

Dear Sir/Madam

RE: Submission for Offaly County Council Draft County plan

I am writing to you to make a brief submission with observations on the Offaly County Development Plan 2021-2027 Stage 1. I make reference to what I think should be in a county plan on important issues such as housing, climate action, biodiversity, heritage, landscape, and community.

Housing and Sustainable living

Our open countryside is experiencing too much pressure to accommodate one-off housing. Particular pressure is seen on approach roads and on the outskirts of our struggling towns and villages. This has a detrimental and costly effect on local road conditions through poor drainage from sites, driving hazards from multiple exits and entrances, as well as the extra traffic volumes on our poorer road surfaces. It increases carbon emissions from commuting traffic compared to urban settlements, and it leads to the destruction of unique landscape and a subsequent loss of biodiversity. This also means a further inevitable decline of our villages and towns which are devoid of population.

More Specific Criteria should be used to determine the economic and social need to live in the Countryside. **The majority of people building in the countryside have a desire to do so but not a need to do so.** The holding of a herd number (issued by the department of Agriculture to active farmers) The recipient of a carer's allowance or registration with Tusla as an Early year service provider in (child-minder/Crèche) are three criteria that would demonstrate someone's clear need to live in a particular area. Farmers and those looking after rural based dependents are those who can demonstrate a need of rural housing. Letters from employers or personal statements of a supposed local need or Living arrangements should be given little weighting in planning decisions. This element of planning permission has been abused too often in the past and if it continues people with a genuine need may be excluded in future when areas are overdeveloped.

To discourage one off housing and to discourage Ribbon development the County Plan should emphasis the restriction of more than five developments alongside 250 metres of road frontage. Clustered developments rather than linear developments on road sides should be encouraged where absolutely necessary. Increased setbacks from roads and increased site sizes complete with more prescriptive guidelines on landscaping with reduce the impact of housing on the landscape. With each new one off development large amounts of hedgerow are removed with a great loss to the local ecosystem. These are replaced by ornamental hedging or walls with little or no biodiversity. **All planning applications should ask questions on what loss of habitat will occur and what will be done to negate it i.e. on site woodland planting, preserving existing hedgerows. Where possible, the attached conditions of planning permission should dictate that hedgerows remain in situ at a minimum and state any additional biodiversity measures to be carried out.**

Population increase is the only true way of sustaining towns and villages. Sprawl from the villages should be stopped by discouraging one off housing and by this infill of housing in Villages and towns will be encouraged. The location of Nursing homes should be in villages adjacent to primary care centres or health centres. Those that are resident in nursing homes can be cared for just as adequately in our villages as our towns and indeed are more likely to be from a rural background and would appreciate the semi-rural setting of a village

To be sustainable all our villages, such as my own village of Rhode should have the ability to care for the young of the village, (a crèche and a national school) and care for the elderly of the village (nursing home, primary care centre and post office)

Climate action and energy

A mix of Renewable energy sources is important in the County. Unfortunately the current renewable source being pursued in Offaly namely wind farms has limitations. These are a requirement for back-up generation power whilst they are also regarded by some of the public as having a harsh visual impact on communities. **Any pilot schemes or commercial applications for AD anaerobic digesters to produce biogas from local sources such as slurry , grasses and silage should be encouraged in future development plans and in planning decisions.** This would be a good fit for the mixed farming enterprises and also suit our existing electricity generation infrastructure. It must be borne in mind that renewable energy developments will be in the future encouraged by subsidies so developments that are unviable at present may quickly become viable and thus Offaly must be ready. Therefore future Developments should consider what is currently in the community and ensure a mix of energy sources.

Landscape and Heritage

After the cessation of production on Bord Na Mona peatlands there will be a land bank of over 27,500 hectares of land and with it there will be an opportunity for a variety of uses. Large tracts of these peatlands will allowed to revert to a natural state and /or flooded so as to use as a more efficient carbon sink. Careful Consideration and analysis of what flooding will be allowed to occur must be applied as surrounding private and productive lands and bogs may be un-intentionally flooded.

I would suggest there is an opportunity for the edges of Peat lands known as the fringes to be used for a model of environmental management by private citizens. This would be is similar to higher level Environmental Stewardship (ES) which is a land management scheme in operation in the United Kingdom. This scheme operates in uplands in national parks and on moors and could be implemented in Offaly. In practice this could see interested groups or possibly small land holders have access to Bord Na Mona lands for their use but as part of the various environmental schemes these “holdings” could conserve wildlife such as the grey partridge (biodiversity) or maintain and enhance landscape quality and character, or help to promote public access to traditional turf cutting banks. By skilfully managing the fringes the public can have access and ownership of Offaly biggest resource but not in a way that would comprise the central land bank which is best kept in its natural state.

Finally any Development plan should ensure that turf cutting for domestic consumption will continue in the county including on SAC's provided it does not threaten the integrity of the sites. This will ensure our shared heritage is protected and preserved like the bogs themselves for future generations.