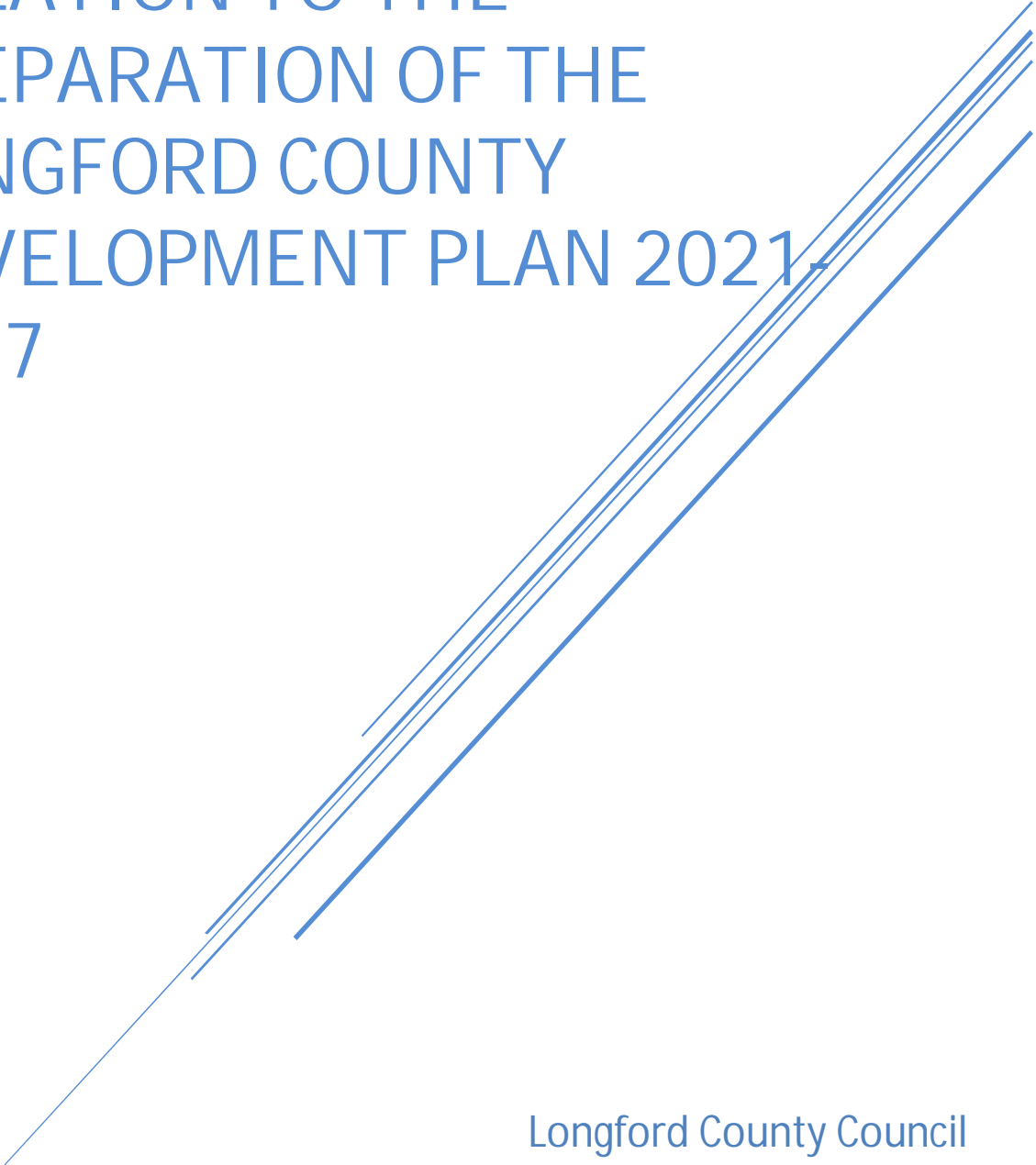


CHIEF EXECUTIVE'S REPORT TO
MEMBERS ON SUBMISSIONS
RECEIVED AND
RECOMMENDATIONS IN
RELATION TO THE
PREPARATION OF THE
LONGFORD COUNTY
DEVELOPMENT PLAN 2021-
2027



Longford County Council
Planning Department
January 2020

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Glossary of Abbreviations

AA – Appropriate Assessment
LECP – Local Economic and Community Plan
EMRA – Eastern Midland Regional Assembly
RSO – Regional Strategic Objective
NIA – Natura Impact Assessment
NIS – Natura Impact Statement
NPF – National Planning Framework
NPO – National Planning Objective
OPR – Office of the Planning Regulator
RPO – Regional Planning Objective
RSES – Regional Spatial and Economic Strategy
SEA – Strategic Environmental Assessment
SFRA – Strategic Flood Risk Assessment
SPC – Strategic Policy Committee

1.0 Statutory Context and Overview of Review of Longford County Development Plan

In accordance with Section 11 of the Planning and Development Acts 2000 (as amended), Longford County Council gave notice on 26th September 2019 of its intention to commence the review of the existing County Development Plan and to prepare a new County Development Plan (Appendix 1). The review of the Plan will take two years and will conclude with the adoption of the new Longford County Development Plan 2021-2027.

1.1 Statutory Context and Purpose of the Chief Executive's Report

Under Section 11(4) (a) of the Planning and Development Acts 2000 (as amended), the Chief Executive as part of the Development Plan process, is required to prepare a report on the submissions and observations received to the initial public consultation process of the pre-Draft Plan, not later than 16 weeks after giving notice that the Development Plan is to be reviewed. Said report must be submitted to the Elected Members of the Planning Authority for their consideration by 24th January 2020. The legislative requirements of the Chief Executive's Report are set out in Section 11(4) (b) of the Planning and Development Act 2000 as amended, and are as follows:

- List the persons or bodies who made written submissions/observations, as well as any person or bodies consulted (Appendices 2, 3 & 4).
- Summarise the issues raised in the written submissions and during the public consultation events but shall not refer to a submission relating to a request for zoning of particular land for any purpose (Sections 2, 3 and 4).
- Give the opinion of the Chief Executive on the issues raised and recommendations, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives of the Government or of any Minister of the Government (Section 2, 3 and 4).
- State the Chief Executive's recommendations on policies to be included in the Draft Development Plan (Section 2, 3 and 4).
- Summarise the issues raised and recommendations made by the relevant regional assembly and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the Draft Development Plan (Section 2).

1.2 Legislative Background for the making of the County Development Plan:

The Planning and Development Acts 2000 (as amended), places an obligation on every planning authority to make a Development Plan for its functional area every 6 years. The current Plan was adopted on the 11th February 2015 and came into effect on the 11th March 2015 and extends to 2021. The Planning and Development Acts 2000 (as amended), requires a planning authority to review its existing Development Plan and prepare a new one for its area not later than 4 years after the making of a Development Plan. In accordance with Section 11 (1)(a) of the Planning & Development Acts 2000 (as amended), the review of the existing Development Plan and preparation of a new Development Plan by the planning authority is required to be strategic in nature for the purposes of developing—

- (a) the objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area of the Development Plan, and
- (b) the core strategy, and
- (c) shall take account of the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

1.3 Overview of the Initial Notification and Public Consultation undertaken:
The consultation process comprised a number of elements:

1.3.1 Notice

The statutory notice of the commencement of the review of the County Development Plan was placed in the Longford Leader dated 27/9/19, announcing that Longford County Council was commencing the review of the Development Plan on 26/9/19. The notice directed the public to material on the website, public libraries and the Planning Department and advised of the duration of the formal consultation period (Appendix 1).

1.3.2 Electronic Correspondence

The Council wrote by electronic mail to all the prescribed bodies, Elected Members, the 3 no. Strategic Policy Committees (Placemaking SPC; Climate Action and Planning SPC; and Governance SPC) and relevant stakeholders informing them of the commencement of the review process on 26th September 2019 (Appendix 3 and 4).

1.3.4 Public Consultation Issues Paper

A Public Consultation Issues paper was made available in all public libraries and on the dedicated Development Plan review webpage, and forwarded to all Elected Members, all Strategic Policy Groups, Prescribed Bodies, and relevant stakeholder groups in order to generate public submissions on the Pre-draft Plan. The Public Consultation Issues paper featured a wide range of topics, as follows:

1. Settlement Strategy and Housing
2. Regeneration and Placemaking
3. Transport and Movement
4. Critical Infrastructure
5. Economic Development
6. Rural Development
7. Tourism
8. Built and Cultural Heritage
9. Green Infrastructure
10. Climate Change and Energy
11. Environment

1.3.5 Online and social media

The review of the County Development Plan was also advertised on the Council's social media outlets. A dedicated webpage was designed to keep members of the public up to date with the process of the preparation of the Development Plan throughout the 2-year period of the plan making process, on www.longfordcoco.ie/services/planning/preparation-of-longford-cdp-2021-2027/. Submissions to the pre-Draft consultation stage could be made online via the Council's consultation portal or by email to a dedicated address. The Council also utilised Facebook and Twitter to notify the public of the launch of the review process and of the public consultation events. Cumulatively between the website, Facebook and Twitter there were 2,876 'hits' during the pre-consultation period.

1.3.6 Public Consultation Events:

Three public meetings were advertised in the Longford Leader on 18th October, 2019, and online and through social media inviting the public to attend information sessions regarding the Development Plan preparation and review process. Events were held in the following locations:

- Longford Municipal District: Longford Branch Library on 21st October, 3-6pm.
- Granard Municipal District: Granard Library on 22nd October, 2-5pm.
- Ballymahon Municipal District: Ballymahon Library on 24th October, 2-5pm.

Planning staff facilitated meetings with members of the public during the informal public information sessions at Ballymahon, Granard and Longford which consisted of informal discussions between staff members of the Planning Section and individual's in attendance. Consultation material was on display and available at each meeting including; Public Consultation Issues Paper booklets and the public display of aerial photography and maps for the County. Members of the public were invited to review the Public Consultation Issues paper and were also encouraged to discuss any issues, with the exception of zoning matters with planning staff. Concerns and comments raised by the public included matters such as quality of life issues and the role and development of the towns and villages within the county and were reflected in submissions received. These matters were reflected in written submissions received and will be taken into consideration in the preparation of the Draft County Development Plan.

1.3.7 Stakeholder meetings:

Planning staff engaged in a number of key stakeholder meetings, in order to ascertain the viewpoints of individual sectoral groups and discussed the manner in which the County Development Plan could potentially assist in addressing these issues. Council officials met with the following stakeholders/groups during the consultation period:

- Eastern and Midland Regional Assembly (EMRA);
- The Office of the Planning Regulator;
- Internal Local Authority Working Group (consisting of representatives of key sections within the local authority).

Both the meeting with EMRA and the Planning Regulator reflected the need to comply with national policy. This sentiment was subsequently conveyed to the internal local authority working group, where it was indicated that the relevant priorities of each section should be considered as part of the Plan preparation. The meetings undertaken reflect a collaborative approach undertaken by the Council which strives to engage and incorporate the findings to assist in the preparation of the Draft Plan. The Council will continue to engage with these stakeholders during the County Development Plan preparation process.

1.4 Submissions Received and Considered in the Chief Executive Report

The pre-Draft consultation stage was undertaken from 26th September 2019 until 22nd November 2019 (both dates inclusive). In total 30 no. submissions were received during the pre-Draft consultation period (Appendix 2) of which 4 were related to zoning submissions and cannot be considered as part of this Chief Executive Report, therefore resulting in the consideration of 26 no. submissions in this report.

The opinions, views and ideas set out in the written submissions, and of those expressed and recorded at the public consultation events/stakeholder meetings, were considered. In this regard Longford

County Council wishes to express its appreciation to those who made submissions/observations and/or attended the information events.

1.5 Zoning Submissions

Zoning submissions have been excluded from this report. Section 11(2)(bc) of the Planning and Development Act 2000 as amended, prescribes that proposals for zoning of particular land for any purposes cannot be considered at this stage of the County Development Plan process. The purpose of the pre-consultation stage of the Development Plan making process, is to set out an overall strategy for the proper planning and sustainable development of the County and a broad structure for the Development Plan and the Core Strategy. When a strategy and a set of policies have been determined for the Draft Plan, the issue of zoning will be considered in accordance with the Planning and Development Acts 2000 (as amended).

2.0 Submission from the Eastern and Midland Regional Assembly (EMRA) Submission no: CDP6

This section contains a summary of the issues raised by the Eastern and Midland Regional Assembly (EMRA), and the Recommendation of the Chief Executive in relation to the manner in which those issues will be addressed in the Draft Development Plan.

2.1 Issue Raised - Regional Spatial and Economic Strategy

The Planning Authority shall ensure the County Development Plan is consistent with the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region.

Chief Executive Recommendation

It is proposed that the RSES will be incorporated into the plan in accordance with section 11(b) of the Planning & Development Act 2000 (as amended), which makes specific reference to the RSES and states *'for the purposes of enabling the incorporation of the National Planning Framework and a regional spatial and economic strategy into a development plan...'*

2.2 Issue Raised - Growth Strategy of the RSES

- Growth Enablers are specified in Section 3.2 of the RSES. Attention is brought to the appropriate general Growth Enablers and the Growth Enablers of the Gateway Region relevant to County Longford.
- The Development Plan shall ensure consistency with RPO (Regional Priority Objectives) 3.2 and 3.3 aimed at securing compact growth in line with the National Planning Framework (NPF).

Chief Executive Recommendation

- Both RPO 3.2 and 3.3 relate to *'Compact Growth'*. It is proposed to include in the plan the Key Enablers for growth for the region as they affect County Longford and to ensure compliance with RPO 3.2 of the RSES which relates to requiring at least 30% of future homes that are targeted in settlements to be located within the existing built-up footprint of the settlements in an effort to make settlements more compact and reduce unsustainable urban sprawl and ribbon development, as is stated in National Policy Objective 3c of the NPF. The county population target will accord with Appendix 2 of the RSES.
- In terms of RPO 3.3 it is stated that *'local authorities in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for new Apartment's Guidelines' and the 'Urban Development and Building Heights Guidelines for Planning Authorities'*. It is proposed to ensure compliance with RPO 3.3 in terms of Development Plan Policy.

2.3 Issue Raised - Settlement Strategy

- The RSES defines Longford as a Key Town and the Settlement Hierarchy of the Development Plan is required to reflect this and this acknowledgement in the Issues Paper is welcomed.
- In formulating the core strategy, attention is brought to Chapter 4 of the RSES, including Settlement Strategy RPO 4.1 and 4.2, and Appendix B (SPA and County Population Tables).

- Table 4.2 of the RSES outlines the Settlement Typologies to be included as part of the Settlement Hierarchy which is to be defined by the County Development Plan. Regarding the Key Town of Longford, RPO 4.26 addresses the role of Key Towns within core strategies and is augmented by RPO 4.59 - 4.63 which specifically relate to Longford. Table 4.3 of the RSES provides further guidance and details policy responses for the different settlement typologies. Future County Development Plan policy should ensure consistency in this regard.
- Section 3.1 and Appendix A of the RSES provide detail on the Asset-Based approach to spatial development and will be useful in formulating a Settlement Strategy for the Plan.

Chief Executive Recommendation

- The Core Strategy shall consider relevant densities for the settlement typologies in accordance with Government Guidelines. Regeneration/Opportunity sites will be identified in the plan.
- A Settlement Hierarchy will form part of the plan which is also required in accordance with the provisions of the Planning & Development Acts 2000 (as amended). It will utilise the format set out in Table 4.1 of the RSES; key town, self-sustaining growth towns, self-sustaining towns, towns, and rural (which includes villages and the wider rural area). Recognition of Longford's role as a Key Town as set out in the RSES will be made in the Draft Plan.
- In preparing the Draft Plan, the capacity of services to meet demand will be investigated in order to ensure alignment with proposed growth.
- The Asset-Based approach utilised in the RSES will be considered as a basis for compiling the Settlement Strategy of the Draft Plan.

2.4 Issue Raised - Issues Paper

- Welcomes the inclusion of '*Section 2.0 National and Regional Strategic Context*', outlining the policy hierarchy of national and regional spatial plans within which the County Development Plan will sit.
- The reference that the County Development Plan must be consistent with the RSES is welcome and the inclusion of the three key principles of the RSES; Healthy Placemaking, Climate Action and Economic Opportunity.
- The broad areas outlined including Settlement Strategy and Housing; Regeneration; Placemaking; Transport and Movement; Critical Infrastructure; Economic Development; Rural Development; Tourism; Natural, Built and Cultural Heritage; Green Infrastructure; Climate Change and Energy; and Environment are considered to provide a robust basis for scoping out and developing the overall County Development Plan.

Chief Executive Recommendation

The comments made are noted.

2.5 Issue Raised - Settlement Strategy and Housing

- The Assembly welcomes the emphasis placed on the Core Strategy within this section of the Issues Paper and the stated requirement to align with the national and regional strategies.
- Section 9.3 of the RSES deals specifically with '*Housing and Regeneration*', whereas Section 4.8 deals with housing in rural places. These sections will provide further direction to assist in formulating related policy for the County Development Plan.
- There is an obligation to prepare a Housing Need Demand Assessment (HNDA). RPO 9.5 outlines the commitment of the Regional Assembly to support local authorities in the provision of a HNDA in keeping with National Policy Objective (NPO) 37 of the NPF. Draft Departmental Guidelines on HNDA are currently being prepared that will inform an approach.

Chief Executive Recommendation

- It is proposed to align the Core Strategy, Settlement Strategy and Housing Strategy of the Plan with the policies of the National Planning Framework and the RSES.
- A HNDA will be made which will feed into the Plan. A HNDA is a robust evidence base undertaken to correlate and accurately align future housing requirements which informs housing policies, the Housing Strategy in terms of the proportion of social and affordable housing required, and the Core Strategy through associated land requirements.

2.6 Issue Raised - Regeneration

- Regeneration is a recurrent RSES theme and acknowledgement that regeneration and renewal is inherent in the proper planning and sustainable development of the County is welcomed.
- The reference to Longford as a Key Town within the Issues Paper is acknowledged and RSES policy is contained in Chapter 4.
- The RSES recognises that Longford Town has a number of strategic areas that can act as regenerative catalysts increasing the residential, economic and leisure potential of the town centre, whilst also addressing vacancy, derelict buildings and enhancing the vibrancy of the town. Key areas include the Camlin Quarter and Ballyminion Areas with further strategic sites throughout, including possibilities within the southern quarter of the town.
- Sections 9.3 and 4.8 of the RSES deal explicitly with Regeneration in urban and rural contexts. Regional Strategic Outcome 2 specifically emphasises the importance of Compact Growth and Urban Regeneration, whilst one of the key enablers for growth across the Region (Section 3.2) promotes regeneration and revitalisation of small towns and villages and supports local enterprise and employment opportunities to ensure their viability as service centres for their surrounding rural areas. The RSES outlines that local authorities in developing their core strategies and settlement hierarchies will consider a number of growth enablers to meet the potential of places within the County including regeneration and development, through the identification of significant ready-to-go regeneration projects in existing built urban areas, as well as rural regeneration opportunities, which could leverage private and public-sector support and investment, including NPF and European funding with a focus on social as well as physical regeneration.

Chief Executive Recommendation

- The Draft Plan will include policy relating to regeneration in accordance with the RSES.

2.7 Issue Raised - Placemaking

- This section of the Issues Paper is in keeping with the RSES Key Principle of Healthy Placemaking aimed at promoting people's quality of life through the creation of healthy and attractive places in which to live, work and visit.
- The information contained in Chapter 9 of the RSES, which details diversity, inclusivity, housing, regeneration, healthy placemaking, social opportunity, economic opportunity, access to childcare, education, health services and access to arts, culture, language and heritage, will support the local authority in developing relevant policy.

Chief Executive Recommendation

- In accordance with the RSES, it is proposed to insert into the Draft Plan policies relating to diversity, social inclusion, housing, regeneration, healthy place-making, social and economic opportunity, access to childcare, education, health services and arts, culture, language and heritage.

2.8 Issue Raised - Transport and Movement

- Welcome the Transport and Movement Section of the Issues Paper and consider the points raised are reflective of several Regional Strategic Outcomes (RSOs) across the three Key principles of the RSES; namely Healthy Placemaking, Climate Action and Economic Opportunity, particularly RSOs 1, 4, 6, 9, 10 and 15.
- Information contained at Chapter 8 of the RSES will provide assistance in developing related policy in this area, including RPO 8.6 which outlines that a Local Transport Plan (LTP) for the settlement of Longford is to be prepared.

Chief Executive Recommendation

- The relevant sections of the RSES will be used in formulating Development Plan policy and an objective will be included to make a Local Transport Plan for Longford.

2.9 Issue Raised - Critical Infrastructure

- The inclusion of a Section on 'Critical Infrastructure' is welcomed and in particular the reference that integration and coordination between land use and the delivery of services is essential in creating sustainable communities and improving economic competitiveness. Information contained at Chapters 7, 8 and 10 will assist in developing related policy.

Chief Executive Recommendation

- The draft plan will include policy relating to critical infrastructure in accordance with the RSES.

2.10 Issue Raised - Economic Development

- The Assembly welcomes the inclusion of a section on 'Economic Development' as part of the Issues Paper, as it is one of the three Key Principles of the RSES and supported by RSOs 12-16.
- Chapter 6 of the RSES deals specifically with 'Economy and Employment' and this chapter will assist in developing policy. Of particular note for County Longford are the relevant stated sectoral opportunities at Section 6.4 of the RSES, RPOs 6.4-6.8 and RPO 4.84 relating to the rural economy, RPO 6.9 which supports relevant actions within the Regional Enterprise Plan related to County Longford and RPO 6.19 that relates to tourism in Longford. Section 6.5 also details specific sectors and should be consulted in developing policy.

Chief Executive Recommendation

- The Draft Plan will include policy relating to economy and employment in accordance with the RSES.
- The sectoral opportunities at Section 6.4 of the RSES, RPOs 6.4-6.8 and RPO 4.84 relating to the rural economy, RPO 6.9 which supports relevant actions within the Regional Enterprise Plan related to County Longford and RPO 6.19 that specifically relates to tourism in Longford will be included in Draft Development Plan policy.

2.11 Issue Raised - Rural Development

- The RSES recognises the contribution that rural places make towards regional and national development in economic, social and environmental terms. This is specifically reflected in
 - Section 4.8 of the chapter 'People and Place' and Sections 6.4, 6.5, 6.6 and 6.7 of the chapter 'Economy and Employment', and it is considered that these elements of the RSES will assist in formulating policy.

- RPOs 4.80 and 4.81 specifically relate to rural housing provision whilst RPOs 4.84, 6.6, 6.7 and 6.8 relate to diversification within the rural economy including through enhancing sectors such as agriculture and food, forestry and aquaculture, energy and extractive industries, the bio-economy, tourism and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage.

Chief Executive Recommendation

- The Draft Plan will recognise the contribution that rural places make towards regional and national development in economic, social and environmental terms. This will be dispersed through many chapters of the Draft Plan. In particular Draft Development Plan policy will reflect Section 4.8 of the chapter *'People and Place'*; sections 6.4, 6.5, 6.6 and 6.7 of the chapter *'Economy and Employment'* and the sectoral opportunities of Section 6.4 and RPOs 6.4-6.8 and RPO 4.84 relating to the rural economy of the RSES.

2.12 Issue Raised - Tourism

- The Assembly acknowledge the inclusion as part of the issues paper that County Longford, with its wealth of heritage, natural assets and recreational infrastructure has enormous potential to benefit from tourism. Information contained as part of Chapter 6 of the RSES, which specifically relates to Tourism, Natural and Cultural Tourism Assets and Investing in the Tourism Product will assist in developing policy.

Chief Executive Recommendation

- The Draft Plan will include policy relating to Tourism, Natural and Cultural Tourism Assets and Investing in the Tourism Product in accordance with the RSES. In particular RPO 6.19 which specifically relates to tourism in Longford will inform Development Plan policy.

2.13 Issue Raised - Natural, Built and Cultural Heritage

- The recognition and promotion of the Natural, Built and Cultural Heritage of County Longford is a welcome inclusion within the Issues Paper. Sections 7.5 and 9.7 will assist in formulating future County Development Plan policy. This includes detail around cultural, architectural and archaeological heritage, heritage-led regeneration, biodiversity and natural heritage.

Chief Executive Recommendation

- The Draft Plan will include policy relating to biodiversity, landscape, natural heritage, green infrastructure, protected structures and infrastructure, which will adhere to the RSES.

2.14 Issue Raised - Green Infrastructure

- The Green Infrastructure section of the Issues Paper is in keeping with the RSES which dedicates Section 7.7 to Green Infrastructure. The RSES outlines the importance of Placemaking and Green Infrastructure and recognises that at the local authority scale, Green Infrastructure offers an opportunity to develop integrated strategies around economic development, urban placemaking and rural policy, while linking strategic natural assets with cultural and heritage assets further enhances the opportunities for Green Infrastructure strategies to drive recreation and tourism benefits. All of this is particularly relevant for County Longford.
- The RSES also identifies a number of significant opportunities to develop a number of flagship Greenways in the Region, including some of which are relevant to County Longford namely

the development of the Shannon and Shannon-erne waterways taking in Lough Ree, The Royal Canal and potential for a Midlands based Regional Peatway taking in the Corlea Trackway. These elements of the RSES will assist in formulating future County Development Plan policy.

Chief Executive Recommendation

- The plan will include policy relating to Green Infrastructure which will adhere to the RSES.
- In accordance with the RSES the Draft Plan will include policy to identify a number of significant opportunities to develop a number of flagship Greenways, namely the development of the Shannon and Shannon-erne waterways taking in Lough Ree, the Royal Canal and potential for a Midlands based Regional Peatway taking in the Corlea Trackway.

2.15 Issue Raised - Climate Change and Energy

- The Climate Change and Energy Section of the Issues Paper is a welcome addition. This is in keeping with the RSES Key Principle on Climate Action, which is supported by RSOs 6-11.
- Information contained at Chapters 7, 8 and 10 of the RSES will assist in developing related policy. Included as part of this is specific reference to the challenge of climate change and of particular relevance to County Longford are the Guiding Principles for Peatland Areas and RPO 7.29 which refers to the role of Peatlands.
- In line with the Issues Paper, which references emissions targets, attention is drawn to RPO 3.6 and the preceding qualifying paragraphs of the RSES, which outlines the requirement of County Development Plans to assess their impact on carbon reduction targets. To this end, EMRA is leading an ESPON EU research programme to identify a robust method for quantifying the relative greenhouse gas impacts of alternative spatial planning policies, the outputs of which are anticipated in 2020, and may inform the preparation of the Development Plan.

Chief Executive Recommendation

- The Draft Plan will include policy relating to Climate Action which will adhere to the RSES.
- It is proposed to accord with the Guiding Principles for Peatlands as set out in the RSES in terms of assessing development on peatlands.

2.16 Issue Raised - Environment

- The Assembly acknowledge and welcome the statement as part of the Issues Paper that the County Development Plan will be carried out in tandem with the required environmental processes, namely Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment.
- The Assembly recommend early engagement with the relevant bodies in this regard, including the Office of Public Works, Department of Culture, Heritage and the Gaeltacht, the National Parks and Wildlife Service, the Environmental Protection Agency and Irish Water.

Chief Executive Recommendation

- The Draft Plan will be carried out in tandem with the required environmental processes, namely Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. This process is currently underway.
- The relevant prescribed environmental bodies in accordance with the legislation will be consulted with.

2.17 Issue Raised - General

- The Council are advised to give consideration to the style and legibility of the future County Development Plan, in order to ensure that the information contained is as clear and accessible as possible for future users.
- In determining the overall vision of the Longford County Development Plan 2021-2027, it is recommended that the Council consider the Vision, Key Principles and Regional Strategic Outcomes (RSOs) of the RSES (Chapter 2) in crafting this.
- The RSOs are aligned to the National Strategic Outcomes (NSOs) of the NPF and it should be noted that the ability to demonstrate delivery of these may potentially be linked to future funding sources.

Chief Executive Recommendation

- The Vision statement in the RSES is *'To create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all'*. The key principles are; healthy place-making, climate action, and economic opportunity. The RSO's of the RSES are
 - Sustainable settlement patterns
 - Compact growth and urban regeneration
 - Rural communities
 - Healthy communities
 - Creative places
 - Integrated transport and land use
 - Sustainable management of water, waste and other environmental resources
 - Build climate resilience
 - Support the transition to low carbon and clean energy
 - Enhanced green infrastructure
 - Biodiversity and natural heritage
 - A strong economy supported by enterprise and innovation
 - Improve education skills and social inclusion
 - Global city region
 - Enhanced strategic connectivity
 - Collaboration platform.

The Vision of the Draft County Development Plan will consider the vision, key principles and RSOs stated in Chapter 2 of the RSES.

3.0 Submission from the Office of the Office of the Planning Regulator (OPR) Submission no: CDP14

This section contains a summary of the issues raised by the Office of the Planning Regulator (OPR), and the Opinion and Recommendation of the Chief Executive in relation to the manner in which those issues should be addressed in the Draft Development Plan.

3.1 Issue Raised - Duty of Office of the Planning Regulator

In carrying out its assessments and evaluations the OPR will ensure that the Draft Plan addresses:

- Matters generally to be contained in a Development Plan (Section 10) and, in particular, s.10(2)(n) in relation to climate change;
- Consistency with the Development Plan and the National Planning Framework and Regional Spatial and Economic Strategies for Eastern and Midland Regional Assembly;
- Ministerial guidelines under section 28;
- Ministerial policy directives issued under section 29, and,
- Such other legislative and policy matters as the Minister may communicate to the Office in writing.

Chief Executive Opinion

The role and function of the duty of the Planning Regulator are noted.

Chief Executive Recommendation

The Planning Authority shall ensure that the County Development Plan is consistent with the National Planning Framework and Regional Spatial and Economic Strategies for the Eastern and Midland Regional Assembly; Ministerial guidelines issued under section 28; Ministerial policy directives issued under section 29, and, such other legislative and policy matters as the Minister may issue.

3.2 Issue Raised - Settlement Strategy and Housing

- The National Planning Framework (NPF) sets out population growth targets for the three regional assembly areas. It is projected that the overall population of Ireland will increase by approximately 1 million over the next 20 years and that 50% of this population growth will be within the Eastern Midland Regional Assembly (EMRA) area.
- The adopted Regional Spatial and Economic Strategy (RSES) for the EMRA, 2019-2031, has designated Longford Town as a 'Key Town' and as such, Longford Town will be a driver for economic development in the region. A primary objective of the NPF is to drive growth in all designated growth centres, as well as all towns and villages with more sustained urban focused development. 'Key Towns' will have an economic role and function that provides employment and services for a wide catchment area.
- The forthcoming Longford County Development Plan will need to underline policy objectives with practical placemaking proposals that provide for and make towns and villages more viable and attractive places to live.
- National Policy Objective (NPO) 3c of the NPF requires that the '*delivery of at least 30% of all new homes are targeted in settlements other than the five cities and their suburbs within their existing built-up footprints*'.

- Policy objectives within the Longford County Development Plan should underline the need to provide a variety of housing types to accommodate different household needs and to ensure choice whilst ensuring settlements are developed in compact manner. Issues identified in the Longford Issues Paper in relation to settlement strategy and regeneration will play a fundamental role in achieving a more urban focused development whilst achieving the sequential growth model as set out in the Section 28 Ministerial Guidelines. Forthcoming updates to the statutory Development Plan Guidelines will provide guidance in relation to core strategy preparation and the Housing Needs Demand Assessment (HDNA) which is an objective of the NPF.
- The OPR acknowledges and supports the recognition in the Longford Issues Paper that in the context of the rural nature of settlement patterns in Longford, it is appropriate that the Draft Development Plan recognises that there remains an on-going demand for rural one-off dwellings in the rural hinterland. In addition, there is a need to strike a balance between facilitating housing for people who have a rural housing requirement, whilst at the same time ensuring a balanced and sustainable approach to the development of the county's rich heritage of towns and villages, many of which are facing a decline in population, increasing levels of vacancy or under-occupation of central parts and pressure on the survival of essential local services and amenities.
- Activation of the potential of towns and villages to sustain themselves and grow as drivers of their wider and more rural environs will be a key issue for the plan to grapple with. Moreover, NPO 15 of the NPF supports managing the growth of areas that are under strong urban influence and encouraging growth in areas that have experienced low population growth.

Chief Executive Opinion

The NPF as per NPO 3c stipulates that at least *'30% of all new homes are targeted in settlements and their suburbs within their existing built-up footprints'*. In the RSES Longford Town is identified as a *'Key Town'* and as such, Longford Town will be a driver for economic development in the region. NPO15 of the NPF relates to *'Planning for Diverse Rural Places'* and aims to *'support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities'*. In County Longford there remains an on-going demand for rural one-off dwellings in the rural hinterland. There is therefore a need to strike a balance between facilitating housing for people who have a rural housing requirement, whilst at the same time ensuring a balanced and sustainable approach to the development of the county's rich heritage of towns and villages. There are a variety of different housing needs with the county to be accommodated and policy objectives within the Longford County Development Plan should underline the need to provide a variety of housing types and needs in accordance with national and regional policy. The Draft Development Plan will need to cognisance of national and regional policy objectives and underline policy objectives with practical place-making proposals that provide for and make towns and villages more viable and attractive places to live. Any forthcoming updates to statutory relevant Guidelines will be taken account of in preparing the core strategy and HDNA (Housing Needs Demand Assessment) as required under NPO37 of the NPF.

Chief Executive Recommendation

The Draft Plan will comply with the objectives and recommendations set out in both the NPF and the EMRA RSES. The Draft Plan will incorporate an evidence-based core strategy that will accord with the provisions set out in the Planning and Development Acts 2000 (as amended) the NPF and EMRA RSES, ensuring that development is supported and integrated with a range of accessible community facilities in a sustainable manner. The population targets and housing

allocation for the County will include an analysis of current demographic and population data trends, using available sources of material as appropriate. The core strategy will form the basis for objectives and policies throughout the Plan including population targets, settlement strategy, density considerations, economic development and the quantum of lands to be zoned for residential and mixed uses, in an evidence based and sequential manner. The Settlement Strategy for the County will take cognisance of the Settlement Strategy prescribed in the EMRA RSES. The Draft Plan will continue to support the development of the key settlement of Longford.

3.3 Issue Raised - Regeneration

- The policy objectives in the Longford County Development Plan should outline practical proposals to ensure that the various towns and villages in Longford are attractive places to live and work, consistent with NPO 4 of the NPF.
- Recognising that the EMRA RSES has identified key regeneration sites within Longford town, the Development Plan represents a key opportunity to present practical and implementable regeneration proposals to ensure that urban areas become more vibrant and attractive places to live, which will in turn attract inward investment in terms of economic activity.
- Proposals for urban placemaking and town and village regeneration policy objectives will play a vital role in securing regeneration and compact growth.

Chief Executive Opinion

NPO 4 of the NPF is to *'ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being'*. In order to make stronger urban places, this NPO should be translated into the Draft Development Plan. Within Longford town the key regeneration sites identified in the RSES provide a key opportunity to provide tangible actions in terms of regeneration, placemaking, compact growth and increased economic activity.

Chief Executive Recommendation

- The policy objectives in the Draft Development Plan will outline practical proposals to ensure that the various towns and villages in Longford are attractive places to live and work, consistent with NPO 4 of the NPF.
- In accordance with the EMRA RSES which identified key regeneration sites within Longford town, the Draft Development Plan will provide practical and implementable regeneration proposals to ensure that urban areas become more vibrant and attractive places to live and attract inward investment.
- The Draft Development Plan will contain policy in relation to urban placemaking and town and village regeneration.

3.4 Issue Raised - Rural Development:

- Given the changing dynamic of the rural economy there is a strong need for rural diversification as an economic alternative.
- Cessation of industrial peat harvesting in Longford presents opportunities for the rehabilitation of peatlands and consideration of appropriate and alternative uses, including tourism through Greenway/Blueway development and renewable energy production. Such strategies will need to be cognisant of retaining the remaining carbon stores of peatlands and their potential for active carbon sequestration.
- Policy objectives in the Longford County Development Plan should underline the importance of environmental sustainability for future generations. NPO 52, 53 and 54 of the NPF set out

the environmental and sustainability goals and these objectives will inform the preparation of the Longford County Development Plan.

Chief Executive Opinion

It is accepted that there is a changing dynamic of the rural economy and that as such there is a strong need for rural diversification as an economic alternative. Specifically in terms of Longford where there has been a long association with the peat extraction industry, it is considered that the cessation of industrial peat harvesting does present opportunities which need to be further investigated. In accordance with national policy, the importance of environmental sustainability for future generations is necessary.

Chief Executive Recommendation

- Policy which promotes rural diversification as an economic alternative will be included in the Plan.
- Policy to address the rehabilitation of peatlands and consideration of appropriate and alternative uses, including tourism through Greenway/Blueway development and renewable energy production will be included. Such policies will be cognisant of retaining the remaining carbon stores of peatlands and their potential for active carbon sequestration.
- Policy objectives in the Longford County Development Plan will underline the importance of environmental sustainability for future generations and NPO 52, 53 and 54 of the NPF which set out the environmental and sustainability goals will inform the Draft Plan.

3.5 Issue Raised - Tourism

- Longford has very significant tourism resources that serve the region including the newly developed Centre Parcs, Lough Ree, Royal Canal walking/cycling route and the potential for the Mid-Shannon Wilderness Park. These amenities have the scope to attract further significant visitors to the county, which will in turn has the potential to generate direct and indirect employment opportunities and provide for rural diversification of the rural economy, which is consistent with a variety of national policies, including the NPF. A particular strength of successive County Development Plans in Longford over many years has been the steadfast championing of these initiatives.

Chief Executive Opinion

In recent years significant resources have been targeted into the tourism sector, with Centre Parcs, Lough Ree, Royal Canal walking/cycling route and the Mid-Shannon Wilderness Park. It is considered that these amenities have the scope to attract further significant visitors to the county and that this should be further built upon.

Chief Executive Recommendation

Relevant policies will be included to promote and develop tourism in the Draft Plan.

3.6 Issue Raised - Natural, Built and Cultural Heritage

- The role of rural towns and villages in providing more compact development and improving the amenity value of these settlements will provide choice to those otherwise that tend towards urban generated housing in the countryside, in turn providing for the preservation and protection of the receiving environment.
- Rural towns and villages can use their natural and built assets to add to their distinctiveness in terms of placemaking. Sense of place is an important factor in making these settlements attractive places to live and work. NPO 17 of the NPF sets out an objective to enhance and

protect built heritage in rural town and villages, which will enhance the quality of life and encourage investment. This objective sets out to make rural towns and villages more attractive places to live and work and identifies the role that the natural environment and built heritage can play in enhancing quality of life. The OPR welcomes Section 11 *'Natural, Built and Cultural Heritage'* of the Longford Issues Paper which sets out a policy menu for protecting natural, built and cultural heritage.

Chief Executive Opinion

It is recognised that rural towns and villages have a role in providing more compact development and that by improving and enhancing the built and cultural heritage, the amenity value of these settlements this will make these settlements more attractive as a residential choice, in turn providing for the preservation and protection of the wider receiving environment.

Chief Executive Recommendation

- Draft Development Plan policy will recognise the role of rural towns and villages in providing more compact development and improving the amenity value of these settlements will provide choice to urban generated housing in the countryside.
- Draft Development Plan policy will be included in accordance with NPO 17 of the NPF which sets out an objective to enhance and protect built heritage in rural town and villages, which will enhance the quality of life and encourage investment.

3.7 Issue Raised - Climate Change

- Having regard to the Climate Action Plan 2019, and the objectives in the NPF and RSES, the transition to a low carbon economy and the overall reduction in carbon emissions is a central issue in planning policy.
- The forthcoming updates to the Section 28 Development Plan Guidelines will initiate a process of enhanced guidance in relation to preparing Development Plans whilst having regard to the need to ensure policy measures, which reduce energy demand and greenhouse gas emissions and address adaptation requirements in relation to climate change.
- The inclusion of the promotion of sustainable settlements and transport strategies for both urban and rural areas to include measures to reduce energy demand, greenhouse gas emissions, and to adapt to climate change, having regard to location, layout and design of new development will be critical.
- The OPR is specifically obliged to address these matters, having regard to Section 10(2)(n) of the Act.
- The promotion of renewable energy within the county in accordance with the Section 28 Wind Energy Development Guidelines will be critical to ensure Ireland meets its national reductions in energy and greenhouse gas emissions targets.

Chief Executive Opinion

The transition to a low carbon economy and the overall reduction in carbon emissions is recognised as a central issue in planning policy and accordingly Draft Development Plan policy should have regard to the relevant national, relation and local plans, policies and strategies in this regard.

Chief Executive Recommendation

- The transition to a low carbon economy and the overall reduction in carbon emissions is recognised as a central issue in planning policy and accordingly Draft Development Plan policy will have regard to the relevant national, relation and local plans, policies and strategies.

These will include the *National Climate change Adaptation Framework, Building Resilience to Climate Change (2012)*, the *National Climate Action Plan, 2019*, and the relevant objectives in the NPF and RSES, along with any forthcoming updates to the Section 28 Development Plan Guidelines in order to include policy measures, which reduce energy demand and greenhouse gas emissions, and address adaptation requirements in relation to climate change. At a local level the *Longford Climate Change Adaptation Strategy 2019* will inform objectives and policies in the Draft Plan. The Draft Development Plan will include policy in relation to the promotion of sustainable settlements and transport strategies for both urban and rural areas to include measures to reduce energy demand, greenhouse gas emissions, and to adapt to climate change, having regard to location, layout and design of new development.

4.0 Other Submissions

Excepting the EMRA and OPR submissions which have been addressed separately in the previous sections of this report, this section contains a summary of the other 24 no. valid written submissions received as part of the pre-Draft consultation process, and the Opinion and Recommendations of the Chief Executive to the issues raised therein. Each of the submissions has been allocated a unique number which identifies the individual submission. The individual submissions and the corresponding reference are listed in Appendix 2. The submissions have been summarised under 11 no. topic areas. Many of the submissions are inter-related across a number of topics.

Summary of submissions received by Topic

1. Settlement Strategy
2. Regeneration and Placemaking
3. Transport and Movement
4. Critical Infrastructure
5. Economic Development
6. Tourism
7. Built and Cultural Heritage
8. Green Infrastructure
9. Climate Change and Energy
10. Environment
11. Miscellaneous.

These are dealt with accordingly in the subsequent sections of this report.

4.1 SETTLEMENT STRATEGY

Submission Numbers: CDP7, CDP10, CDP18, CDP21

The main issues raised are summarised as follows: -

4.1.1 Issue Raised

- Transport Infrastructure Ireland (TII) consider that the implications of land use policies on the strategic national road network in the area as a criterion in determining the future land use zoning strategy should be outlined in the Draft Plan and the respective core strategy.
- In accordance with Government policy, TII supports practices aimed at concentrating development in established urban areas and designated development centres subject to development being framed within a coherent integrated land use and transportation strategy. In addition to the review of the extent and location of residential lands in accordance with core strategy requirements, it may be appropriate to review the extent and location of industry, employment and other commercial type land uses to prepare a co-ordinated and integrated land use pattern. The Guidance Note on Core Strategies (DoECLG, 2010) contains advice.
- TII recommends that residential, retail and employment objectives especially zoning objectives should guide developers to design for sustainable transportation requirements at the earliest stages of development design. An integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by public transport, foot and private car so that the variety of enterprise and employment zones can be easily accessible by all modes of transport and all of society.
- Exercise care in assessment and management of development proposals in the Development Plan relating to the zoning of locations at or close to junctions on the national road network where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national road/associated junctions.
- Proposals for development and land use zoning designations at national road interchanges and junctions should be considered and prepared in the context of the provisions of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines and an appropriate evidence base. TII acknowledges previous collaboration in the preparation of the Longford Norther Environs Local Area Plan and the accompanying Strategic Transport Assessment undertaken. TII remains available to assist the Council in updating existing Strategic Transport Assessments and in the preparation of new Assessments.
- Planning authorities, in considering proposals for zonings adjacent or close to existing or planned national roads/motorways and junctions, should give special attention to the preferences expressed in the Retail Planning Guidelines for locating developments that attract many trips within established towns and district centres.
- There is a requirement to co-ordinate proposed zoning designations and/or access strategies in the Development Plan and accompanying settlement plans, as appropriate, with speed limits on national roads. (CDP7)
- The National Transport Authority consider that the Development Plan should be guided by and include land use policies and objectives which support the consolidation of urban generated development within existing urban areas, in complement with the integration of land use and transport planning:
 - For urban generated development, the development of lands, within or contiguous with existing urban areas should be prioritised over development in less accessible locations. This is of particular relevance to the largest urban areas;

- To the extent practicable, residential development in urban areas should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport, including infill and brownfield sites, are prioritised.
- Larger scale, trip intensive developments, such as offices and retail, should primarily be focused into central locations in urban areas. (CDP21)
- Respect the dignity and entitlement of green residential/agricultural areas already existing and avoid infringing on them or surrounding them with industrial development, particularly when there are already pre-existing black spots within a short distance which are zoned industrial and where no residential area exists. (CDP10)

Chief Executive Opinion

In addition to consideration of residential zoning, the Draft Development Plan will also assess all other zonings within the Plan. In terms of impact on the road network the Draft Development Plan should include land use policies and objectives which support the consolidation of urban generated development within existing urban areas, and which aim to integrate land use and transport planning.

The core strategy will form the basis for objectives and policies throughout the Plan including population targets, settlement strategy, density considerations, economic development and the quantum of lands to be zoned for residential and mixed uses, in an evidence based and sequential manner. The population targets and housing allocation for the County will include an analysis of current demographic and population data trends, using available sources of material as appropriate, in particular the 2016 census.

Both RPO 3.2 and 3.3 relate to *'Compact Growth'*. It is proposed to include in the Draft Plan the Key Enablers for growth for the region as they affect County Longford and to ensure compliance with RPO 3.2 of the RSES which relates to requiring at least 30% of future homes that are targeted in settlements to be located within the existing built-up footprint of the settlements in an effort to make settlements more compact and reduce unsustainable urban sprawl and ribbon development as is stated in National Policy Objective 3c of the National Planning Framework.

In terms of RPO 3.3 it is stated that *'local authorities in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for new Apartment's Guidelines' and the 'Urban Development and Building Heights Guidelines for Planning Authorities'*. It is proposed to ensure compliance with RPO3.3 in terms of Development Plan Policy through the targeting of regeneration sites.

Chief Executive Recommendation

The Planning Authority shall ensure the County Development Plan is consistent with the NPF and RSES for the Eastern and Midland Regional Assembly; Ministerial guidelines under section 28; Ministerial policy directives issued under section 29, and, such other legislative and policy matters as the Minister may communicate to the Office in writing. The Draft Plan will incorporate an evidence-based core strategy that will accord with the provisions set out in the Planning and Development Acts 2000 (as amended) and the NPF and EMRA RSES, ensuring that development is supported and integrated with a range of facilities in a sustainable manner.

In addition to consideration of residential zoning, the Draft Development Plan will also assess all other zonings within the Plan. In terms of impact on the road network the Draft Development Plan will include land use policies and objectives which support the consolidation of urban generated development within existing urban areas, and which aim to integrate land use and transport planning.

4.1.2 Issue Raised

- In Ballymahon require provision of a 25/30 affordable housing scheme aimed specifically at people whose earnings leave them over the limit for social housing but are not in a position to qualify for a traditional mortgage. This development should comprise a mixture of dwelling types and include units for those with disabilities. (CDP18)

Chief Executive Opinion

The Housing Strategy is required to provide for different housing needs, including social and affordable housing, sheltered housing and housing for persons with disabilities.

Chief Executive Recommendation

Issues raised relating to the provision of housing, house types and density standards shall be addressed in the Draft Development Plan and/or any forthcoming Local Area Plans.

4.1.3 Issue Raised

- 4 no. zoning requests were made. (CDP7, CDP28, CDP29, CDP30)

Chief Executive Opinion:

Zoning requests cannot be considered at pre-draft stage in accordance with section 11(4)(b)(ii) of the Planning & Development Acts 2000 (as amended).

Chief Executive Recommendation:

These submissions which are primarily zoning requests should not be considered at this pre-draft stage as is stipulated in section 11(4)(b)(ii) of the Planning & Development Acts 2000 (as amended).

4.2 REGENERATION AND PLACEMAKING

Submission Numbers: CDP10, CDP13, CDP18, CDP19, CDP21, CDP26
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The main issues raised are summarised as follows: -

4.2.1 Issue Raised

- On page 4 of the Issues paper the subheading; *'Healthy placemaking by promoting people's quality of life'* also points toward developing many already existing blackspots in the Granard area listed as industrial zones. This would reduce ugly blackspots and render areas more attractive locally and in terms of tourism, and would further avoid infringement on already pre-existing residential areas and their associated rights. (CDP10)
- Page 2 of the Issues Paper it is stated that; *'The Development Plan is important as it sets down a guide as to how development should progress in the areas where the population lives; 'The policies and objectives can be critical in determining the appropriate location and form of different types of development as the development plan is one of the factors against which planning applications are assessed'*. These excerpts are extremely important because residents, particularly those in already pre-designated residential areas, are entitled to safety, including road safety/safety of inhabited homes, as well as rights of pollution-free (noise, lights, air) enjoyment of their homes. (CDP10)

Chief Executive Opinion

Quality of life factors and 'placemaking' are increasingly recognised as key to developing attractive places in which to invest, live, visit and work including access to amenities, facilities, arts, culture and heritage. The importance of community facilities in the County is recognised and it will be essential to protect and expand such facilities through appropriate policies and objectives.

The Council proposes to continue to ensure the protection and sympathetic enhancement of the built heritage of all of County Longford and this will be reinforced in the Draft Plan. The Council recognises the importance of encouraging high quality and well-designed development to support and promote healthy placemaking and quality of life and this will be addressed in the Draft Plan.

The Draft Plan will encourage appropriate residential, social and community uses within the County to enhance the vitality and viability of the County, in accordance with the principles of good design and to add quality to the places where people live and work.

The Draft Plan will strengthen policy on the public realm for open spaces, streets and areas enjoyed by the public and support the development and implementation of schemes on a county wide basis. This should include enhancements in existing areas and incorporation into new schemes. The creation of qualitative public spaces and safe and attractive spaces will be important in designing the public realm within development.

Chief Executive Recommendation

The Plan will promote the goals and strategic values set out in Longford County Council's *Corporate Plan 2019-2025* and enhance the quality of life for the people of Longford leading economic and community development and delivering efficient and sustainable services. The Draft Plan will aim to make Longford an attractive rural and urban environment and a better place for people to live, work and visit. Sustainable Communities and placemaking, including creating attractive places for people to invest, live, work and visit are core themes which will

be explored in the Plan. The Draft Plan will ensure the timely provision of community services and resources, including open space, schools, community facilities, amenities, culture and heritage required for the creation of sustainable communities.

The Draft Plan will provide for good quality well designed housing units and residential areas, with a mix of housing, to meet different user needs and different densities having regard to proximity to public transport infrastructure. High quality design should underpin planning policies in the preparation of the Draft Plan. National Policy guidance including '*Sustainable Residential Developments in Urban Areas- Guidelines for Planning Authorities, 2009*' and '*Sustainable Urban Design standards for New Apartments, 2015*' and the '*Design Manual for Urban Roads and Streets, 2013*', will be applied in the design and layout of new developments in the Draft Plan.

4.2.2 Issue Raised

Drumlish specific (CDP16)

- Redevelopment of the Drumlish community centre and sports amenity.
- Refurbishment of the Men's Shed as a social space to accommodate training facilities.

Ballymahon specific (CDP13)

- Create a connection from the ticket office to the town, via the Mass Pass.
- Overhead cables to be put underground.
- Stone wall undermined that leads to St. Mathews Terrace and needs urgent attention.
- Stone wall required along the Athlone road.
- Provision of bus shelters and seating, and extra stop at the lower side of town, or a more central one.
- Bottle bank needed near the schools.
- New bins, new trees and seating.
- A cinema, with Corlea Visitor centre a possible location.
- A dog park.
- A kick around football green.
- CCTV to be installed.
- Put lighting up in the Oliver Goldsmith car park.
- Seating at the library needs urgent attention.
- New murals to advertise local sites of interest on the wall at the Longford Bridge.
- Provision of exercise equipment at the Longford Bridge and near the gym.
- Light up canal for walkers and cyclist.
- Car parking on both sides of the canal at the Longford Bridge.
- Parking for campers.
- Raise the hand rail on the Inny bridge and light Bridge.
- Bring the old swimming pool grounds into use i.e. skate park, basketball, teenage area.
- Create a climbing wall.

Ballymahon specific (CDP18)

- Current poles appear too high and with LED bulbs is a lot of shadow and dark spots.
- Require numerous new charging points for electric vehicles.
- Bridgeway's Family Resource Centre and the Convent Day Care Centre are in buildings unfit for purpose. Both services could be accommodated on the same site, with a youth club.
- The former Masonic Hall should be given consideration for restoration under the regeneration programme, and could have many uses.

Ballymahon specific (CDP26)

- Need a state-of-the-art community centre.
- Provision of a funeral home and ancillary services.

Chief Executive Opinion

It is noted that RPO 6.12 of the RSES requires local authorities to include objectives in Development Plans to support emphasis on a Placemaking Strategy for towns and implementation of Town Centre Renewal Plans, while RPO 6.13 states that local authorities shall support the preparation of Design Guidelines to provide for improvements in the appearance of streetscapes and for revitalising vacant spaces. The Draft Plan will have regard to the relevant policies under the RSES and will include policies and objectives across a number of chapters to suppose and facilitate the improvement of the public realm and provision of community cultural facilities and uses.

As part of enhancing Longford's settlements, a number of '*Opportunity Sites*' are proposed to be identified for regeneration purposes as part of the Draft Plan. It is considered that their appropriate redevelopment would provide significant improvements in the overall local environment and prompt local economic growth. It is considered that their redevelopment would contribute greatly to the renewal, enhancement and regeneration of the settlements in which they are located. Town plans and village plans will be prepared for the towns and villages in the county to include '*Opportunity Sites*' where appropriate and will form part of the Draft Plan to guide growth and encourage investment in these settlements.

The Draft Plan will promote the development of community, sports and recreational facilities. The Council will seek to engage with key stakeholders/community groups to encourage shared responsibility for community development within the County. The Council is committed to developing a more socially inclusive society and promoting participation and access for all.

Notwithstanding this, some of the specific projects listed are outside the scope of the Development Plan to deliver and may be more appropriate for the town team to address. The height of public lighting is not an issue for the Development Plan and should be referred to the Town Team to address.

Chief Executive Recommendation

It is recommended that policies in this area address the following:

- Continue to facilitate, promote and encourage the re-development of brownfield/infill sites as Opportunity Sites to be identified in the new plan, with emphasis on key criteria; place making, mix, urban grain and vibrancy and vitality.
- Apply for funding under various funding streams to facilitate the enhancement, revitalisation, renewal and regeneration of communities and town/village centres, and the delivery of innovative and transformational regeneration proposals such as under the Urban and Rural Regeneration and Development Funds.
- Promote a collaborative approach between the local authority, central government, semi-state bodies, the community, private sector and voluntary associations to successfully achieve the regeneration of areas including site assembly where appropriate.
- support and facilitate the development and expansion of community infrastructure, facilities and services by working with the relevant agencies as appropriate to ensure the timely provision of community services, including schools, required for the creation of sustainable communities.

- Encourage a mixture of uses within the built-up area in order to promote the liveability and sustainability of our settlements.
- Be flexible in terms of enabling brownfield/infill development within settlements, focusing on design-led and performance-based outcomes, rather than specifying absolute requirements in all cases.
- Promote high standards for public realm, place making and quality of life considerations for both and private residential developments.
- Promote compact town and village centres across the settlement hierarchy for Longford in line with the NPF and Eastern and Midland RSES.

4.2.3 Issue Raised

The Health and Safety Executive (HSE) submission has an overall aim to improve the health and wellbeing of the population of Longford and makes recommendations to incorporate the following relevant health actions and strategies in relation to the following into the strategic planning of the spatial and built environment of the county:-

- *County Longford Health Status*
- *Get Ireland Active – National Physical Activity Plan for Ireland*
- *Tobacco Free Ireland*
- *Healthy Ireland - A Healthy Weight for Ireland*
- *Steering Group Report on a National Substance Misuse Strategy*
- *The National Positive Ageing Strategy*
- *Universal Design Guidelines for Homes in Ireland*
- *Time to move on from congregated settings – A strategy for community inclusion*
- *The Urban Design Manual – A Best Practice Guide*
- *Transport Smarter Travel Policy*
- *National Cycle Policy Framework*
- *Waste A Resource Opportunity – Waste Management Policy in Ireland*
- *Water*
- *Food*
- *Research 195: Health Benefits from Biodiversity and Green Infrastructure*
- *Biodiversity & Green Areas*
- *Sustainable Development*
- *Our sustainable future – A Framework for Sustainable Development*
- *Energy*
- *Environmental Noise*
- *Air Quality (CDP19)*

Chief Executive Opinion

The Draft Plan will have regard to the comments of the HSE. Existing policies and objectives in the current Plan will be updated where necessary. In accordance with the RSES, it is proposed to insert into the Draft Plan policies relating to diversity, social inclusion, housing, regeneration, healthy place-making, social and economic opportunity, access to childcare, education, health services and arts, culture and heritage.

Chief Executive Recommendation

- Support the key priorities of the Healthy Ireland Plan to promote health and well-being.
- The Draft Plan will have regard to the comments of the HSE. Taking account of same and the requirements of the RSES, existing policies and objectives in the current Plan will be updated where necessary.

4.3 TRANSPORT AND MOVEMENT

Relevant Submission Numbers: CDP7, CDP13, CDP18, CDP20, CDP21, CDP22, CDP26

The main issues raised are summarised as follows: -

4.3.1 Issue Raised

- Transport Infrastructure Ireland request the Development Plan ensure the protection of the safety, carrying capacity and efficiency of the existing and future national roads network is maintained.
- Ensure future National Road Scheme planning is provided for and schemes are safeguarded.
- An integrated approach to land use and transportation solutions throughout the County should be undertaken such that local traffic generated by developments is catered for primarily within the framework of the local (i.e. non-national) road network. (CDP7)

Chief Executive Opinion

- The Draft Plan will have regard to the Spatial Planning & National Roads Guidelines for Planning Authorities 2012, relating to development affecting National Primary and Secondary roads, including motorways and associated junctions.
- Improvements to the roads across the County in terms of upgrades, realignments, repairs, traffic management measures and traffic calming should be assessed and implemented as deemed necessary and as resources allow. The upgrade and development of the County's national, regional and local road infrastructure will continue to be supported.

Chief Executive Recommendation

- The policies and objectives within the Draft Plan will seek to support and encourage sustainable and compact forms of development which will have minimal impact on the carrying capacity, efficiency and safety of the road network.
- The Draft Plan will have regard to the Spatial Planning & National Roads Guidelines for Planning Authorities 2012, relating to development affecting National Primary and Secondary roads, including motorways and associated junctions, or other such relevant policy.
- The Draft Plan will reference a programme of roads improvement schemes in accordance with national and regional policy, and as prioritised by the relevant sections, as resources allow.

4.3.2 Issue Raised

Ballymahon specific (CDP13)

- Provision of town centre car parking.
- Provision for camper parking.
- Close existing entrance to children's playground and relocate entrance beside kayak club.
- Provision of parking bays for the disabled and elderly near Post Office.
- Provision of car parking on both sides of the canal at the Longford Bridge.
- Provision of footpath from the National School to Moigh, towards the Hyundai Garage.
- Light up canal for walkers and cyclists.

Ballymahon specific (CDP18)

- Provision of off-street parking in the town centre and a new street layout.
- Road alignment work on the R392.
- To provide a number of cycleways which are vital to connect to Center Parcs.

Ballymahon specific (CDP26)

- Access to the Soccer Club requires a wider access road and a possible one-way system with separate entrance/exit points.
- The current parking markings are incorrect and cars need to reverse to the middle of the road to exit. If the markings were angled properly, this would not arise.
- Provision of a cycle path/walkway from the Royal Canal at Brannigan to the town to boost for local tourism.

Chief Executive Opinion

- Car parking standards will be reviewed during the Draft Plan process.
- Local traffic management measures are a matter for a Local Area Plan.
- The Draft Plan should continue to promote walking and cycling through the provision, upgrading and maintenance of cycleways and footpaths as resources allow; and ensure that connectivity is provided in new developments with the provision of good pedestrian and cycle network and facilities.

Chief Executive Recommendation

- Car parking standards will be reviewed in the town centre in the Draft Plan to reflect the proposed modal shift away from the private car to more sustainable forms of transport, such as cycling and walking.
- The Draft Plan will facilitate and support the development of Longford as a premier location for outdoor recreational activities including walking and cycling. The Draft Plan will continue to promote walking and cycling through the provision, upgrading and maintenance of cycleways and footpaths as resources allow; and ensure that connectivity is provided in new developments with the provision of good pedestrian and cycle network and facilities.

4.3.3 Issue Raised

Compressed Natural Gas (CNG) fuelled Heavy Goods Vehicles (HGVs) and buses would support a reduction in carbon emissions relative to diesel. If these vehicles were to use bio-CNG carbon neutral transport could be achieved. Gas Networks Ireland suggests that the Transportation and Movement section of the Development Plan includes a section supporting CNG infrastructure as follows:

'The development of CNG Infrastructure would enable fuel switching from diesel to CNG for heavy goods vehicles (HGVs) and buses. This would lead to a significant reduction in carbon emissions along with air quality benefits for vehicles where currently electricity is not a viable alternative to diesel. There will be a presumption in favour of applications for CNG infrastructure provided planning and environmental criteria are satisfied'. (CDP20)

Chief Executive Opinion

In terms of measures to support the reduction in CO2 emissions the potential of Compressed Natural Gas Infrastructure is noted.

Chief Executive Recommendation

Development Plan policy should be included to support development which provides a lower carbon society.

4.3.4 Issue Raised

- The Development Plan should be guided by and include land use policies and objectives which support the consolidation of urban generated development within existing urban areas, in complement with the integration of land use and transport planning:
 - For urban generated development, the development of lands, within or contiguous with existing urban areas should be prioritised over development in less accessible locations. This is of particular relevance to the largest urban areas;
 - To the extent practicable, residential development in urban areas should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport, including infill and brownfield sites, are prioritised.
 - Larger scale, trip intensive developments, such as offices and retail, should primarily be focused into central locations in urban areas;
 - As intensively used, central locations, the management of space in town centres should deliver a high level of priority and permeability for walking, cycling and public transport modes. The key outcome of such an approach would be town centres that are accessible, attractive, vibrant and safe, as places to work, live, shop and engage in community life;
 - Planning at the local level should promote walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services and other services at the local level such as schools;
 - New development areas should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to give competitive advantage to these modes for local trip making;
 - The density and location of employment development should maximise the potential for the use of walking, cycling and public transport;
 - Where possible, new residential developments should provide for filtered permeability, i.e. provide for walking, cycling, public transport and private vehicle access while restricting or discouraging private car through trips;
 - Trip destinations (employment sites, schools, retail etc) should be developed at locations that can maximise the potential to access such developments by walking, cycling or on public transport;
 - The strategic transport function of national roads should be maintained and protected in accordance with national policy;
 - All non-residential development proposals should be subject to maximum parking standards;
 - In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied – of particular relevance to the larger urban areas;
 - For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing NTA guidance. (CDP21)

Chief Executive Opinion

The Council acknowledges that future growth, both in terms of employment and residential development, must be based on safeguarding road infrastructure and must also provide sustainable modes of transport where possible.

Chief Executive Recommendation

The Draft Plan will promote land use patterns which where possible safeguard the road network, reduce the need to travel, support sustainable forms of transport and promote a modal shift to alternative uses of transport other than the car.

4.3.5 Issue Raised

- The rural economy and the rural social fabric should be supported through the provision of better local connectivity and connectivity to services and commercial activities located in cities and towns.
- Urban – generated development in rural areas needs to be managed to safeguard the integrity of rural areas and to support the accommodation of urban generated development within urban areas. The Development Plan should acknowledge the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns. (CDP21)

Chief Executive Opinion

Although the Council is not a public transport provider, it acknowledges the importance of the provision of high-quality public transport services and will facilitate transport service providers where possible in the expansion of services and improvements in the quality of services on offer. In terms of how the Council can best promote and support a modal shift towards more sustainable modes of transport it is considered that the possibility of the development of a sustainable mobility plan should be considered.

Chief Executive Recommendation

The Draft Development Plan will acknowledge the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns. The development of a sustainable mobility plan is recommended. The Draft Plan will include policy as appropriate.

4.3.6 Issue Raised

- The NPF sets out the importance of maintaining, improving and protecting the strategic function of the key transport corridors including the imperative to improve and protect the strategic function of the TEN-T core and comprehensive network. In order to protect the strategic transport function of the national roads, including motorways, the National Transport Authority (NTA) recommends that any development objectives should be in accordance with the DOECLG Spatial Planning and National Roads Guidelines, 2012 and that this should be reference in the Development Plan.
- National Policy Objective 74 of the NPF seeks to '*secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes*'. National Strategic Outcomes 2 of the NPF indicates the need to '*maintain the strategic capacity and safety of the national roads network including planning for future capacity enhancements*'. (CDP21)

Chief Executive Opinion

The Draft Plan will have regard to the Spatial Planning & National Roads Guidelines for Planning Authorities 2012, relating to development affecting National Primary and Secondary roads, including motorways and associated junctions. The upgrade and development of the County's national, regional and local road infrastructure will continue to be supported. However improvements to the roads across the County in terms of upgrades, realignments,

repairs, traffic management measures and traffic calming should be assessed and implemented as deemed necessary and as resources allow.

Chief Executive Recommendation

- The policies and objectives within the Draft Plan will seek to support and encourage sustainable and compact forms of development which will have minimal impact on the carrying capacity, efficiency and safety of the road network.
- The Draft Plan will implement a programme to upgrade roads and road improvement schemes in accordance with national and regional policy, and as prioritised by the relevant sections, as resources allow.

4.3.7 Issue Raised

- Car parking provision for non-residential land uses should be stated as maximum standards rather than minimum requirements.
- In locations where the highest intensity of development occurs, car parking on an area wide basis should be applied.
- The Development Plan should include specific policies on cycle parking in the urban realm and in private developments. Standards for Cycle Parking and Associated Cycling Facilities, Dun Laoghaire County Council 2018 are recommended. (CDP21)

Chief Executive Opinion

Parking standards will be reviewed in town centres in the Draft Plan to reflect the proposed modal shift away from the private car to more sustainable forms of transport, such as cycling and walking.

Chief Executive Recommendation

Parking standards for all modes of transport will be reviewed during the Draft Plan process.

4.3.8 Issue Raised

- A priority should be to provide a wider range of targeted public transport options for tourists who wish to travel from urban areas to rural based tourist attractions and amenities. Possible delivery mechanisms to be explored would include the extension of the Rural Transport Network to include tourism objectives and key tourism sites. Enhanced walking and cycling facilities also have a key role to play in utilising resources and opening up access to natural assets. The importance of integration of all forms of public transport is highlighted. (CDP22)

Chief Executive Opinion

Although the Council is not a public transport provider, it acknowledges the importance of the provision of high-quality public transport services and will facilitate transport service providers where possible in the expansion of services and improvements in the quality of services on offer. In terms of how the Council can best promote and support a modal shift towards more sustainable modes of transport it is considered that the possibility of the development of a sustainable mobility plan should be considered.

Chief Executive Recommendation

The Draft Development Plan will acknowledge the role integrated transport services can perform. The development of a sustainable mobility plan is recommended. The Draft Plan will include policy as appropriate.

4.4 CRITICAL INFRASTRUCTURE

Relevant Submission Numbers: CDP3, CDP8, CDP9, CDP17, CDP18, CDP20
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The main issues raised are summarised as follows: -

4.4.1 Issue Raised

Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Plan. (CDP3)

Chief Executive Opinion

The Draft Development Plan should ensure that adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Plan.

Chief Executive Recommendation

Appropriate policy shall be included in the Draft Development Plan to ensure that adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Plan.

4.4.2 Issue Raised

The NPF population projections for County Longford indicate a potential increase of c 6,100 persons which will result in a requirement for additional education provision at both primary and post-primary level. Important that all future engagements between the Department and Council take into consideration both the short and longer-term population projections outlined for County Longford in the RSES. The Department emphasises the critical importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for educational requirements and would welcome the opportunity to discuss potential educational requirements. (CDP8)

Chief Executive Opinion

The Department of Education and Skills is responsible for the delivery of educational facilities and services. The Council's role in education provision is in ensuring that adequate serviceable land is available in appropriate locations to meet current and future requirements. The Council will liaise with the Department of Education and Skills during the plan-making process in the provision of education facilities having regard to the projected population growth contained in the core strategy. This will include the reservation of sufficient zoned land for expansion of existing schools and/or provision of new schools, where considered necessary. The Draft Plan will have regard to the section 28 Ministerial Guidelines entitled '*The Provision of Schools and the Planning System, A Code of Practice for Planning Authorities*' (Department of Education & Science and DEHLG, 2008).

Chief Executive Recommendation

Liaise with and the Department of Education and Skills in order to facilitate the provision of education facilities, as appropriate. This includes the identification and reservation of sufficient land to meet the need for expansion of existing schools and/or provision of new schools in accordance with the county's settlement hierarchy, requirements of individual settlements, their catchment area and the requirements of the relevant education authority,

in accordance with 'The Provision of Schools and the Planning System, A Code of Practice for Planning Authorities', (Department of Education & Science and DEHLG, 2008).

4.4.3 Issue Raised

Irish Water (CDP17)

- In terms of wastewater infrastructure, Irish Water (IW) have made general comments in relation to the current and remaining capacity in the main settlements of Longford, Edgeworthstown, Ballymahon, Drumlish, Granard and Newtownforbes. It is indicated that prior to the completion of the draft core strategy, the Commissions for Regulations of Utilities (CRU) will have approved the next capital investment programme funding, and that IW can then discuss in more detail available capacity/headroom.
- In terms of water infrastructure, it is indicated that Longford has four water resource zones and the supply across the county is managed using the interconnectivity between the zones. It is indicated that the National Water Resources Plan are currently assessing the 'optioneering' options in for the 25-year plan to address the water need for Longford county to deliver secure, reliable and sustainable long-term water supplies which facilitate domestic and economic development (subject to constraints of the IW Capital Investment Programme).
- Suggested policies and objectives are suggested for the Draft County Development Plan in terms of Water Supply and Distribution; Wastewater Collection and Treatment; and Water Quality and Groundwater Protection.

○ Water Supply and Distribution

It is the policy of the Council to work in conjunction with Irish Water to protect existing water infrastructure, to maximise the potential of existing capacity and to facilitate the timely delivery of new water services infrastructure to facilitate future growth.

Include objectives which address the following:

- To protect both ground and surface water resources and to work with Irish Water to develop and implement Water Safety Plans to protect sources of public water supply and their contributing catchment.
- To ensure that adequate water services will be available to service development prior to the granting of planning permission for those developments and to require developers to consult Irish Water regarding available capacity, prior to applying for planning permission.
- To minimise wastage of water supply by requiring new developments to incorporate water conservation measures.
- Provide guidance and advice regarding the protection of water supply to private wells with the overall responsibility remaining with the householder.
- Promote the sustainable use of water and water conservation in existing and new development within the county and encourage demand management measures among all water users.

○ Wastewater Collection and Treatment

It is the policy of the Council to work in conjunction with Irish Water to protect existing wastewater infrastructure, to maximise the potential of existing capacity and to facilitate the timely delivery of new wastewater services infrastructure to facilitate future growth.

Include objectives which address the following:

- Liase with and work in conjunction with Irish Water during the lifetime of the plan for the provision, extension and upgrading of wastewater collection and

treatment systems in all towns and villages of the county to serve existing populations and facilitate sustainable development of the county, in accordance with the requirements of the settlement strategy and associated core strategy.

- Liaise with Irish Water to ensure the provision of wastewater treatment systems in order to ensure compliance with existing licences, *EU Water Framework Directive, River Basin Management Plans, the Urban Waste Water Directive and the EU Habitats Directive*.
- To prohibit the discharge of additional surface water to combined sewers and promote Sustainable Urban Drainage Systems (SUDs) and solutions to maximise the capacity of towns with combined drainage systems.
- To require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems.
- To promote the changeover from septic tanks to collection networks in all cases where this is feasible (subject to connection agreements with Irish Water) and that all new developments utilise and connect to the public wastewater infrastructure.
- To ensure that the local authority provides adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan areas, and to ensure that appropriate flood management measures are implemented to protect property and infrastructure.
- To refuse residential development that requires the provision of private wastewater treatment facilities, other than single house systems.
- To ensure that private wastewater treatment plants, where permitted, are operated in compliance with their wastewater discharge licence, in order to protect water quality (*EPA's Code of Practice Wastewater Treatment & Disposal Systems Servicing Single Houses (PE. <_10) (EPA 2009), as may be amended*).

o Water Quality and Groundwater Protection

The Council supports the development of Drinking Water Protection Plans in line with the requirements of the Water Framework Directive and the current and future cycles of River Basin Management Plans. In this regard, the Council supports mitigation and protection measures for all protected areas, including Drinking Water Protected Areas and associated Source Protection Plans.

Include objectives which address the following:

- Manage, protect and enhance surface water and groundwater quality to meet the requirements of the EU Water Framework Directive.
- Ensure, through the implementation of the River Basing Management Plan(s), and any other associated legislation, the protection and improvement of all drinking water, surface water and ground waters throughout the county.
- The provision of individual septic tanks and treatment plans will be strongly discouraged, to minimise the risk of groundwater pollution.
- When identifying areas for development, to ensure that full consideration is given to the level of investment that will be required in the provision of water services – particularly in environmentally sensitive areas – to ensure that the provision of water services does not negatively impact on habitat quality, species diversity or other environmental considerations.

Chief Executive Opinion

The County's capacity to accommodate future growth is dependent on the capacity of water supply sources alongside water and wastewater infrastructure within the county. The Council will continue to engage with Irish Water to ensure that the future demands of the county are provided for and will continue to promote water conservation and work in conjunction with Irish Water.

The Water Framework Directive and River Basin Management Plans will be key considerations for the Draft Plan and standards for the protection of groundwater are provided by the European Communities (Groundwater) Regulations 2010 and through objectives included in River Basin Management Plans.

Chief Executive Recommendation

- The Draft Plan will facilitate the provision of high-quality water supply and wastewater infrastructure adequate to serve the short, medium and long term needs of the county working in conjunction with Irish Water and other local authorities, where appropriate.
- The Draft Plan will strive to achieve '*good status*' in all waterbodies in compliance with the Water Framework Directive, the River Basin Management Plan and the associated Programme of Measures and to cooperate with the development and implementation of the National River Basin Management Plan 2017-2021.
- Longford County Council will work closely with Irish Water to facilitate the timely provision of water services infrastructure within the county in line with Council's core strategy and settlement strategy.
- It is recommended that policies and objectives in the Draft Development Plan should, where possible, seek to address the submission of Irish Water.

4.5 ECONOMIC DEVELOPMENT

Submission Numbers: CDP9, CDP16, CDP18, CDP20, CDP22, CDP23, CDP25, CDP26

The main issues raised are summarised as follows: -

4.5.1 Issue Raised

- Amendments to chapter 4 'Economic Development' of the existing Development Plan are suggested in terms of the inclusion of an additional subsection on forestry and associated forestry, commercial forestry and amenity woodlands policies. Amendments to existing agricultural policy are suggested. (CDP9)

Chief Executive Opinion

It is considered that the amendments to existing agricultural policy and the inclusion of an additional subsection on forestry and associated commercial forestry and amenity woodlands policy would augment the existing Development Plan. While the agriculture and forestry elements could (if not deemed standalone elements) be contained within the economic section of the Development Plan, it is accepted that the elements associated with visual amenity, landscape character, walkways and rights of way would be appropriate in other sections, as the topic is cross-cutting in nature.

Chief Executive Recommendation

Keep Ireland's Open suggestions are noted. Policies and objectives will be included to preserve and protect landscapes, scenic views, archaeology, natural heritage and the natural environment, where appropriate and feasible in the relevant sections of the Draft Development Plan.

4.5.2 Issue Raised

- In terms of policies to support rural diversification and industry it is considered that these should include supporting the establishment of anaerobic digestion (AD) plants to produce renewable gas as it would bring employment and revenue to rural communities. (CDP20)

Chief Executive Opinion

It is noted that anaerobic digestion plants could provide valuable employment and revenue to rural communities. However some should be subject to the proper planning and sustainable development of the area.

Chief Executive Recommendation

It is considered that subject to residential, visual, environmental and any other relevant considerations, that policy should be included in the Draft Plan to support the establishment of anaerobic digestion plants to produce renewable gas and other employment generating uses where possible.

4.5.3 Issue Raised

- By developing a robust and well-informed plan, the Council will be facilitating rural based enterprises and ensuring employment in rural areas into the future. (CDP23)

Chief Executive Opinion

Longford is predominantly a rural county. A balance is required to be reached that seeks to protect the landscape and natural heritage of rural Longford while also promoting economic opportunities associated with rural life such as agricultural, horticultural, renewable technologies and rural-related economic uses. The current Development Plan supports the role of rural areas and the countryside in sustaining the rural economy and its role as a key resource for agriculture and agri-food, forestry, energy production and carbon reduction, tourism, recreation, mineral extraction and/or other new and emerging rural based enterprises, and this will continue in the Draft Plan. The growth of rural enterprises is vital in order to ensure employment in rural areas into the future. The Draft Plan will continue to promote the growth of rural enterprises and activities that are resource dependent, including energy production, extractive industry and small-scale industry. The Draft Plan will support the objectives and goals outlined in the Food Harvest 2020 Programme, and its future successor, in developing a competitive and environmentally sustainable food industry.

Chief Executive Recommendation

Economic development within the County is a strategic corporate goal for the Council, and the Draft Plan will continue to enable economic growth and enterprise development, attract appropriate investment, including sustainable tourism. Existing and future employment lands will be reviewed during the Development Plan process to ensure the potential for sustainable economic growth is maximised in appropriate locations. This will be supported by the LECP. The Draft Plan will continue to support sustainable rural development, the development of the tourism industry, and ensure the continued conservation of the county's natural, cultural and built heritage.

4.5.4 Issue Raised

- Continue to support sustainable rural based enterprises such as forestry in the County. (CDP25)

Chief Executive Opinion

The growth of rural enterprises is vital in order to ensure employment in rural areas into the future.

Chief Executive Recommendation

The Draft Plan will continue to promote the growth of rural enterprises, in particular activities that are resource dependent, and which will include the forestry sector.

4.5.5 Issue Raised

- Development of a Drumlish Enterprise Development Hub. (CDP16)
- Ballymahon is served by high speed fibre broadband and should seek a suitable building to purchase/lease for an enterprise hub fully equipped with hot desks and appropriate I.T technology to enable workers commuting to work remotely from the hub. (CDP18)
- Ballymahon is ideally located for a town hub for start-up businesses. A site is needed to enable entrepreneurs to develop their ideas. (CDP26)
- In Ballymahon there is potential for growth in many business areas e.g. dry cleaners, bicycle hire/sales and repairs, storage units. (CDP26)

Chief Executive Opinion

A key strategic goal of the Corporate Plan and the Local Economic and Community Plan (LECP) is to promote economic recovery and secure and enhance the prosperity of the county. The importance of the vitality and viability of the town centres within the county is acknowledged, as is the social and economic function of the urban centres to those that live and work in the county. The Draft Plan will promote the growth and vibrancy of the town centres of the county, by providing for a mix of uses in these areas, including employment and social uses.

The importance of providing for a resilient local economy both in the short and long term within the County, that is diverse and well positioned to compete with other areas, is considered essential to the economic development policies of the Draft Plan. The Council will work with the IDA, Enterprise Ireland, other agencies and the business community to ensure that all avenues for job creation in the county are fully exploited. The location of zoned employment, industrial and associated uses will be determined with reference to the settlement strategy for the county, taking into account proximity to residential developments and transport networks.

Chief Executive Recommendation

- The Draft Plan will actively support sustainable economic development and regeneration of town and village centres.
- The Draft Plan will support retailing and ensure that policies in relation to type, quantum and locations of retail floorspace provision, are consistent with the requirements and recommendations of the relevant regional policy frameworks and national planning guidelines.
- The Draft Plan will have regard to relevant economic national and regional plans, strategies and guidance, and will include supporting policies and objectives to achieve the relevant goals of the Corporate Plan and Local Economic and Community Plan, in order to promote economic recovery and secure and enhance the prosperity of the county.
- The Draft Plan will seek to maximise the strength and position of the county within the Midland region and provide for the continued expansion of established enterprise clusters in the county and the enhancement of linkages between enterprise hubs and national enterprise development agencies, such as Enterprise Ireland and the IDA.

4.5.6 Issue Raised

- In is essential that the work which has commenced on Ballymahon Business Park is given high priority. (CDP18)

Chief Executive Opinion

The progress of the work of the Ballymahon Business Park and the promotion of same is outside the remit of the Development Plan.

Chief Executive Recommendation

The progress of the work of the Ballymahon Business Park and the promotion of same should be considered by the Ballymahon Town Team or other appropriate body.

4.5.7 Issue Raised

- Gas Networks Ireland is involved in two initiatives which can benefit County Longford from both an economic and environmental perspective: (i) Development of renewable gas injection infrastructure and (ii) Development of Compressed Natural Gas (CNG) infrastructure for gas

in transport. GNI has provided suggested text that the Development plan could include to support these two initiatives. (CDP20)

Chief Executive Opinion

It is considered that the two initiatives outlined by Gas Networks Ireland can benefit County Longford from both an economic and environmental perspective.

Chief Executive Recommendation

It is recommended that Gas Networks Ireland Ireland's initiatives be included in the preparation of the Draft Development Plan.

4.5.8 Issue Raised

- Fáilte Ireland seek to ensure the following in the context of the Development Plan:
 - To acknowledge and recognise tourism as a key economic driver for the county which supports job creation and sustains communities;
 - Key nodes of tourism activity in the county should be identified – both existing and proposed specific tourism centres (major tourism attractions, outdoor activities etc.);
 - Strategic tourism centres (principal towns containing tourist facilities) where key services such as accommodation providers are located should be identified.
 - Areas of unrealised tourism potential where proactive policies will aim to encourage the development of this sector should be identified;
 - Branding – reference and use of Fáilte Ireland Tourism Brand(s) logos (Ireland's Hidden Heartlands) applicable to the county;
 - Full realisation of the economic potential of increased visitor revenue and increased dwell time with high quality tourism infrastructure including accommodation providers, restaurants, holiday homes;
 - Protection and enhancement of the tourism resource with information and interpretation provided and the actual resources carefully managed and protected.
 - Update of the county Wind Energy Strategy '*Areas of Windfarm Potential*', objectives and policies. Fáilte Ireland recognises the value and necessity of strengthening, improving and expanding energy infrastructure in the county and region, and that this in turn supports the growth of the tourism sector. Whilst Fáilte Ireland is generally supportive of the development of transmission infrastructure and is supportive of the economic benefits associated with its growth and development, potential impacts on landscape and the natural environment (including those on tourism) must be considered and this must be clearly expressed in the Development Plan. (CDP22)

Chief Executive Opinion

Failte Ireland are a statutory consultee and their submission will be considered and taken account of where appropriate in conjunction with the Longford Tourism Plan in the preparation of the Draft Development Plan.

Chief Executive Recommendation

Failte Ireland are a statutory consultee and their submission will be considered and taken account of where appropriate in conjunction with the Longford Tourism Plan in the preparation of the Draft Development Plan.

4.6 TOURISM

Submission Numbers: CDP7, CDP9, CDP13, CDP16, CDP22, CDP24, CDP26

The main issues raised are summarised as follows: -

4.6.1 Issue Raised

Keep Ireland Open have recommended an individual section on tourism and a large number of individual policies and textual changes in the walking, cycling and public right of way spheres. (CDP9)

Chief Executive Opinion

The importance of tourism to the Longford economy is acknowledged, as are the textual changes suggested.

Chief Executive Recommendation

The importance of tourism to the Longford economy is acknowledged and accordingly a dedicated chapter to Tourism will be included in the Draft CDP. The textual changes will be considered.

4.6.2 Issue Raised

- *'Policy on the Provision of Tourist and Leisure Signage on National Roads'* (TII, 2011), outlines policy on the provision of tourist and leisure information signs on national primary and national secondary roads in Ireland. (CDP7)

Chief Executive Opinion

The Development Plan should take account of national policy relating to the provision of tourist and leisure information signs on national primary and national secondary roads.

Chief Executive Recommendation

The Draft Development Plan shall take cognisance of national policy in relation to the provision of tourist and leisure signage on national roads.

4.6.3 Issue Raised

- Create a connection from the ticket office to Ballymahon, via the Mass Pass and a walkway from Ballymahon to the Newcastle Bridge and forest. (CDP13)

Chief Executive Opinion

The consideration of additional walkways/cycleways should be referenced to the Longford Tourism Strategy and would be subject to liaison with relevant outside bodies, landowner agreement and funding provisions.

Chief Executive Recommendation

The creation of additional walkways/cycleways will be provided subject to prioritisation and inclusion in the Longford Tourism Strategy, satisfactory liaison with relevant outside bodies, landowner agreement and funding provisions.

4.6.4 Issue Raised

- Bord Failte to get more involved. (CDP13)

Chief Executive Opinion

Failte Ireland are already substantially involved in the Development Plan process as a statutory consultee and have made a submission to this issues paper.

Chief Executive Recommendation

Failte Ireland are a statutory consultee and have made a submission to this issues paper which is being considered and taken account of as appropriate in the Draft Development Plan.

4.6.5 Issue Raised

- Establish a tourism/visitor taskforce linking the main heritage sites. (CDP16)

Chief Executive Opinion

The establishment of a tourism/visitor taskforce is outside the remit of the Development Plan.

Chief Executive Recommendation

The establishment of a tourism/visitor taskforce should be addressed by the Town Team or another appropriate fora.

4.6.6 Issue Raised

- Require a visual interpretation and tourism ambassador training programme. (CDP16)

Chief Executive Opinion

The establishment of a visual interpretation and tourism ambassador training programme is outside the remit of the Development Plan.

Chief Executive Recommendation

The establishment of a visual interpretation and tourism ambassador training programme should be addressed by the Town Team or another appropriate fora.

4.6.7 Issue Raised

- Policies relating to growth and development in the tourism sector should be tempered by a recognition of the potential constraints posed by the need to protect and restore biodiversity and the natural landscape that supports the sector. (CDP24)

Chief Executive Opinion:

In terms of tourism opportunities, the challenge between protecting the natural environment of the county and the need to promote economic opportunities is acknowledged.

Chief Executive Recommendation:

A Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) is being undertaken as part of the Development Plan preparation process and will address such potential impacts. The Draft Development Plan shall set out how tourism development will be accommodated whilst protecting biodiversity and the natural landscape.

4.6.8 Issue Raised

- There is a scarcity of tourist accommodation in Ballymahon. The provision of grants to help people develop bed and breakfast properties would alleviate this. (CDP26)

Chief Executive Opinion

The provision of grants for tourist accommodation is outside the remit of the Development Plan.

Chief Executive Recommendation

This should be addressed by the Town Team or other appropriate fora.

4.6.9 Issue Raised

- Ballymahon needs a dedicated tourist office to grow interest in the area due to the increased number of visitors with the opening of Center Parcs. (CDP26)

Chief Executive Opinion

The provision of a dedicated tourist office is outside the remit of the Development Plan.

Chief Executive Recommendation

The provision of a dedicated tourist office is outside the provision of the Development Plan and is for the Tourism Officer or the Town Team to address.

4.6.10 Issue Raised

- Fáilte Ireland seek to ensure the following in the context of the Development Plan:
 - To acknowledge and recognise tourism as a key economic driver for the county which supports job creation and sustains communities;
 - To provide a dedicated tourism chapter including policies and objectives for tourism;
 - Tourism should be planned for as a spatial land use. Tourism features should be mapped in the County Development Plan in a similar way that other functions and roles are presented.
 - Key nodes of tourism activity in the county should be identified – both existing and proposed specific tourism centres (major tourism attractions, outdoor activities);
 - Existing transport links between nodes and identified trails – whether walking, cycling or road based including greenways and blueways should also be identified.
 - Strategic tourism centres (principal towns containing tourist facilities) where key services such as accommodation providers are located should be identified.
 - Sensitive environments where the provision of services and development must be sensitive and appropriate to the robustness/sensitivity of the receiving environment and in particular its existing tourism significance;
 - Areas of unrealised tourism potential where proactive policies will aim to encourage the development of this sector;
 - Branding – reference and use of Fáilte Ireland Tourism Brand(s) logos (Ireland's Hidden Heartlands) applicable to the county;
 - Proactive planning policies including provision of supporting infrastructure such as visitor car parking, toilets, café or catering facilities – particularly in sensitive locations;
 - Sustainable travel between sites with the promotion of public transport along key routes; Informed design and location guidelines for the development of tourism related facilities in sensitive amenities. Key to this would be the consideration of particularly special areas

- which may not normally be considered – such as the proposed views of proposed developments from riverside, prominent or elevated locations;
- Full realisation of the economic potential of increased visitor revenue and increased dwell time with high quality tourism infrastructure including accommodation providers, restaurants, holiday homes;
 - Protection and enhancement of the tourism resource with information and interpretation provided and the actual resources carefully managed and protected.
 - Update of the county Wind Energy Strategy '*Areas of Windfarm Potential*', objectives and policies. Fáilte Ireland recognises the value and necessity of strengthening, improving and expanding energy infrastructure in the county and region, and that this in turn supports the growth of the tourism sector. Whilst Fáilte Ireland is generally supportive of the development of transmission infrastructure and is supportive of the economic benefits associated with its growth and development, potential impacts on landscape and the natural environment (including those on tourism) must be considered and this must be clearly expressed in the Development Plan. (CDP22)

Chief Executive Opinion

Faillte Ireland are a statutory consultee and their submission will be considered and taken account of where appropriate in conjunction with the Longford Tourism Plan in the preparation of the Draft Development Plan.

Chief Executive Recommendation

Faillte Ireland are a statutory consultee and their submission will be considered and taken account of where appropriate in conjunction with the Longford Tourism Plan in the preparation of the Draft Development Plan.

4.6.11 Issue Raised

- Greenways are key tourism infrastructure. Research undertaken by Fáilte Ireland identified that visitors have particular preferences in relation to the types of trails and services which they require when cycling in particular. A number of resources are available which provide guidance including the '*Strategy for the Future Development of National and Regional Greenways*' and publications by the National Trails Office relating to developing and maintaining recreational trails in Ireland. (CDP22)

Chief Executive Opinion

In terms of how we make our recreational infrastructure, including greenways, walking trails and waterways more user friendly and accessible for visitors it is considered that the resources highlighted should be consulted and the issues highlighted should be included where possible.

Chief Executive Recommendation

The Draft Plan will make reference to the relevant guidance documents and include policy as appropriate.

4.6.12 Issue Raised

- Towns and villages in Longford should focus on tourism provision, as key towns act as a base or hub for a host of activities and attractions within their hinterlands. A priority should be to provide a wider range of targeted public transport options for tourists who wish to travel from urban areas to rural based tourist attractions and amenities. Possible delivery mechanisms to be explored would include the extension of the Rural Transport Network to include tourism

objectives and key tourism sites. Enhanced walking and cycling facilities have a key role to play in utilising our resources and opening access to the abundance of natural assets. (CDP22)

Chief Executive Opinion

In terms of how we better link key tourism attractions with our towns and villages, so that greater economic benefit can be obtained from tourism it is considered that the issues highlighted should be included where possible.

Chief Executive Recommendation

The Draft Development Plan will include policy as appropriate.

4.6.13 Issue Raised

- Fáilte Ireland have created Visitor Experience Development Plans (VEDPs), the key focus of which is to unlock the economic growth potential of an area by progressing a range of key initiatives that will motivate and facilitate potential tourists to visit and stay in the local area. Fáilte Ireland would like to see inclusion of a policy/objective to support delivery of VEDP's.
- Tourists need reassurance that there will be enough attractions and activities, a sufficient range of accommodation options and a night-time economy. The most effective and efficient way to deliver this is through destination towns that cater for tourists. It is crucial that improvement and investment across a wide range of touch points – including transport links, accommodation supply, public realm attractions, restaurants, a vibrant night-time economy and tourist management are acknowledged and supported in the Development Plan. (CDP22)

Chief Executive Opinion

It is considered the issues highlighted would facilitate and encourage tourism to Longford.

Chief Executive Recommendation

The Draft Plan will make reference to the relevant documents and include policy as appropriate.

4.6.14 Issue Raised

- The forthcoming Shannon Tourism Masterplan by Fáilte Ireland in partnership with Waterways Ireland seeks to drive tourism opportunities both on and off the water, and in the towns surrounding it. Its priorities should inform the Development Plan, in particular the facilitation by the Council of opportunities for waterside dining or water-view dining. (CDP22)

Chief Executive Opinion

It is considered the issues highlighted would facilitate and encourage tourism to Longford. It is important to take advantage of the activity tourism potential of our lakes and waterways, while protecting our valuable natural landscapes and habitats.

Chief Executive Recommendation.

The Draft Plan will make reference to the relevant document and include policy as appropriate.

4.6.15 Issue Raised

- Longford has an array of natural and cultural assets including the River Shannon, Lough Ree, the Royal Canal, Granard Motte, Corlea Trackway, woodlands and picturesque villages. It is

important that these assets are invested in in order to meet the needs and expectations of our domestic and overseas visitors. The Norman Heritage Park in Granard and the Maria Edgeworth Centre should act as a catalyst for the further tourism development and potential of these towns. Center Parcs has the potential to be a key hub for tourism in the county and wider Hidden Heartlands. (CDP22)

Chief Executive Opinion

In order to develop international tourism destinations of excellence in County Longford it is considered that the issues highlighted should be included where possible.

Chief Executive Recommendation.

The Draft Plan will include policy as appropriate.

4.6.16 Issue Raised

- Fáilte Ireland has published *'Development Guidelines for Tourism Destination Towns'* to provide a framework to support communities and local authorities and set out the key drivers which make a town appealing to the international tourist. The guidelines aim to enhance public spaces such as squares, streetscapes and markets in a way that will engage tourists and enhance their experience in key towns. This could include spaces for food and craft markets, areas for town centre events, public art displays as well as orientation and signage to help visitors explore a town's local heritage. (CDP22)

Chief Executive Opinion

In order to enhance the public realm of our towns and villages to make them more appealing to visitors and encourage visitors to stay for longer it is considered that the proposals of Fáilte Ireland should be included in the Draft Plan where possible.

Chief Executive Recommendation

The Draft Plan will make reference to the relevant document and include policy as appropriate.

4.6.17 Issue Raised

- The Corlea Bog Iron Age Trackway has the potential to become Ireland's Iron Age Centre and is a priority project identified as part of Fáilte Ireland's strategic partnership with the OPW. (CDP22)

Chief Executive Opinion

The potential of the Corlea Bog Iron Age Trackway to become a national attraction having being identified as a priority project by both Fáilte Ireland and the OPW is noted and should be addressed in the Development Plan.

Chief Executive Recommendation

The Draft Plan will include policy as appropriate.

4.6.18 Issue Raised

- Tourism services and facilities should be clustered within established settlements as this will serve to protect the quality of the Irish environment; foster strong links to a whole range of other economic and commercial sectors and sustain the host communities; and utilise existing

ancillary services and facilities such as water and wastewater infrastructure and power supply, rather than creating a requirement for further development in the Irish landscape. The pathway to sustainable rural development is outlined in the Action Plan for Rural Development (2017) and supported through key objectives of the NPF. The RSES provides guidance on achieving protection of the environment and balancing development. (CDP22)

Chief Executive Opinion

In terms of what policies and objectives can be implemented to ensure the protection of the countryside from tourism overdevelopment, the proposals of Fáilte Ireland are noted and this issue should be addressed in the Development Plan. The Development Plan should also take cognisance of relevant national policy in this regard.

Chief Executive Recommendation

The Draft Plan will make reference to the relevant documents and include policy as appropriate.

4.6.19 Issue Raised

A greenway creates opportunities for new employment including cycle hire services, accommodation, food and beverage and construction sectors, resulting in sustainable employment throughout the year. The Royal Canal Greenway is well positioned to extend to nearby towns and villages connecting both rural and urban environments and connecting a wider regional recreational network which will provide significant local economic value as well as an excellent visitor experience e.g. Kenagh to Mosstown link, walkway and cycleway link from Lanesboro to Clondra and construction of a link from the Royal Canal to Newcastle Woods, Ballymahon. (CDP22)

Chief Executive Opinion

Substantial Greenways and cycleways have been developed in Longford over the last five years as important infrastructure for tourists and locals alike. In terms of the Greenways and cycleways in the county it is considered that the proposals of Fáilte Ireland should be included in the Draft Plan where possible.

Chief Executive Recommendation

The Draft Plan will include policy as appropriate.

4.6.20 Issue Raised

- Fáilte Ireland supports the use of peatlands in providing recreation, access to nature and the use of peatlands in forming a connected network of green infrastructure for leisure as indicated in the EMRA RSES. The Bord na Mona peatlands provide opportunities for tourism development including joined-up walking and cycling trails, re-wetting/re-wilding of abandoned cutaway bog to create new amenities. The role of Bord na Mona in particular in the development of tourism should be developed further.
- The Mid-Shannon Wilderness Park project would provide for significant rehabilitation of cutaway bogs allowing for the re-establishment of wildlife populations and bring benefits for people, communities and businesses with natural and restored wetlands linked to each other by walkways and cycle routes. The project should be supported by way of policy/objectives in the Draft Plan. (CDP22)

Chief Executive Opinion

The social, community and economic benefits from improving tourism offers within the County are recognised and acknowledged. However the challenge between protecting the natural environment of the county and the need to promote economic opportunities within the rural areas and villages should also be acknowledged.

Chief Executive Recommendation

The Draft Plan will include policy as appropriate and will support the objectives of the Longford Tourism Strategy 2016-2020 and the delivery of the Mid-Shannon Wilderness Plan, in addition to coordinating and liaising with relevant bodies.

4.6.21 Issue Raised

- Longford forms part of Ireland's Hidden Heartlands Regional Experience Brand. The consideration of natural and heritage resources, strategic planning for accommodation and promotion of inter-agency tourism strategies in the upcoming development plan will build on the previous success of strong tourism consideration in Development Plans.
- Longford as a largely rural county is important for tourism as tourism in Ireland, for the most part, takes place in rural areas. These areas are home to rich heritage and immense natural beauty that support a varied tourism offering. These assets should be acknowledged and explicitly referenced as a growth enabler for Longford. Towns and villages in Longford should be a focus for tourism provision, as key towns act as a base or hub for a whole host of activities and attractions within their immediate environs and hinterlands. It is important to ensure provision is made for the expansion in accommodation and facilities within towns and along with supporting infrastructural investment including transport links, public realm.
- The cruising industry is very important for tourism in County Longford. Facilitation of the development of navigation infrastructure is very important, as is the adaptation of navigation infrastructure for tourism, e.g. development of on-shore facilities for boat users.

Chief Executive Opinion

The social, community and economic benefits from improving tourism offers within the County are recognised and acknowledged. However the challenge between protecting the natural environment of the county and the need to promote economic opportunities within the rural areas and villages should also be acknowledged.

Chief Executive Recommendation

The Draft Plan should acknowledge the value of Tourism to the Longford economy and will aim to promote and facilitate the development of tourism in the county and ensure the objectives and policies support and align with Longford's Tourism Strategy and the delivery of the Mid-Shannon Wilderness Plan.

The Draft Plan will include policy as appropriate.

4.7 BUILT AND CULTURAL HERITAGE

Relevant Submission Numbers: CDP3

The main issues raised are summarised as follows: -

4.7.1 Issue Raised

The Longford Heritage Plan 2019-2025 is currently out for public consultation. A commitment should be given upon adoption to integrating the recommendations of this Plan into the County Development Plan. (CDP3)

Chief Executive Opinion

Longford's historic environment, comprising its built form, landscape, heritage and archaeology, provides a depth of character that benefits the county's economy, culture and quality of life. Built heritage assets are a non-renewable resource that contributes to our understanding of the past. It is important that components of our built heritage such as our historic planned towns, heritage towns, protected structures, Architectural Conservation Areas, sites and monuments, country houses and demesnes, industrial architecture, vernacular structures and monastic sites are valued and protected for future generations.

Chief Executive Recommendation

- The Longford Heritage Plan is currently being prepared. The Longford Heritage Plan aims to protect and conserve the natural, built and cultural heritage features that contribute to the distinctive character and heritage value of Longford. When adopted the Draft Development Plan will have regard to the Longford Heritage Plan in terms of relevant policy.

4.7.2 Issue Raised

- The adaptive reuse of existing historic buildings is one of the best ways a community can improve the economic, social and environmental sustainability of its village or a town. Proactive planning policies and objectives which support the reuse and refurbishment of protected structures and older buildings of architectural, cultural, historic and aesthetic merit which, make a positive contribution to the character, appearance and quality of local streetscapes and the sustainable development of the county should be included in the plan. (CDP22)

Chief Executive Opinion

In order to better interpret, animate and develop our heritage assets to strengthen their contribution to the tourism economy, while protecting them for future generations it is considered that the proposals of Failte Ireland should be included in the Draft Plan where possible.

Chief Executive Recommendation

The Draft Plan will include relevant policy as appropriate.

4.8 GREEN INFRASTRUCTURE

Relevant Submission Numbers: CDP9, CDP13, CDP16, CDP18, CDP22, CDP24, CDP26

The main issues raised are summarised as follows: -

4.8.1 Issue Raised

Walking/Cycling is a broad topic and as it is becoming an increasingly important part of peoples' lives, it merits a separate chapter, and should at the very least be cross referenced. (CDP9)

Chief Executive Opinion

It is acknowledged that Green Infrastructure is an area which has grown in importance since the preparation of the last Development Plan. As such consideration will be given to the potential inclusion of an individual section on Green Infrastructure. However it is acknowledged that it does cover a number of topic areas and should be cross referenced in various sections of the Development Plan.

Chief Executive Recommendation

The Draft Development Plan will be appropriately cross referenced in terms of Green Infrastructure.

4.8.2 Issue Raised

Keep Ireland Open have recommended a large number of individual policies and textual changes in the walking, cycling and public right of way spheres. (CDP9)

Chief Executive Opinion:

The Council notes the points of the Keep Ireland Open submission and will endeavour to make appropriate reference to same in the Draft Plan.

Chief Executive Recommendation:

The Draft Plan will include relevant policy as appropriate.

4.8.3 Issue Raised

- Fáilte Ireland request that existing transport links between nodes and identified trails - whether walking, cycling or road based including greenways and blueways should be identified. (CDP22)

Ballymahon specific

- Create a connection from the ticket office to the town, via the Mass Pass and a walkway from town to the Newcastle Bridge and forest. (CDP13)
- Provide a cycleway from Bridgeway's Family Resource Centre to the Longford Bridge at Drinan, and provide a similar facility from Ballymahon Bridge to Newcastle Bridge to enable cyclists an off road facility from Ballymahon to Center Parcs. (CDP18)
- Provision of a cycle path/walkway from the Royal Canal at Brannigan to the town. (CDP26)

Drumlish specific

- Provision of a walkway/cycleway from Drumlish to Monaduff Sportsgrounds.

- Provision of a walkway/cycleway from Ballinamuck school to the village.
- Further develop and create linkages between the Ballinamuck Rebel Trail and Edenmore Looped bog walk.
- Develop Bishop O'Higgins walking route. (CDP16)

Chief Executive Opinion

The Draft Plan should continue to promote walking and cycling through the provision, upgrading and maintenance of cycleways and footpaths as resources allow; and ensure that connectivity is provided in new developments with the provision of good pedestrian and cycle network and facilities.

Chief Executive Recommendation

The Draft Plan will support and facilitate the development and expansion of community , sports and recreation facilities by working with the relevant agencies as appropriate to ensure the timely provision of community services including greenways. The Draft Plan will facilitate and support the development of Longford outdoor recreational activities including walking and cycling as resources allow.

4.8.4 Issue Raised

- The requirements of EIA for Greenway/cycleway should be considered.
- The Development Plan policies relating to Green Infrastructure (GI) should reflect the wider definitions, goals and aims adopted at an EU and National level. GI should involve creating new green areas in existing built infrastructure and creating a green network. It should not be confused and be interpreted as solely putting built infrastructure into existing green areas.
- All the critical components of GI should be clearly identified and mapped in the Development Plan. The inter-connectivity and inter-dependence of identified GI should be clearly established and where necessary should support the collation of sufficient information/data on the GI to ensure informed decision making around their exploitation is supported by scientifically robust evidence and methods. (CDP24)

Chief Executive Opinion

An appropriate definition for 'Green Infrastructure' should be included in the Draft Plan. The Development Plan should be consistent with relevant legislation, EIAR thresholds and national, regional and local plans, policies or strategies. All of the critical components of Green Infrastructure should be clearly mapped as part of the Development Plan preparation process.

Chief Executive Recommendation

An appropriate definition for 'Green Infrastructure' will be included in the Draft Plan. The Development Plan should be consistent with relevant legislation, EIAR thresholds and national, regional and local plans, policies or strategies. The Draft Plan will make reference to the relevant documents and include policy as appropriate. The critical components of Green Infrastructure will be mapped as part of the Development Plan preparation process.

4.8.5 Issue Raised

- Identification and retention of existing rights of way ensuring forestry is not visual obtrusive, and the preparation of an indicative forestry strategy.
- In terms of amenity woodlands, it should be policy to minimise the loss of trees associated with development management, promote the preservation and enhancement of the existing

network of woodlands, and encourage the use of the Neighbourhood and Native Woodland Scheme to enhance existing woodlands or create new ones.

- In terms of Commercial Forestry and Amenity Woodlands the broad zone of deciduous woodlands should be protected and access to forestry encouraged.
- An additional policy should be included that *'Existing Public Rights of Way and established walking routes will be identified prior to any new telecommunication developments (including associated processes) which will be prohibited if they impinge or impact thereon or on recreational amenities or public access to the countryside'*. (CDP9)

Chief Executive Opinion

Keep Ireland's Open suggestions are noted and policies shall be considered for inclusion where appropriate and feasible in the relevant sections in the preparation of the Draft Development Plan. In terms of visual impact, the Draft Plan should take into account the National Landscape Strategy. A strategy for green infrastructure will be investigated as part of the Draft Plan to raise awareness of the importance of environmentally designated sites, river and canal corridors, and green spaces to enhance opportunities for recreation and tourism and in adapting to climate change.

Chief Executive Recommendation

The Draft Plan will make reference to the relevant documents and include relevant policy as appropriate.

4.9 CLIMATE CHANGE AND ENERGY

Submission Numbers: CDP3, CDP5, CDP11, CDP12, CDP18, CDP20, CDP22, CDP23, CDP25

The main issues raised are summarised as follows: -

4.9.1 Issue Raised

- There is a need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans. (CDP3)

Chief Executive Opinion

The Development Plan should be consistent with relevant national, regional and local plans, policies or strategies.

Chief Executive Recommendation

The Draft Plan will include policies and objectives that are informed by EU and national energy targets. The importance of factoring climate change into the plan is recognised and the Draft Plan will have regard to the *National Climate Change Adaptation framework, Building Resilience to Climate Change (2012)* and the *Climate Action Plan 2019 to Tackle Climate Breakdown*. The Draft Plan will promote the development of renewable energy infrastructure in the county, including wind, solar PV, solar thermal and seasonal storage technologies etc. Such projects will be considered subject to environmental safeguards and the protection of natural or built heritage features, biodiversity, views and prospects.

Policies and objectives in relation to wind energy shall be reviewed in the Draft Plan on the recommendations of the review of the Wind Energy Guidelines 2006, when this has been completed by Government.

The Draft Plan will make reference to the relevant documents and include policy as appropriate.

4.9.2 Issue Raised

- The proposed Derryadd wind farm would have negative environmental and biodiversity implications.
- It is vital that the Mid Shannon Wilderness Park, which is a strong biodiversity project, is established as a core feature of the Development Plan, with removal in full of the proposed wind development areas featured in the current County Development Plan.
- The Government have declared a national climate emergency and we could lead by example by having Longford as a County leader in carbon sequestration, biodiversity rehabilitation, job sustaining and creation, tourism and education, local economic growth etc. (CDP5)

Chief Executive Opinion

- The Council recognises the importance of the sustainable after use of cutaway bogs in the county and acknowledges and promotes the potential for the utilisation of protected and post-industrial peatland areas for tourist, amenity, educational and research purposes in policies relating to biodiversity and landscape in the draft plan.
- The Council recognises that peat fired electricity generation will be phased out in the interests of climate action according to the Governments Climate Action Plan 2019 and that the Draft Development Plan will highlight the potential of the peatlands to accommodate the needs of

emerging and early deployment for renewable energy, and future energy storage and the significant potential to develop a Green Energy Hub in County Longford, which focuses on the higher order aspects of the industry such as research, new technologies, financing, office and headquarter development, assembly and maintenance

Chief Executive Recommendation

The Draft Plan will acknowledge that County Longford's peatlands can contribute significantly to climate change mitigation and adaptation, providing important carbon sinks, water attenuation and flooding protection.

The Draft Plan will support the enhancement of carbon sinks such as peatlands, forestry, and permanent grasslands with consideration of afforestation on cut away bogs. The development of wind energy in suitable locations in an environmentally sustainable manner and in accordance with Government policy and the Longford Wind Energy Strategy will be encouraged in the Draft Plan.

The Draft Development Plan will actively encourage the redevelopment of sites with antecedent uses or disused sites which were formerly ESB plants and Bord na Móna works for enterprise and employment creation subject to ecological impact assessment and appropriate assessment screening.

The Draft Plan will include relevant policy as appropriate.

4.9.3 Issue Raised

- In the NPF and RSES the strategic issue of the future development of Ireland's electricity transmission grid was highlighted. The future development plan should be consistent with national plans, policies or strategies.
- In County Longford there is significant transmission infrastructure given its central location on the island.
- The development of the transmission grid outlined in detail in EirGrid's *Grid Development Strategy - Your Grid, Your Tomorrow (2017) and associated Technical Report (2017) (ENCL3)*, is of critical importance to support the economy and society, as well as to realise the transformation of Ireland's energy system to meet climate change and energy obligations.
- To ensure Ireland's sustainable development and growth, EirGrid requires appropriate and robust policy and objectives for planning the national grid infrastructure and prioritising it appropriately in order to deliver national, regional and local benefit. EirGrid requests that the importance of the grid is acknowledged as a strategic issue. (CDP11)

Chief Executive Opinion

Key objectives within the NPF are to facilitate the transition towards a low carbon energy future, reducing greenhouse gas emissions from the energy sector by at least 80% by 2050, which includes the shift from predominantly fossil fuels, to predominantly renewable energy sources. Regional Policy Objective RPO 7.35 of the RSES requires the Eastern and Midlands Regional Assembly, in conjunction with local authorities in the region, to identify Strategic Energy Zones as areas suitable for larger energy generating projects.

The Council recognises the need for cost effective and reliable sources of power that are capable of supporting the future growth and development of the County. The Draft Plan will continue to promote the development of renewable energy sources. It will provide for the enabling of renewable energy resources of the county to be harnessed in a manner that is

consistent with proper planning and sustainable development, and with regard to current Government guidelines to achieve a consensus approach by all stakeholders to the transition to a low carbon economy. The Draft Plan will continue to support the implementation of EirGrid's (2017) *Grid Development Strategy- Your Grid Your Tomorrow* Investment programme, subject to landscape, residential, amenity and environmental considerations.

Chief Executive Recommendation

The Draft Plan will incorporate policies to support a safe, secure and reliable supply of electricity, particularly the development, reinforcement and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required to provide for the future physical and economic development of County Longford.

The Draft Plan will contain suitable policy to ensure cooperation with the regional assembly and other stakeholders including Bord na Móna, to progress a strategy for identifying suitable locations for Strategic Energy Zones, and for strategic level thinking which assists EirGrid in grid development, as set out in the *Grid Development Strategy – Your Grid, Your Tomorrow, 2017* and *Tomorrow's Energy Scenarios 2017: Planning our Energy Future, 2017*.

The Draft Plan will include relevant policy as appropriate.

4.9.4 Issue Raised

- Ireland has widespread shallow geothermal resources for small and medium-scale heating applications, which can be explored online through Geological Survey Ireland's Geothermal Suitability maps for both domestic and commercial use. Recommend use of their Geothermal Suitability maps to determine the most suitable type of ground source heat collector for use with heat pump technologies. (CDP12)

Chief Executive Opinion

It is noted that Geological Survey Ireland supports and funds research into the national energy resource sector and as such it is considered that any such relevant data should be used where possible.

Chief Executive Recommendation

The preparation of the Draft Development Plan will be informed by the relevant data sources in terms of GSI Geothermal Suitability maps to determine the most suitable type of ground source heat collector for use with heat pump technologies

4.9.5 Issue Raised

- The sustainable development of natural resources should be an integral part of all Development Plans. The consideration of mineral resources and potential resources as a material asset should be explicitly recognised within the environmental assessment process. Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development. (CDP12)

Chief Executive Opinion

Action 133 of the *Climate Action Plan 2019* is to evaluate natural resources concealed by peat cover in the Midland counties and to outline the potential for communities and industry to utilise available sand and gravel deposits, minerals, groundwater and deeper geothermal

energy resources as part of a Just Transition for these areas. As data from Geological Survey Ireland is valuable to the delivery of Action 133 of the *Climate Action Plan 2019*, any relevant data and its interpretation should be used where possible.

Chief Executive Recommendation

The preparation of the Draft Development Plan will be informed by the relevant data sources and associated interpretation available.

4.9.6 Issue Raised

- Housing estate development should be very well insulated and have a common heating system. (CDP18)

Chief Executive Opinion

To address climate change, meet national, regional and local policies and in terms of sustainable development the importance of increased BER and the installation of appropriate heating systems is accepted.

Chief Executive Recommendation

The Draft Plan will support the provision of carbon neutral and low carbon solutions in housing developments in accordance with the requirements of the relevant national, regional and local plans. The Draft Plan will include relevant policy as appropriate.

4.9.7 Issue Raised

- Ballymahon requires numerous new charging points for electric vehicles. (CDP18)

Chief Executive Opinion

In order to address climate change, to meet national, regional and local policies and in terms of sustainable development the importance of the provision of adequate charging facilities for electric vehicles is accepted.

Chief Executive Recommendation

The Draft Plan will support the growth in the use of electric vehicles, prioritising parking for electric vehicles in central locations in settlements and in new developments in accordance with car parking standards. The Draft Plan will include relevant policy as appropriate.

4.9.8 Issue Raised

- Careful consideration should be given to any spending to transition to a low carbon and climate resilient society. Funds should be spent on the least cost method to transition ensuring the best value and any technologies being considered should be subject to full life cycle assessments. (CDP20)

Chief Executive Opinion

It is considered that favourable consideration should be given to spending to transition to a low carbon and climate resilient society.

Chief Executive Recommendation

The Draft Plan will include relevant policy as appropriate.

4.9.9 Issue Raised

In addition to wind and solar, the development of anaerobic digestion plants to produce renewable gas should be pursued. It is suggested that a section supporting renewable gas is included. (CDP20)

Chief Executive Opinion

The views of Gas Networks Ireland are noted in terms of wind, solar and anaerobic digestion plants to produce renewable gas. Anaerobic digestion is a biological process in which microorganisms break down organic biodegradable material to biogas, which can be combusted to generate electricity and heat, or can be processed into renewable natural gas and transportation fuels. Anaerobic digestion of farm or other wastes and by-products will be considered, as the process has the potential to combat greenhouse gas concerns and to provide alternative sources of incomes to farmers.

Chief Executive Recommendation

The Draft Plan will recognise and promote the benefits of Anaerobic digestion in line with EU and national waste management legislation and policy. The Draft Plan will facilitate and support the development of projects that convert biomass to gas or electricity subject to national and regional policy, normal siting, design, environmental and planning considerations and proposals for anaerobic digestion of farm or other wastes and by-products, as the process have the potential to combat greenhouse gas concerns and to provide alternative sources of incomes to farmers. The Draft plan will support the expansion of the gas network to new areas or new towns in County Longford in line with CRU approved Connections.

The Draft Plan will make reference to the relevant documents and include policy as appropriate.

4.9.10 Issue Raised

- Update the county Wind Energy Strategy '*Areas of Windfarm Potential*', objectives and policies, to recognise the value and necessity of strengthening, improving and expanding energy infrastructure in the county and region. Potential impacts on landscape and the natural environment must be considered and this must be clearly expressed in the Development Plan. (CDP22)
- Develop a Renewable Energy Strategy for the county based on the principles of the Sustainable Energy Authority of Ireland (SEAI) Local Authority Renewable Energy Strategy as part of the County Development Plan review. (CDP25)

Chief Executive Opinion

The importance of wind energy as a potential energy source and its associated potential impacts are noted. The production of a Wind Energy Strategy would identify '*Areas of Windfarm Potential*' and allow for the development of appropriate policies to recognise the value and necessity of strengthening, improving and expanding energy infrastructure in the county and region which also taking cognisance of the potential impacts on the landscape and the natural environment.

Chief Executive Recommendation

As part of the Development Plan a Wind Energy Strategy will be produced, and '*Areas of Windfarm Potential*', objectives and policies will be developed to recognise the value and necessity of strengthening, improving and expanding energy infrastructure in the county and

region, while also taking cognisance of the potential impacts on the landscape and the natural environment.

The Draft Plan will make reference to the relevant documents and include policy as appropriate.

4.9.11 Issue Raised

- One of the key objectives of the RSES is to support renewable energy opportunities by harnessing natural resources that will support decarbonisation, energy security and allow the region to take advantage of the economic benefits of greener energy as outlined in RPOs 7.35, 7.36 and 10.20.
- The National Climate Action Plan (COP) 2019 has set a 70% target for renewable energy production to 2030. Therefore the local authority should be cautious when considering the zonation of areas for renewable energy development, so as not to constrain any areas which may have renewable energy potential, particularly for wind generation.
- The Office of the Planning Regulator has written to local authorities advising them to maximise renewable energy sources in line with national government policies on climate change.
- In the absence of any certainty around the realisation of RPO's 10.19 to 10.23 of the RSES and in response to the advice of the OPR, the targets in the COP 2019 and the key challenges and questions in the Issues paper, a local renewable energy strategy is an absolute requirement as part of the County Development Plan review.
- Develop a Renewable Energy Strategy for the county that incorporates the methodologies outlined in the SEAI local Authority Renewable Energy Strategy (LARES), the Wind Energy Guidelines 2006, and any future guidelines adopted.
- Carry out a full assessment of County Longford for renewable energy development potential and zone accordingly to ensure no planning ambiguity surrounding any unzoned areas. The following standards for renewable energy zones are suggested; 'No-go', 'Open to Consideration' and 'Preferred' areas.
- All local authorities should develop consistent Landscape Character Assessment (LCA) criteria. A 'Low', 'Medium' and 'High' weighting table for landscape sensitivity types should be considered for renewable energy development potential. The Council are urged to update the LCA completed for County Longford taking account of this recommendation.
- As turbine technologies have advanced significantly, the SEAI Wind Atlas or any similar general wind resource data should not be a constraint when developing and zoning areas for renewable energy development. Grid constraints should not be considered by local authorities when preparing their Renewable Energy Strategies. (CDP23)

Chief Executive Opinion

The growing importance of the recognition of climate change and associated national, regional and county policy is recognised. A plan-led approach to wind energy development in County Longford should be supported which sets out areas suitable for wind energy developments and considerations for the evaluation of wind energy planning applications in line with the recommendations of the '*Wind Energy Development Guidelines*' (2006), any an subsequent update.

Chief Executive Recommendation

The Draft Plan will promote the development of renewable energy infrastructure in the county, including solar PV, solar thermal, wind and seasonal storage technologies. Such projects will be considered subject to environmental safeguards and the protection of natural or built heritage features, biodiversity views and prospects.

The Draft Plan will contain a Wind Energy Strategy which in line with the recommendations of the *'Wind Energy Development Guidelines'* (2006) supports a plan led approach to wind energy development in County Longford and sets out areas suitable for wind energy developments and considerations for the evaluation of wind energy planning applications.

The Draft Plan will make reference to the relevant documents and include policy as appropriate.

4.9.12 Issue Raised

- Recognise and respond to the scale and urgency of climate change as part of the County Development Plan review process. (CDP25)

Chief Executive Opinion

The Draft Plan should include policies and objectives that are informed by EU and national energy targets. The Draft Plan should reflect the importance given to Climate Action in the RSES and indeed the Project Ireland 2040 National Planning Framework by including consistent policies and objectives that integrate climate action at a local level. The Draft Development Plan will include policies & objectives to promote and support the *'transition to low carbon & climate-resilient society'* which is a National Policy Outcome of the NPF. Climate Action is one of the cross-cutting key principles of the Eastern and Midland Regional Spatial & Economic Strategy (RSES) which seeks to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The Development Plan should be consistent with relevant national, regional and local plans, strategies or policies.

Chief Executive Recommendation

The Draft Plan will make reference to the relevant documents and include relevant policy as appropriate.

4.9.13 Issue Raised

- Promote the use of sustainable timber products where possible. (CDP25)

Chief Executive Opinion

The National Policy Objective of the NPF in relation to the *'sustainable management of water, waste and other environmental resources'* is noted. As such the use of sustainable products should be encouraged where possible.

Chief Executive Recommendation

The Draft Plan will include relevant policy as appropriate.

4.9.14 Issue Raised

- Ensure that wind speed and existing grid capacity issues are not considered constraints. (CDP25)

Chief Executive Opinion

The importance of wind energy as a potential energy source and its associated potential impacts are noted. The production of a Wind Energy Strategy would identify *'Areas of Windfarm Potential'* and allow for the development of appropriate policies to recognise the value and necessity of strengthening, improving and expanding energy infrastructure in the county and region which also taking cognisance of the potential impacts on the landscape and the natural environment.

Chief Executive Recommendation

The Draft Plan will contain a Wind Energy Strategy which in line with the recommendations of the *'Wind Energy Development Guidelines'* (2006) supports a plan led approach to wind energy development in County Longford and sets out areas suitable for wind energy developments and considerations for the evaluation of wind energy planning applications.

4.10 ENVIRONMENT

Submission Numbers: CDP3, CDP4, CDP5, CDP7, CDP9, CDP12, CDP15, CDP22, CDP24, CDP25

The main issues raised are summarised as follows: -

4.10.1 Issue Raised

- There is a need to protect non-designated aspects of biodiversity including ecological corridors/linkages/green infrastructure, areas of important local biodiversity, and to ensure appropriate control and management measures for invasive species. To help protect and/or to enhance biodiversity in the Plan area, there is merit in assessing and incorporating any relevant habitat mapping available.
- In preparing the Plan and SEA, the recommendations, key issues and challenges described within '*State of the Environment Report Ireland's Environment – An Assessment 2016*' (EPA, 2016) should be considered, as relevant to the Plan.
- Under the SEA Regulations the local authority should consult with the prescribed Environmental Authorities. (CDP3)

Chief Executive Opinion

- The Draft Plan will be informed by, and compliant with national, EU and International law including environmental directives, and consideration of flood risk and flood risk management plans, climate change mitigation and adaptation, river basin management plans, impacts on water quality, biodiversity and landscape assessment.
- The local authority notes the suggested data sets and associated tools and will use same in the preparation of the Draft Plan and related SEA and AA documents.
- It is noted that the Draft Longford Heritage Plan 2019-2025 contains important context and policy consideration for the Longford County Development Plan 2021-2027.
- In preparing the Plan and SEA, the recommendations, key issues and challenges described within '*State of the Environment Report Ireland's Environment – An Assessment 2016*' (EPA, 2016) will be considered, as relevant and appropriate to the Plan.
- The need to consult with prescribed Environmental Authority is noted and is being adhered to. .

Chief Executive Recommendation

- The suggested data sets and associated tools will be used in the preparation of the Draft Plan and related SEA and AA documents.
- Upon adoption the recommendations of the forthcoming Longford Heritage Plan 2019-2025 shall be integrated into the Longford County Development Plan 2021-2027.
- In preparing the Plan and SEA, the recommendations, key issues and challenges described within '*State of the Environment Report Ireland's Environment – An Assessment 2016*' (EPA, 2016) will be considered, as relevant and appropriate to the Plan.
- The local authority will continue to consult with prescribed Environmental Authority in accordance with SEA regulations.

4.10.2 Issue Raised

- The EPA provide a 'self-service approach' via the attached guidance document '*SEA of Local Authority Land Use Plans – EPA Recommendations and Resources*', which sets out key recommendations for integrating environmental considerations into local authority land use plans. It is recommended that this guidance document is taken into account in preparing the Plan and SEA. (CDP4)

Chief Executive Opinion

The EPA guidance document '*SEA of Local Authority Land Use Plans – EPA Recommendations and Resources*' is noted and will be taken into account in preparing the Plan and SEA.

Chief Executive Recommendation

The EPA guidance document '*SEA of Local Authority Land Use Plans – EPA Recommendations and Resources*' is noted and will be taken into account in preparing the Plan and SEA.

4.10.3 Issue Raised

- It is considered that the proposed Derryadd Wind Farm would have negative environmental and biodiversity implications.
- It is vital that the Mid-Shannon Wilderness Park, which is a strong biodiversity project, is established as a core feature of the Development and Heritage Plans, with removal in full of the proposed wind development areas featured in the current County Development Plan. (CDP5)

Chief Executive Opinion

- There is a strong support for the protection of the natural and built heritage of the county including the lakes, landscape, biodiversity and this will be reinforced in the Draft Plan.
- The Council is supportive of the collaborative approach to a Just transition that incorporates the management, rehabilitation and restoration re-wetting of significant tracts of peatlands. Considering that this Just Transition will be planned and managed collaboratively, the Council is also supportive of integration of commercial development, including windfarms and solar farms, subject to normal planning and environmental considerations.

Chief Executive Recommendation

- The Draft Plan will include policies to develop and protect the setting and interpretation of the Mid-Shannon Wilderness Park, and thus support the bid to advance its designation as a UNESCO Biosphere Nature Reserve.
- The Draft Plan will contain policy relating to afforestation, wilderness, and green infrastructure, which will support the rewilding of Bord na Móna and other state-owned lands, as appropriate.
- Ensure that any planning application which proposes renewable energy will be assessed on a case-by-case basis, with any application to include an after-use proposal, and for assessment criteria to include the impacts of the extraction phase and after-use plan on biodiversity, landscape and natural heritage.
- Support collaboration between Longford County Council, Coillte, the Bord na Móna Regional Transition Team and relevant stakeholders of a partnership approach to integrated peatland management for a Just Transition that incorporates the management, rehabilitation and restoration/re-wetting of significant tracts of peatlands; and in the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the county.
- Support collaboration between Longford County Council, Geological Survey Ireland, Department of Communications, Climate Action and Environment, the Bord na Móna Regional Transition Team and other relevant stakeholders to implement the Climate Action Plan 2019 and to encourage research into the potential for further renewable energy opportunities including geothermal energy resources on post-industrial peat lands as part of Just Transition for affected communities.

4.10.4 Issue Raised

- The Council is requested to refer to the requirements of S.E. No. 140 of 2006 Environmental Noise Regulations in the Draft Plan. The Authority advises that it requires that development proposals identify and implement noise mitigation measures, where warranted. The costs of mitigation measures shall be borne by the developer, as the Authority will not be responsible for the provision of additional noise mitigation. (CDP7)

Chief Executive Opinion

The Draft Plan will take cognisance of the requirements of S.E. No. 140 of 2006 Environmental Noise Regulations. Policy will be included that advises that development proposals identify and implement noise mitigation measures, where warranted with the costs of mitigation measures borne by the developer.

Chief Executive Recommendation

The Draft Plan will take cognisance of the requirements of S.E. No. 140 of 2006 Environmental Noise Regulations. Policy will be included that advises that development proposals identify and implement noise mitigation measures, where warranted with the costs of mitigation measures borne by the developer.

4.10.5 Issue Raised

In terms of the existing Development Plan in relation to section 4.6 'Mining and Aggregates', it is considered that the following policy should be included:

- *An EIS, including a remedial EIS, will be required where the thresholds outlined in Schedule 5 of the Planning and Development Regulations 2001 are reached. Ensure that proposals for aggregate extraction include an assessment of the impact on the natural heritage. The Council will also exercise its powers under Article 103-subsection (1) to require an EIS for sub-threshold development where it is considered that the development would be likely to have MATERIAL effects on the environment or heritage. The size of the proposed development and the cumulative workings of the area will be taken into account when assessing planning applications. Appropriate mitigation measures must be included.*
- *Protect, conserve, preserve and safeguard recorded monuments and areas in their vicinity, World Heritage Sites, archaeological sites and features and zones of archaeological potential, natural heritage, natural environment, listed views and prospects, features of natural beauty or interest, designated and prescribed sites, geological sites and areas of geological/geomorphological interest and areas of high scenic amenity from inappropriate development. Applicants must recognise that the aggregates (stone and sand/gravel deposits and mines) concrete products industry have a particularly sensitive role in relation to the environment. Any development of aggregate extraction, processing, delivery must be carried out so that it minimises adverse effect on the environment and visual amenities whether in respect of new quarries or extensions to existing ones. Development will be prohibited if the quality of the environment or landscape, particularly sensitive landscape, is adversely affected or there is a reduction of the visual amenity of areas of high amenity. All working should be landscaped either by the retention of existing vegetation or by screening. (CDP9)*

Chief Executive Opinion

The Council notes the points of Keep Ireland Open. The Draft County Development Plan will consider including relevant policies where appropriate.

Chief Executive Recommendation

The Council will endeavour to maintain the conservation value and seek the sustainable management of the county's geological heritage resources. The Council will consider appropriate policies where relevant in the Draft County development Plan.

4.10.6 Issue Raised

- Geological Survey Ireland (GSI) advises the planning authority that they have datasets on Bedrock Geology, Quaternary Geology, Geological Heritage Sites, Mineral deposits, Groundwater Resources and the Irish Seabed and recommend using these various data sets, when undergoing the planning and scoping processes.
- County Geological Sites (CGS), as adopted under the National Heritage Plan are now included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. The sites listed in the County Audit should be included in the Development Plan.
- With regard to Flood Risk Management, there is a need to identify areas for integrated constructed wetlands. Recommend using the GSI's National Aquifer and Recharge maps.
- GSI has information available on past landslides and engages in national projects. It is recommended that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and GSI encourage use of their data. (CDP12)

Chief Executive Opinion

The Council notes all the points of the Geological Survey Ireland submission and will endeavour to make appropriate reference to same in Chapter 4: Biodiversity and Landscape in the Draft Plan. The use and sharing of data sets is welcomed.

Chief Executive Recommendation

The Council will endeavour to maintain the conservation value and seek the sustainable management of the county's geological heritage resources. Relevant data sets will be availed of where appropriate. The Council will endeavour to make appropriate reference to all the points of the Geological Survey Ireland submission, where appropriate, in the Draft Plan.

4.10.7 Issue Raised

- In the Issues Paper there is no emphasis on flood risk which is a key consideration. OPW recommend a comprehensive section demonstrating how the sustainable development practices and zoning decisions are intended to be carried out within the Development Plan is included and that any zoning decision is made are in full compliance with the '*Planning System and Flood Risk Management Guidelines, 2009 AND Circular PL2/2014*'. (CDP15)

Chief Executive Opinion

In the Issues Paper the section on environment specifically references flooding. A Strategic Flood Risk Assessment is also being carried out as consultants as part of the plan preparation process. As such flood risk is a key consideration which has been and will continue to be taken into account in the plan preparation process.

Chief Executive Recommendation

A Flood Risk Assessment will be completed as part of the Development Plan preparation process. Any zoning decisions will be informed by the findings of the Strategic Flood Risk Assessment currently under preparation and will be made in full compliance with *the 'Planning System and Flood Risk Management Guidelines, 2009 AND Circular PL2/2014'*.

4.10.8 Issue Raised

- In sensitive environments the provision of services and development must be sensitive and appropriate to the robustness/sensitivity of the receiving environment and in particular its existing tourism significance.
- Sustainable travel should be encouraged between sites with the promotion of public transport along key routes; informed design and location guidelines for the development of tourism related facilities in sensitive amenities. Key to this would be the consideration of particularly special areas which may not normally be considered – such as the proposed views of proposed developments from riverside, prominent or elevated locations. (CDP22)

Chief Executive Opinion

The sensitivity of particular landscapes in terms of visual amenity and biodiversity is noted and should be carefully considered.

Chief Executive Recommendation

A landscape and biodiversity element will be included in the new plan which will include consideration of protected views. The Draft Plan will make reference to the relevant documents and include policy as appropriate.

4.10.9 Issue Raised - Legislative considerations with regard to Nature conservation and biodiversity

- SEA and AA should not be solely undertaken as a legislative obligation that generates separate reports to the main Development Plan text, but should inform the main body of the Development Plan text. They should be clearly reflected in the text and any specific risks identified should be mitigated through avoidance and or clearly identified appropriate measures in the Development Plan.
- There is a requirement to document any mitigation by avoidance that are incorporated into the Development Plan and to clearly present the step-by-step decision making process where it has been informed by environmental considerations, assessments and reports. (CDP24)

Chief Executive Opinion

In accordance with Section 10(5a) of the Planning and Development Act 2000 (as amended), all proposed policies and objectives of the Draft Plan will be subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), with the objectives of SEA being to provide for a high level of protection to the environment and to promote sustainable development, and with the purpose of AA being to provide an assessment of the potential adverse effects of the Draft Plan on Special Areas of Conservation. The Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment processes being undertaken as part of the plan-making process will facilitate the integration of environmental considerations into the Development Plan. It is intended that these considerations will include policies and objectives contributing towards environmental protection, management and sustainable development.

Chief Executive Recommendation

The Development Plan will be carried out in tandem with the required environmental processes, namely Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment, which will inform Development Plan policy and objectives.

4.10.11 Issue Raised - Biodiversity

- The Development Plan should be developed to integrate biodiversity considerations in a positive, proactive and precautionary way, reflected in the text and content, including its aims, objectives and policies and associated maps.
- The Development Plan should reflect the application of overarching environmental objectives throughout the entire plan development process. A commitment to no net loss of biodiversity as articulated in Ireland's 3rd *National Biodiversity Action Plan (2017-2021)* and to nature conservation interests more generally should be clearly reflected throughout the document and not only in relation to those aspects that deal specifically with the environment. (CDP24)

Chief Executive Opinion

The Draft Plan should acknowledge the importance of conserving biodiversity in the county.

Chief Executive Recommendation

The Draft Plan will make reference to the relevant documents and include relevant policy as appropriate.

4.10.12 Issue Raised - Peatland, Wetlands and Freshwater Habitats

- Longford County incorporates some of Ireland's best peatland areas and the Development Plan should reflect this. Peatland policies and objectives should be included as a separate item and recognised as a valuable habitat in their own right.
- Risks to peatlands that are identified in the Strategic Environmental Assessment or the Natura Impact Report should be clearly identified in the text of the Development Plan.
- The Development Plan should incorporate a clear commitment to peatland conservation with reference to the aims and objectives of the *National Raised Bog Special Areas of Conservation Management Plan 2017-2022* and the *National Peatlands Strategy 2015*.
- The close proximity of Natura 2000 sites supporting wetland and bog habitat to the Key town of Longford should be acknowledged in any individual section regarding Longford town.
- Longford town is surrounded by a network of interdependent bog and wetland habitats and clear direct hydrological links exist between these sites and the town. The SEA should note that these sites have heightened hydrological sensitivities. (CDP24)

Chief Executive Opinion

It is accepted that the Development Plan should recognise that peatlands and Natura 2000 sites are of conservation value, but can also offer significant development potential, if planned in a sensitive manner to respect to protect biodiversity value. The Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment processes being undertaken as part of the plan-making process will facilitate the integration of environmental considerations into the Development Plan. It is intended that these considerations will include policies and objectives contributing towards environmental protection, management and sustainable development.

Chief Executive Recommendation

The Draft Plan will acknowledge that peatlands and Natura 2000 sites are of significant conservation value but can offer significant development potential, if planned in a sensitive manner to respect to protect biodiversity value. Reference will be made in the Draft Plan to the Guiding Principles for Peatlands as set out in the RSES in terms of assessing development on peatlands. The Development Plan will be carried out in tandem with the required environmental processes, namely Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment, which will inform Development Plan policy and objectives.

The Draft Plan will make reference to the relevant documents and include relevant policy as appropriate.

4.10.13 Issue Raised – Tourism

- Policies relating to growth and development in the tourism sector should recognise potential constraints posed by the need to protect and restore biodiversity and the natural landscape.
- The Development Plan should set out how growth in the tourism sector will be accomplished whilst maintaining no further loss of biodiversity and protecting the habitats and species that support the Natura 2000 Network and International designated sites of nature conservation interest. (CDP24)

Chief Executive Opinion

One significant adverse impact associated with tourism infrastructure and an increased frequency of visitors is the risk of damage to the natural features, landscape and biodiversity that underpin the tourism sector itself. It is accepted that the Development Plan should recognise that Natura 2000 sites are of conservation value, but can also offer significant development potential, if planned in a sensitive manner to respect to protect biodiversity value. The Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment processes being undertaken as part of the plan-making process will facilitate the integration of environmental considerations into the Development Plan. It is intended that these considerations will include policies and objectives contributing towards environmental protection, management and sustainable development.

Chief Executive Recommendation

Policies relating to growth and development in the tourism sector will be tempered by a recognition of the potential constraints posed by the need to protect and restore biodiversity and the natural landscape that supports the sector.

The Draft Plan will acknowledge that Natura 2000 sites are of significant conservation value but can offer significant development potential, if planned in a sensitive manner to respect to protect biodiversity value. The Development Plan will be carried out in tandem with the required environmental processes, namely Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment, which will inform Development Plan policy and objectives.

The Draft Plan will include relevant policy as appropriate.

4.10.14 Issue Raised – EC Birds and Habitats Regulations 2011

The Development Plan should include individual principal objectives for the protection of Nature conservation interests and specifically the protection of European designated sites and species made under the EC Birds and Habitats Regulations 2011. A specific Objective articulating the requirements of Article 10 of the Habitats Directive should be included. (CDP24)

Chief Executive Opinion

An Appropriate Assessment and a Strategic Environmental Assessment will accompany the Draft plan and will feed into policy in the Draft Plan. In accordance with Section 10(5a) of the Planning and Development Act 2000 (as amended), all proposed policies and objectives of the Draft Plan will be subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), with the objectives of SEA being to provide for a high level of protection to the environment and to promote sustainable development, and with the purpose of AA being to provide an assessment of the potential adverse effects of the Draft Plan on Special Areas of Conservation.

It is envisaged that the Draft Plan will seek to safeguard Special Protection Areas (SPAs) which were established under Annex 1 of the Birds Directive as they support populations of birds of particular species that are rare or threatened in Europe and require particular measures, including the designation of protected areas to conserve them. In addition, it is envisaged that the Draft Plan will place emphasis on the protection of habitats, such as wetlands, for endangered as well as regularly occurring migratory species in line with the Birds Directive.

Chief Executive Recommendation

The Draft Plan will include policies and objectives to protect all designated sites under the EU Birds and Habitats Directives.

The Draft Plan will make reference to the relevant documents and include relevant policy as appropriate.

4.10.15 Issue Raised – Flood Risk

- The positive role that sites of high nature and biodiversity value can take in the provision of ecosystem services or green infrastructure for alleviating flood risk should be visible.
- The potential constraints in relation to flood management measures which may arise from statutory requirements in relation to European sites and nature conservation should be acknowledged. (CDP24)

Chief Executive Opinion

In line with Regional Policy Objective (RPO) 7.21 of the Eastern and Midland Regional Spatial and Economic Strategy (RSES), the Council will adopt an ecosystems services approach in the preparation of the Draft Plan, recognising and sustaining the benefits provided by the environment whilst delivering other economic and social goals, with all draft plan policies and objectives being subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA).

The Draft Plan will also have regard to the "*Planning System and Flood Risk Management – Guidelines for Planning Authorities*" (DoEHLG/OPW, 2009) through the use of the sequential approach and application of Justification Tests for developable lands. The application of the Sustainable Urban Drainage Systems (SUDS) to minimise and limit the extent of hard surfacing

and paving and requiring the use of sustainable drainage techniques where appropriate will also reduce the potential impact of existing and predicted flooding risks.

The potential constraints in relation to flood management measures which may arise from statutory requirements in relation to European sites and nature conservation should be acknowledged and will be considered as part of the Appropriate Assessment, Strategic Environmental Assessment, Flood Risk Assessment process which will feed into policy in the Draft Plan.

Chief Executive Recommendation

The Draft Plan will make reference to the relevant documents and include relevant policy as appropriate.

4.10.16 Issue Raised

- In relation to water and wastewater services the Development Plan should clearly document the potential for constraints in relation to European sites. (CDP24)

Chief Executive Opinion

The environmental assessment of the Draft Plan is an iterative process which will inform the preparation of the Draft Plan and the SEA process will influence the development strategy, policies and objectives of the Draft Plan.

The Water Framework Directive and River Basin Management Plans will be key considerations for the Draft Plan and standards for the protection of groundwater are provided by the European Communities (Groundwater) Regulations 2010 and through objectives included in River Basin Management Plans. The Draft Plan will be informed by, and compliant with national, EU and International legislation.

Chief Executive Recommendation

The Draft Plan will make reference to the relevant documents and include relevant policy as appropriate.

4.10.17 Issue Raised

- Lead the EMRA region in developing a consistent approach to key RES issues including a consistent approach to identifying suitable lands and categorising landscape sensitivity. (CDP25)

Chief Executive Opinion

The sensitivity of particular landscapes in terms of visual amenity and biodiversity is noted and should be carefully considered. The Draft Plan will consider options to utilise the natural amenity areas such as the lakes, canals, bogs and wetlands of Longford as national and international tourist destinations and will be supported in a sustainable manner throughout Longford. It is recognised that a consistent approach to key RES issues including categorising landscape sensitivity is required.

Chief Executive Recommendation

The Draft Plan will continue to protect the County's key environmental assets by implementing an environmental protection policy which recognises the various environmentally sensitive areas and Natura 2000 sites within the County. The Draft Plan will

support the RSES and the National Landscape Strategy 2015-2025 and will encompass actions contained within the Longford Biodiversity Action Plan and Heritage Plan. A landscape and biodiversity element will be included in the Draft Plan which will include protected views.

4.10.18 Issue Raised – Data collation, Accessibility and Dissemination

- Greater access to better information can build the foundation for better assessment, risk avoidance and decision making. This can be achieved by clearly identifying the need for such an approach in the Development Plan through the inclusion of a specific objective. The Department would welcome the creation of an accessible repository for historic Natura Impact Statement and Reports to support future appropriate assessment and environmental assessment across the county. (CDP24)

Chief Executive Opinion

The Draft Plan will be subject to SEA, AA, and SFRA. Natura Impact Statements and Reports are currently available to view in hardcopy and online on individual planning applications. However the benefits of creating a shared repository of Natura Impact Statements and Reports is acknowledged in terms of better risk assessment and decision making.

Chief Executive Recommendation

The provision of an accessible repository for historic Natura Impact Statements and Reports will be investigated in terms of process and resources.

4.11 MISCELLANEOUS

Submission Numbers: CDP9, CDP10, CDP25
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The main issues raised are summarised as follows: -

4.11.1 Issue Raised

- There is a fault in the communication process as the Notice of Review of the Development Plan did not appear in the local newspaper. (CDP 10)

Chief Executive Opinion

Public notice was given in accordance with the statutory requirements of the legislation which included an advertisement in the local newspaper, '*The Longford Leader*'. Notification was also placed on the Council website and on social media platforms such as Facebook and Twitter. Public consultation meetings were also held in each of the 3 Municipal Districts and a dedicated online submission portal and email address created. Documents are also available in PDF format on the Council's webpage.

Chief Executive Recommendation

The Draft Plan will be prepared in terms of the consultation requirements as per the legislation. Public notice will continue to be given in accordance with the statutory requirements of the legislation.

Documents and relevant information will continue to be made available on the Council's webpage.

4.11.2 Issue Raised

- The layout of the current Development Plan creates difficulties when referring to particular points with many sub-numbered/lettered lists -this should be extended to all lists and all paragraphs should be numbered or lettered. Section titles and numbers should be included on each page. In terms of the format an Index is recommended in the Development Plan Guidelines. (CDP9)

Chief Executive Opinion

The document should be as legible and user friendly as practicably possible

Chief Executive Recommendation

The layout of the Draft Plan will be considered during the review of the Plan with the objective of making it clear and concise. A glossary will be included for abbreviations.

4.11.3 Issue Raised

- While there is an obligation to take into account plans in adjoining counties, consider taking into account plans in other counties particularly those within the Midland Region. (CDP9)

Chief Executive Opinion

In accordance with legislative requirements the views of the adjoining local authorities have been sought. The Eastern Midland Regional Assembly is a statutory consultee and will ensure compliance with the RSES regional vision.

Chief Executive Recommendation

The Draft Plan will continue to be prepared in terms of the consultation requirements as per the legislation which requires consultation with the adjoining local authorities and the Eastern and Midland Regional Assembly.

4.11.4 Issue Raised

- Work in partnership with other Government Agencies and third parties, including the public, to achieve goals. (CDP25)

Chief Executive Opinion

It is the intention of the local authority to work in partnership with other Government Agencies and third parties, including the public, to achieve relevant goals. It is envisaged that reference will be made in the Draft Plan to Longford County Council working in collaboration with other local authorities and relevant stakeholders in a partnership approach, where feasible.

Chief Executive Recommendation

The Draft Plan will include relevant policy as appropriate.

5.0 Public Consultation Events

The main issues raised at the public consultation meetings in each of the 3 no. Municipal Districts are summarised as follows.

5.1 Ballymahon Public Consultation

5.1.2 Issue Raised

- Create a connection from the ticket office to the town, via the Mass Pass.
- Provision of footpath from the National School to Moigh and towards the Hyundai Garage.
- Undergrounding of overhead cables.
- Stone wall has been undermined to St. Mathews Terrance and needs urgent attention.
- Provision of stone wall along the Athlone road.
- Provision of bus shelters, seating and an extra or more central bus stop.
- Bottle bank needed near school.
- New bins, trees and seating.
- Provision of a cinema, with Corela Visitor centre a possible location.
- Provision of a dog park.
- Signage to be relocated further out on the Mullingar Road.
- A walkway from town to the Newcastle Bridge and forest.
- Bord Failte to get more involved.
- A kick around football green.
- CCTV to be installed.
- Close existing entrance to children's playground and put new entrance beside kayak club.
- Install lighting in the Oliver Goldsmith car park.
- Parking bays for the disabled and elderly near post office.
- Seating at the library needs urgent attention.
- New murals to advertise local sites of interest put on the wall at the Longford Bridge.
- Provision of outdoor exercise equipment.
- Light up canal for walkers and cyclists.
- A proper car parking is needed on both sides of the canal at the Longford Bridge.
- Parking for campers.
- Incorrect car park markings.
- Raise the hand rail on the Inny bridge and light the bridge.
- Bring the old swimming pool grounds into use i.e. a skate park, basketball, teenage area etc.
- Provision of a climbing wall.
- Provision of community centre.
- Provision of a funeral home and ancillary services to cater for the Greater Ballymahon area.
- The soccer club needs a wider access road and a possible one-way system with separate entrance/exit points.
- Provision of a cycle path/walkway from the Royal Canal at Brannigan to the town.
- Scarcity of tourist accommodation in the local area and require grants to help people develop bed and breakfast properties.
- Provision of a dedicated tourist office.
- Provision of a town hub for start-up businesses and a site for entrepreneurs.
- There is potential for growth in many business areas e.g. dry cleaners, bicycle hire/sales and repairs and storage units.

Chief Executive Opinion

It is noted that RPO 6.12 of the RSES requires local authorities to include objectives in Development Plans to support emphasis on a Placemaking Strategy for towns and

implementation of Town Centre Renewal Plans, while RPO 6.13 states that local authorities shall support the preparation of Design Guidelines to provide for improvements in the appearance of streetscapes and for revitalising vacant spaces. The Draft Plan will have regard to said policy under the RSES and will include policies and objectives across a number of chapters to support and facilitate the improvement of the public realm and provision of community cultural facilities and uses. For the purpose of public realm improvements, the Council will continue to make applications for various grant programmes including the Urban/Rural Regeneration and Development Funds and Town & Village Renewal Schemes. In terms of engaging in or consulting on local level projects and initiatives to influence public realm improvements, this could be achieved by way of engaging with the bodies and other local authority sections involved in the implementation of other relevant plans and strategies.

Town plans and village plans will be prepared for the towns and villages in the County to include Opportunity Sites where appropriate and will form part of the Draft Plan to guide growth and encourage investment in these settlements. As part of enhancing Longford's settlements, a number of '*Opportunity Sites*' are proposed to be identified for regeneration purposes. It is considered that their appropriate redevelopment would provide significant improvements in the overall local environment and prompt local economic growth. It is considered that their redevelopment would contribute greatly to the renewal, enhancement and regeneration of the settlements in which they are located.

The Draft Plan will promote the development of community, sports and recreational facilities. The Council will seek to engage with key stakeholders/community groups to encourage shared responsibility for community development within the county. The Council is committed to developing a more socially inclusive society and promoting participation and access for all.

Notwithstanding this, some of the specific projects listed are outside the scope of the Development Plan to deliver and may be more appropriate for the Town Team to address. The height of public lighting is not an issue for the Development Plan and should be referred to the Town Team to address.

Chief Executive Recommendation

It is recommended that policies in this area address the following:

- Continue to facilitate, promote and encourage the re-development of brownfield /infill sites as '*Opportunity Sites*' to be identified in the Draft Development Plan, with emphasis on key criteria; place making, mix, urban grain and vibrancy and vitality.
- Apply for funding under various funding streams to facilitate the enhancement, revitalisation, renewal and regeneration of communities and town/village centres, and the delivery of innovative and transformational regeneration proposals such as under the Urban and Rural Regeneration and Development Funds.
- Promote a collaborative approach between the local authority, central government, semi-state bodies, the community, private sector and voluntary associations to successfully achieve the regeneration of areas including site assembly where appropriate.
- Support and facilitate the development and expansion of community infrastructure, facilities and services by working with the relevant agencies as appropriate to ensure the timely provision of community services, including schools, required for the creation of sustainable communities.
- Encourage a mixture of uses within the built-up area in order to promote the livability and sustainability of our settlements.

- Be flexible in terms of enabling brownfield/infill development within settlements, focusing on design-led and performance-based outcomes, rather than specifying absolute requirements in all cases.
- Promote high standards for public realm, place making and quality of life considerations for both and private residential developments.
- Promote compact town and village centres across the settlement hierarchy for Longford in line with the National Planning Framework and Eastern and Midland Regional Spatial and Economic Strategy.

5.2 Granard Public Consultation

5.2.1 Issue Raised

- Query in relation to increased funding for older persons facilities.

Chief Executive Opinion

Funding issues for specific older person residential units are outside the remit of the Development Plan. In terms of policy, the county has an aging population and as such provision for older persons should be made in the Development Plan, where possible.

Chief Executive Recommendation

Draft Development Plan policy shall where possible and relevant, include policy for an aging population.

5.3 Longford Public Consultation

5.3.1 Issue Raised

- General queries in relation to the process of preparing the plan and the timescale involved.

Chief Executive Opinion

The process and legislative requirements of the Planning and Development Acts 2000 (as amended) and the Planning and Development Regulations 2001 (as amended) are noted as relevant and as setting out the process and timescale involved.

Chief Executive Recommendation

The Draft Plan will continue to be prepared in terms of the process and requirements set out in the legislation.

5.3.2 Issue Raised

- Queries in relation to need to comply with national and regional policy in terms of the NPF and RSES, particularly in terms of the core strategy, and the impacts on village development and rural housing.

Chief Executive Opinion

In accordance with the NPF and NPO 3c at least *30% of all new homes are targeted in settlements and their suburbs within their existing built-up footprints*. In the RSES Longford Town is identified as a *'Key Town'* and as such, Longford Town will be a driver for economic development in the region. NPO15 of the NPF relates to *'Planning for Diverse Rural Places'* and aims to *'support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent*

decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities. There remains an on-going demand for rural one-off dwellings in the rural hinterland. There is therefore a need to strike a balance between facilitating housing for people who have a rural housing requirement whilst at the same time ensuring a balanced and sustainable approach to the development of the county's rich heritage of towns and villages. There are a variety of different housing needs with the county to be accommodated and policy objectives within the Longford County Development Plan should underline the need to provide a variety of housing types and needs in accordance with national and regional policy. The Draft Development Plan will need to take cognisance of national and regional policy objectives and underline policy objectives with practical place-making proposals that provide for and make towns and villages more viable and attractive places to live. Any forthcoming updates to statutory relevant Guidelines, will be taken account of in preparing the core strategy and HDNA (Housing Needs Demand Assessment).

Chief Executive Recommendation

The Planning Authority shall ensure the Draft County Development Plan is consistent with the National Planning Framework and Regional Spatial and Economic Strategies for Eastern and Midland Regional Assembly; Ministerial guidelines under section 28; Ministerial policy directives issued under section 29, and, such other legislative and policy matters as the Minister may communicate to the Office in writing.

The Draft Plan will incorporate an evidence-based Core Strategy that will accord with the provisions set out in the Planning and Development Acts 2000 (as amended) and the NPF and RSES, ensuring that development is supported and integrated with a range of accessible community facilities in a sustainable manner. The population targets and housing allocation for the county will include an analysis of current demographic and population data trends, using available sources of material as appropriate. The core strategy will form the basis for objectives and policies throughout the Draft Plan including population targets, settlement strategy, density considerations, economic development and the quantum of lands to be zoned for residential and mixed uses, in an evidence based and sequential manner. The settlement strategy for the County will take cognisance of the settlement Strategy prescribed in the EMRA RSES. The Draft Plan will continue to support the development of the key settlement of Longford.

6.0 Procedure Following Chief Executive's Report

This Chief Executive's report shall issue to the Longford County Council Elected Members for their consideration by 24th January 2020. Not later than 10 weeks following the receipt of this report (3rd April 2020), the Members may issue strategic directions to the Chief Executive regarding the preparation of the Draft Longford County Development Plan 2021-2027.

Any such directions must be strategic in nature and must take account of the statutory obligations of the Council and any relevant policies or objectives for the time being of the Government or of any Minister of the Government. In issuing directions, the Members shall be restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates.

Meeting arrangements to facilitate the Members' directions will be made in advance of the deadline (3rd April 2020) for such directions.

No later than 12 weeks following receipt of strategic directions from the Members, the Chief Executive shall prepare a Draft Longford County Development Plan for the period 2021 - 2027 and submit it to the Members for their consideration.

Appendices:

Appendix 1: Press Notices/Publications/Social Media Posts

Appendix 2: List of Written Submissions Received

Appendix 3: List of Prescribed Bodies informed of the Plan Review Process

Appendix 4: List of Stakeholders informed of the Plan Review Process

Appendix 1: Press Notices/Publications/Social Media Posts

Press Notice of Commencement of Review and New Preparation of New Plan

Notice of Commencement of Review and Preparation of New Plan

Longford County Development Plan 2021-2027

Notice is hereby given pursuant to Section 11(1) of the Planning and Development Acts, 2000-2019 (as amended) of the intention of Longford County Council to commence the review of the existing Longford County Development Plan 2015-2021 and to prepare a new Longford County Development Plan for the period 2021-2027. The preparation of the new Development Plan shall be strategic in nature for the purposes of developing objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the County.

Pursuant to the Planning and Development (Strategic Environmental Assessment) Regulations 2004-2011 (as amended), the Planning Authority proposes to carry out an environmental assessment as part of the review of the existing development plan and the preparation of a new development plan, and for this purpose, the Planning Authority will prepare an environmental report of the likely significant effects on the environment of implementing the new plan. Pursuant to the Habitats Directive 92/43/EEC and the Planning and Development Acts 2000-2019 (as amended), screening for Appropriate Assessment and, where relevant, an Appropriate Assessment of implementing the new plan will be undertaken.

You are hereby invited to make a submission to the Planning Authority in relation to the review of the Longford County Development Plan 2015-2021 and the preparation of the new Longford County Development Plan 2021-2027, including the Strategic Environmental Assessment and Appropriate Assessment processes. All submissions will be considered by the Planning Authority.

Children, or groups or associations representing the interests of children, are entitled to make submissions or observations.

In order to stimulate debate and encourage participation in this process a Public Consultation Issues Paper has been prepared and is available for inspection online at www.longfordcoco.ie and also at the branch libraries in the County and at the Planning Department in Aras an Chontae, Great Water Street, Longford, during office hours from 26/9/19 to 22/11/19 (both dates inclusive).

Making a Submission

Submissions or observations regarding the review of the existing Longford County Development Plan 2015-2021 and the preparation of the new Longford County Development Plan 2021-2027 may be made from Thursday 26th September 2019 until 4.00pm on Friday 22nd November 2019 (both dates inclusive).

Submissions Should:

- Relate to the proper planning and sustainable development of County Longford, from broad policy issues to specific types of development in identified areas.
- Not include zoning proposals at this pre-draft stage. Any submission requesting or proposing the zoning of any land for any use will not be considered at this stage.
- Include a map if you refer to particular locations or features.
- Be clear, concise, and to the point. If you need to make a lengthy submission, please attach an executive summary to it.
- Include your name and address on a separate page to the content of your submission in order to assist Longford County Council in complying with the provisions of the Data Protection Act, as submission are legally required to be published on line.
- Preferably be in typed format in the interests of legibility.

Submissions/observations may be made via ONE of the following methods:

online: www.longfordcoco.ie/cdp

email: cdp@longfordcoco.ie

hard copy: Administrative Officer,
Review of the County Development Plan,
Forward Planning Unit,
Longford County Council,
Áras An Chontae,
Great Water Street.
Longford,
N39 NH56.

Submissions received by Longford County Council after 4.00pm on Friday 22nd November 2019 will not be accepted.

John Brannigan,

Director of Services,

Strategic Infrastructure and Climate

Facebook Post

The review of the Longford County Development Plan 2015-2021 and preparation of the new Longford County Development Plan 2021-2027, including Strategic Environmental Assessment and Appropriate Assessment processes has formally commenced. The 1st stage is a public consultation period until 4pm on 22/11/19.

A Public Consultation Issues Paper intended to help identify what broad planning and development matters should be considered in the new County Development Plan and to prompt debate on issues facing County Longford can be viewed online at www.longfordcoco.ie and is also available to view in branch libraries and at the Planning Department, Aras an Chontae, Great Water Street, Longford. Submissions should be made to the dedicated address either via hardcopy, email or the online portal until 4pm on 22/11/19.

Public consultation sessions will be held at various locations within this time, details of which will be announced in due course.

Twitter Post

Preparation of the Longford County Development Plan 2021-2027 has formally commenced with a public consultation stage until 4pm on 22/11/19. An Issues Paper is available to view online, in branch libraries and at the Planning Department. Further details on <http://www.longfordcoco.ie/services/planning/preparation-of-longford-cdp-2021-2027/>

Notification of Public Consultation Events

Press Notice

Longford County Development Plan 2021-2027 Notice of Development Plan Public Consultation Events

As part of the preparation of the new Longford County Development Plan 2021-2027, Longford County Council are holding a number of public consultation events as follows: -

Longford Branch Library: Monday 21st October, 3-6pm.

Granard Library: Tuesday 22nd October, 2-5pm.

Ballymahon Library: Thursday 24th October, 2-5 pm.

These meetings will offer an opportunity for you to discuss any issue that you may have with a member of the Forward Planning Team and possibly help frame future policies and objectives of the County Development Plan. These meetings are supplementary to the public consultation issues paper which is available to view on www.longfordcoco.ie and is also available to view in the branch libraries in the county and at the Planning Department in Aras an Chontae, Great Water Street, Longford during office hours until 4pm on 22/11/19.

In terms of the public consultation events, if you consider that you have a disability which may affect your attendance and participation, please give details of any special requirements in order that appropriate arrangements can be made if necessary via either of the following methods: -

email : cdp@longfordcoco.ie

writing to: Administrative Officer,
Review of the County Development Plan,
Forward Planning Unit,
Longford County Council,
Áras An Chontae,
Great Water Street.
Longford,
N39 NH56.

Facebook Post:

Longford County Development Plan 2021-2027

Public Consultation Events

Longford County Council are holding a number of public consultation sessions as follows: -

Longford Branch Library: Monday 21st October, 3-6pm.

Granard Library: Tuesday 22nd October, 2-5pm.

Ballymahon Library: Thursday 24th October, 2-5 pm.

These meetings represent an opportunity for you to discuss issues in relation to the Plan preparation with a member of the Forward Planning Team and possibly help frame future policies and objectives of the County Development Plan. If you consider that you have a disability which may affect your attendance and participation, please give details of any special requirements in order that appropriate arrangements can be made if necessary.

Twitter Post:

Longford County Development Plan 2021-2027

Public Consultation Events

Public consultation sessions are as follows: -

Longford Branch Library: Monday 21st October, 3-6pm.

Granard Library: Tuesday 22nd October, 2-5pm.

Ballymahon Library: Thursday 24th October, 2-5 pm.

Further details on <http://www.longfordcoco.ie/services/planning/preparation-of-longford-cdp-2021-2027/>

Appendix 2: List of Written Submissions Received

Reference Number	Name
CDP1	Department of Community and Rural Affairs
CDP2	Department of Community and Rural Affairs (SEA)
CDP 3	EPA (SEA)
CDP4	EPA – Land use recommendations and resources
CDP5	No to Derryadd Wind Farm Community Group
CDP6	EMRA
CDP7	TII
CDP8	Department of Education
CDP9	Keep Ireland Open
CDP10	Granardkille Residents
CDP11	Eirgrid
CDP12	Department of Communication, Climate Action and Environment
CDP13	Ballymahon Mens Group
CDP14	Office of the Planning Regulator
CDP15	Office of Public Works
CDP16	Drumlish Ballinamuck Area Dev. CLG
CDP17	Irish Water
CDP18	Cllr. P. O'Toole
CDP19	Health Service Executive
CDP20	Gas Networks Ireland
CDP21	National Transport Authority
CDP22	Failte Ireland
CDP23	IWEA
CDP24	Department of Culture, Heritage and the Gaeltacht
CDP25	Coillte
CDP26	J. Nally
	Submissions received relating to zoning
<i>CDP27</i>	<i>Ger Fahy</i>
<i>CDP28</i>	<i>Declan Quinn</i>
<i>CDP29</i>	<i>MKO</i>
<i>CDP30</i>	<i>MKO</i>

Appendix 3: List of Prescribed Bodies informed of the Plan Review Process

Number	Prescribed Body
1	Minister for Housing, Planning, & Local Government
2	An Bord Pleanála
3	Minister for Agriculture, Food and the Marine
4	Department of Culture, Heritage and the Gaeltacht
5	Minister for Communications, Climate Action & The Environment
6	Minister for Defence
7	Minister for Education & Skills
8	Minister for Transport, Tourism and Sport
9	Department of Business, Enterprise and Innovation
10	An Chomhairle Ealaíon
11	Commissioners of Public Works
12	Dublin Airport Authority
13	Eirgrid Plc
14	Environmental Protection Agency Headquarters
15	ESB Electric Ireland
16	Fáilte Ireland
17	Health Service Executive
18	The Heritage Council
19	Health & Safety Authority
20	Inland Fisheries Ireland
21	Transport Infrastructure Ireland
22	An Taisce The National Trust for Ireland
23	Irish Water
24	National Transport Authority
25	Department of Community & Rural Affairs
26	Office of The Planning Regulator
27	Irish Aviation Authority
28	The Eastern & Midland Regional Assembly
29	Northern & Western Regional Assembly
30	Cavan County Council
31	Roscommon County Council
32	Westmeath County Council
33	Leitrim County Council
34	Longford Community Development Committee

Appendix 4: List of Stakeholders Informed of the Plan Review Process

Number	Stakeholder
1	IDA
2	Enterprise Ireland