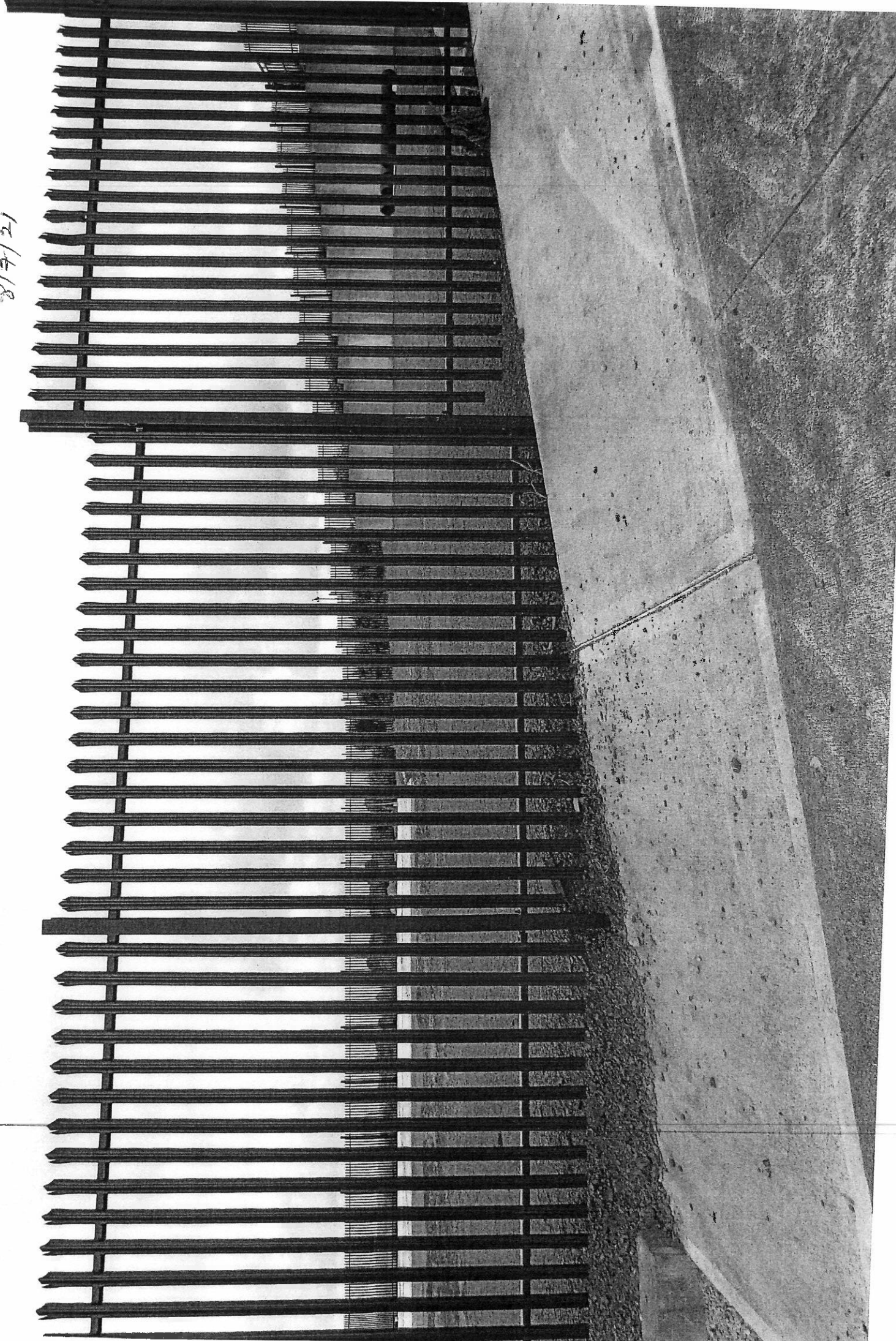
Industrial - Fire Station Site,
8/7/2021



Industrial - Fire Station Site 2
10/7/2021



S. K. 5
8/7/81



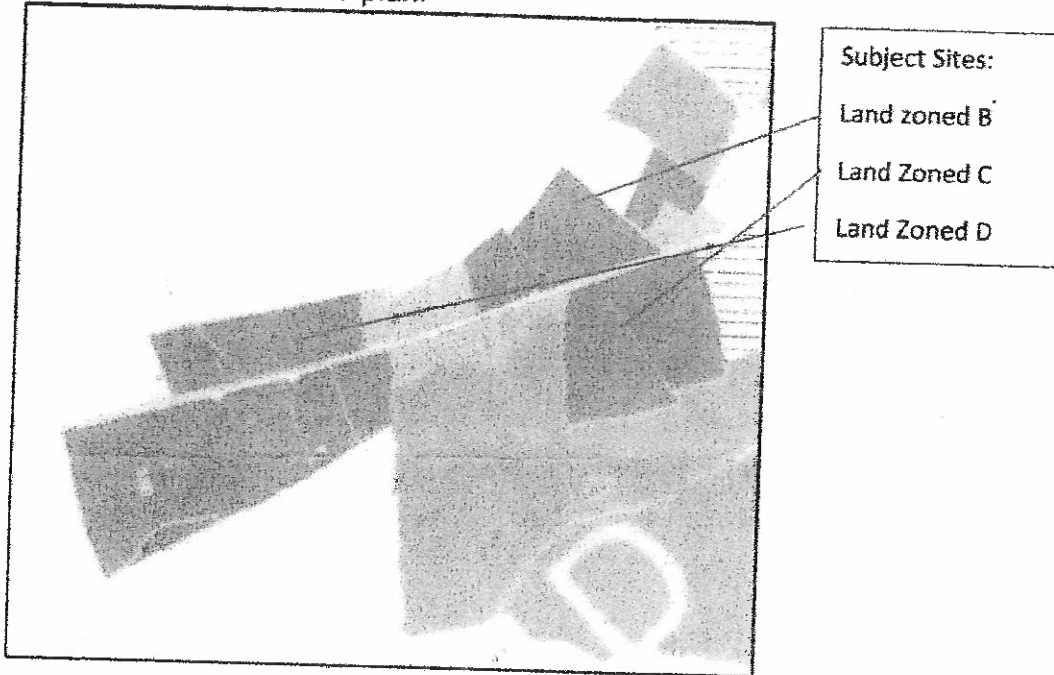
Industrial Pine Station Site 4



Industrial / Commercial / Warehousing

Submissions DCDP-03 and DCDP-73

DCDP-03 and DCDP-73 requests a change of land zoning from Industrial/Commercial/Warehousing zoning to an alternative land use of either "Residential – Agricultural – Recreational uses" on the subject lands located to the west of Granard located along the regional road R194 and refers to lands marked B, C and D on the attached plan.



Chief Executive's Response

The intention of the proposed motion is acknowledged.

The subject lands zoned B, C and D on the plan submitted within the motion were zoned for Industrial purposes within the current Longford County Development Plan 2015-2021. The amount of lands zoned for industrial and industrial / commercial development as part of the Draft Plan having been assessed and the quantum of lands deemed appropriate to enable the settlement of Granard to achieve its planned and proposed future growth and has been based upon the existing pattern of industrial development in the area.

Within the vicinity of the subject lands the existing industrial, commercial and warehousing uses are established and the direct links onto the important regional road R194.

It is identified that some Industrial Uses are established on the lands marked B. The Council acknowledge (Please see Submission DCDP-71) that a buffer be provided between the existing industrial development and the residential lands to the west of the subject site.

Following the Submissions and that of the OPR the Council have undertaken a review of the lands zoned and an infrastructure assessment of the area. Following this review the quantum of lands zoned on the outskirts of the settlement have been reviewed and revised.

Chief Executive's Recommendations

The site also needs to be considered in light of the submission from the Office of the Planning Regulator which is dealt with separately in this report.

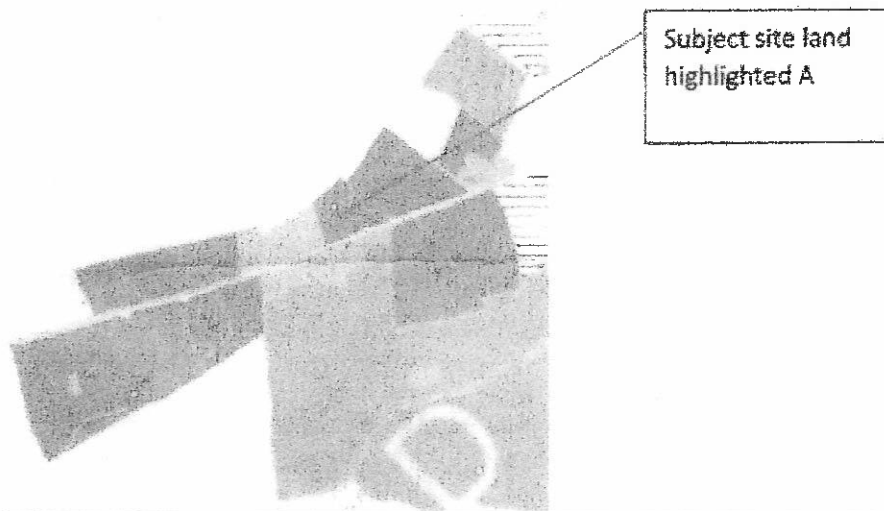
CE ZO-02

To amend the land zoning objectives for the subject sites.

- Land marked B – the Industrial zoned lands will be retained. However, the size of the lands reduced in order to provide a buffer with the residential lands to the west. Land to be de-zoned and left Agricultural.
- Lands marked C – the industrial zoned lands to be retained as Industrial / Commercial and remain unaltered.
- Lands marked D – the industrial zoned lands located to the west of the Town of Granard and north of Kiernan Milling along the regional road R194 to be de-zoned and the Industrial zoning removed and the lands to be left un-zoned and assumed Agricultural as a consequence.

Submission DCDP-71

Submission DCDP-71 requests a change of land zoning from Industrial/Commercial/Warehousing zoning to an alternative land use "Residential" on the subject lands located to the west of Granard located along the regional road R194. The subject lands are to the north of the R194 and to the west of existing commercial/warehousing uses and to the east of a residential dwelling.



The rationale supporting this submission includes:

**Appendix 1B: Self-Sustaining Growth Towns – Granard
Ballymahon and Lanesborough**

Granard

Section	Heading	Page no.
Appendix 1B	Granard	42-52

Move Granard from Appendix 1C to Appendix 1B to reflect the revised settlement hierarchy.

The following material amendments are proposed (to be read in conjunction with attached Granard Proposed Material Amendment Zoning Maps - Area A and Area B and specific parcel number):

Appendix 1B	Granard	51-52 (mapping)
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Insert the CSO defined Urban Settlement Boundary, which defines development within this boundary as brownfield and development outside of the boundary as greenfield, on the recommended revised Land Use Zoning map.

See Granard: Proposed Material Amendment Zoning Maps - Area A and Area B.

Insert an overlay of the flood risk maps over the land use zoning map.

See Granard: Proposed Material Amendment Zoning Maps - Area A and Area B.

On lands zoned '*Constrained Land Use*' no further zoning will be considered, and the lands will be amended as indicated in the Land Use Zoning map.

See Granard: Proposed Material Amendment Zoning Map – Area A:
Land parcel no. 27 – no zoning.

See Granard: Proposed Material Amendment Zoning Map - Area B:
Land parcel no. 13 – no zoning.
Land parcel no. 21 – no zoning and 'Transport and Utility Objective'.

Legend, map and zoning changes box – 'Transport & Utility Objective' – new position for new road.

Amend the Land Use Zoning map of the Draft Plan to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for each settlement incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Granard: Proposed Material Amendment Zoning Map – Area A:
Residential Related:
Land parcel no. 6, 14 – no zoning.

Other Uses:
Land parcel no. 12 - no zoning.
Land parcel no. 27 – no zoning.

See Granard: Proposed Material Amendment Zoning Map – Area B:
Residential Related:
Land parcel no. 7, 19, (part) 20, 28 and 30 - 'Residential'.
Land parcel no. 9 and 16 – 'New Residential';
Land parcel no. 15 – 'New Residential' and no zoning;
Land parcel no. 17, 18, (part) 20, 29 - no zoning;

Other Uses:
Land parcel no. 8 (part) - 'Social/Community/Education/Public Utility'.
Land parcel no. 10, 11 and (part) 21 – 'Transport & Utility Objective'.
Land parcel no. 13 (part) - no zoning
Land parcel no. 24, 26 - no zoning.

Amend the quantum of the employment generating land use zonings to reflect the OPR comments and the findings of the Infrastructural Assessment Report (IAR) as indicated in the revised zoning maps.

See Granard: Proposed Material Amendment Zoning Map – Area A:
Land parcel no. 1, 2, 3, 4, 5, 22 – no zoning.

See Granard: Proposed Material Amendment Map – Area B:
Land parcel no. 8 – part no Zoning; part 'Social/Community/Education/Public Utility'.
Land parcel no. 13 (part) - no zoning
Land parcel no.20 (part) no zoning and 'Residential';
Land parcel no. 23 – no zoning.

- The size of the industrial zoned lands to be reduced in order to provide a buffer with the residential lands to the west - Land to be de-zoned.

Granard: Proposed Material Amendment Zoning Map - Area A:
Land Parcel no. 3 – no zoning.

- The industrial zoned lands located to the west of Granard and north of Kiernan Milling along the regional road R194 to be de-zoned, the Industrial zoning removed and the lands left un-zoned and assumed Agricultural as a consequence.

Granard: Proposed Material Amendment Zoning Map - Area A:
Land Parcel no. 1 – no zoning.

The existing industrial complex will be retained as lands zoned Industrial/Commercial/Warehousing and the lands to the west de-zoned and assumed Agricultural.

See Granard: Proposed Material Amendment Zoning Map – Area A:
Land Parcel no. 3. – no zoning.

The lands zoned Industrial/Commercial/Warehousing to be de-zoned and assumed Agricultural.

See Granard: Proposed Material Amendment Zoning Map – Area A:
Land Parcel no. 1. – no zoning.

De-zone the subject lands and leave as un-zoned lands / agricultural lands.

See Granard: Proposed Material Amendment Zoning Map – Area A:
Land Parcel no. 5 – no zoning.

Change zoning from 'Town Centre' to 'Tourism' as indicated in the revised settlement map

See Granard: Proposed Material Amendment Zoning Map – Area A:
Land parcel no. 25 – 'Tourism' zoning.

Include an 'Amenity Walkway' as indicated in the revised settlement map Map B

See Granard: Proposed Material Amendment Map – Area B:
Legend, map and zoning changes box – Amenity Walkway indicated.

Remove the zoning for 'Social / Community / Education' and to apply 'Residential' zoning.

See Granard: Proposed Material Amendment Zoning Map – Area B:
Land parcel no. 19 – 'Residential' zoning.

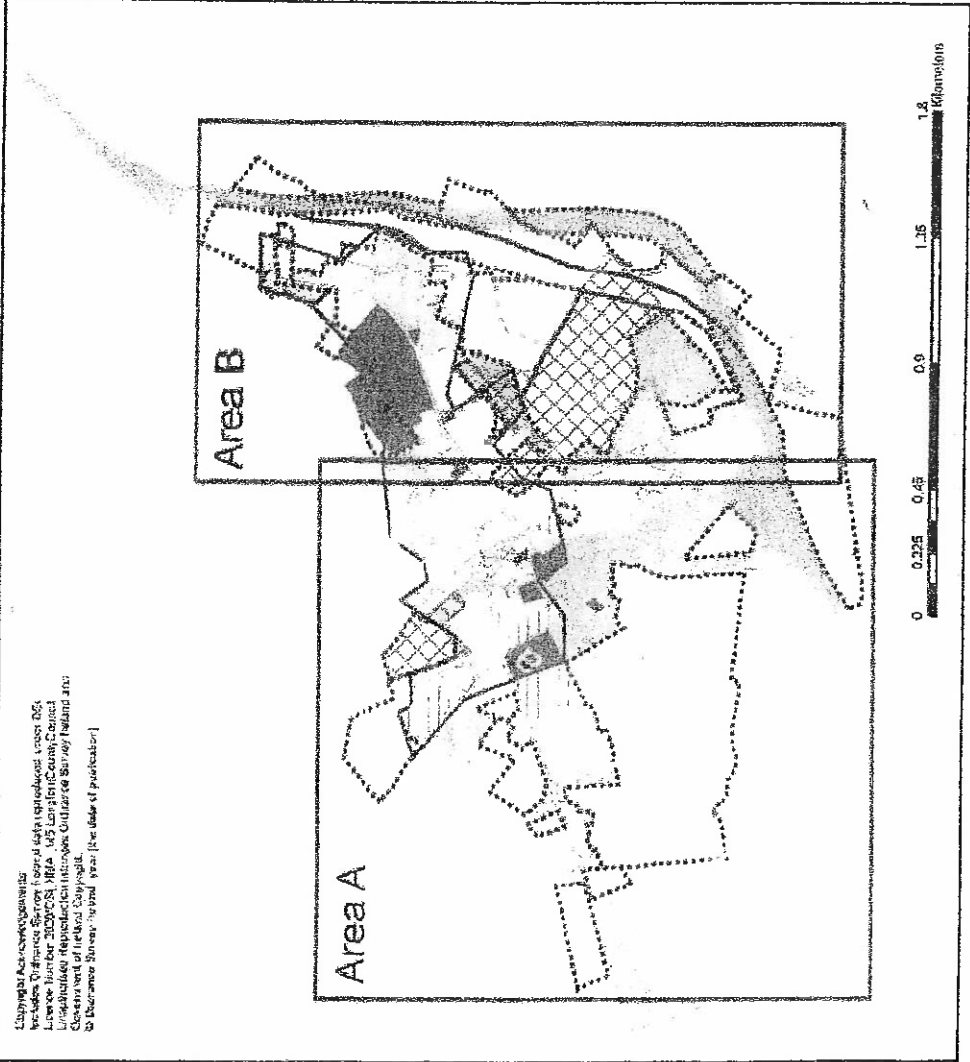
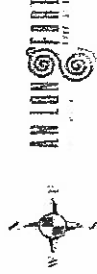
Apply the zoning category 'Social/Community/Education/Public Utility' to all existing school sites in Co. Longford.

See Granard: Proposed Material Amendment Zoning Map – Area B:
Land parcel no. 8 (part).

**Granard
Proposed Material Amendments
Area A & Area B**
County Development Plans 2021-2027

- Legend**
- Changed Zoning
 - Area of Contained Land Use
 - 50 Footment Boundary
 - Industrial/Commercial/Maintenance
 - New Residential
 - Recreational/Assembly/Green Space
 - Residential
 - Social/Community/Education/Public Utility
 - Strategic Industrial Reserve
 - Strategic Residential Reserve
 - Tourism
 - Town Core
 - Transport & Utility Objective
 - Amenity Walkway
 - Proposed Service Road Granard

See separate Maps
of Area A and Area B



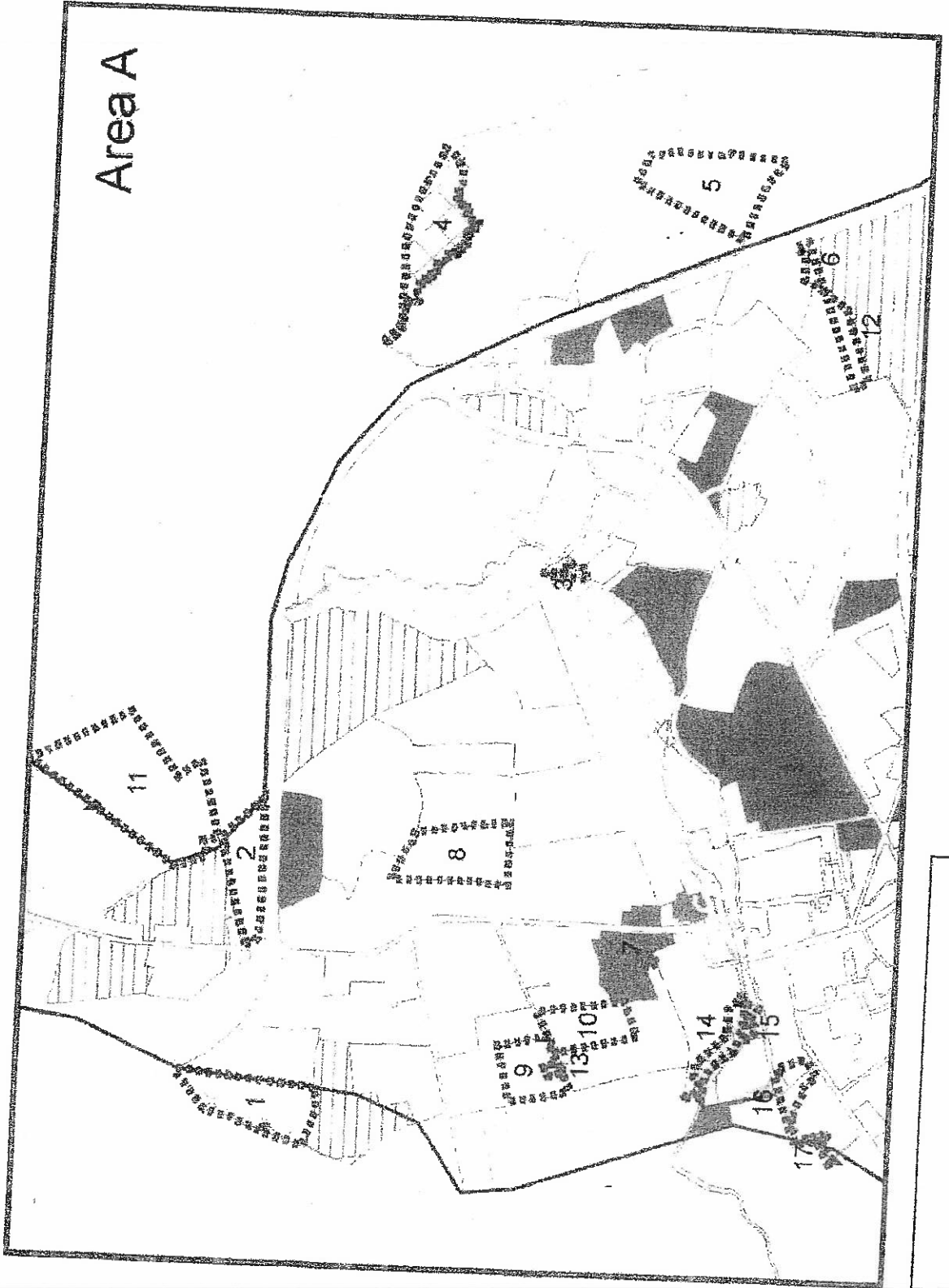
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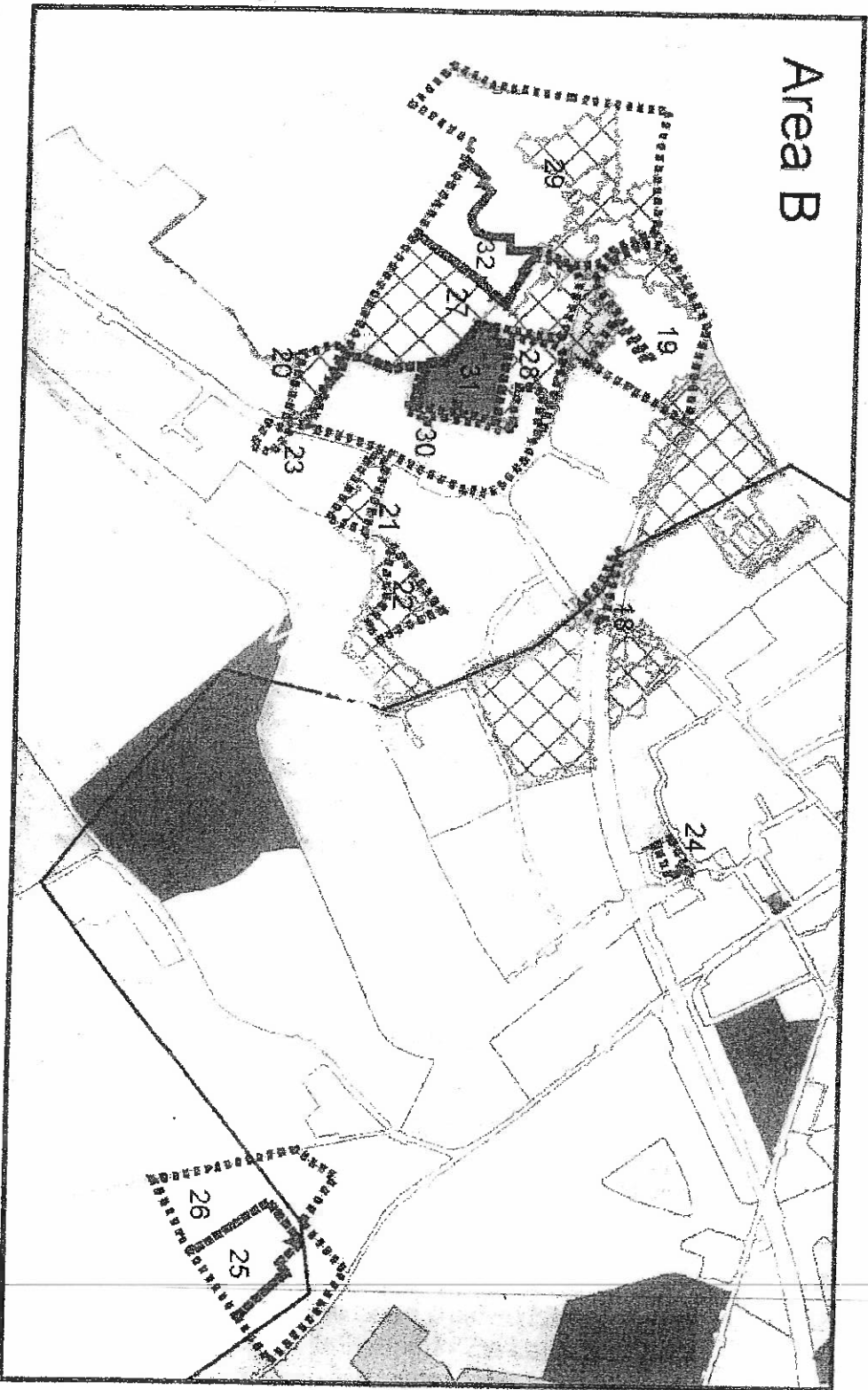
ARE

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Zentr
Index

Area A



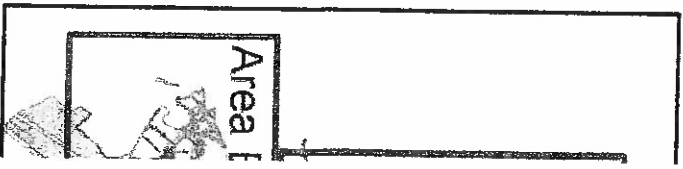
Area B



Legend
Changed Zoning
Areas of Constrained Land Use



Propo
Count



Draft Plan:
Zoning in Draft
Industrial/Com