

**Mid-Shannon Wilderness Park Greenway
Planning Reports
Volume 4**



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1. Planning Statement

**EIA Screening
Report Appendix 6
Planning Statement**

Mid-Shannon Wilderness Park Greenway Planning Statement

Document No: MSWP-RP-PS-0001-P05



DATE: 23/07/2021
Client: Longford County Council
Project: Mid-Shannon Wilderness Park Greenway



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ISSUE AND REVISION RECORD

Rev	Date	Originator	Checker	Approver	Description
P03	12/02/2021	Carl Wessels	Mark Brindley	Seán FitzSimons	Draft for review
P04	06/07/2021	Carl Wessels	Mark Brindley	Seán FitzSimons	Draft for review
P05	23/07/2021	Carl Wessels	Mark Brindley	Seán FitzSimons	Minor Amendments

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1 INTRODUCTION

1.1 Purpose of this Document

The Planning Partnership has been retained by Clandillon Civil Consulting (CCC), as part of a commissioned consultancy team for *Longford County Council Regeneration Department* to prepare this *Planning Statement* in support of an application for permission for the development of a proposed new greenway through the Bord na Móna bogs of south Longford (the Mid Shannon Wilderness Park) and further detailed in the respective statutory notices and supporting reports and drawings.

The application by way of a Local Authority Own Development is presented in association with Clandillon Civil Consulting (CCC), who have undertaken a preliminary design and environmental evaluation. The supporting general layout drawings and the accompanying suite of documents which includes; an Environmental Impact Assessment Screening Report, a Flood Risk Assessment Report, an Ecological Impact Assessment Report and a Cultural Heritage Assessment further consider the proposals. Additionally, Flynn Furney, Environmental Consultants, have carried out a Stage 1 Appropriate Assessment (AA) Screening Report.

This Planning Statement presents the planning rationale and statutory context for the proposed greenway works within the identified Mid Shannon Wilderness Park. The proposed greenway works are presented as 'plan-led' in terms of available spatial planning policy on a national, regional and local scale. The proposals represent the sensitive, holistic and expansive re-use of Bord na Móna boglands with the aim of expanding the greenway provision in County Longford and enhancing its position within Ireland's Hidden Heartlands as a significant tourism destination, whilst extending and linking the broader National Cycle Network.

2 DEVELOPMENT SPECIFICS

2.1 Proposals, Location and Context

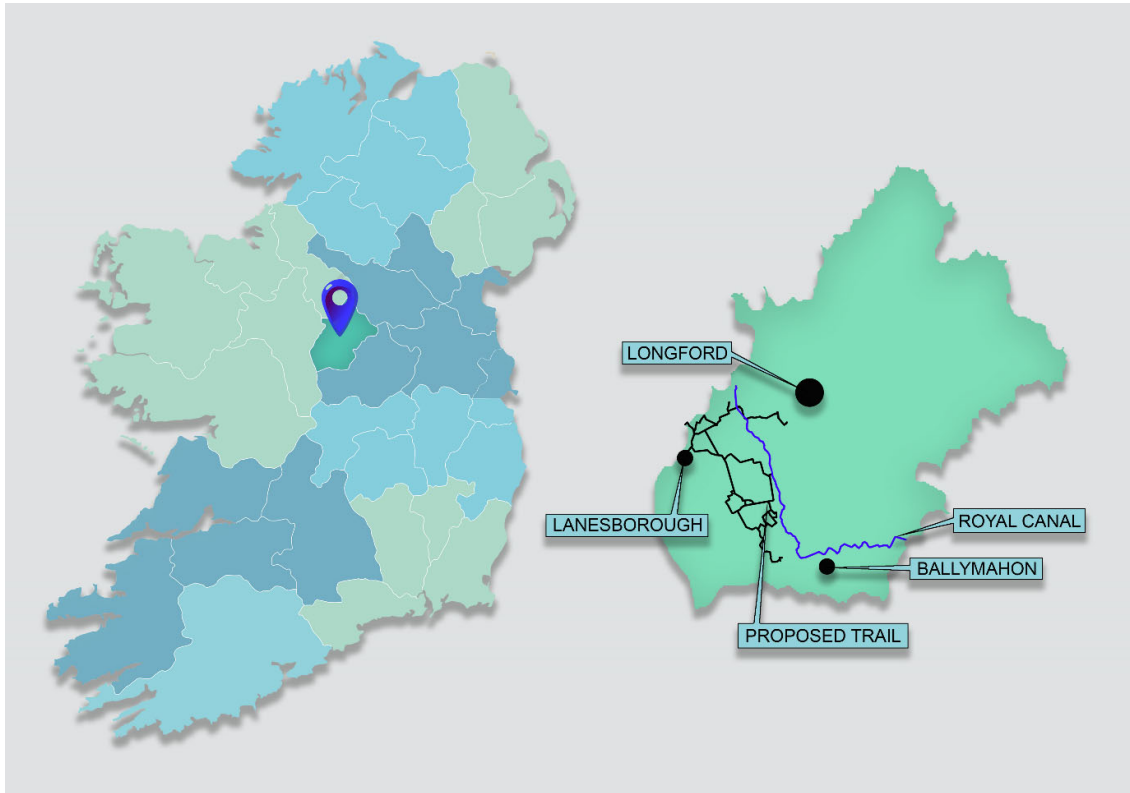


Figure 1: MSWP Greenway – Scheme Location

The proposed cycling and walking ‘greenway’ route network generally follows the Bord na Móna industrial railway network through a number of former raised bogs south and west of Longford town. The trail also incorporates a number of roadways, a bridge, farm lanes and areas of recolonising bare ground / former cutaway bog.

The aim of the project is to expand the greenway provision in County Longford and to add to and link into the growing network of greenways in Ireland in accordance with the policies and objectives set out in Project Ireland 2040, the National Cycle Policy Framework, the Longford and Roscommon County Development plans and associated planning documents. The provision of the greenway is also central to the creation of the Mid Shannon Wilderness Park which is linked to the vision of Ireland’s Hidden Heartlands. The location of the scheme is illustrated in Figure 1 above.

A central tenet of the scheme is to make use of existing rail lines which were previously used by Bord na Móna as part of their peat harvesting operations which ceased in 2020. The use of these lines and the associated existing ballast and rail structures will significantly reduce the cost and potential environmental impact of the proposed scheme.

In its entirety, the scheme is approximately 73 km and consists of:

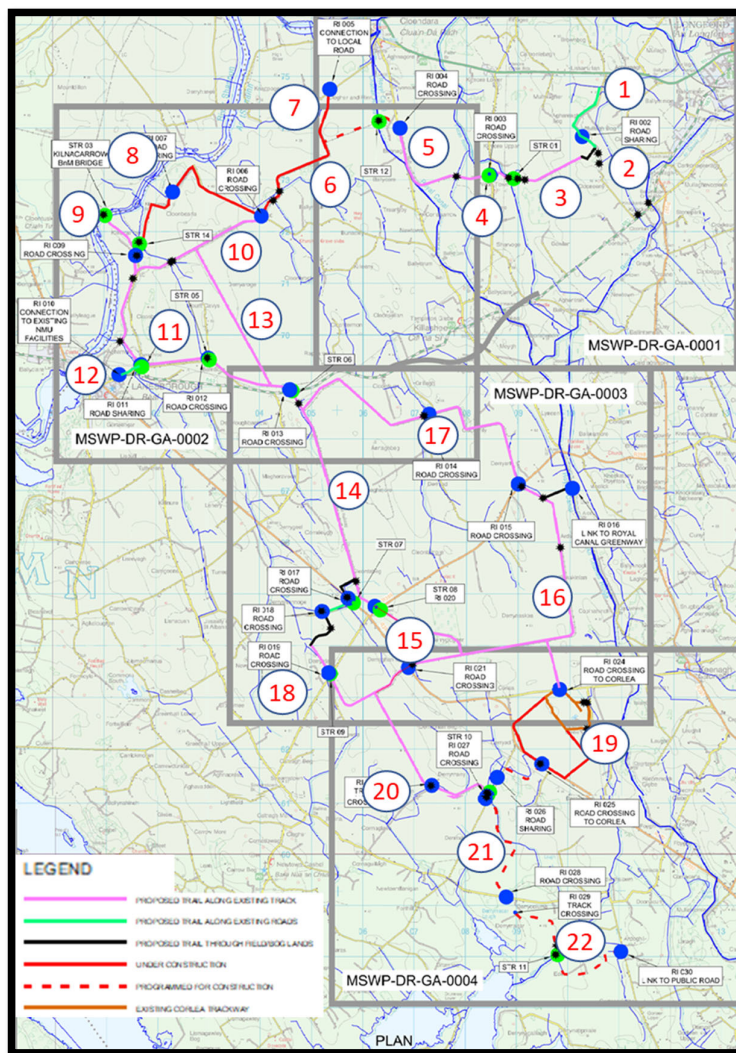
- 61 km of greenway along decommissioned Bord na Móna rail lines;
- 6 km of greenway along existing roads;
- 6 km of greenway through existing cutaway bog.

Of the 73 km, 23.4 km of the proposed greenway have been subject to successful Part 8 planning applications.¹ Existing planning applications account for 3km of the 6km of the greenway which cross cutaway bog. While predominantly located in Co. Longford, the scheme also includes a crossing of the River Shannon into Co. Roscommon. This crossing will be over the existing Bord na Móna bridge at Kilnacarrow, which will be retrofitted as part of this scheme.

General Arrangement drawings which illustrate the route and distinguish between the lengths which follow existing rails, those that follow existing roads, those that cross land and those that were subject to granted Part 8 planning applications are provided as part of this application.

The delivery of the Mid Shannon Wilderness Park greenway will be dependent on the availability of funding from a number of different sources, including the Department of Transport, the Department of Tourism, Culture, Arts, Gaeltacht and Sport and the Department of Rural and Community Development, under the Outdoor Recreation Infrastructure Scheme, Just Transition as well as own resources from Longford County Council and other funding which may become available during implementation of the project.

Figure 1.1: Proposed Trail Route with a Total distance of 74 Kilometres



¹ Part 8 Planning References No. 49, 57, 62, 64, 67, 76, 79 and 81

The trail passes through what is an almost entirely rural landscape with other bogs, woodlands and pasture-based agriculture being the main land uses surrounding the site. The greater majority of the route is located within lands owned by Bord na Móna.

The route starts from Clooneeny on the L11274 approximately 4km west of Longford town centre. The route then progresses west towards Lanesborough and the Roscommon country border. The route moves south towards the Mount Dillon Bord na Móna Yard and continues south to Derryhaun. The route will also extend east and connect with the Corlea Trackway Visitors Centre and the walkways that surround it. From Derryhaun, the route generally continues in a southern direction through Ballynamóna and east towards Ballymahon.

Works involved with this project include clearance, track widening, removal of old trainlines, removal and stock piling of material and the laying of a new track surface, resurfacing of existing roads and the provision of signage and street furniture. A number of new bridges and culverts are also likely to be required as part of this project.

3 PLANNING POLICY CONTEXT

The following presents a brief synopsis of the relevant land-use planning policy background and objectives applicable to the proposals and referred at national, regional and local policy levels.

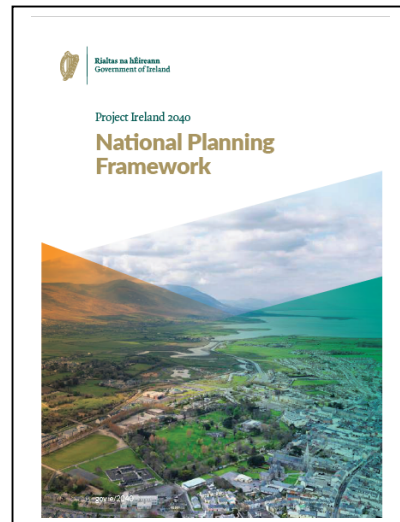
3.1 National Planning Framework – Project Ireland 2040

National Policy Objective 21: *Facilitate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.*

National Policy Objective 27: *Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.*

National Policy Objective 58: *Integrate planning for Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans.*

National Policy Objective 64: *Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.*



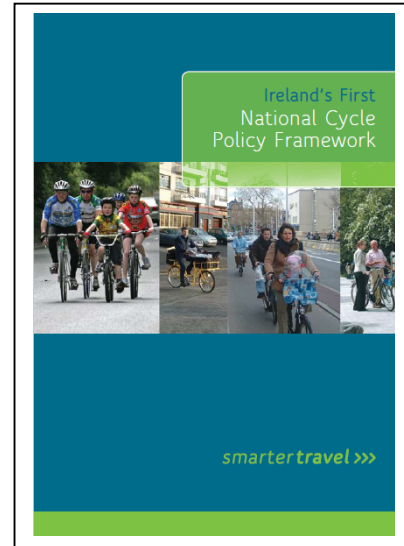
3.2 National Cycle Policy Framework (2009)

The Government is committed to developing cycling as one of the most desirable modes of travel, it being good for your health, the economy and the environment. This National Cycle Policy Framework (NCPF) sets out objectives to the year 2020 to achieve its vision.

Ireland currently does not have a National Cycle Network on the ground. However, Fáilte Ireland has produced its Strategy for the Development of Irish Cycle Tourism (Fáilte Ireland, 2007). While the main target market of the cycle tourism strategy is visitors – both overseas and domestic – the secondary target market is recreational cyclists.

While the overall framework of the tourism network has been identified, there is more work to be carried out to identify further routes, particularly in the Midlands and particularly to use existing traffic free routes such as the canal and river tow paths. There is also further work to be carried out in identifying which sections of the extensive network of disused rail-lines would be most suitable to be converted to high quality, traffic-free routes suitable for cyclists of all ages and abilities.

Objective 3: *Provide designated rural cycle networks especially for visitors and recreational cycling.*



3.3 Regional Spatial and Economic Strategy (Eastern and Midland Regional Assembly) 2019-2031

Promote the Region for tourism, leisure and recreational activities including development of an integrated greenway network while ensuring that high value assets and amenities are protected and enhanced. (Page 36)

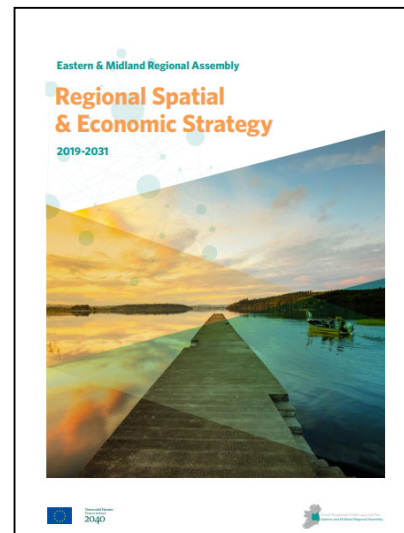
Regional Policy Objective 6.19: *Support the local strategies that are already in place to link the River Shannon Blueway, The Royal and Grand Canal Greenways and the proposed Barrow Blueway right across the Midlands, incorporating the towns of Longford, Athlone, Mullingar, Tullamore and Portarlington.*

7.7 Placemaking and Green Infrastructure

GI serves a wide variety of important functions including but not limited to; provision of habitat, increased biodiversity, ecological corridors, climate change adaptation and mitigation, water treatment, water retention, local amenity provision, air quality improvement, cultural and heritage preservation, a mentally restorative environment and flood mitigation.

At the local authority scale, GI offers an opportunity to develop integrated strategies around economic development, urban placemaking and rural policy. Linking strategic natural assets with cultural and heritage assets further enhances the opportunities for GI strategies to drive recreation and tourism benefits.

Regional Policy Objective 7.23: *Support the further development of Green Infrastructure policies and coordinate the mapping of strategic Green Infrastructure in the Region.*



Regional Policy Objective 7.24: *Promote the development of a sustainable Strategic Greenway Network of national and regional routes, with a number of high capacity flagship routes that can be extended and/ or linked with local greenways and other cycling and walking infrastructure, notwithstanding that capacity of a greenway is limited to what is ecologically sustainable.*

Regional Policy Objective 7.25: *Support local authorities and state agencies in the delivery of sustainable strategic greenways, blueways, and peatways projects in the Region under the Strategy for the Future Development of National and Regional Greenways*

Connectivity is key – *interconnect GI (Green Infrastructure) assets with each other and with people, providing linkages from built up areas to the countryside. This includes wildlife corridors between areas of high biodiversity value and the development of greenways, blueways and peatways.*

Sustainable transport options through enhanced development of the Blueway and Greenway networks will further enable strategic connections and heightened collaboration for the benefit of the tourism industry. Increased recreational use of the Grand Canal, completion of the Dublin to Galway Greenway which is designated as a trans-European Eurovelo Rote and increased recreational use of the Royal Canal as part of a Dublin to Westport Greenway, will improve northwest connectivity.

7.8 Peatlands

Peatlands form unique landscapes which can act as amenity areas for locals and visitors and support a variety of outdoor activities such as hill-walking, wildlife watching and fishing which bring economic benefits in remote areas. Peatlands are also considered amongst the most important ecosystems in the world, because of their key value for biodiversity, regulation of climate, water filtration and supply.

GUIDING PRINCIPLES

In the consideration of development on peatland areas, the following guiding principles should apply:

- *Consideration of the potential contribution of peatlands to an existing or proposed greenway/blueway/peatway network.*

Regional Policy Objective 7.29: *Support collaboration between local authorities, the Bord na Móna Transition Team and relevant stakeholders and the development of partnership approaches to integrated peatland management that incorporate any relevant policies and strategies such as the Bord na Móna Biodiversity Plan 2016-2021 and the national Climate Mitigation and Adaptation Plans. This shall include support for the rehabilitation and/or re-wetting of suitable peatland habitats.*

8.4 Transport Investment Priorities - Walking and Cycling

The following walking and cycling objectives will guide investment in the EMRA:

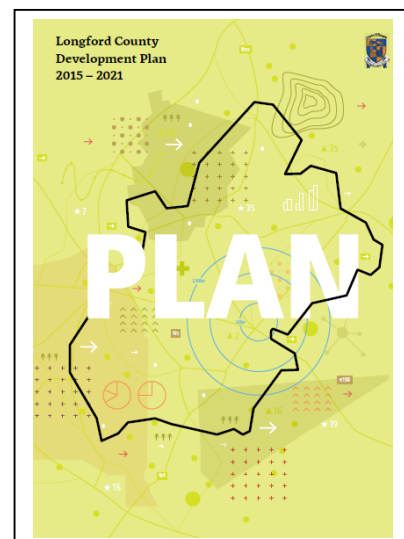
- *Delivery of the National Cycle Plan within the Region inclusive of the Greenway and Blueway projects*

3.4 Longford County Development Plan 2015-2021

Chapter 4.5

'Royal Canal Walking/Cycling Route

There are current proposals to link Dublin to Mullingar and Longford Town to the Shannon via the Royal Canal as walking/cycling routes. It is envisaged during this plan period (2015-2021) that the Royal Canal link will be extended from Mullingar through Longford to the Shannon. This would provide a major and important off road National walking/cycling route across the County which will have major tourism benefits for Longford. In addition, plans are well advanced to upgrade the Canal spur to Longford Town as a walking/cycling route. This will have



important implications for Longford Town as the main population hub for the County, making the Town more accessible to tourists using the canal and creating a natural corridor that will link the population hub to the various water channels and tourism facilities around the County' 'Corlea Archaeological and Biodiversity Centre Longford County Council in association with Keenagh Community Group and Corlea Visitor Centre now propose to develop approximately 12 acres of cutaway bog near Corlea Centre for a recreated Iron Age type settlement and to present the archaeology and biodiversity of the area as a visitor attraction. A more detailed report on this project is attached as an annex to this plan. As part of this proposal it is intended to provide walking trails across the bog to the Corlea Centre. These walking trails have the potential to be linked with the adjoining Royal Canal. This will facilitate boating, walking and cycling visitors coming from Dublin and travelling to the West via Longford and the Shannon to visit Corlea Centre.

TOU 2: The Council recognises the potential of all peatland bogs in the County, including industrial peatlands, in terms of providing opportunities for recreation and tourism thus creating new features of local distinction. Where appropriate the Council will cooperate with adjoining local authorities including Roscommon and Westmeath County Council to facilitate, subject to the requirements of the Habitats Directive, this potential in areas where bogs straddle the County boundary.

The development of the bogs for amenity purposes will not exclude them for other purposes such as the generation of renewable energy including wind generation. It is envisaged that these types of activities can be mutually inclusive and developed in an integrated way.

TOU 3: The Council will seek to facilitate and promote, where appropriate the development of the Mid Shannon Wilderness Park and Corlea Archaeological and Biodiversity Project.

TOU 4: The Council will promote the growth of the County's indoor and outdoor tourism sector and the necessary supportive facilities, providing an array of activities in order to diversify the range of tourist experiences available in Longford and extend the tourist season.

TOU 20: a) The Council shall promote and encourage the development of "Honeypot" tourism developments at the locations indicated below.

Mid Shannon Wilderness Park Villages

Lanesboro – River Shannon, Lough Ree, Commons North. In particular with a view to developing the amenity area to the south of the town adjoining Lough Ree for visitor and tourism development and a lake side walking/cycling route to Newtowncashel and Ballymahon. Also the possible bridging point for a walking cycling route to Roscommon and the west.

TOU 23: The Council shall continue to engage with the following agencies:

– National Parks and Wildlife Service, Coillte, ESB/Bord Na Mona with regard to the potential for tourism related uses of cutaway bogland.

Section 5.1.3 – Pedestrian and Cyclists

PED 5: The Council shall investigate the provision of dedicated cycle and pedestrian routes along routes of high amenity.

PED 6: The Council shall support the appropriate provision of cycle strategies for settlements throughout the County and where necessary and appropriate, reserve lands for the provision of off-road cycling tracks and cycling/pedestrian infrastructure as identified as part of any such cycling strategy prepared.

PED 7: The Council shall support the appropriate provision of cycle strategies for settlements throughout the County and where necessary and appropriate, reserve lands for the provision of off road cycling tracks and cycling/pedestrian infrastructure as identified as part of any such cycling strategy prepared.'

PED 8: *It is policy of the Council to pursue the redevelopment of the towpath of the Royal Canal for pedestrian/cycle use, providing linkages with Longford Town to the River Shannon in Clondra and to the towns of Keenagh, Ballymahon and Abbeyshrule and to link with the National Cycle Network at Mullingar via established cycle routes in Westmeath.'*

6.2.2.7 Inland Lakes and Waterways

ILW 10: *The Council shall encourage and promote the investigation and use of the potential of the Canal towpaths for the provision of designated walking and cycle routes and wildlife corridors for recreational, amenity and educational purposes and the promotion of links with any further designated walking, cycling and wildlife routes existing or proposed throughout the County. This should be carried out in the context of an important resource for the population of the County and with a view towards the promotion of sustainable tourism projects in County Longford.*

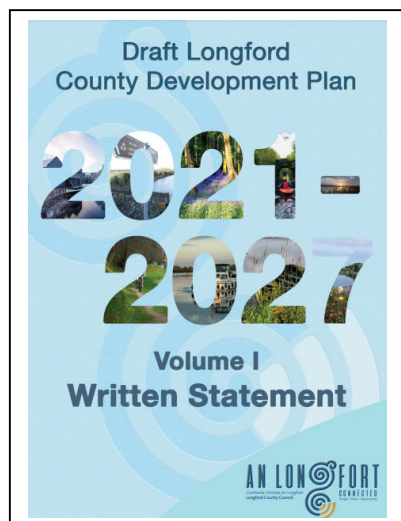
Annex 6 Mid-Shannon Wilderness Park Plan – Section 2.3

'There is now a proposal to develop a new Corlea Archaeological and Biodiversity Project. This can be added to in time with the Royal Canal Walking/Cycling Route and the Mid Shannon Wilderness Park to provide the various communities and villages of South Longford with wonderful amenity facilities and tourism infrastructure. It will also encourage visitors to the area especially of the walking and cycling variety. This will help the area to build a more sustainable ecotourism base which will in turn provide economic benefits to the area. The above proposed walking trails and the Corlea Centre have the potential to be linked with the adjoining Royal Canal in the period 2014/15. This will facilitate boating, walking and cycling visitors coming from Dublin and the East and travelling to the West via Longford and the Shannon to visit both Longford and the Corlea Centre. As the portion of bog immediately adjoining the Corlea Project site is worked out and re-habilitated by Bord na Móna it is hoped to develop an additional area of bog with a direct link back to the Corlea Centre. This would provide dedicated walking trails through the bog presenting the developing biodiversity. It is expected that a portion of the low-lying bog shall be rewatered and colonised with appropriate native plants, birds and fish. The timetable for this portion of the project to be achieved is expected to be between 2020-2025.

3.5 Draft Longford County Development Plan 2021-2027

CPO 5.51: *Support and promote the heritage value of the rail network and the retention and enhancement of disused rail lines with the uses to provide for tourism, amenity and sustainable transports uses such as cycleways and walkways.*

CPO 5.55: *Work with the relevant statutory bodies and other relevant stakeholders, to improve on the existing level of infrastructure and facilities for walking and cycling.*



CPO 5.56: *Identify and implement a strategic, coherent and high-quality cycling and walking network across the County that is integrated with public transport and interconnected with cultural, recreational, retail, educational and employment destinations and attractions.*

CPO 5.61: *Ensure that all new roads and cycle routes implement the **National Cycle Manual** or any replacement document, with a focus on a high-level service for cyclists and encourage a modal shift from the private car to cycling.*

CPO 6.43: *Support the designation of the Mid-Shannon Wilderness Park as UNESCO Biosphere candidate site in the County.*

CPO 6.84: Build on tourism investment in Centre Parcs and enhance Longford County as a destination, by enhancing the Royal Canal, Dublin-Westport Greenway, and Mid-Shannon Wilderness Park through the strategic development of recreational trails and networks.

CPO 10.20: Support community projects and industry – led collaborative tourism initiatives which aim to enhance and promote the visitor offering in towns and villages. These shall include trail heads for the Rebel Trail, Literary Trail and Mid Shannon Wilderness Park. (see Appendix 5: Tourism - Literary and Rebel Trail Map)

10.35: Continue to develop and promote the Rebel Trail, Literary Trail, Tain Trail and the Mid Shannon Wilderness Park as part of Longford's primary tourism offer and experience (see Appendix 5: Tourism – Literary and Rebel Trail Map and Mid – Shannon Wilderness Park Map)

CPO 10.51: Continue to work closely with Bord na Móna, Fáilte Ireland, Waterways Ireland, NPWS, Coillte, Just Transition related groups and neighbouring counties to realise and develop the potential of the Mid Shannon Wilderness Park and Lough Ree Biosphere Nature Reserve

CPO 12.46: Work with partners and stakeholders to progress the development of the Mid- Shannon Wilderness Park and Biosphere.

CPO 13.4: Ensure green infrastructure protection and provision promotes pedestrian access, cycling and public transport in preference to the car, as appropriate while protecting biodiversity and other landscape resources.

Transport: Support construction of green routes/cycleways/pedestrian routes, subject to normal environmental considerations.

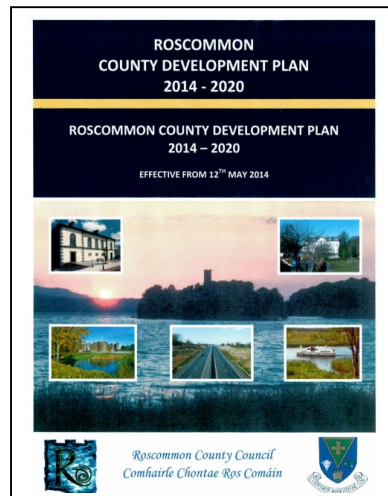
3.6 Roscommon County Development Plan 2014-2020

Section 4.1.2 – Cycling and Walking

The National Cycle Policy Framework (as part of Smarter Travel – A Sustainable Transport Future 2009) which sets out a national policy for cycling, aims to create a stringer cycling culture, a more friendly environment for cycling and improved quality of life. The vision is that all cities, towns and rural areas will be bicycle friendly. The policy document sets a target of 10% of all trips by bicycle by 2020 and places emphasis on promoting and integrating cycle networks.

Objective 4.20: Implement the relevant policies of the Department of Transport's National Cycle Policy Framework and support the provision of a national cycle network including rural cycle networks for recreational cycling and green routes as the opportunity arises and where relevant supported by environmental assessment.

Objective 4.21: Provide a cycleway and walkway crossing through South Roscommon as part of the proposed Dublin to Galway Cycleway Network including all related signage, way marking and associated works and connections.



3.6.1 Draft Roscommon County Development Plan 2021-2027

Chapter 6: Economic Development - Section 6.7 Tourism

The increased demand for activity lead tourism over the past decade has resulted in walking and cycling becoming increasingly popular activities.



The Council recognises the numerous benefits arising from the further development of walking and cycling routes, in particular as a tourism product with significant potential to attract overseas visitors, for local communities in terms of economic benefits, and for all users as an amenity for physical activity and a contributor to health and wellbeing. Accordingly, it is Council policy to continue to expand and create an integrated network of greenways across the County and maximise pedestrian and cycle access to same.

ED 6.24: Collaborate with relevant state bodies, neighbouring Local Authorities and local communities in delivering a UNESCO accredited, Biosphere for Lough Ree and the Mid-Shannon Wilderness Park.

ED 6.26: Facilitate the creation of a network of cycling/walking routes (including existing footpaths and walking routes, off road routes, local walks, tourist walks, medium and long distance

walking routes) within the county.

ED 6.27: Develop linkages between existing and new trails, particularly those with a historic association in adjoining counties, in cooperation with Inland Waterways, Fáilte Ireland and with other relevant stakeholders to provide linkages with trails in adjoining counties in partnership with their Councils.

Section 10.15 Green Infrastructure Strategy

NH 10.25: Support the development of strategic greenways, blueways and peatways in the county in accordance with the Strategy for the Future Development of National and Regional Greenways (2018).

3.7 Other Relevant Policy Documents

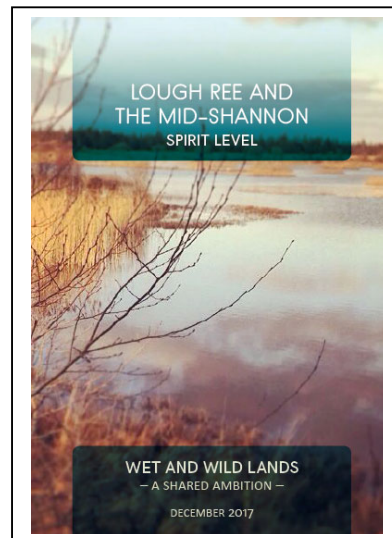
3.7.1 Wet Wild Lands A Shared Ambition (Mid Shannon Spirit Level)

An off-road walking, cycling and water – based network of significance is emerging in the Midlands, making the most of flat topography, state lands and inland waterway systems. This chimes with the large domestic and international market for easy off-road travel in ecologically and heritage rich natural settings.

The Lough Ree and Mid-Shannon region is well placed for early engagement and alignment with the work underway by Fáilte Ireland in developing the new Midlands experience brand. The investment in integrated off-road networks has many other proven benefits for community physical and mental health, active travel, environmental awareness raising, and local businesses. (Page 5)

Connectivity of wild places is very important and therefore there is an opportunity now to reframe the ambition to one of strategic ‘re-wilding’. Everywhere can be a bit wilder – not just cutaway bog, but also rivers and streams, lake edges, amenity areas, road verges, public spaces and streets. A network of wild places can form part of the tapestry of landscape in the Midlands. (Page 8)

This approach aligns with Bord na Móna’s ‘Strategic Framework for the Future Use of Peatlands’ which seeks to maximise the commercial, environmental and social value of its peatlands in the area, including the rehabilitation of sites required by IPC licensing and the work on predictive habitat



mapping for individual bogs, it also aligns with current and emerging agricultural policies at national and European levels. (Page 9)

Cycle and walking routes allow visitors to absorb the unique atmosphere of this special landscape (Lough Boora Discovery Park) and now form a key part of an emerging Midlands Cycle Destination by linking with the Grand Canal Blueway and other off-road trails. Lough Boora Discovery Park is the prime example of a cutaway area that has been developed as a fine amenity with high biodiversity value, a range of events and activities all through the year and good partnerships with local communities and clubs. (Page 10)

Corlea Amenity Walk project is a collaboration between state organisations and the local community. Wetlands Heritage Ireland and Keenagh Co-Op have been instrumental in planning and delivering the project, Bord na Móna provided the land, expertise, and equipment and Longford County Council are managing the funding and delivery of the project. The project builds on the success of the Corle Bog and Trackway centre and opens up access to the surrounding re-wilding peatlands. (Page 11)

The ambition for a fine-grained network of blue and green infrastructure and off-road networks also provides many benefits for local people in terms of recreation, active travel, health, business opportunities and getting up close to nature. (Page 16)

3.7.2 Fáilte Ireland – Tourism Development and Innovation

Strategic Objectives:

- To successfully and consistently deliver a world class visitor experience,
- To support a tourism sector that is profitable and achieves sustainable levels of growth and delivers jobs,
- To facilitate communities to play an enhanced role in developing tourism in their locality, thereby strengthening and enhancing local communities, and
- To recognise, value and enhance Ireland's natural environment as the cornerstone of Irish Tourism.

Stimulating Innovation

One of the main findings of the consultation with key stakeholders on the development of this strategy is the need for Fáilte Ireland to support partners and applicants throughout the application process to stimulate innovative and creative projects for funding. This will be done by:

- Providing information and technical advice and supports on business models, case studies and organising benchmarking trips etc. when required or appropriate.
- Providing funding for technical assistance required to bring them through the design and development stages of the project.
- Hosting innovative workshops and webinars for partners and applicants to stimulate ideas and discussions.
- Providing market and consumer insights and trends to ensure to applicants have up to date information required to ensure projects are evidence based and market driven.



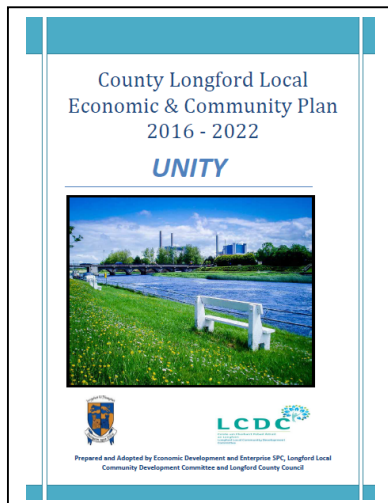
Engaging with the Outdoors

3.2 Improving the visitor experience of State Lands: Where appropriate, and only ever in partnership with the state body concerned. Fáilte Ireland will support projects which seek to optimise the visitor experience of state owned lands such as national parks, nature reserves and forest parks, through delivery of quality outdoor activity infrastructure and essential ancillary facilities.

3.7.3 County Longford Local Economic and Community Plan 2016-2022

Longford has a vast array of natural, historical, cultural and landscape attractions that, if sensitively managed, have the potential to raise the profile of Longford County as a significant tourist destination. County Longford's character, quality landscape and rich culture are vital assets which help the County compete as a tourism destination and as a location of choice. Longford is uniquely positioned having regard to the River Shannon and the Royal Canal to capitalise upon the potential of these existing waterways. Recent investment in cycle infrastructure in the County, in particular the Greenway, which forms part of the National Cycle Network will further add to the County's tourism potential.

Accordingly tourism has the potential to become a key driver of economic growth and job creation across Longford, the Midlands and the Upper Shannon Erne. Tourism provides jobs in rural and urban areas and is populated by many Irish owned SME's. Tourism also offers positive spillovers into other aspects of the economy and society, in terms of the development of Artisan and Local Food Related Businesses, quality of life improvements for permanent residents, and increasing the attractiveness of Longford and the region for inward investment.



E4.1.9: Identify sustainable transport provision (to include cycling and the provision of cycle networks) which facilitates unemployed people to access training and employment.

E6.4.8 Explore the potential to utilise worked-out bog lands to develop a National Wetlands Park. A significant natural attraction developed from exhausted bog land.

E6.4.12: Complete the development of a network of integrated themed trails e.g. Rebel, Literary, Edgeworth, South Longford and Food trails

C6.2.8: Continue to develop a network of additional walking and cycle routes. Enhancement of walking and cycling routes available and length if additional routes provided.

Promote sustainability and the use of "clean technology" in existing and proposed industrial developments, including the use of alternative and renewable energy sources and the promotion of developments located within walking/cycling proximity of larger residential areas. To establish strong inter-regional partnerships which have the potential to create opportunities for enterprise and employment in the Midland Region through expanding on linkages with the Border and West Regions.

3.7.4 Longford Tourism Strategy

3.5 Royal Canal Greenway

It is expected that the full section of the Royal Canal Greenway in County Longford will be **accessible walkers and cyclists by mid-2018**. The expected completion of the full canal walk from Dublin to the River Shannon at Clondra harbour in County Longford will provide a major and important off road national walking/cycling artery across the County which will have major tourism benefits for Longford.

The canal spur into Longford Town, already a popular walking and cycling route will bring more visitors to Longford once the full walk is established and the beautiful relatively flat landscape along the canal should have particular appeal to those tourists that are interested in active but leisurely outdoor pursuits.

4.1 The Lough Ree and Mid-Shannon Wilderness Park

Is a relatively undiscovered area of rich history, heritage and nature. It is an absolute treasure trove of beautiful rivers, lakes, Islands, bogs and rich pasture land. The four local authorities of Offaly, Westmeath, Roscommon, Longford and Waterways Ireland, Bord na Mona, National Parks and Wildlife Services and Coillte have now come together in a Intra Regional Project to open up this long forgotten piece of hidden Ireland for the enjoyment and delight of locals, visitors and tourists.

The large areas of bog land on either side of the Shannon also offer wonderful opportunities in relation to recreation and biodiversity. Most of these bogs, up to 8,000 hectares, are owned by Bord Na Mona and are reaching the end of their peat harvesting life. Once they revert back to nature other compatible uses will include renewable energy, flood attenuation and carbon sequestration.

In association with the Shannon and Lough Ree they present a one off opportunity for Ireland to develop a unique visitor experience of **social, cultural and natural biodiversity value of international importance**.

Despite its location and its tourism assets, the Mid Shannon Waterway has yet to exploit its position in terms of tourism potential and it is underdeveloped relative to other visitor destinations in Ireland. This strategy now proposes to **promote and develop Lough Ree and the Mid Shannon Area** as a tourist destination of international attraction and repute. The various visitor and tourism assets will be developed and presented to make them more easily accessible and a more exciting and memorable experience for the visitor.

As a first step Longford County Council proposes to work with Bord na Mona and Keenagh Co-operative Association to develop a Bog Land Park with amenity walks around the **Corlea Trackway Centre** to enhance the tourism offer at this important location. This Corlea Project represents a first step in the development of a potential Mid Shannon Wilderness Park.



4 PLANNING ASSESSMENT – STATEMENT OF CONSISTENCY

In principal terms, the proposed development is welcomed to deliver a segregated trail across the River Shannon from Leinster into Connaught to the north of Lough Ree. Kilnacarrow Bridge is currently used as a rail bridge, facilitating Bord na Móna to transport fuel peat from nine bogs located west of River Shannon in mid County Roscommon to the Lough Ree Power Station in Lanesborough. Bord na Móna have, since 18th January 2021, ceased their peat related operations nationwide and have consequentially closed their operations in Longford at the end of 2020 and therefore the rail lines in the area, including those across the bridge will no longer be in use. This provides a unique opportunity for Longford County Council and the local communities to develop the former rail lines as walking/cycling trails. The current project, if delivered would enable the practical implementation of this objective. As such, the proposal fully accords with the aims/objectives of the following documents:

1. National Planning Framework – Project Ireland 2040,
2. National Cycle Policy Framework,
3. Regional Spatial and Economic Strategy (Eastern and Midland Regional Assembly),
4. Longford County Development Plan 2015-2021, and
5. Roscommon County Development Plan 2014-2020

The following tabular presentation identifies key spatial planning policies and confirms the consistency of the project with the referred policy objectives and as such provides a *Statement of Consistency*.

Document	Policy / Policy Objectives	Project Response
National Planning Framework (NPF)	<p>NPO21: <i>Facilitate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.</i></p> <p>NPO27: <i>Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.</i></p> <p>NPO58: <i>Integrate planning for Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans.</i></p> <p>NPO64: <i>Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.</i></p>	<p>This project facilitates the provision of an interconnected National and Regional network of Greenways. The project progresses the establishment of the Mid-Shannon Wilderness Park, a joint venture between Longford, Westmeath and Roscommon County Councils in conjunction with Fáilte Ireland, Bord na Móna, National Parks and Wildlife Services and Waterways Irelands.</p> <p>This project is based on developing a Greenway route for pedestrians and cyclists to use with enough space for these users to share the route.</p> <p>The tourism development opportunities of the route combined with the appreciation of the restoration of the worked and unworked bogs will also provide valuable ‘carbon sinks’ associated with the Climate Change Agenda.</p> <p>The combined benefits of the proposed greenway in keeping with NPF Objectives presents a spatial planning opportunity to encourage tourism, recreational opportunities,</p>

Document	Policy / Policy Objectives	Project Response
		<p>the associated health benefits and ecosystem appreciation.</p> <p>The project can be positively considered consistent with the National Planning Framework.</p>
<p>National Cycle Policy Framework – Smarter Travel</p>	<p>Objective 3: <i>Provide designated rural cycle networks especially for visitors and recreational cycling.</i></p> <p><i>Should any cycle network be developed they must adhere to the five main requirements for cycling: safety; coherence; directiveness; comfort; attractiveness</i></p>	<p>The project is in accordance with the <i>Smarter Travel</i> policy document to promote tourism, leisure and recreational activities via the delivery of an integrated greenway network while ensuring that the surrounding bogland amenity is protected and enhanced.</p> <p><i>Smarter Travel</i> encourages and supports the provision of dedicated signed rural cycling networks building on Fáilte Ireland’s Strategy to Develop Irish Cycling Tourism. This will cater for recreational cyclists as well as visitors.</p> <p>The Greenway is to be routed through degraded bogland. The route will predominantly follow an existing BnM railway route.</p> <p>The proposed Greenway has been assessed and is presented as following the five main requirements for cyclists:</p> <ol style="list-style-type: none"> 1. Safety, 2. Coherence, 3. Directiveness, 4. Comfort, and 5. Attractiveness <p>The project can be positively considered as consistent with the National Cycle Policy Framework.</p>
<p>Regional Spatial and Economic Strategy (RSES) for EMRA</p>	<p>RPO 6.19: <i>Support the local strategies that are already in place to link the River Shannon Blueway, The Royal and Grand Canal Greenways and the proposed Barrow Blueway right across the Midlands, incorporating the towns of Longford, Athlone, Mullingar, Tullamore and Portarlinton.</i></p>	<p>The proposed Mid-Shannon Wilderness Park Greenway is in accordance with the overarching <i>Regional Policy Objectives</i> as contained within the <i>EMRA RSES</i>.</p> <p>The project can be assessed favourably set against the broad objectives of the promotion of</p>

Document	Policy / Policy Objectives	Project Response
	<p>RPO 7.23: Support the further development of Green Infrastructure policies and coordinate the mapping of strategic Green Infrastructure in the Region.</p> <p>RPO 7.24: Promote the development of a sustainable Strategic Greenway Network of national and regional routes, with a number of high capacity flagship routes that can be extended and/ or linked with local greenways and other cycling and walking infrastructure, notwithstanding that capacity of a greenway is limited to what is ecologically sustainable.</p> <p>RPO 7.25: Support local authorities and state agencies in the delivery of sustainable strategic greenways, blueways, and peatways projects in the Region under the Strategy for the Future Development of National and Regional Greenways</p> <p>RPO 7.29: Support collaboration between local authorities, the Bord na Móna Transition Team and relevant stakeholders and the development of partnership approaches to integrated peatland management that incorporate any relevant policies and strategies such as the Bord na Móna Biodiversity Plan 2016-2021 and the national Climate Mitigation and Adaptation Plans. This shall include support for the rehabilitation and/or re-wetting of suitable peatland habitats</p>	<p>greenway and blueway routes, their integration and linkage to existing, established and future designated routes.</p> <p>Importantly and significantly the RSES document promotes the significant resource the peatlands provide within the Midland Region. It (RSES) also highlights the partnership approach and cross-cutting themes that schemes such as the subject proposal can deliver in the context with the main partners in establishing the Wilderness Park and the integrated Greenway.</p> <p>The project can be positively considered consistent with the Regional Spatial and Economic Strategy for the EMRA Region.</p>
<p>Longford County Development Plan 2015-2021</p>	<p>TOU 2: The Council recognises the potential of all peatland bogs in the County, including industrial peatlands, in terms of providing opportunities for recreation and tourism thus creating new features of local distinction. Where appropriate the Council will cooperate with adjoining local authorities including Roscommon and Westmeath County Council to facilitate, subject to the requirements of the Habitats Directive, this potential in areas where bogs straddle the County boundary.</p> <p>The development of the bogs for amenity purposes will not exclude them for other purposes such as the generation of renewable energy including wind generation. It is envisaged that these types of activities can be mutually inclusive and developed in an integrated way.</p>	<p>The principal material planning considerations associated with any plan or project within the County should be assessed primarily against the County Development Plan 2015-2021.</p> <p>In effect, local authority own development is not enabled if it contravenes local planning policy or objectives.</p> <p>The use of peatland bogs for recreational opportunities is promoted within the LCDP and can and should be integrated within any other relevant future uses.</p> <p>The proposed use of the former industrial peat infrastructure will</p>

Document	Policy / Policy Objectives	Project Response
	<p>TOU 3: <i>The Council will seek to facilitate and promote, where appropriate the development of the Mid Shannon Wilderness Park and Corlea Archaeological and Biodiversity Project.</i></p> <p>TOU 4: <i>The Council will promote the growth of the County’s indoor and outdoor tourism sector and the necessary supportive facilities, providing an array of activities in order to diversify the range of tourist experiences available in Longford and extend the tourist season.</i></p> <p>TOU 20: <i>a) The Council shall promote and encourage the development of “Honeypot” tourism developments at the locations indicated below.</i></p> <p>Mid Shannon Wilderness Park Villages</p> <p><i>Lanesboro – River Shannon, Lough Ree, Commons North. In particular with a view to developing the amenity area to the south of the town adjoining Lough Ree for visitor and tourism development and a lake side walking/cycling route to Newtowncashel and Ballymahon. Also the possible bridging point for a walking cycling route to Roscommon and the west.</i></p> <p>TOU 23: <i>The Council shall continue to engage with the following agencies:</i></p> <ul style="list-style-type: none"> <i>– National Parks and Wildlife Service, Coillte, ESB/Bord Na Mona with regard to the potential for tourism related uses of cutaway bogland.</i> <p>PED 5: <i>The Council shall investigate the provision of dedicated cycle and pedestrian routes along routes of high amenity.</i></p> <p>PED 6: <i>The Council shall support the appropriate provision of cycle strategies for settlements throughout the County and where necessary and appropriate, reserve lands for the provision of off-road cycling tracks and cycling/pedestrian infrastructure as identified as part of any such cycling strategy prepared.</i></p> <p>PED 7: <i>The Council shall support the appropriate provision of cycle strategies for settlements throughout the County and where necessary and appropriate, reserve lands for the provision of off road cycling</i></p>	<p>promote outdoor recreational use of re-watered boglands to enhance recreational experience and promote extended cycle and footpath links. The proposals extend the growing network of off-road cycling routes, providing links to existing blue and greenway routes within the County and extending inter-county routes.</p> <p>The project can be positively considered consistent with the adopted Longford County Development Plan 2015-2021 and objectives contained therein.</p>

Document	Policy / Policy Objectives	Project Response
	<p>tracks and cycling/pedestrian infrastructure as identified as part of any such cycling strategy prepared.</p> <p>PED 8: It is policy of the Council to pursue the redevelopment of the towpath of the Royal Canal for pedestrian/cycle use, providing linkages with Longford Town to the River Shannon in Clondra and to the towns of Keenagh, Ballymahon and Abbeyshrule and to link with the National Cycle Network at Mullingar via established cycle routes in Westmeath.</p>	
<p>Roscommon County Development Plan 2014-2020</p>	<p>Objective 4.20: Implement the relevant policies of the Department of Transport's National Cycle Policy Framework and support the provision of a national cycle network including rural cycle networks for recreational cycling and green routes as the opportunity arises and where relevant supported by environmental assessment.</p> <p>Objective 4.21: Provide a cycleway and walkway crossing through South Roscommon as part of the proposed Dublin to Galway Cycleway Network including all related signage, way marking and associated works and connections.</p>	<p>The proposed development will enhance the national cycle network and promote connections to green routes within the county and inter-county.</p> <p>The project can be positively considered consistent with the adopted Roscommon County Development Plan 2014-2020 and objectives contained therein.</p>
<p>Lough Ree Mid-Shannon Spirit Level Wet and Wild Lands a Shared Ambition 2017</p>	<p>As a public document this is also intended as a resource for all with a stake in the Midlands; for people who live here, who work here and for those tasked with management and funding decisions.</p> <p>This statement of shared ambition will be useful for those concerned with the links between community, environmental and economic resilience in and around Lough Ree and the Mid-Shannon and it provides a robust foundation for the articulation of a tourism proposition of scale for the wider Midlands area.</p>	<p>Whilst not strictly a spatial land-use planning document, the 'Shared Ambition' provides and allows for the presented initiative of the subject Greenway proposals to enable a recreational tourism product whilst experiencing and appreciating the environmental significance of the landholding and the particular environs.</p> <p>The project can be positively considered consistent with the adopted Shared Ambition document and objectives contained therein.</p>
<p>Fáilte Ireland – Tourism Development and Innovation -</p>	<p>Strategic Objectives:</p> <ul style="list-style-type: none"> ➤ To successfully and consistently deliver a world class visitor experience, 	<p>The proposed project intends to increase tourism by allowing the public to enjoy a wide range of scenic areas within the Country it is intended that the tourists can travel from one place to another via safe</p>

Document	Policy / Policy Objectives	Project Response
Hidden Heartlands	<ul style="list-style-type: none"> ➤ <i>To support a tourism sector that is profitable and achieves sustainable levels of growth and delivers jobs,</i> ➤ <i>To facilitate communities to play an enhanced role in developing tourism in their locality, thereby strengthening and enhancing local communities, and</i> ➤ <i>To recognise, value and enhance Ireland's natural environmental as the cornerstone of Irish Tourism.</i> 	<p>and secure travel modes such as cycling and/or walking while enjoying the natural habitat. The project and the proposals best fit the Fáilte Ireland <i>Hidden Heartlands</i> model. This may provide smaller towns and villages an opportunity to provide services to cater for tourism communities visiting these areas which may have been overlooked due to the national road and particularly the motorway system that does not cater for these places of interest and their supporting towns and villages.</p> <p>The project can be positively considered consistent with the adopted objectives of Fáilte Ireland within their <i>Hidden Heartlands</i> tourism offer.</p>
Co. Longford Local Economic and Community Plan 2016-2022	<p>E4.1.9: <i>Identify sustainable transport provision (to include cycling and the provision of cycle networks) which facilitates unemployed people to access training and employment.</i></p> <p>E6.4.8 <i>Explore the potential to utilise worked-out bog lands to develop a National Wetlands Park. A significant natural attraction developed from exhausted bog land.</i></p> <p>E6.4.12: <i>Complete the development of a network of integrated themed trails e.g. Rebel, Literary, Edgeworth, South Longford and Food trails</i></p> <p>C6.2.8: <i>Continue to develop a network of additional walking and cycle routes. Enhancement of walking and cycling routes available and length if additional routes provided.</i></p>	<p>The LECP objectives related to both community and economic development of the County see the promotion of cycling and the development of the Mid Shannon Wilderness Park as integral to plan objectives.</p> <p>The project can be positively considered consistent with the adopted objectives of the Longford LECP.</p>
Longford Tourism Strategy 2017-2022	<p>4.1 The Lough Ree and Mid-Shannon Wilderness Park <i>Is a relatively undiscovered area of rich history, heritage and nature. It is an absolute treasure trove of beautiful rivers, lakes, Islands, bogs and rich pasture land. The four local authorities of Offaly, Westmeath, Roscommon, Longford and Waterways Ireland, Bord na</i></p>	<p>This project will facilitate the development of a new and important piece of tourism infrastructure to promote and develop the Mid-Shannon area for recreational and tourist cycle and walking routes in the existing natural amenities of the River Shannon, Lough Ree and the</p>

Document	Policy / Policy Objectives	Project Response
	<p><i>Mona, National Parks and Wildlife Services and Coillte have now come together in a Intra Regional Project to open up this long forgotten piece of hidden Ireland for the enjoyment and delight of locals, visitors and tourists.</i></p> <p><i>Despite its location and its tourism assets, the Mid Shannon Waterway has yet to exploit its position in terms of tourism potential and it is underdeveloped relative to other visitor destinations in Ireland. This strategy now proposes to promote and develop Lough Ree and the Mid Shannon Area as a tourist destination of international attraction and repute. The various visitor and tourism assets will be developed and presented to make them more easily accessible and a more exciting and memorable experience for the visitor.</i></p> <p><i>As a first step Longford County Council proposes to work with Bord na Mona and Keenagh Co-operative Association to develop a Bog Land Park with amenity walks around the Corlea Trackway Centre to enhance the tourism offer at this important location. This Corlea Project represents a first step in the development of a potential Mid Shannon Wilderness Park.</i></p>	<p>Royal Canal, with the future rehabilitation of bogs as national biodiversity locations.</p> <p>The subject proposal will promote and extend the walking and cycling route for the Mid Shannon Wilderness Park objective and provide improved access to the referred Corlea Trackway.</p> <p>The project can be positively considered consistent with the adopted objectives of the Longford Tourism Strategy 2017-2022</p>

4.1 EIA Screening Report

Environmental Impact Assessment (EIA) Screening Report has been carried out by *Clandillon Civil Consulting Ltd.* supported by Flynn Furney Environmental Consultants, to inform a planning application for the proposed route of the proposed Mid-Shannon Wilderness Park Greenway. The purpose of the Screening for EIA is to determine whether an EIA Report is required as part of the EIA Directive (2013/52/EU) for the proposed development. The screening process comprises two phases. The first phase looks at the requirement for a mandatory EIA with regard to Annex I and Annex II of the EIA Directive (as amended). The proposed development is not of a type listed in either Annex I or Annex II and therefore does not require mandatory EIA.

The second phase of the work considers the requirement for a sub-threshold EIA. Since the project is a local authority own development, the requirement for sub-threshold EIA is addressed in Article 120 of the Planning and Development Regulations 2001. The type and characteristics of potential impacts were considered within the sub-threshold screening assessment. A cultural and archaeological heritage assessment, flood risk assessment, ecological assessment, also prepared for the project, have been considered within the EIA Screening Report. The EIA Screening Report has also considered other issues such as population and human health, land and soils, material assets, biodiversity, air and climate, and water. An Appropriate Assessment Screening Report was also completed which necessarily informed the EIA screening assessment.

It is concluded that the proposed greenway does not fall into a category or exceed threshold under the Planning Acts that trigger the mandatory requirement of an EIA, and therefore a statutory EIA is not required. Having carried out an EIA screening assessment of the proposed development and considering the type and scale of the proposed development and the nature of the receiving environment in addition to the nature, size and location of the proposed development, impacts on aspects such as biodiversity, lands and soils, water, and heritage are not expected and can be ruled out.

In relation to the construction stage, the EIA Screening Report indicates that best practice guidance will be followed, preventing vegetation removal and minimising disturbance to the receiving environment. It is anticipated that the construction will likely bring about a temporary increase in traffic and noise. However, this will be for a short period and will result in increased road safety, improved infrastructure and accessibility to local cultural sites, a positive environmental benefit.

The EIA Screening Report concludes that there is no real likelihood of significant effects on the environment arising from the proposed development and is concluded that the proposed development of the Mid-Shannon Wilderness Park Greenway Project would not be likely to have such effects and accordingly the preparation of an **Environmental Impact Assessment Report is not required.**

4.2 Appropriate Assessment Screening Report

An Appropriate Assessment Screening Report has been carried out by *Flynn Furney Environmental Consultants* for the proposed construction of a Greenway within and around a number of cutover bog sites in Co. Longford. The report has been completed to provide information regarding the ecological status of the proposed site of works and to provide this information necessary to allow the competent authority to conduct an Article 6[3] Appropriate Assessment (AA) Screening of the proposed development.

The report concludes that impacts on the Lough Ree SPA and Lough Ree SAC and or any other Natura 2000 designated sites of the proposed Greenway construction **are not predicted.** The possibility of temporary disturbance during construction phase to a bird species that is a qualifying interest of Lough Ree SPA was identified. However, if best practice is applied to works this is considered unlikely and significant of impact likely to be negligible. It is therefore concluded that a **full Appropriate Assessment (or Stage 2 Natura Impact Statement) is not required.**

4.3 Flood Risk Assessment Report

Clandillon Civil Consulting (CCC) Ltd has carried out a Flood Risk Assessment (FRA) to inform an Environmental Impact Assessment Screening Report being completed for the Project and was completed in accordance with “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” DOEHLG 2009.

The results of the FRA indicated that parts of the proposed Greenway route are subject to Fluvial Flood risk. CCC has reviewed all the available datasets relating to flood risk for the proposed development and has concluded that the predominant source of flood risk to the development is fluvial flooding from the Shannon River. In particular, the Greenway section within Lanesborough and the Kilnacarrow BnM Bridge encroaches Flood Zone A, B and C as well as the track section near the Ledwithstown River. Flooding occurs in these locations as shown by the OPW datasets of the 2009 and 2015 Shannon River Flood events.

A Justification test was not required since the development is considered to be ‘water compatible’ and therefore appropriate for all Flood Zones classes A, B and C. However, as Greenway sections

within Flood Zone A have a 10% chance that a Flood event will occur or be exceeded in any given year, bound pavement sections are proposed that will minimise maintenance.

The Contractor will be required to prepare an Emergency Plan for managing flood risk during construction, which may include monitoring of weather conditions through consultation with Met Éireann and Longford County Council. The Contractor is to ensure measures are in place to reduce any potential inundation due to flooding during the works.

4.4 Cultural Heritage Desk Study

The cultural heritage assessment was carried out in October 2020 as part of the Environmental Screening Report for the proposed project. The assessment of the proposed route was undertaken by Kerstin Bartels-Shortt MIAI of *Clandillion Civil Consulting*. The report sets out to assess the archaeological potential on the area and forms the basis for the examination of potential impacts of the proposed development on the archaeology, architectural heritage, industrial heritage, and other potential cultural heritage elements of the receiving environment.

The route of the proposed greenway development follows existing railway tracks for 61km out of 73 kms and there will be limited groundworks in areas where existing tracks are being used. There will also be 6 kms of new greenway track construction, connecting existing railway section and local roads. These sections of the proposed route pass largely through milled bogs and adjoining countryside. Mechanical excavation of topsoil and peat layers to enable groundworks has the potential to uncover further sites of archaeological significance, however the proposed design is for geogrid to be placed directly on top of brash/vegetation in areas of new construction. Construction may involve shallow excavation of up to 0.9 m, placement of culverts and construction of bridges over streams. In order to mitigate impacts on previously unidentified archaeological sites in these areas, it is recommended that groundworks and clearing of vegetation will be monitored by a suitably qualified archaeologist as agreed by Longford County Council and Bord na Mona. This is especially pertinent where large clusters of trackways and platforms have previously recorded, such as at Corlea, Derraghan More and Derrynagran townlands.

The proposed low impact trail development is unlikely to impact on the setting of cultural heritage sites. Some sites may be more accessible following the development, such as the Canal bridges and Kilnacarrow bridge, as well as the industrial heritage of Lanesborough Power Station. The visual impact on any structures of architectural heritage significance is also deemed to be low. The thatched cottage at Cloontamore, for example, is located beside an existing road and the proposed route development does not pose a further risk to its setting. The proposed greenway route in fact presents a positive environmental benefit in making the cultural heritage of the mid-Shannon area more accessible wholly in line with the tourism objectives associated with the Fáilte Ireland, *Hidden Heartlands* objectives.

5 PART 8 – SUB-THRESHOLD LOCAL AUTHORITY OWN DEVELOPMENT

5.1 Part 8 Local Authority Own Development

The Planning Statement herein confirms the ability of the proposals to be undertaken via Local Authority Own Development, **Part XI, Section 179 of the Planning and Development Act 2000-2020** (as amended) in effect a Sub-threshold Development **under Article 120 of the Planning and Development Regulations 2001** and where an Environmental Impact Assessment Report is not required under **Section 175** nor a Stage 2 Appropriate Assessment (Natura Impact Statement) under **Section 177AE** of the PandD Act.

5.2 Determination of Local Authority Own Development

Local authority own development Section 179 Planning and Development Act.

179.— (1) (a) The Minister may prescribe a development or a class of development for the purposes of this section where he or she is of the opinion that by reason of the likely size, nature or effect on the surroundings of such development or class of development there should, in relation to any such development or development belonging to such class of development, be compliance with the provisions of this section and regulations under this section.

(b) Where a local authority that is a planning authority proposes to carry out development, or development belonging to a class of development prescribed under *paragraph (a)* (hereafter in this section referred to as “proposed development”) it shall in relation to the proposed development comply with this section and any regulations under this section.

(d) This section shall also apply to proposed development which is carried out within the functional area of a local authority which is a planning authority, on behalf of, or in partnership with the local authority, pursuant to a contract with the local authority.

Sub-threshold EIAR – Article 120 Planning and Development Regulations

120. (1) (a) Where a local authority proposes to carry out a subthreshold development, the authority shall carry out a preliminary examination of, at the least, the nature, size or location of the development.

- (b) Where the local authority concludes, based on such preliminary examination, that—
- (i) there is no real likelihood of significant effects on the environment arising from the proposed development, it shall conclude that an EIA is not required,
 - (ii) there is significant and realistic doubt in regard to the likelihood of significant effects on the environment arising from the proposed development, it shall prepare, or cause to be prepared, the information specified in Schedule 7A for the purposes of a screening determination, or
 - (iii) there is a real likelihood of significant effects on the environment arising from the proposed development, it shall—
 - (I) conclude that the development would be likely to have such effects, and
 - (II) prepare, or cause to be prepared, an EIAR in respect of the development.

(1A) (a) Where the local authority prepares, or causes to be prepared, the information specified in Schedule 7A, the information shall be accompanied by any further relevant information on **the characteristics of the proposed development and its likely significant effects on the environment**, including, where relevant, information on how the available results of other relevant assessments of the effects on the environment carried out

pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account.

5.3 Public Notices

Local authority own development Section 179 Planning and Development Act.

179.—(2) The Minister shall make regulations providing for any or all of the following matters:

- (a) the publication by a local authority of any specified notice with respect to proposed development;
- (b) requiring local authorities to—
 - (i) notify prescribed authorities of such proposed development or classes of proposed development as may be prescribed, or
 - (ii) consult with them in respect thereof, and
 - (ii) give to them such documents, particulars plans or other information in respect thereof as may be prescribed;
- (c) the making available for inspection, by members of the public, of any specified documents, particulars, plans or other information with respect to proposed development;
- (d) the making of submissions or observations to a local authority with respect to proposed development.

Notice of proposed development Article 81 Planning and Development Regulations

- 81.** (1) A local authority shall, in accordance with this article,—
- (a) give notice of proposed development in an approved newspaper, and
 - (b) erect or fix a site notice or site notices on the land on which the proposed development would be situated.
- (2) A notice referred to in sub-article (1) shall state that the local authority proposes to carry out development and—
- (a) indicate the location, townland or postal address of the proposed development (as may be appropriate),
 - (b) indicate the nature and extent of the proposed development,
 - (c) where the proposed development consists of or comprises the carrying out of works —
 - (i) which would materially affect the character of a protected structure or a proposed protected structure,
 - (ii) to the exterior of a structure which is located within an architectural conservation area, and the development would materially affect the character of the area concerned,
- indicate this fact,
- (ca) indicate its conclusion under article 120(1)(b)(i) or screening determination under article 120(1B)(b)(i), as the case may be (and, in the latter case, including, or referring to, the description, if any, provided under article 120(1A)(b) or 120(3)(cb)(ii), as the case may be), and
 - (d) state that—
 - (i) plans and particulars of the proposed development will be available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy during office hours at the offices of the local authority for a specified

6 CONCLUDING COMMENTS

We submit that the proposed development of a 73 km segregated greenway running mainly through Bord na Móna cutaway bogs of central Longford where circa. 61 km of the proposed route uses existing railway through these bog lands, including the conversion of the existing Bord na Móna bridge at Kilnacarrow to a walkway/cycleway to provide off road access into County Roscommon is in accordance with national regional and local spatial planning policy objectives. It is important to note that 23.4 km of the total 73 km proposed greenway route have already been the subject of successful Part 8 applications to date.

The proposed development represents the suitable use of the existing railway lines which Bord na Móna ceased operating as part of their peat harvesting operations significantly terminated in Longford in 2020. As these railway lines will no longer be in use, the adopted *Longford County Development Plan 2015-2021* identifies the *Mid-Shannon Wilderness Park* as a key aim and flagship tourism product to allow tourism attractions to be promoted and expanded and to convert these railway lines into a walkway/cycleway. The proposal will offer extensions and links to existing and proposed greenway network and will enable the area's promotion under the Fáilte Ireland, *Hidden Heartlands* banner, tourism product.

The design and approach in developing this project is presented as fully accordance with the *National Planning Framework 2040*, *The National Cycle Policy Framework*, and the *Regional Spatial and Economic Strategy* to increase active travel, make alternative travel to other modes of transport and to allow the users to enjoy the scenic parts of the country in a safe and user-friendly environment.

Longford County Council have already delivered on a number of elements of the Mid-Shannon Wilderness Park, including the development of the Corlea Bog Walk, which is the first phase of this project in providing a walking and cycling trail within approximately 70 acres of rehabilitated bog. Longford County Council intends to continue this trail to be linked to Longford Town allowing for a further increase of users and tourism to make use of the proposed Greenway.

The proposed development and associated submitted documentation in respect of:

1. Environmental Impact Assessment Screening Report,
2. Appropriate Assessment Screening Report
3. Flood Risk Assessment,
4. Ecological Impact Assessment Report and
5. Cultural Heritage Study Report

are presented to promote the understanding of the proposal and to enable the full consideration of the scheme in accordance with the logical, orderly and sustainable development of the subject lands in accordance with the principal material planning considerations contained within the Longford County Development Plan and Roscommon County Development Plan, where the route provides a logical link over the River Shannon.

We look forward to your full consideration of the scheme to promote further development of Greenways in Ireland, making alternative modes of transportation systems and increase active transportation in both urban and rural areas allowing the public to enjoy the scenic areas in the State and the community benefits that the development will bring to the local community.