

Offaly County Development Plan 2021 - 2027

Chief Executive's Report on Draft Consultation Stage



March 2021



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1 Requirement for CE's Report

Planning Authorities are legally obliged to review their existing development plan and prepare a new development plan. The requirement to undertake this Chief Executive's (CE) Report is part of the wider development plan making process as set out in the Act.

The County Development Plan is a land use plan which sets out a vision and an overall strategy for the proper planning and sustainable development of the County for a six-year period. The Draft Offaly County Development Plan comprises two volumes (Volume 1 Written Statement and Volume 2 Settlement Plans).

This report is a requirement of section 12 (4) of the Planning and Development Act 2000 (as amended) whereby the Planning Authority is obliged to *'prepare a report on any submissions or observations received'* within a specified submission/observation period. Not later than 22 weeks after publishing notice of the preparation of the draft development plan, the planning authority shall prepare the CE report. Therefore, this CE report is required to be circulated to the Elected Members of Offaly County Council for their consideration.

The CE report is required to be published on the website of the planning authority as soon as practicable following its submission to the elected members.

The CE's Report is required to:

- List the persons or bodies who made submissions or observations.
- Summarise the recommendations, submissions and observations made by the Office of the Planning Regulator (OPR).
- Summarise the submissions and observations made by any other person.
- Give the response of the CE on the issues raised taking account of (a) any directions of the members of the authority, (b) the proper planning and sustainable development of the area, (c) the statutory obligations of any local authority in the area, and (d) any relevant policies or objectives of the Government or of any Minister of the Government.
- Summarise the issues raised and the recommendations made by the Eastern and Midland Regional Assembly in its written submissions and outline the recommendations of the CE in relation to the manner in which those issues and recommendations should be addressed in the Development Plan.

2 Consultation Undertaken on Draft Plan

2.1 Methods of Consultation

The public consultation stage of the draft Offaly County Development Plan 2021-2027 took place from the 27th July 2020 to the 7th October 2020 (inclusive).

Public consultation was facilitated through a number of media, namely;

- The draft Plan was uploaded onto a dedicated webpage www.offaly.ie/cdp2021-2027.
- Hard copies of the draft plan were available for inspection at the following locations:
 - Offaly County Council, Áras an Chontae, Charleville Road, County Offaly.
 - Birr Municipal District, Wilmer Road, Birr, County Offaly.
 - Tullamore Municipal District, Cormac Street, Tullamore, County Offaly.
 - Edenderry Municipal District, Town Hall, Edenderry, County Offaly.
 - Branch Libraries at Birr, Clara, Edenderry and Tullamore (during branch opening hours).
- The statutory public notice was advertised in locally circulating newspapers, a copy of which is provided in Appendix A;

Local Papers
Leinster Express
Midlands Tribune
Offaly Topic
Tullamore Tribune
Offaly Independent

- Notification of the draft Plan and a link to the website showing the draft Plan was issued to:
 - The prescribed authorities listed in Appendix C (required under section 12(1)(a) of the Planning Act).
 - the Public Participation Network (PPN) who distributed them to 504 community & voluntary groups.
 - Offaly's elected members and Oireachtas members.
- Notification of the draft Plan were advertised on the Council's Twitter, Facebook and Instagram accounts.

2.2 Submissions

Submissions could be made online through a tailor-made portal, or by hard copy in the post.

196 no. submissions were received within the statutory timeframe. The list of submissions received within the statutory timeframe for public consultation is outlined in Appendix B.

There were 10 no. late submissions received outside the statutory timeframe for accepting submissions/observations which cannot be considered. They are listed in Appendix D.

3 Summary of Submissions Received Including the CE's Policy Recommendations

3.1 Introduction

This section contains a summary of the 196 no. written submissions received as part of the draft Plan consultation process, and the response of the CE to the recommendations / submissions / observations raised therein.

The CE's response on the issues raised take account of (a) any directions of the members of the authority, (b) the proper planning and sustainable development of the area, (c) the statutory obligations of any local authority in the area, and (d) any relevant policies or objectives of the Government or of any Minister of the Government.

Submissions are addressed under topics in section 3.2 below. Appendix B of the CE Report lists the reference numbers and accompanying names of all submissions.

The submission received by the Office of the Planning Regulator (OPR) and the Eastern and Midland Regional Assembly (EMRA) are included in sections 4 and 5 respectively of this CE Report. Submissions in relation to Protected Structures are included in section 6.

Recommended proposed new text as an amendment to the draft Plan is coloured in red in the CE Responses, whilst recommended text to be removed from the draft Plan is indicated by strikethrough in the CE Responses.

Please note that submission no. CDP/D/187 is addressed in conjunction with no. CDP/D/70. Also, submission no. CDP/D/151 is addressed in conjunction with no. CDP/D/68.

Based on the making of the Section 28 Ministerial Guidelines titled 'Housing Supply Target Methodology for Development Planning ', (December 2020), amendments have been made to the 'County Offaly Housng Strategy and Housing Need Demand Assessment 2021-2027 - Draft' which formed part of the draft Offaly County Development Plan. The recommended amended document forms part of this CE Report as a separate addendum document, and it is recommended as the up to date copy to form part of the County Development Plan.

3.2 Submissions

3.2.1 Towns

3.2.1.1 Tullamore

[Ref: CDP/D/11](#)

Person / Body:

Murray Architecture on behalf of S. Earley

Summary of submissions / observations:

Notes that green (open space) zoning as per the draft plan encroaches on Site No. 14 Cloncollog, Tullamore which impacts on the potential of the site in question.

Requests that the entire site be rezoned as residential as the site was sold by Offaly County Council as a residential site.



CE Response:

This draft zoning is a discrepancy from the previous Tullamore Town and Environs Development Plan 2010-2014.

The entirety of site no. 14 should be zoned Existing Residential as per map below, an increase of 170m² approximately. It is advised to amend the zoning to residential for the full site, as per the submission.

[Ref: CDP/D/14](#) (Submission CDP/D/121 relates to the same land / site)

Person / Body:

Sean Garry

Summary of submissions / observations:

Requests the rezoning of lands at the corner of Lock House View on the Sragh Road in Tullamore from Open Space in the Town and Environs Development Plan 2010-2016 as extended to New Residential or Strategic Residential Reserve.

States that the lands in question have been used as a dumping ground. Photographic evidence of the dumping forms part of the submission.



CE Response:

These lands have already been proposed for zoning to 'existing residential' in the Draft Offaly County Development Plan 2021- 2027. The lands are therefore no longer proposed to be zoned for Open Space in the draft zoning objectives map for Tullamore.

This zoning of Existing Residential allows for the conservation and enhancement of the quality and character of existing residential areas, to protect residential amenities and to allow for small scale infill development which is appropriate to the character and pattern of development in the area. Existing residential zoned land may also provide for small scale home-based employment uses where the primary residential use will be maintained.
No change recommended to the draft plan.

Ref: CDP/D/21**Person / Body:****Ray Carroll****Summary of submissions / observations:**

Requests that consideration be given to introducing a one-way vehicular traffic system at Bury Bridge, Tullamore (in an easterly direction from Convent Rd./ St. Brigid's Place to the Daingean Road) considering the significant number of pedestrians that traverse Bury Bridge; and to provide a footpath at this location.

CE Response:

A Local Area Plan (LAP) will be prepared for Tullamore after the adoption of the Offaly County Development Plan 2021-2027. Chapter 2 of the draft plan includes the following relevant objective: **CSO-04** It is an objective of the Council to make Local Area Plans for Tullamore and Birr. During the transition period between adoption of this County Development Plan and the adoption of the Local Area Plans for Tullamore and Birr, the objectives (including zoning objectives), policies and standards in this County Development Plan shall apply to Tullamore and Birr.

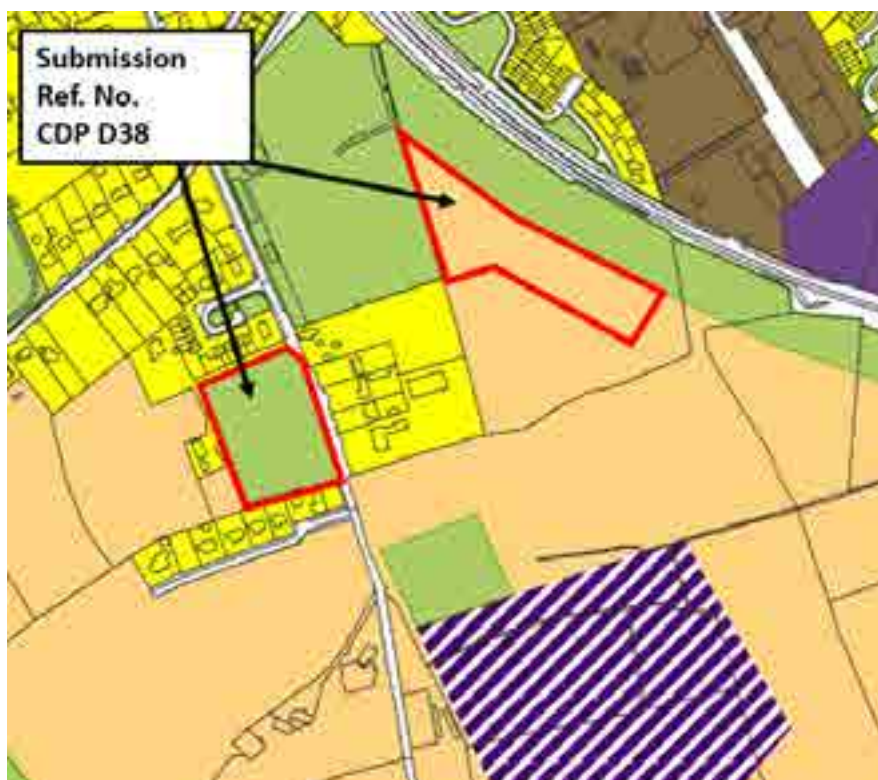
As stated in the RSES, a Local Transport Plan (LTP) is required for Tullamore as it is designated as a Key Town in the RSES and the policies, objectives and measures which emerge from the LTP shall be incorporated into the LAP. Chapter 8 of the draft plan includes the following relevant objective: **SMAO-02** It is an objective of the Council to prepare a Local Transport Plan for the Key Town of Tullamore in conjunction with the National Transport Authority.

The LTP will examine permeability and sustainable mobility within Tullamore. Accordingly, the suggestions in the submission cannot be considered at this stage as it is outside the scope of the Offaly County Development Plan.

Offaly County Council has applied for funding under the Urban Regeneration and Development Fund for Tullamore in 2020, which if successful will include '*Tullamore Regeneration Framework*', an element of which will be A Strategy for Sustainable Access & Permeability.

Ref: CDP/D/38**Person / Body:****Stephen Lynam – Tullamore Rugby Club****Summary of submissions / observations:**

- a) Requests that an existing rugby pitch, which is on the opposite side of the road to the main rugby club, in Spollanstown, with an area of 1.15ha. be rezoned to New Residential and that 0.97ha (adjoining the main rugby pitches) located to the north east of the existing Rugby Club grounds be zoned as Open Space to accommodate an extension to the rugby club playing/training pitches.



CE Response:

- a) This proposal would represent a swap of an Open Space zone (1.15ha.) in the draft Plan to New Residential and a swap from a Strategic Residential Reserve zone to Open Space (0.97 ha.). The proposal would constitute a net increase of 1.15ha, of New Residential in the Plan area.

In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that *'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'*. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that *'Residential development 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.'*

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

There are other lands identified as being more appropriately located to deliver the Core Strategy housing allocation for Tullamore over the lifetime of the development plan, consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

Further, there is a policy in the draft plan to preserve the land use of existing public and private recreation areas, including sports clubs.

SICCDP-17 It is Council policy to preserve the land use of existing public and private recreation areas, including sports clubs, built leisure facilities and open space areas. In exceptional circumstances, a change of use may be sought, but must demonstrate that alternative recreational provisions are provided in a suitable location. Further, it is Council policy to identify, where possible and appropriate, sites for possible future extensions of public open space areas and amenities within settlement plans.

No change proposed.

[Ref: CDP/D/54](#)

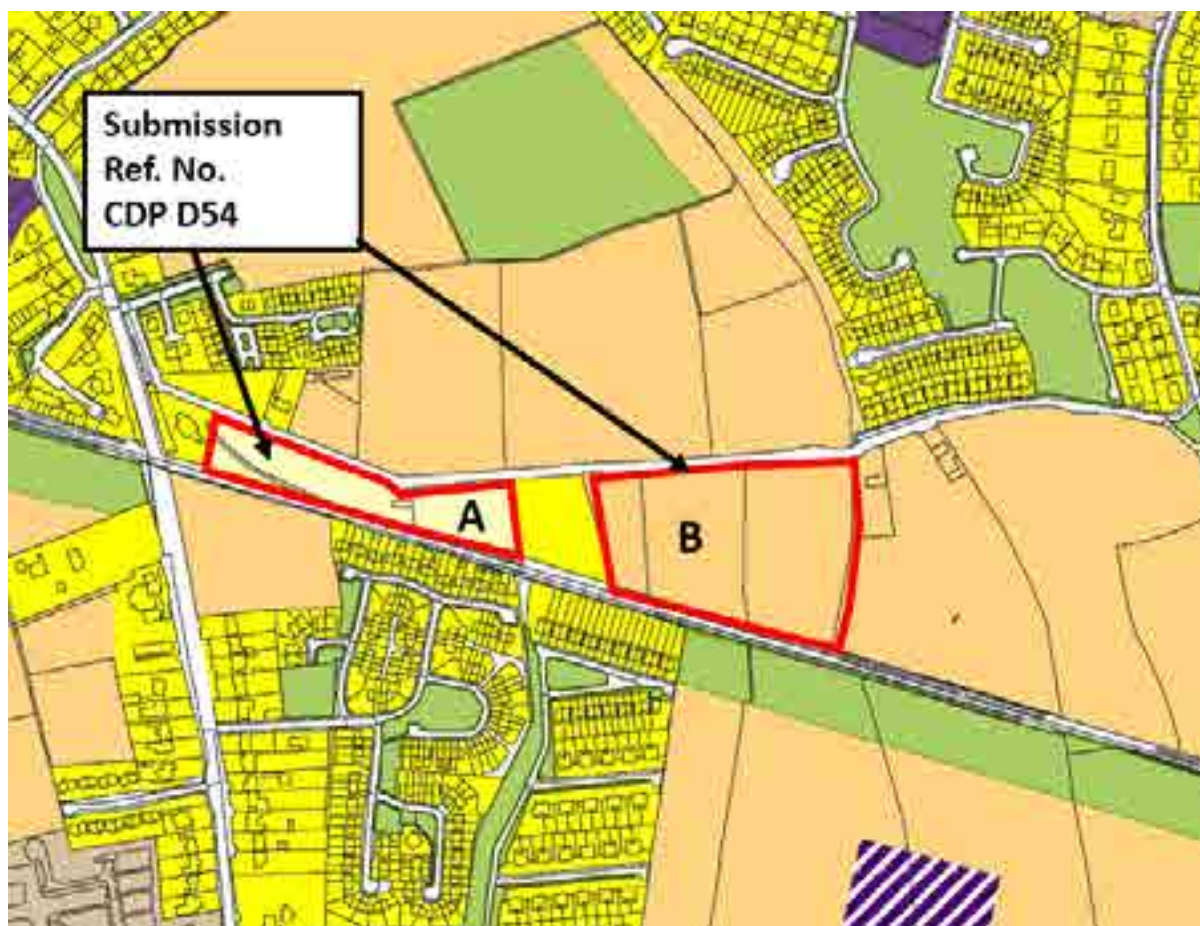
Person / Body:

Cllr. Eddie Fitzpatrick /Ruairi Whelan Consulting Engineers, on behalf of Landowner

Summary of submissions / observations:

This submission relates to 2 parcels of land on Chancery Lane, Tullamore. Area A and Area B as identified in the accompanying maps.

- (i) Area A is zoned New Residential as per the Draft Plan and it is requested that its zoning would be retained.
- (ii) Area B is zoned Strategic Residential Reserve as per the draft plan and it is requested that this be zoned New Residential. It is stated that Area B is zoned residential in the Tullamore Town and Environs Development Plan (TTEDP) 2010 -2016, (as extended), and retaining this zoning would ensure multi-modal connectivity to existing developments and facilities and adjacent lands which are zoned for development
- (iii) The owner of the lands has commissioned an upcoming application for a housing scheme on these lands.



CE Response:

In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that '*From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'*. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that '*Residential development 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.'*

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

There are other lands identified as being more appropriately located to deliver the Core Strategy housing allocation for Tullamore over the lifetime of the development plan, consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

No change proposed.

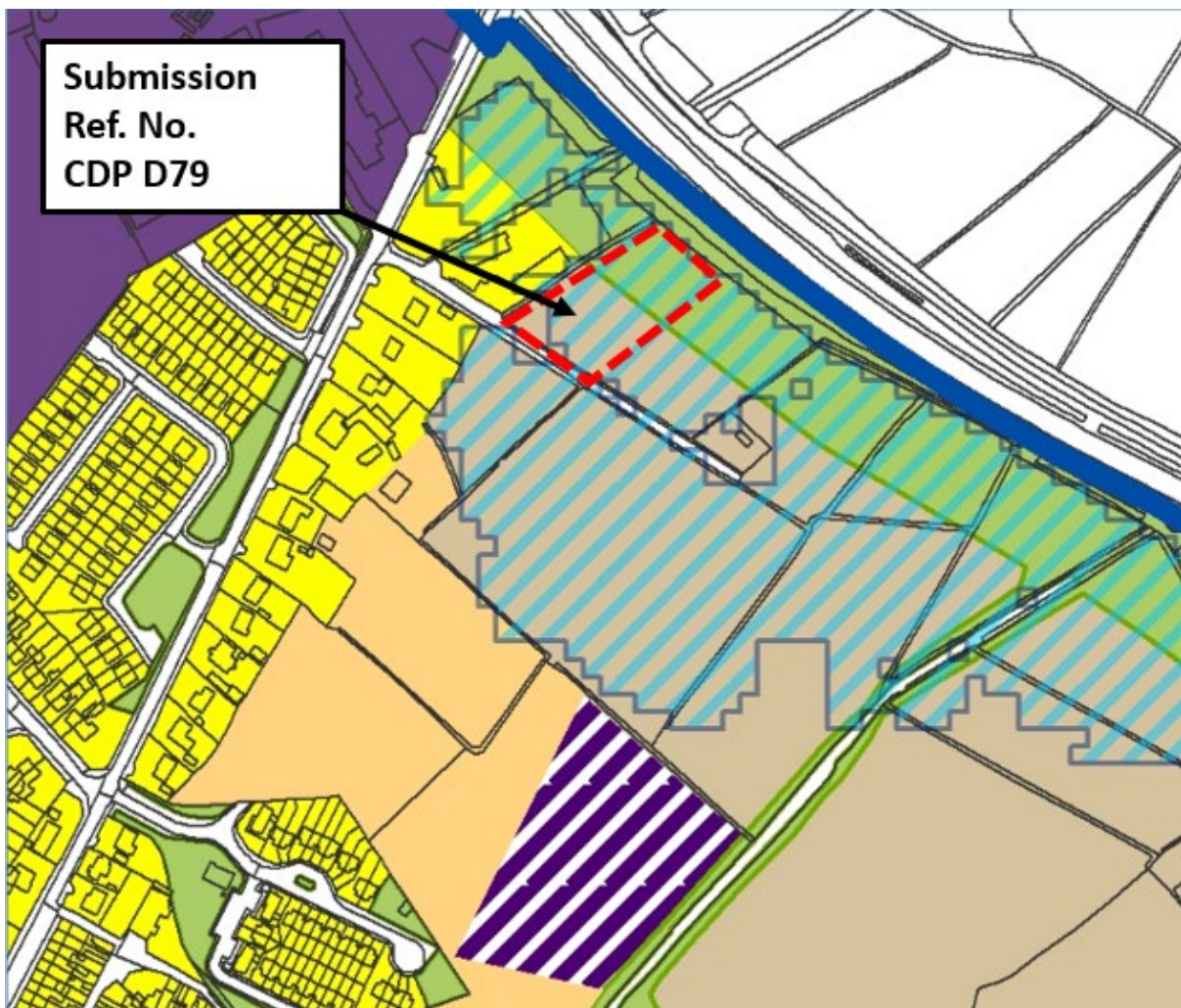
[Ref: CDP/D/79](#)

Person / Body:

Colin Brady

Summary of submissions / observations:

This submission states a pre-planning application is in preparation for a housing estate on lands at Puttaghaun which are currently zoned residential in the Tullamore Town and Environs Development Plan 2010 -2016, as extended. A sketch drawing for a scheme of 17 units is submitted.



CE Response:

These lands are zoned part Enterprise and Employment as defined in section 12.4.5 of the Draft Plan, and part Open Space Amenity and Recreation and are entirely within the Constrained Land Use zoning. Please see definitions below.

12.4.5: Enterprise and Employment

This zoning promotes the development of employment uses that reinforce the enterprise and employment function of the subject area as a whole and require high environmental and design standards. Appropriate uses in this zoning include, for example research and development, light industry, retail warehousing, car showrooms, offices, employment and enterprise related uses within a high quality campus/park type development.

12.6.1: Constrained Land Uses

Flood risk areas in settlement plans are represented by a 'Constrained Land Use' designation. This designation generally limits new development, but will facilitate existing development uses within these areas that may require small scale development such as small extensions. Development proposals within these areas shall be accompanied by a detailed Flood Risk Assessment, carried out in accordance with The Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014 (or as updated), which shall assess the risks of flooding associated with the proposed development.

Proposals shall only be considered favourably where it is demonstrated to the satisfaction of the Planning Authority that they would not have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities, or increase the risk of flooding to other locations and be in accordance with the proper planning and sustainable development of the area. The nature and design of structural and non-structural flood risk management measures required for development in such areas will also be required to be demonstrated, to ensure that flood hazard and risk will not be increased. Measures proposed shall follow best practice in the management of health and safety for users and residents of the development.

As these lands are in Flood Zone B of the Constrained Land Use Designation, Enterprise and Employment land use zoning is considered appropriate subject to satisfactory Flood Risk Assessment, however residential zoning as a vulnerable use would not be considered appropriate. It is advised not to amend the draft plan in response to this submission.

The Enterprise and Employment zone is acceptable at this location as this is Flood Zone B of the Constrained Land Use Zone.

[Ref: CDP/D/89](#)

Person / Body:

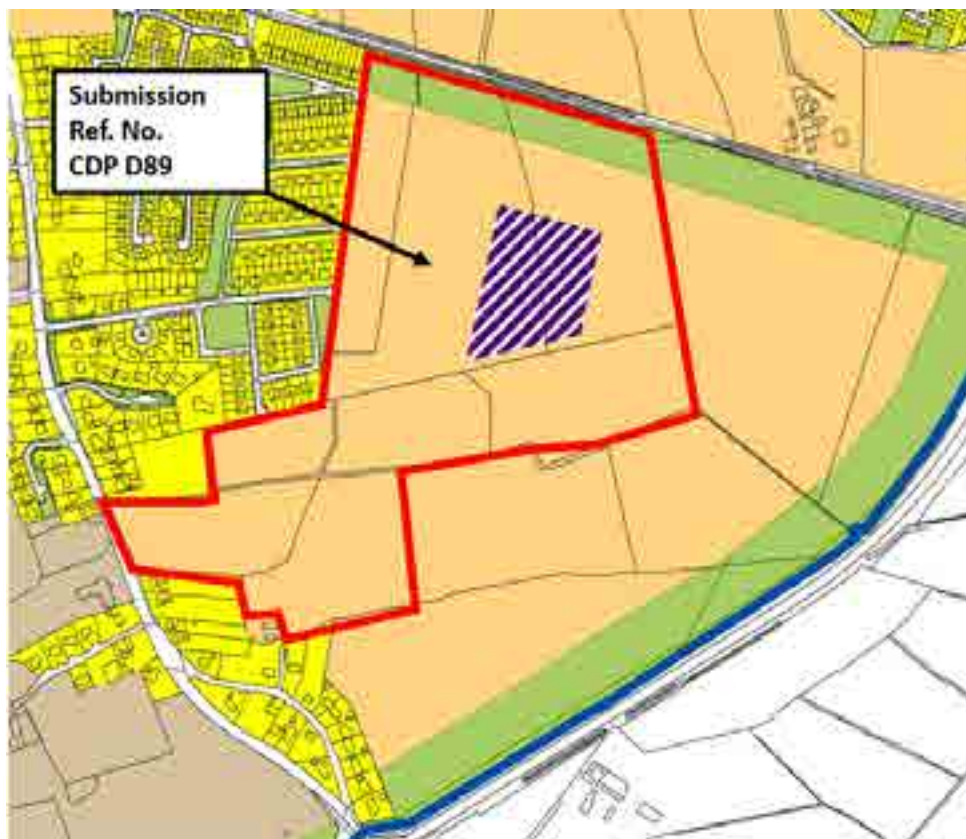
Steinfort Investment Fund

Summary of submissions / observations:

- a) (i) This submission relates to lands extending to c.25ha to the southeast of Tullamore Town Centre in the townlands of Gayfield and Clonminch and seeks the zoning of these lands as 'New Residential' in the Tullamore Zoning Map as contained in the Draft Offaly County Development Plan 2021-2021.
 - (ii) Under the Tullamore Town and Environs Development Plan 2010-2016 (as varied and extended) the majority of the submission lands are zoned 'Residential' with a Neighbourhood Centre and Public/Community/Educational zoning objective affecting the lands.
 - (iii) The draft zoning objectives map which forms part of the Draft Offaly County Development Plan, proposes to zone the submission lands as '*Strategic Residential Reserve*', '*Strategic Community Services/Facilities Reserve*' and '*Open Space, Amenity and Recreation*'.
- b) Part of the submission site lands are the subject of a Strategic Housing Development (SHD) planning application (ABP-307832 -20) for 358 no. residential units, childcare facility, neighbourhood centre and site development works which is currently under consideration by An Bord Pleanála. This application will supply supporting social and community infrastructure, including cycle links on the Clonminch Road linking the site to the town centre. This SHD application of itself, provides strong evidence that these lands are serviceable and available for development during the period of the Development Plan.
- c) It has been demonstrated through confirmation of feasibility and design acceptance by Irish Water that the proposed Strategic Housing Development lands are serviceable.
- d) It is submitted that the proposed Strategic Residential Reserve land use zoning applied to the submission lands is unfounded and in direct conflict with the evidenced based approach of the National Planning Framework and Regional Spatial and Economic Strategy which places greater emphasis an actual delivery of housing.
- e) Planning Authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan". Appendix 3 of the NPF, "This infrastructural assessment must be aligned with the approved infrastructural investment programme(s) of the relevant delivery agency(ies)
- f) In relation to the HNDA and Core Strategy, the submission states that there is an underestimation of the quantity of lands required for Tullamore to grow in line with the NPF and RSES.
- g) Notes that the location of the majority of larger sized sites is to the north of the town, providing no market choice, due to lack of zoning in the southern lands.
- h) It is a National Policy Objective (73a) for Guidance to "*be developed to enable planning authorities to apply an order of priority for development of land, taking account of proper planning and sustainable development, particularly in the case of adjoining interdependent landholdings*". In the absence of official Guidelines, it is submitted that the preparation of the HNDA is only the first step and source of evidence to inform plan-ma

king and decision-taking, and the identification of a 6-year supply of housing land. The full assessment should involve a process whereby-

- Sites with potential for development are identified
 - An assessment is undertaken of their development potential
 - An assessment is undertaken of their suitability for development and availability and the likelihood of development coming forward.
- i)* The land supply for a growth centre like Tullamore should consist of a supply of deliverable sites sufficient to provide housing as set out in the policies of the draft Development Plan and HNDA. There is no information provided for the Draft Tullamore zoning map on site viability, ownership constraints or infrastructural provision.
- j)* The submission outlines objective CSO-01 to monitor and manage the delivery of residential development in County Offaly through the development management process to ensure it is in line with the Core Strategy. In this respect, the Planning Authority shall maintain a record of residential development permitted in individual settlements in order to ensure compliance with the population a/locations defined by the Core Strategy Table and states that delivery of all residential development will be carefully monitored during the lifetime of the Plan to ensure it does not cumulatively result in the housing units and population been exceeded, however, there is no provision for when targets are not being achieved
- k)* The development of the lands would generate much needed housing as well as construction jobs in the area, including social housing in accordance with the Part V social housing commitments contained in the SHD application.



CE Response:

- a) The submission requests that the site be zoned New Residential to allow for residential development.

National Strategic Outcome 1 (NSO 1) of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development 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.'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

Zoning the submission lands for residential development would create a large suburban style housing area on the periphery of the town a move which would not support compact growth. There are other lands identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the development plan, consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

- b) It is noted that this Strategic Housing Development (SHD ABP-307832-20) application was refused by An Bord Pleanála, in November 2020.
- c) The Environment and Water Services Section of Offaly County Council do not support that contention that it is feasible to service these land over the lifetime of the plan. The proposed works to the network upgrade involve the laying of a new interceptor over a distance of approx. 1.75km, to Tullamore waste water treatment plant to reduce loading on existing pumping stations in the town. No timeframe for completion of such works has been confirmed. These works area still at design stage and are unlikely to be constructed for some years.
- d) It is deemed appropriate to zone these lands for Strategic Residential Reserve as set out in the Chapter 12 Land use Zoning Objective of the Draft Plan, due to their peripherality and lack of services, and in accordance with the Principle for Growth, in Section 2.1.4 of the Draft County Development Plan

Strategic Residential Reserve *This categorisation includes lands which are not currently and not proposed to be sufficiently serviced to support development within the lifetime of this Plan. These lands are not developable within this plan period. The inclusion of Strategic Residential Reserve lands in this Plan will not in any way infer a prior commitment on the*

part of Offaly County Council regarding their future zoning in subsequent development plans. Such a decision will be considered within the framework of national and regional population targets applicable at that time, infrastructural services and the proper planning and sustainable development of the county, including environmental assessment requirements and compliance with the Flood Risk Management Guidelines.

Land Use Zoning Objective – Strategic Residential Reserve

It is an objective of the Council to:

LUZO-05 Provide lands for development at some time in the future but it will not be considered for development purposes during the current plan period.

Chapter 12 Land Use Zoning Objective

The Core Strategy as set out in Chapter 2 Core Strategy, Settlement Strategy and Housing Strategy of the draft plan outlines the Principle for Growth Section 2.1.4 for the county and as outlined in the response to the Office of the Planning Regulator's (OPR'S) submission CDP/D/172, the zoning plan for Tullamore is built on the principle of the sequential approach.

Section 4.19 (f) of the Development Plan Guidelines 2007 relates to the 'Sequential Approach'. It states '*In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided); (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan*'.

It is considered that the Plan adheres to the above section of the Development Plan Guidelines. Accordingly, a paragraph will be inserted into the Plan as follows:

'Sequential Approach:

In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach was taken to the zoning of land for development: (i) Zoning extends outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes given preference (i.e. 'leapfrogging' to more remote areas has been avoided); (ii) A strong emphasis is placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas zoned are contiguous to existing zoned development lands'.

- e) A written Infrastructural Assessment Report will be included in the Plan which will identify the infrastructure available and its proximity to lands for servicing purposes. It will state the deficiencies and proposals for improvement within the life of the Plan. A copy of this is inserted in Appendix 4 at the end of the OPR summary submission of this CE Report. In the

actual Co. Development Plan, it will be known as Appendix 2. Cross-referencing will be made to it in the town and village settlement plans as follows:

‘Appendix 2 of Volume 1 of the County Development Plan includes an Infrastructural Assessment Report which addresses infrastructure provision, deficiencies and investment proposals relating to the towns and villages’.

- f) The approach to realise County Offaly’s population target as set out in the NPF Implementation roadmap, and the provision of this within the settlements and countryside of County Offaly is set out in a robust evidence based analysis of demand, past delivery and the potential of the county’s settlements. This involved an analysis of the capacity of towns and villages throughout the county to accommodate future growth to support the settlement strategy and which examined key issues including: Strategic Environmental Assessment of this Plan;
- NPF, National Development Plan (NDP) and RSES;
 - Existing population base and other demographic factors;
 - Availability of social and physical infrastructure; existing and planned;
 - Environmental constraints;
 - Settlement form;
 - Vacancy, dereliction, brownfield / infill sites, unfinished housing developments;
 - Planning history; and
 - Potential for economic and social development.

Additional to that, and on foot of the OPR submission CDP/D/172, the population growth rate of Tullamore will be revised from a 33% rate of growth to a 30% rate of growth in accordance with National Policy Objective (NPO) 9 of the National Planning Framework which states:

‘In each Regional Assembly area, settlements not identified in Policy 2a of 2b of this Framework, may be identified for significant (i.e. 30% or more above 2016 population levels) rates of population growth at regional and local planning stages, provided this is subject to:

- *Agreement (regional assembly, metropolitan area and / or local authority as appropriate);*
- *Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and / or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall target; and*
- *A co-ordinated strategy that ensures alignment with investment in infrastructure that the provision of employment, together with supporting amenities and services’.*

- g) The southern part of Tullamore will require significant levels of investment by Irish Water in order to service the lands zoned Strategic Residential Reserve, which are primarily located in the Southern Masterplan area of the Tullamore Town and Environs Development Plan 2010-2016 as extended. While investment is also required to service the lands to the northern part of the settlement of Tullamore, it is considered more feasible, as advised by the Environment and Water Services Section of Offaly County Council to do so over the lifetime of the Plan 2021-2027.

- h) The planning Authority in the application of the Principles of Growth and assessment criteria applied to potential developable sites and the Core Strategy allocation for the settlement of Tullamore has had regard to potential deliverability of sites insofar as possible under the Planning and Development Act 2000, (as amended).
- i) The monitoring and management process will ensure compliance with population allocations for respective settlements, however should the achievement of these targets not be achieved this is outside the realm of the Planning Authority, due to the multiplicity of factors which may be contributory to this.
- j) Noted
- k) Noted

Ref: CDP/D/101

Person / Body:

Tullamore & District Chamber of Commerce.

Summary of submissions / observations:

- a) States that Tullamore & District Chamber of Commerce is in favour of the prioritisation of Tullamore as a "Key Growth Settlement" and economic engine for the entire County and region."
- b) Acknowledges that there is recognition and planning for the primacy of Tullamore as the key future economic driver of County Offaly, with the increased zoning to the north of the town for industrial development. This was part of the pre-draft submission to 'Identify and develop a new 100 plus acre IDA industrial site.'
- c) States their opposition in relation to the reduction to the border around the town's retail core. 'The proposed border only encompasses one of nine opportunity sites identified in the plan, which makes no sense'. At a minimum, the retail core should encompass all opportunity sites, except no. 9 which is located adjacent to the bypass. States it does not take account of retail developments that have already happened '*outside of the core*', such as the new Lidl on Church Street and the Retail Park in Cloncollig or the planning permission already granted at Coen's Yard.
- d) Concerned that the proposed housing and settlement strategy aspect of the draft plan will place unnecessary limitations on Tullamore's ability to fulfil its function as a Key Growth Settlement. In this respect the submission states that:
 - (ii) extensive lands to the south of the canal, previously zoned residential, have now been reclassified as "Strategic Residential Reserve"; and
 - (iii) there is a miss match in terms of the school provision and the location of the future housing lands.
- e) States that the impact of COVID-19 has accelerated a shift to remote working.

- f) There is an opportunity for Offaly County Council to encourage Irish Water in providing adequate water supply to areas of the town which need to be developed.
- g) Raises the issue of developing a double rail track from Portarlington / Tullamore with commuter time schedules to / from Tullamore the same as Portarlington.
- h) Requests the delivery of the extension of the M6 to Tullamore and also to improve North / South and inter regional connectivity by delivering a dual carriageway between Tullamore and Portlaoise.
- i) Supports Midland Regional Hospital Tullamore in its pursuit to gain University Status.
- j) Requests dedicated cycling tracks around the entire town of Tullamore linking all schools.

Notes the extensive emphasis on the development and provision of greenways and blueways, but would like to see more emphasis and detail on the linking of schools and future residential developments. Requests an accessibility and permeability plan for Tullamore.

- k) Looks for improvement in connectivity within the town e.g. open the Library bridge and walkway from Market Sq. to O'Connor Sq. and Tanyard to High St.
- l) Looks to progress the redevelopment of the Tullamore Harbour. Acknowledges the provision of the Harbour as Opportunity Site no. 1 and the progress made in re-locating the Waterways Ireland depot.
- m) Offaly with such a high percentage of land in public ownership, is a prime candidate for reforestation and re-wilding. Environments with significant and mixed sources of locally generated renewable energy, forestry and biodiversity are prime candidates for *data centre development*.

CE Response:

- a) Noted. Tullamore is designated as a 'Key Town' in the Regional Spatial and Economic Strategy (RSES).
- b) There is a requirement from the RSES to identify Strategic Employment Zones for Tullamore as a Key Town. Section 12.6.2 of the Draft Plan outlines the land use zoning objectives in relation to Strategic Employment Zones (SEZs) as follows;

12.6.2 to Strategic Employment Zones (particular to Tullamore)

Reflecting Regional Policy Objective 4.27 of the Regional Spatial and Economic Strategy which states that Key Towns (such as Tullamore) shall act as economic drivers and provide for strategic employment locations to improve the economic base by increasing the ratio of jobs to workers, it is an objective of the Plan to provide two Strategic Employment Zones (SEZ) within the settlement boundary of Tullamore town in the following areas:

- *Ardan Road; and*
- *Ballyduff.*

The purpose of this objective is to facilitate strategic large scale employment in development zones in a sequential manner to promote sustainable compact growth in tandem with the

delivery of infrastructure and enabling services. These zones have development capacity, good accessibility, availability of a land bank of at least 100 acres in size and potential to deliver significant economic development and employment creation.

The proposed Ardan Road SEZ has potential to cater for the expansion of Midland Regional Hospital Tullamore and its continued development as a Teaching/University Hospital and/or to provide a Med or Bio Technology Park with linkages to the Hospital, whilst the proposed Ballyduff SEZ has the potential to provide a Business / Technology Park, leveraging its proximity to the Axis Business Park, Burlington Business Park and Srah IDA Business Park in the area.

The lands at Ardan Road SEZ (which include the submission lands) are identified due to their strategic location in relation to easy access to / from the M6 Motorway, proximity to the Midlands Regional Hospital Tullamore, the availability of a land bank and their potential to deliver significant economic development and employment creation. Notwithstanding the RSES requirement outlined above, a land bank of this scale and potential has been identified as a priority for Tullamore in recent times.

The Planning Authority has had consultation with the IDA, Tullamore and District Chamber of Commerce and the HSE in relation to the proposed SEZs and other issues relating to Employment zones in Tullamore and the wider county. It is noted that the SEZ requirement has arisen from the RSES and applies to Tullamore Key Town as evidenced in RPO 4.27 of the RSES which states '*Key towns shall act as economic drivers and provide for strategic employment locations to improve their economic base by increasing the ratio of jobs to workers*'.

c) It is noted that the submission states that the delineations of the core retail area does not take account of retail developments that have already happened '*outside of the core*'. The Retail Planning Guidelines (2012) define retail areas as '*that part of a town centre which is primarily devoted to shopping*'. Therefore, the core retail area in Tullamore contains the primary retail streets of the centre where the main concentration of retail activity takes place. In light of this it is not recommended to change the boundary of the core retail area. It is recommended to insert the red text into chapter 7 as follows for clarity purposes:

Extract from Chapter 7 of draft Plan regarding Core Retail Areas:

*'Volume 2 of the Development Plan provides for settlement plans for all settlement areas within Offaly (except where a separate Local Area Plan exists). The core retail area of each settlement area has been delineated to identify clearly that part of a town centre which is primarily devoted to shopping as distinct from the wider town or village centre / mixed use zoning objective. **Core retail areas contain the primary retail streets of a centre where the main concentration of retail activity takes place.** Identifying and delineating core retail areas allows a focused approach for retailing and town / village centre action initiatives as well as the proper application of the sequential approach to retail development'.*

The Core Retail Area and the town centre / mixed use zoning are different, with the latter encapsulating a wider area with a multiplicity of uses, such as educational, business, recreational, residential and employment, and also an important retail function. It would not be appropriate to identify a Core Retail Area encapsulating all of the Opportunity sites, (bar site no. 9) and giving it a primary retail function as suggested in the submission.

Identifying and delineating core retail areas allows a focused approach for retailing and town / village centre action initiatives as well as the proper application of the sequential approach to retail development.

The proposal to extend the Core Retail Area into wider areas, would not fit with the current definition for Core Retail Areas. Retail development can still be considered outside the Core Retail Area based on the sequential test as set out in the Retail Planning Guidelines. By setting the Core Retail Area to reflect the streets primarily devoted to shopping, it helps safeguard the vitality and vibrancy of the town centre.

d) (i) The submission states the future growth potential of Tullamore is constrained by the Core Strategy and lack of ambition and that more lands should be zoned to the south of the town, on lands identified in the draft Plan as Strategic Residential Reserve.

National Strategic Outcome 1 (NSO 1) of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development 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.'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

The submission requests that large tracts of lands to the south of the settlement of Tullamore (88.8ha.) be zoned 'new residential' in addition to the new residential already proposed in the Draft Plan. (See map below). Zoning the submission lands for 'new residential' development would create an excess of New Residential Zoned lands for the Town of Tullamore, a move which would not support compact growth. There are other lands identified as being more appropriately located closer to the town centre and serviced, to deliver the Core Strategy housing allocation for the town over the lifetime of the development plan, consistent with NSO 1, RSO 2 and the draft Plan CSP-02 and CSO-02.

The Core Strategy as set out in Chapter 2 Core Strategy, Settlement Strategy and Housing Strategy of the draft plan outlines the Principle for Growth Section 2.1.4 for the county and as outlined in the response to the Office of the Planning Regulator's (OPR'S) submission CDP/D/172, the zoning plan for Tullamore is built on the principle of the sequential approach.

Section 4.19 (f) of the Development Plan Guidelines 2007 relates to the 'Sequential Approach'. It states *'In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided); (ii) A strong emphasis*

should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan’.

It is considered that the Plan adheres to the above section of the Development Plan Guidelines. Accordingly, the following paragraph is recommended to be inserted into the Plan as follows:

‘Sequential Approach:

In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach was taken to the zoning of land for development: (i) Zoning extends outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes given preference (i.e. ‘leapfrogging’ to more remote areas has been avoided); (ii) A strong emphasis is placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas zoned are contiguous to existing zoned development lands’.

A written Infrastructural Assessment Report will be included in the Plan which will identify the infrastructure available and its proximity to lands for servicing purposes. It will state the deficiencies and proposals for improvement within the life of the Plan. A copy of this is inserted in Appendix 4 at the end of the OPR summary submission of this CE Report. In the actual Co. Development Plan, it will be known as Appendix 2. Cross-referencing will be made to it in the town and village settlement plans as follows:

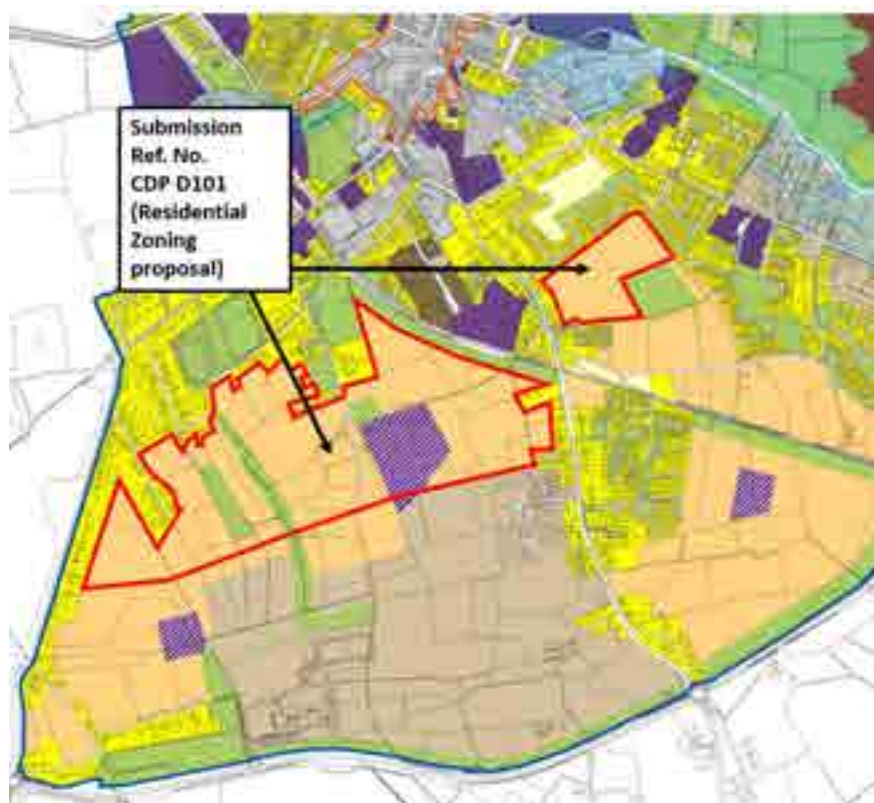
‘Appendix 2 of Volume 1 of the County Development Plan includes an Infrastructural Assessment Report which addresses infrastructure provision, deficiencies and investment proposals relating to the towns and villages’.

The approach to realise County Offaly’s population target as set out in the NPF Implementation roadmap, and the provision of this within the settlements and countryside of County Offaly is set out in a robust evidence based analysis of demand, past delivery and the potential of the county’s settlements. This involved an analysis of the capacity of towns and villages throughout the county to accommodate future growth to support the settlement strategy and which examined key issues including: Strategic Environmental Assessment of this Plan;

- NPF, National Development Plan (NDP) and RSES;
- Existing population base and other demographic factors;
- Availability of social and physical infrastructure; existing and planned;
- Environmental constraints;
- Settlement form;
- Vacancy, dereliction, brownfield / infill sites, unfinished housing developments;
- Planning history; and

- Potential for economic and social development.

(ii) The southern part of Tullamore will require significant levels of investment by Irish Water in order to service the lands zoned Strategic Residential Reserve, which are primarily located in the Southern Masterplan area of the Tullamore Town and Environs Development Plan 2010-2016 as extended. While investment is also required to service the lands to the northern part of the settlement of Tullamore, it is considered more feasible, as advised by the Environment and Water Services Section of Offaly County Council to do so over the lifetime of the Development Plan 2021-2027.



(iii) The Dept. of Education's submission Reference no. CDP/D/145 has recognised that there will be a requirement for primary and post primary schools in Tullamore in the life time of the next plan. In relation to the settlement of Tullamore, there are 27ha. of greenfield land zoned as Community Services/ Facilities in the draft Tullamore zoning objectives maps. During the making of the forthcoming Local Area Plan for Tullamore the Council will consult with the Department of Education and other relevant stakeholders.

Policy SICCDP-02 in the draft Plan provides for the identification of sites for community facilities:
SICCDP-02: It is Council policy to identify and facilitate the development of suitable sites for community facilities within the county, particularly in newly developing areas. These sites should be easily accessible (walking and cycling) and promote the use of public transport.

e) The potential for remote working is recognised in the draft Plan as follows;

The Council recognises that access to quality high speed broadband is essential for economic growth, sustainable development (by facilitating remote working and reducing long distance commuting), social inclusion and an enhanced quality of life for all. The following relevant policies and objectives are contained in the draft Plan.

SICCDP-23 It is Council policy to support and facilitate the establishment of co-working/ remote working hubs and creative hubs as either standalone facilities themselves or ancillary to public buildings, libraries and community centres or in towns and village centres as appropriate.

ENTP-19 It is Council policy to support remote working opportunities from home and innovative designated hub/ co-working spaces, in the interests of mitigating long commuting times.

ENTP-47 It is Council policy to support and facilitate the delivery of the National Broadband Plan and the Offaly Digital Strategy as a means of developing further opportunities for enterprise, employment, education, innovation and skills development.

ENTO-14 It is an objective of the Council to work with government agencies and telecommunication providers to facilitate the delivery of high speed broadband to all premises in Offaly.

ENTO-17 It is an objective of the Council to avail of funding opportunities for the provision of Wi-Fi and broadband in the county to support economic development and social inclusion.

f) The following policy is of relevance; **WSP-02** It is Council policy to liaise and co-operate with Irish Water in the implementation and delivery of the 'Water Services Strategic Plan' (2015, under review in 2020), the 'Irish Water Business Plan 2015-2021', the 'Irish Water National Water Resources Plan' (expected in 2021) and the 'Irish Water Investment Plan 2020-2024' (or any amendment thereof) and other relevant investment works programmes of Irish Water, to provide infrastructure to service settlements in accordance with the Council's Core Strategy and Settlement Strategy'.

g) In relation to the Irish Rail services between Portarlinton and Tullamore, the following policy contained in the draft Plan is of relevance;

SMAP-12 It is Council policy to co-operate with and encourage Iarnród Éireann to (i) secure the upgrading of the existing rail linkages between Athlone, Clara, Tullamore and Portarlinton (ii) improve the frequency of trains between Athlone and Dublin and (iii) ensure that train stations in County Offaly are manned and have frequent services.

h) Objective SMAO-09 of the draft Plan supports the extension of the M6 to Tullamore.

N52: To support the construction of a road between Tullamore and Kilbeggan (Link Road) taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, including section 8.5.4 Corridor and Route Selection Process.

i) The establishment of third level education in Tullamore is strongly supported in the Draft Plan as follows;

It is noted in Table 2.3: Summary of criteria utilised to develop the settlement hierarchy for Offaly 2021-2027 of the draft Plan, that the *Midland Regional Hospital Tullamore is a Teaching/University hospital for a number of institutions including University College Dublin and University of Limerick, acting as a strong economic driver for the town and also providing*

a springboard for further linkages to existing and new med-tech businesses and research facilities.

In the context of the Regional Spatial and Economic Strategy, Regional Policy Objective RPO 4.70: *To examine the need for complementary third level outreach educational facilities at Tullamore, particularly with regard to support for Tullamore Regional Hospital and where appropriate, its continued development as a Teaching/University Hospital, together with potential for linkages to existing and new med-tech businesses and research facilities'.*

It is deemed appropriate to allow for student accommodation / residences as part of an overall Masterplan strategy for Opportunity Site No. 9 based on and in conjunction with a third level campus expansion within that opportunity site.

The following sections and policies from the draft Plan are of relevance to the submission lands and their potential development.

9.7 Other Education/Skills Training/Third Level:

The Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-31 states that by 2031 there will be a significant increase in the number of people in the 15-24 years' age cohort which will lead to greater demand for third level education. The Council considers that Offaly has the potential to accommodate multiple campuses based on its sectoral strengths in areas such as food, energy, biodiversity, pharma and medtech, engineering and advanced manufacturing. Tullamore can provide complementary third level outreach educational facilities supporting the Midland Regional Hospital and its continued development as a Teaching/University Hospital. There also exists an opportunity to develop a centre in the county for exploring/evaluating new technologies in energy provision with Research and Development components based on the expertise available in the Athlone Institute of Technology (AIT), University of Limerick (UL) and Maynooth University nexus.

SICCDP-35 It is Council policy to support the designation of the Midland Regional Hospital Tullamore as a major trauma centre, its continued development as a 'teaching' hospital and the potential of a 'regional' hospice at this location.

The following policies in Chapter 5 are also of relevance:

ENTP-22 It is Council policy to encourage and establish links between County Offaly, Maynooth University, Trinity College Dublin, University of Limerick, Athlone Institute of Technology and Cork Institute of Technology and other higher level colleges as appropriate, which will improve the skills base/education of inhabitants within County Offaly.

ENTP-23 It is Council policy to encourage third level education in County Offaly through the provision of outreach / campus facilities for the accommodation of courses.

ENTP-25 It is Council policy to support the examination of a need for complementary third level outreach facilities in Tullamore, particularly with regard to support for Midland Regional Hospital Tullamore and where appropriate, its continued development as a Teaching / University Hospital, together with potential for linkages to existing and new med-tech businesses and research facilities.

- j) As part of the response to the OPR Submission CDP/D/172; Appendix 1: Table identifying policies, objectives and development management standards in the Plan that promote a transport modal shift details the strong measures, policies and objectives towards achieving targets in the modal shift.

SMAP-08 It is Council policy to prioritise the need for people to be physically active in their daily lives; to improve permeability and to promote walking and cycling in the design of streets and public spaces as an alternative and sustainable mode of transport; and to support safer walking and cycling routes to schools under the Green Schools Initiative subject to appropriate environmental assessments, including Habitats Directive Assessment.

SMAP-09 It is Council policy to support the pedestrianisation and permeability of town and village centres where appropriate, in order to create accessible, attractive, vibrant and safe places. In doing this the Council will strive to support the;

- (i) Provision of 'cycle friendly' towns and villages;
- (ii) Provision of key cycling routes through larger towns;
- (iii) Potential for a walking and cycling route around Tullamore incorporating the Grand Canal, the banks of the Tullamore river and inside the barriers of the Tullamore by-pass.

SMAO-02 It is an objective of the Council to prepare a Local Transport Plan for the Key Town of Tullamore in conjunction with the National Transport Authority.

- k) The development of the pedestrian link between the Library and Church Street is an existing objective of the Tullamore Town and Environs Development Plan 2016-2020 (as extended) and is the subject of a comprehensive Urban Regeneration and Development Fund application.
- l) Noted.
- m) Data Centres are supported in the Draft Plan as follows;

Section 3.7 of the draft Plan: It is Government Policy as set out in the National Planning Framework and the Government Statement on The Role of Data Centres in Ireland to promote Ireland as a sustainable international destination for Information Communications Technology (ICT) infrastructure such as Data Centres. To date, some of the world's best known companies including Microsoft, Google, IBM and Amazon AWS have chosen Ireland as the location for their European data centre footprint and up to now this growth has largely been concentrated in and around Dublin city. Committed expansions and expected growth in the ICT sector in Dublin has created significant demand for more data centres which in turn has increased the demand for renewable energy to facilitate this growth. Increasingly, counties in the midlands and west are seen as attractive locations for data centres with cheap and extensive land, secure energy suppliers and plenty of cooling wind. Offaly County Council acknowledges that data centres contribute to job creation during construction, maintenance and from associated areas such as research and development, data analytics, customer service, technical support, marketing and sales. Data centres generally need to be located in areas where there exists a significant and sustainable electricity supply, high powered fibre optic cables, good accessibility, large land banks that are easily developable with future expansion possibilities and which offers good security. In addition, the Council is mindful that Data Centres should avoid sensitive landscapes and environments as outlined in Chapter 4 Biodiversity and Landscape.

ENTO-08 It is an objective of the Council to support the national objective to promote Ireland as a sustainable international destination for Information and Communications Technology (ICT) infrastructures such as data centres and associated economic activities at appropriate locations. In this regard, the Council will support the provision of data centres at appropriate locations in the county subject to appropriate environmental assessment and the planning process and the criteria set out in Policies CAEP-38 and CAEP-39 in Chapter 3 of this Plan.

CAEP-38 It is Council policy to consider applications for proposed data centres in County Offaly in line with the following criteria;

- Accessibility/ease of connection to power;
- Availability of renewable energy to power proposed data centre;
- Availability of high powered fibre optic infrastructure;
- Transport/road accessibility;
- Compatibility of surrounding land uses/zoning;
- Avoidance of designated sites; and
- Availability of significant landbanks, ~~minimum of circa 50 acres in size.~~ *(the red piece is recommended to be removed as part of submission CDP/D/166).*

CAEP-39 It is Council policy that any application for a data centre shall take account of the cumulative impact of the proposed connections of the data centre with electricity transmission, renewable energy and broadband infrastructure in the area.

RDO-05 It is an objective of the Council to support the longer-term strategic planning for industrial peatland areas, which should include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure including workshops, office buildings and industrial sites, which addresses environmental, economic and social issues including employment and replacement enterprise reflecting the current transition from employment based around peat extraction. Examples of after use and re-purposing of workshops and production facilities could include outreach training centres, gravel extraction, bike-hire facilities, enterprise space / co-working facilities, aquaculture, herb growing, resource management / recycling centre, climate change mitigation (such as through renewable energy, carbon sink, data centres, battery energy storage, afforestation including native woodland, a Green Energy Hub, flood management), and tourism (such as through peatways, recreational forestry, wilderness, eco-tourism based on biodiversity, and a designation of a National Peatlands Heritage Park).

In relation to rewilding of boglands, the following relevant policies are contained in the draft Plan:

CAEP-13 It is Council policy to support the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the midlands and adjacent parts of the north west and southern regions, which meets the environmental, economic and social needs of communities in these areas, and also demonstrating leadership in climate change mitigation and land stewardship. The Council recognises that the industrial peatlands in the midlands are a significant resource will transition to after uses ranging from amenity, tourism, biodiversity services, 'wild areas', flood management, climate mitigation, energy development, industry, education, conservation and many more.

RDO-05 It is an objective of the Council to support the longer-term strategic planning for industrial peatland areas, which should include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure including workshops, office buildings and industrial sites,

which addresses environmental, economic and social issues including employment and replacement enterprise reflecting the current transition from employment based around peat extraction. Examples of after use and re-purposing of workshops and production facilities could include outreach training centres, gravel extraction, bike-hire facilities, enterprise space / co-working facilities, aquaculture, herb growing, resource management / recycling centre, climate change mitigation (such as through renewable energy, carbon sink, data centres, battery energy storage, afforestation including native woodland, a Green Energy Hub, flood management), and tourism (such as through peatways, recreational forestry, wilderness, eco-tourism based on biodiversity, and a designation of a National Peatlands Heritage Park).

[Ref: CDP/D/104](#)

Person / Body:

Scott Hobbs Planning on behalf of Flanagan Properties

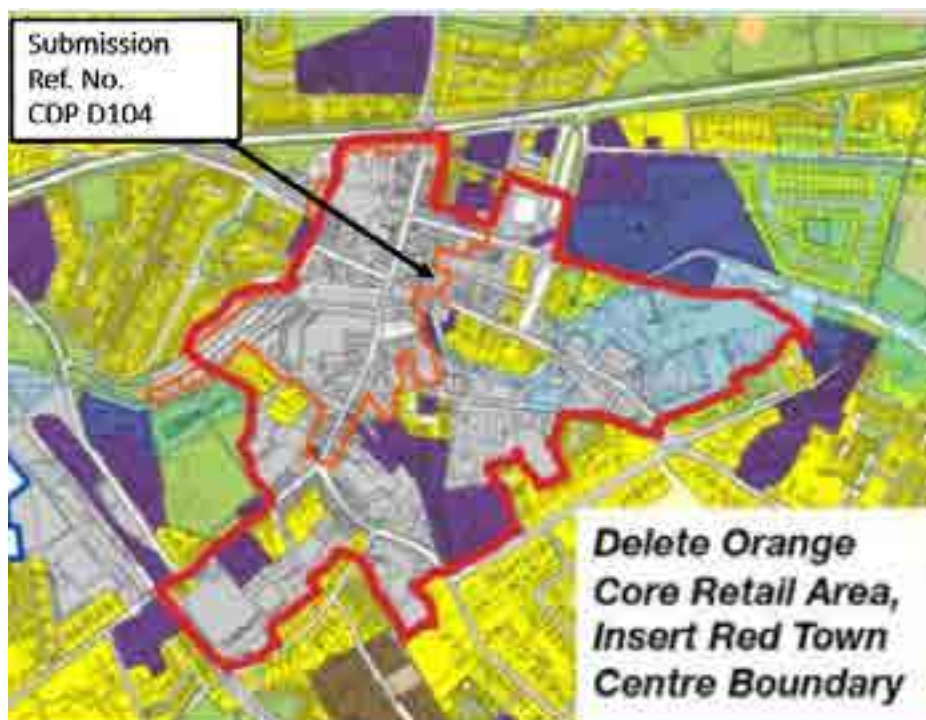
Summary of submissions / observations:

- a) This submission relates to Opportunity Site No. 8, the Tanyard area, and states that the Tanyard is a viable town centre business, occupied by various small scale businesses in a variety of town centre uses. There are some 26 businesses, employing approximately 90 people in the location.
- b) It is stated many units are in retail use and contribute to the vitality and viability of the town centre. The submission states that Tanyard Lane provides a good link between the 'main shopping areas of the town centre (around Columcille Street) and that at Church Street'.
- c) Requests that the draft defined core retail area in Tullamore Town Centre be deleted as the Core Retail Area is incorrectly drawn on the proposed Town Map. It is based on only part of the existing town centre, as it omits the retail area in the vicinity of Church Road/ Church Street. The limited Core Retail Area, and the policies/ objectives which seek to direct development only to that area in the first instance harm the potential for Tullamore to act as the top tier in the retail hierarchy and restrict opportunities for retail led town centre development.
Church Street and Church Road should not be omitted as these are strong retail areas.
- d) States that the following policies are in conflict:

Policy RTCP-07 which states: 'It is Council policy to encourage retail development primarily in core retail areas and to apply the sequential approach in the consideration of the location of retail developments located outside of core retail areas.'

Policy RTCP-02 which states: 'It is Council policy to promote Tullamore, a Key Town, as the main retail centre in the county and to ensure that the retail quantity, quality and range is of a standard that contributes to the strengthening of the retail economy within Tullamore Town, the county and the region as a whole.'
- e) The Core Retail Area should be deleted, and development should be focused around most of the Opportunity Sites identified in Tullamore, (see map below) as the primary location for development, recognising the significant contribution Tanyard Lane plays in linking between the two main shopping areas of the town centre.

- f) Opportunity sites do not necessarily follow coherent boundaries yet the draft Plan requires a coherent approach to their development. Flanagan Properties has no objection to the requirement to ensure that development of one part does not frustrate the development of another but considers it an inappropriate constraint to require all parts to be brought forward at one time. This unnecessarily constrains sites in the urban footprint and particularly those previously developed or in multiple land ownerships.



CE Response:

- a) Noted.
- b) The Tanyard area as outlined is not considered a retail area. There is at present a predominance of light industrial / engineering and auto repair service centres, and furniture stores in the Tanyard Lane area. It is noted that the submission refers to other locations as *'the main shopping areas'*. Rather than the submission site itself. The submission refers to linking Columcille St and Church St however both of these streets meet at a junction so they are already directly linked together and the retail elements of them both feature within the Core Retail Area.
- c) The Retail Planning Guidelines (2012) define retail areas as *'that part of a town centre which is primarily devoted to shopping'*. Therefore, the core retail area in Tullamore contains the primary retail streets of the centre where the main concentration of retail activity takes place. In light of this it is not recommended to change the boundary of the core retail area. It is recommended to insert the red text into chapter 7 of the plan as follows for clarity purposes:

Extract from Chapter 7 of draft Plan regarding Core Retail Areas:

'Volume 2 of the Development Plan provides for settlement plans for all settlement areas within Offaly (except where a separate Local Area Plan exists). The core retail area of each settlement area has been delineated to identify clearly that part of a town centre which is primarily devoted to shopping as distinct from the wider town or village centre / mixed use zoning objective. Core retail areas contain the primary retail streets of a centre where the

main concentration of retail activity takes place. Identifying and delineating core retail areas allows a focused approach for retailing and town / village centre action initiatives as well as the proper application of the sequential approach to retail development’.

The submission site does not fit under the definition as worded or intended. It is advised that no change to the Core Retail Area is required.

The proposal to extend the Core Retail Area into wider areas, would not fit with the current definition for Core Retail Areas. Retail development can still be considered outside the Core Retail Area based on the sequential test as set out in the Retail Planning Guidelines. By setting the Core Retail Area to reflect the streets primarily devoted to shopping, it helps safeguard the vitality and vibrancy of the town centre.

- d) The two policies quoted are not in conflict and are designed to ensure a return to a healthy and vibrant Core Retail Area within Tullamore Town Centre and also a growth in the retail offer for the town of Tullamore, county and wider area.
- e) The Core Retail Area and the town centre / mixed use zoning are different, with the latter encapsulating a wider area with a multiplicity of uses, such as educational, business, recreational, residential and employment, and also an important retail function. It would not be appropriate to identify a Core Retail Area encapsulating all of the Opportunity sites, (bar site no. 9) and giving it a primary retail function as suggested in the submission.
- f) In relation to the timing of the development of Opportunity sites the draft Development Plan states in section 7.2.4 that *‘Some of the sites may be owned by different parties and would require an element of site assembly for a coherent development strategy to progress. This approach to re-development is encouraged over a piecemeal approach. No change to this is advised’.*

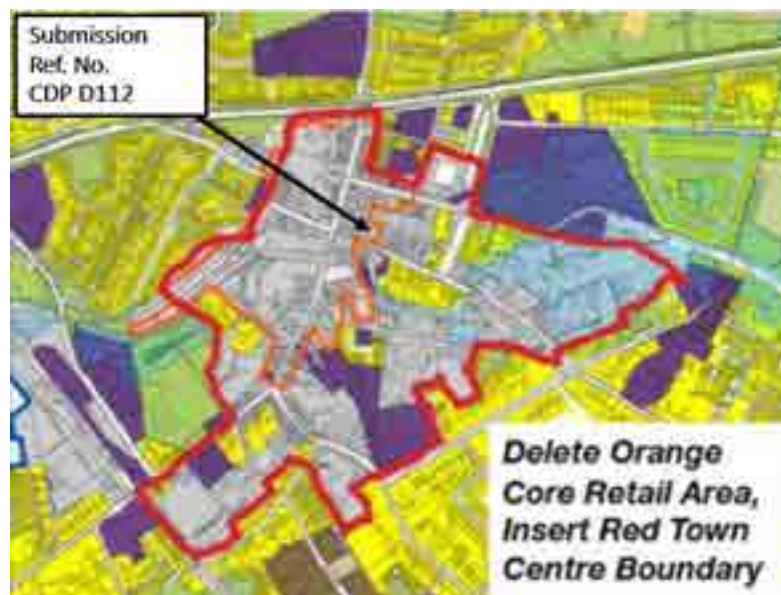
[Ref: CDP/D/112](#)

Person / Body:

Scott Hobbs Planning on behalf of Flanagan Properties

Summary of submissions / observations:

- a) This submission relates to Opportunity Site No. 7, lands located at Kilcruttin, Tullamore. The submission states that the policies and objectives regarding the process for consideration of Opportunity Sites should be amended to ensure sites are viable and can be delivered within the plan period. Kilcruttin is primarily in mixed use at the present, including office, education, storage, R & D and light industrial. The submission states that there is potential for more intensive development of enhanced scale and other town centre uses.
- b) Submits that the town centre for Tullamore is ill-defined and requests the inclusion of a clearly defined town centre boundary which incorporates most of the opportunity sites identified in the draft Plan. The reintroduction of the town centre boundary will underline the importance of the town centre as a whole to the growth and improvement of retailing within the county, the vitality and viability of Tullamore town centre at the top of the retail hierarchy and enhance the potential for the development of the opportunity site.



- c) Opportunity sites do not necessarily follow coherent boundaries yet the draft Plan requires a coherent approach to their development. Flanagan Properties has no objection to the requirement to ensure that development of one part does not frustrate the development of another but considers it an inappropriate constraint to require all parts to be brought forward at one time. This unnecessarily constrains sites in the urban footprint and particularly those previously developed or in multiple land ownerships.



CE Response:

- a) Offaly County Council recognises the potential for Opportunity Site 7 at Kilcruttin. Under section 7.2.4 of the Draft Plan *‘These sites were chosen because of their prominence and underutilisation. In addition to promoting local economic growth, it is considered that their redevelopment would contribute greatly to the renewal, enhancement and regeneration of the towns and villages in which they are located. These sites also provide the greatest potential for development and consolidation’.*
- b) The Core Retail Area and the town centre / mixed use zoning are different, with the latter encapsulating a wider area with a multiplicity of uses, such as educational, business,

recreational, residential and employment, and also an important retail function. It would not be appropriate to identify a Core Retail Area encapsulating most of the Opportunity sites, and giving it a primary retail function as suggested in the submission.

The Retail Planning Guidelines (2012) define retail areas as *'that part of a town centre which is primarily devoted to shopping'*. Therefore, the core retail area in Tullamore contains the primary retail streets of the centre where the main concentration of retail activity takes place. In light of this it is not recommended to change the boundary of the core retail area. It is recommended to insert the red text into chapter 7 of the plan as follows for clarity purposes:

Extract from Chapter 7 of draft Plan regarding Core Retail Areas:

'Volume 2 of the Development Plan provides for settlement plans for all settlement areas within Offaly (except where a separate Local Area Plan exists). The core retail area of each settlement area has been delineated to identify clearly that part of a town centre which is primarily devoted to shopping as distinct from the wider town or village centre / mixed use zoning objective. Core retail areas contain the primary retail streets of a centre where the main concentration of retail activity takes place. Identifying and delineating core retail areas allows a focused approach for retailing and town / village centre action initiatives as well as the proper application of the sequential approach to retail development'.

The submission site does not fit under the definition as worded or intended. It is advised that no change to the Core Retail Area is required.

The proposal to extend the Core Retail Area into wider areas, would not fit with the current definition for Core Retail Areas. Retail development can still be considered outside the Core Retail Area based on the sequential test as set out in the Retail Planning Guidelines. By setting the Core Retail Area to reflect the streets primarily devoted to shopping, it helps safeguard the vitality and vibrancy of the town centre.

- c) In relation to the timing of the development of Opportunity sites the draft Development Plan states in section 7.2.4 that *'Some of the sites may be owned by different parties and would require an element of site assembly for a coherent development strategy to progress. This approach to re-development is encouraged over a piecemeal approach.* No change to this is advised.

[Ref: CDP/D/113](#)

Person / Body:

Scott Hobbs Planning on behalf of WeaverMay Ltd.

Summary of submissions / observations:

- a) It is considered that there is a significant lack of emphasis on delivery of the Plan's aims and objectives and no regard given to the viability and commercial requirements of proposals.
- b) This submission relates to a site of 0.73ha which comprises Opportunity Site No. 2, 'Texas Site' which is located between Offaly Street and O'Connell Street in Tullamore. It is the parcel of land that comprises a current planning application ref. PL20/479.

- c) The submission raises the issue that no Local Authority delivery mechanism are identified to develop infill/brownfield/underutilised sites within the existing built-up footprint of the town centre. The submission also states “that there is no mechanism identified in the plan for the delivery of that infrastructure or for the prioritisation of public resources to ensure that Tullamore is the key settlement for investment.
- d) Core Shopping /Retailing Areas are an unnecessary constraint. Such is the importance of Tullamore, as the top tier in retail activity, and as the Key Town of the county (as identified in the RSES), it is considered that the plan should be positive towards development within the entire town centre rather than just a constrained part, significantly reduced from the extant plan. Requests that a town centre boundary be shown as per the map included, to include most opportunity sites (Opportunity Site 1,2,3,4,6,7, & 8) and the basis that Policy SMAP-05 identifies that larger scale developments should in the first instance be focused into central urban locations and developed in a sequential manner. Suggest this on the basis that there is no clear definition of the central urban area.
- States that “Core Shopping /Retailing Areas are acceptable in the lesser important Towns” Weaver may recommends deleting the Core Retail Area from the proposed Tullamore Town zoning map.



- e) The current approach in the draft Plan will diminish the role of Tullamore and will not achieve its goal to reduce retail leakage and achieve a strong town equal to its designation as a Key Town. Other key towns and settlements lower in the settlement/retail hierarchy will grow disproportionately to Tullamore and it will not be able to compete for scarce resources, making no development scheme viable.
- f) The submissions states that there is no clear data available on the scale, level or form of retail activity deemed acceptable for the county and Tullamore, which continues the level of uncertainty for investors, despite the plan identifying the necessity for such information (paragraph 7.1.3). The retail strategy such be prepared and introduced as a matter of urgency and commitments should be made to this in the plan.
- g) The submission states that the plan should accept as a basic principle that all retail development within the identified town centre is positive. Weaver may requests that the constraint on potential investors to demonstrate the suitability of sites within the town

centre for retail development should be removed.

- h) The submission recommends the addition to the plan of *‘It is recognised that all retail development within the town centre will contribute to the role of Tullamore as the key retail centre in the county’*. The submission also requests the removal of the requirement that *“major retail development proposals in Tullamore shall demonstrate that the proposal will have a positive impact in...”*
- i) The submission states that the need for mixed uses, increasing the density of residential development and increasing the height of development beyond that normally present in the town could deter investment due to viability issues.
- j) Objects to the following policies and objectives contained in table below and requests that they are amended to include the required mechanism to achieve results ‘on the ground’.”

<p>Proposed Amendments from Scott Hobbs Planning on behalf of Weaver may to the Policies / Objectives / Text/ Development Management Standards shown in bold and italics.</p>
<p>ENTP-04 It is Council policy to prioritise, facilitate and promote the development of infrastructure that supports and attracts new economic activity-related investment in County Offaly by allocating its scarce resources to improving the economic infrastructure in Tullamore in the first instance; investment will then follow in other towns in order in the settlement hierarchy.</p>
<p>ENTP-07 It is Council policy to strengthen and channel development into Tullamore the primary driver for economic development within the county, which is designated as a Key Town in the Regional Spatial and Economic Strategy by giving economic growth and job creation consideration paramount importance as the prime considerations in assessing development proposals.</p>
<p>ENTO-03 It is an objective of the Council to facilitate the development of Tullamore, a Key Town under the Regional Spatial and Economic Strategy, in accordance with regional policy. To facilitate this, lands have been reserved This will include measures to seek to reserve lands within Tullamore to make provision for potential nationally and regionally significant activities and to attract specialist large-scale enterprise development within the county. The Council will positively consider all applications for economic-related development on the reserved lands, and other land identified as appropriate for development, by giving economic growth and job creation consideration paramount importance as the prime considerations in assessing development proposals</p>
<p>Typology - Key Town (Tullamore) (Table 7.2)</p>
<p>Tullamore is the focus for all types of retail development. Its role, as a Key Town, can will be strengthened through securing major retail development for the town, which will in turn benefit the county area and the wider region. Tullamore has the greatest capacity to accommodate a range of retail development types and it is recognised that all retail development within the town centre will contribute to the role of Tullamore as the key retail centre in the County. Accordingly, major comparison retail development should be directed to Tullamore town centre and the principle of the retail/ mixed town centre uses will be given primary consideration in assessing development proposals. The application of the sequential test is fundamental to achieving appropriate retail development in the most appropriate locations within Tullamore and will be an essential requirement of proposals on sites outside the designated Tullamore town centre. The assessment must demonstrate the suitability of the out-of-centre site for retail development and that it Major</p>

retail development proposals in Tullamore shall demonstrate that the ~~proposal~~ will have a positive impact in: further reducing levels of retail expenditure exported from the county; generating a significant improvement in Tullamore's regional appeal; and consolidating the town centre, in particular Opportunity Sites.

Development briefs will be prepared for the Opportunity Sites, in consultation with the landowners and other stakeholders, and will be included within the Tullamore Local Area Plan.

A neighbourhood centre will be considered **only** where it complements rather than competes with the town centre. It should provide an appropriate range of local services including commercial, retail and community uses, to support the population of the surrounding area.

Page 211, Chapter 7

The Council supports applications for retail development which:

- Are in line with the role and function of the town or village in the settlement hierarchy of the development plan, and
- Accord with the scale and type of retailing identified for that location in the development plan.

Applications for retail development shall be assessed against a range of criteria, which include the following:

- Sequential approach (**other than in the identified Tullamore Town Centre**),
- Retail Impact Assessment (**other than in the identified Tullamore Town Centre**),
- Traffic and Transport Assessment (**other than in the identified Tullamore Town Centre**);
- Specific categories of retail development (for example, large convenience goods stores such as supermarkets, factory shops, retail parks and retail warehouses) (**other than in the identified Tullamore Town Centre**), Sustainable mobility; and
- Design and place making

A Retail Impact Assessment (RIA) will be required where:

- a new retail development is considered to be particularly large in scale compared to the existing town centre, **with the exception of Tullamore, or**
- there is a particular allocation of a specific type and/or quantum of retail floorspace to a particular settlement **other than Tullamore**, and a proposed development absorbs on one site the bulk of that potential retail floorspace.

An RIA must examine and demonstrate compliance with the Development Plan and that there would not be a material and unacceptable adverse impact on the vitality and viability of any existing centre **and particularly Tullamore town centre**. The RIA must address criteria as set out in the Retail Planning Guidelines 2012 (or any subsequent update).

Table 7.4

Assessment of specific categories of retail development

Large Convenience Goods stores i.e. supermarkets, superstores and hypermarkets

- Should be located in town centres or on the edge of town centres and be of a size which accords with the general floorspace requirements set out in the development plan/retail strategy to

support and add variety and vitality to existing shopping areas and also to facilitate access to shoppers by public transport.

- The sequential approach should be used to find the most preferable sites, ***other than in Tullamore town centre***
- Planning application drawings should clearly delineate the floorspace to be devoted for sale of comparison and convenience goods, and should differentiate between net and gross floor area.
- The balance between the convenience and comparison elements shall be assessed as a critical element of the suitability of the development proposal. Where a significant element of the store is indicated to be for comparison goods the potential impact of that element of the store on existing comparison goods stores within the catchment must be included in the assessment of the application.

RTCP-02 It is Council policy to promote Tullamore, a Key Town, as the main retail centre in the county and to ensure that the retail quantity, quality and range is of a standard that contributes to the strengthening of the retail economy within Tullamore Town, the county and the region as a whole. ***Positive consideration will be given to retail proposals and which will only be refused when the Council is able to demonstrate that the proposal will not achieve the aims of this policy.***

RTCP-03 ***Until such time that a definitive Retail Strategy is in place to provide clarity to its requirements*** It is Council policy to ensure that higher order retail services and developments are located in higher order settlements, as set out in Offaly's Settlement Hierarchy. The Council shall consider the scale, type and location of retail developments within the county when determining their suitability ***and will give positive consideration for proposals which deliver net economic gain. The Council will grant planning permission for retail development within the Tullamore Town Centre.***

RTCP-06 It is Council policy to encourage retail development, including new forms of shopping which relates to the regeneration of existing town and village centres. Proposals, which would undermine the vitality and viability of ~~retail core areas~~ or town and village centres, as a whole shall not be permitted.

RTCP-07 It is Council policy to encourage retail development ***in Tullamore Town centre and primarily in core retail areas of other towns and villages*** and to apply the sequential approach in the consideration of the location of retail developments located outside of Tullamore town centre and other core retail areas.

RTCP-10 It is Council policy to address leakage of retail expenditure from the county by ***proactively*** providing the means to strengthen the range and quality of its retail ***offer by giving net economic gain paramount importance and granting planning permission for retail development in Tullamore town centre.***

Land Use Zoning Objectives Town or Village Centre / Mixed Use:

The purpose of this zoning is to maintain the vitality and viability of existing town and village centres by developing and consolidating centres with an appropriate mix of commercial, recreational, cultural, amenity and residential uses ***and supporting major retail-led proposals in Tullamore Town Centre.*** Development proposals should be of a use, scale, form and design that accords with the role, function and size of the town or village centre. A diversity of uses for both day and evening is encouraged. These areas require high levels of accessibility, including pedestrian, cyclist and public

transport (where feasible). Retail provision will be in accordance with Chapter 7 Retail and Town Centre Strategy and Regeneration.

DMS-58 Retail

The provision of new retail development shall be in accordance with Chapter 7 Retail and Town Centre Strategy and Regeneration, and DECLGs Retail Planning Guidelines (2012) and accompanying Retail Design Manual or any subsequent revisions or updates to these Guidelines thereafter.

Retail development should be in accordance with the fundamental objective to support the vitality and viability of the **retail town or village** centre. All applications for retail developments at edge-of-centre or out-of-centre locations will be subject to the sequential test.

Other than in Tullamore town centre, retail impact assessment and transport impact assessments may be required for significant retail development which due to their scale and/or location may impact on the vitality and viability of town and village centres.

Proposals to amalgamate retail units will be carefully considered.

All planning applications shall contain a design statement prepared in accordance with the ‘Key Principles of Urban Design’ as laid out in the ‘Retail Design Manual, a companion document to the Retail Planning Guidelines for Planning Authorities’, explaining why the particular design solution is considered the most suitable for particular site.

Retail structures should avoid presenting blank frontages to streets. The frontage onto a street should represent the actual retail selling space, to facilitate access for pedestrians and animate the streetscape.

Car parking shall be provided in a discreet, landscaped and well-screened environment, where practical, with a view to minimising its visual impact, particularly when viewed from approach roads. ***The net economic gain to Tullamore Town Centre will always be of paramount importance and the key consideration in determination planning applications. The Council will give priority to assessment of proposals which demonstrate viable proposals which will be delivered during the lifetime of the plan period.***

On page 221 of the Draft Plan:

Opportunity Sites are identified below for Tullamore (Key Town), Birr (Self-Sustaining Growth Town), Edenderry and Portarlington (Self-Sustaining Towns), and those within other settlements are identified in Volume 2 and Local Area Plans. These sites were chosen because of their prominence and underutilisation. In addition to promoting local economic growth, it is considered that their redevelopment would contribute greatly to the renewal, enhancement and regeneration of the towns and villages in which they are located. These sites also provide the greatest potential for development and consolidation. *Regeneration lands as defined in the Urban Regeneration and Housing Act 2015 (as amended) include these Opportunity sites.* ***When an applicant demonstrates through viability assessment that land can be brought forward for development on opportunity sites in Tullamore which will result in positive economic gain in terms of economic development and job creation the council will set aside its requirements for development contributions in the***

whole or part to secure the early completion of the development.

Opportunity site boundaries have not been identified definitively and can be added to, to provide for logical site boundaries or the inclusion of other potential Opportunity Sites. Some of the sites may be owned by different parties and ***the bringing forward of only part of an Opportunity Site at any one time will be encouraged and deemed acceptable providing it is demonstrated that a coherent development strategy is can be realised such that an early release of one part of the site to essential town centre uses will not frustrate the remaining part of the Opportunity Site from being developed in the Plan period.*** ~~would require an element of site assembly for a coherent development strategy to progress. This approach to re-development is encouraged over a piecemeal approach.~~ To help realise the full potential for the development of these sites, any application put forward should consider the Development Plan policies, objectives and standards and shall include an Urban Design Statement and Masterplan taking cognisance of the following development principles:

Site Assembly; A detailed masterplan shall be prepared for each individual area that includes a phasing programme which demonstrates how the proposed development complies with the principles of sustainable compact development, good urban design and healthy place-making. ~~This can be undertaken in consultation with~~ ***The Planning Authority will actively engage in this process prior to the submission of a planning application and will commit to responding to draft submissions within a 3 week period. Developers, landowners and the Council shall be required to coordinate and work together in order to achieve an integrated coherent approach to development as opposed to a piecemeal approach.***

Design and Layout:

- Promote mixed use and diversity, with a substantial amount of residential use ***(if viable and subject to market demand);***
- Comply with the Core Strategy and Housing Strategy;

Incorporate Taller Buildings (6 storeys) if the site is designated for consideration of such in this County Development Plan / future Local Area Plans ***if this appropriate to the timing of the development proposal, viability and market demand***

Comprise a mix of residential unit sizes and types which accommodate a range of living requirements for all age groups, for example, older people and families, and for people with disabilities ***where appropriate.***

Page 226-227 Chapter 7:

While taller buildings will bring much needed additional housing and economic development, they can also assist in reinforcing and contributing to a sense of place within a town centre. In this manner, increased building height is a key factor in assisting modern place-making and improving the overall quality of our urban environment. ***The Council will expect development proposals to include taller buildings only where this is appropriate in terms of the townscape or where this will help deliver development. Applicants will be expected to demonstrate the positive aspects of taller buildings in the application documentation.***

The Urban Development and Building Heights Guidelines for Planning Authorities (December 2018) states that it would be appropriate to support the consideration of building heights of at least 6 storeys at street level. Taller buildings are advocated in the major towns identified for strategic development in the Regional Spatial and Economic Strategy: in Offaly's case this is ***may be***

Tullamore only, a designated Key Town. **Applicants for proposals including taller buildings shall demonstrate the site** is suitable for taller buildings **and** shall meet the highest standards of architectural quality, urban design and place-making.

The Development Management Standards (Chapter 13) sets out the items which are to be addressed in proposals for taller buildings.

The following two sites in Tullamore are **open for consideration** to accommodate taller buildings based on the mix of adjacent building heights, the desire to have higher densities at these brownfield central locations and their extensive site sizes, **although this is not an essential component of the development of the sites**. These two sites are also designated Opportunity Sites;

- Grand Canal Harbour site, Tullamore (Opportunity Site No. 1)
- Texas site, Tullamore (Opportunity Site No. 2)

Permitting taller buildings at these locations is dependent on assessment by the Planning Authority of the following documents prepared by a prospective applicant / applicant;

RTCO-01 It is an objective of the Council to encourage the continued vitality and viability of town centres by:

- Identifying and promoting key town and village centre Opportunity Sites for development **and promoting tier development through positive action including net economic gain paramount importance granting retail development prime consideration in the assessment of development proposals and allowing reduced / no developer contribution towards development proposals.**

RP-11 It is Council policy to facilitate, promote and encourage the re-development of Opportunity Sites identified in Volume 1 and Volume 2 of the County Development Plan and Local Area Plans for appropriate development that contributes positively to the character of the settlement. ~~Any~~ **Proposals** brought forward on Opportunity Sites **which are demonstrated to be shall-be** in accordance with the Development Principles for Opportunity Sites as set out in section 7.2.4 of the County Development Plan, ~~with~~ **through** the inclusion of an urban design statement and **concept** masterplan ~~and which shall demonstrates~~ the rationale for the proposal and how it will interact within its context and the wider urban area **will be given priority during the determination process and planning permission will be granted.**

RP-12 It is Council policy to consider the development of taller buildings on the 'Harbour site' and 'Texas site' in Tullamore as identified in Figure 7.8 of the County Development Plan, **although this is not an essential component of the development of the sites** subject to assessment by the Planning Authority of the following documents prepared by a prospective applicant / applicant;

- A masterplan and local planning framework to deal with movement, public realm, and design;
- An urban design statement addressing aspects of impacts on the historic built environment;
- A specific design statement on the individual proposal from an architectural perspective;

<ul style="list-style-type: none"> • A visual impact assessment; and • Daylight and shadow projection diagrams.
<p>Page 342 Chapter 13: Chapter 7 of this Plan outlines two opportunity sites <i>in Tullamore for which</i> open for consideration for taller buildings in Tullamore in accordance with Specific Planning Policy Requirement (SPPR) 1 of Urban Development and Building Heights, Guidelines for Planning Authorities, December 2018 <i>are open for consideration</i> and which supports Tullamore’s role as a Key Town in the Eastern and Midland Regional Spatial and Economic Strategy (RSES). In accordance with SPPR 2-4 of these Guidelines, the development management standards require the applicant to demonstrate an appropriate mix of uses, comply with stated development management criteria from the Guidelines, achieve minimum densities and provide an adequate mix of building heights and typologies in relation to ‘taller’ buildings.</p>
<p>DMS -09 Building Heights</p> <p>On sites deemed suitable for consideration of taller buildings as set out in Chapter 7 of this Plan, <i>should taller buildings be proposed the</i> planning applications shall include the following; A masterplan and urban design statement prepared by professionals with expertise in areas such as architecture, urban design, building...</p>
<p>RO-07 It is an objective of the Council as per the Urban Regeneration and Housing Act 2015 (as amended), to use site activation measures such as the Vacant Site Levy in specific areas to bring forward vacant or underutilised ‘Residential Lands’ and ‘Regeneration Lands’ (which includes Opportunity Sites) into beneficial use where considered necessary for renewal and regeneration.</p>
<p>Collaboration</p> <p>A collaborative approach between central government (funding), the local authority, semi-state bodies, the community, private sector and voluntary associations is required to successfully achieve the regeneration of areas. A joined up approach is encouraged <i>but not essential</i> whereby landowners work together in amalgamating sites to bring forward a comprehensive and coherent development proposal.</p> <p>Collaboration</p> <p>RP-13 <i>The Council recognises the need for development projects to be viable and it</i> is Council policy to promote a collaborative approach between Offaly County Council, central government, semi-state bodies, the community, the private sector and voluntary associations to successfully achieve the regeneration <i>viable redevelopment</i> of areas.</p>
<p>Page 213, Chapter 7</p> <p>A Traffic and Transport Assessment (TTA) must examine the traffic and transport impacts of a proposed development, incorporating any subsequent measures necessary to ensure roads and junctions and other transport infrastructure in the vicinity of the development are adequate to accommodate the proposed development without causing additional delays to existing and future road based traffic. A TTA is important in demonstrating how to encourage a shift towards sustainable travel modes by those using the retail development in question. The TTA must also address urban design impacts of the proposed public and private transport proposals. A TTA will <i>may</i> be required for retail developments over a threshold of 1,000sq.m. gross floorspace; and, at the discretion of the Planning Authority, a TTA may be required for retail developments below this</p>

threshold, *other than Tullamore town centre.*

Page 296, Chapter 13

Other than in Tullamore town centre or where it is demonstrated that sufficient car parking exists or can be provided, Offaly County Council may in lieu of shortfall of car parking spaces require the payment of a financial contribution under the Offaly County Council contribution scheme effective on the date of the grant of permission.

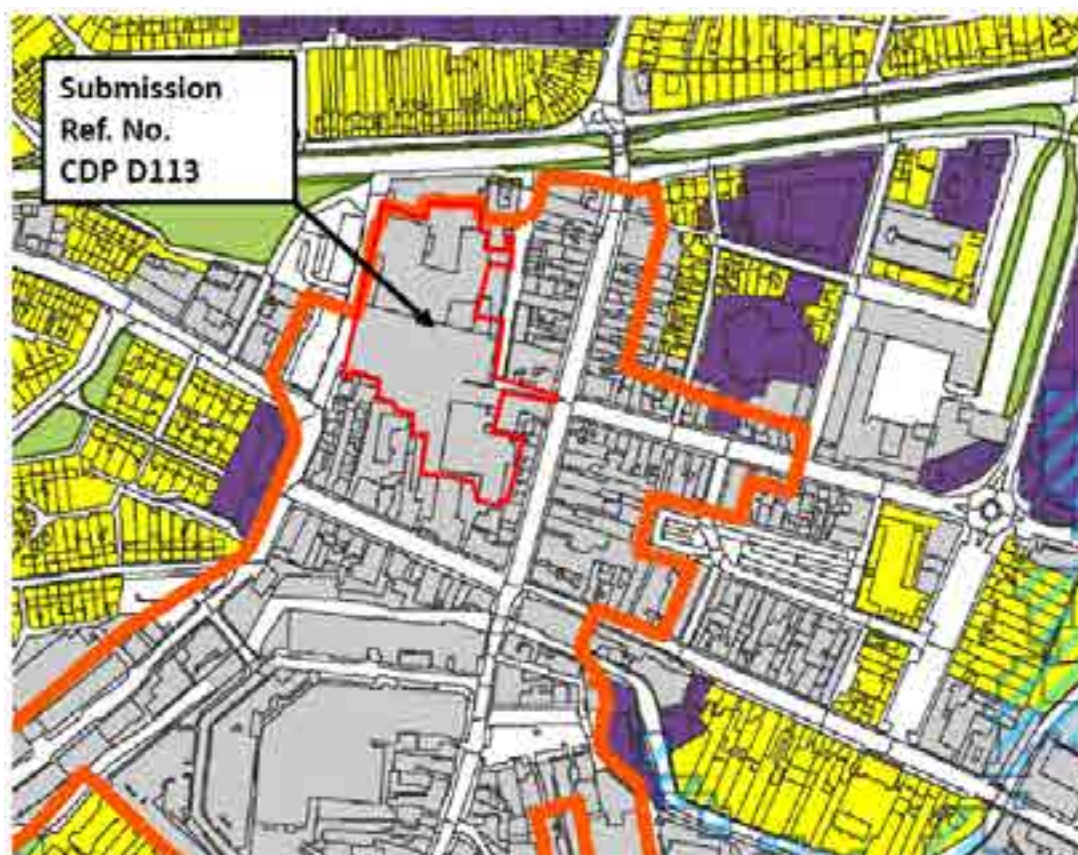
BLP-33 It is Council policy, to ensure that issues of scale, siting, design and overall compatibility (including particular regard to environmental sensitivities) with a site's location within an Area of High Amenity are of paramount importance when assessing any application for planning permission, ***unless the wider merits of each proposal indicate that the balance should fall in favour of development which achieves the wider objectives of the plan to secure Tullamore as a key growth driver of the county and midland region. In all other cases*** the merits of each proposal will be examined on a case-by case basis.

Areas of High Amenity

BLO-20 It is an objective of the Council to ensure that new development, whether individually or cumulatively, does not impinge in any significant way on the character, integrity and distinctiveness of or the scenic value of the Areas of High Amenity listed in Table 4.18. New development in Areas of High Amenity shall not be permitted if it;

- Causes unacceptable visual harm;
- Introduces incongruous landscape elements; and
- Causes the disturbance or loss of (i) landscape elements that contribute to local distinctiveness; (ii) historic elements that contribute significantly to landscape character and quality such as field or road patterns; (iii) vegetation which is a characteristic of that landscape type and (iv) the visual condition of landscape elements.

Developments which will facilitate securing Tullamore as a key growth driver will be considered an exception to this general presumption.

**CE Response:**

- a) This contention is not accepted, Chapter 1 of the draft Plan contains a section dedicated to Implementation and Monitoring:

Section 1.7 Implementation and Monitoring

The Council is fully committed to securing and monitoring the implementation of the strategies, policies and objectives of this Plan. The Council will continue to occupy a leadership role to progress and secure the Plan policies and objectives to achieve the sustainable development of the county. The successful implementation of a significant number of the policies and objectives of this Development Plan will necessitate on-going collaboration and a sense of good-will across a range of agencies and stakeholders. The implementation of this Plan will depend also on the economic climate, political support, Council funding and the availability of funding from other sources.

The Planning Department of the Council is the main section responsible for monitoring and implementing the Plan, mainly through the development management function. However, it is important to note that this Plan coordinates the work and objectives of other key departments within Offaly County Council, such as Local Economic Office (LEO), Environment and Water Services, Roads, Housing, Tourism, Regeneration, and Local Community Development. In some cases, the body responsible for the implementation of certain Plan objectives may be external, such as Irish Water, National Parks and Wildlife Service, Waterways Ireland, Transport Infrastructure Ireland, and the Environmental Protection Agency.

The Planning and Development (Amendment) Act 2018 established the legal basis for the Office of the Planning Regulator and outlines its role and functions, which include the assessment of all local authority forward planning programmes. It operates an independent monitoring role, advising Government on implementation of local authority statutory planning processes.

Under the provisions of Section 15 of the Planning and Development Act 2000 (as amended), the Council has a statutory obligation to secure the implementation of the objectives of the Plan and to prepare a progress report on achieving the objectives not more than 2 years after the making of this Plan.

b) Noted.

c) In response to this statement, there a number of objectives that focus on Tullamore as a Key Town for investment and also which target infill/brownfield sites as follows;

SSP-06 It is Council policy to strategically prioritise the development of Tullamore to underpin its role as a designated Key Town and driver of economic development for the county.

SSP-07 It is Council policy to require sustainable, compact, sequential growth and urban regeneration in Tullamore by consolidating the built-up footprint through a focus on regeneration and development of town centre infill and brownfield sites, and encouraging regeneration of underutilised, vacant and derelict lands for residential development and mixed use to facilitate population growth.

RP-10 It is Council policy to 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.

RO-04 It is an objective of the Council to establish a database of strategic brownfield and infill sites so that brownfield land re-use can be managed and co-ordinated across multiple stakeholders as part of an active land management process.

d) The Retail Planning Guidelines (2012) define retail areas as *'that part of a town centre which is primarily devoted to shopping'*. Therefore, the core retail area in Tullamore contains the primary retail streets of the centre where the main concentration of retail activity takes place. In light of this it is not recommended to change the boundary of the core retail area. It is recommended to insert the red text into chapter 7 of the plan as follows for clarity purposes:

Extract from Chapter 7 of draft Plan regarding Core Retail Areas:

*'Volume 2 of the Development Plan provides for settlement plans for all settlement areas within Offaly (except where a separate Local Area Plan exists). The core retail area of each settlement area has been delineated to identify clearly that part of a town centre which is primarily devoted to shopping as distinct from the wider town or village centre / mixed use zoning objective. **Core retail areas contain the primary retail streets of a centre where the main concentration of retail activity takes place.** Identifying and delineating core retail areas allows a focused approach for retailing and town / village centre action initiatives as well as the proper application of the sequential approach to retail development'*.

It is advised that no change to the Core Retail Area is required.

The Retail Planning Guidelines state that the definition by way of a map of the boundaries of core shopping areas must be addressed.

The proposal to extend the Core Retail Area into wider areas, would not fit with the current definition for Core Retail Areas. Retail development can still be considered outside the Core Retail Area based on the sequential test as set out in the Retail Planning Guidelines. By setting the Core Retail Area to reflect the streets primarily devoted to shopping, it helps safeguard the vitality and vibrancy of the town centre.

The Core Retail Area and the town centre / mixed use zoning are different, with the latter encapsulating a wider area with a multiplicity of uses, such as educational, business, recreational, residential and employment, and also an important retail function. It would not be appropriate to identify a Core Retail Area encapsulating all of the Opportunity sites, (bar site no. 9) and giving it a primary retail function as suggested in the submission.

- e) This contention is not accepted. There are strong policies and objectives in place to protect the town centre and the retail function of Tullamore to realise its Key Town potential.
- f) Regional Policy Objective (RPO) 6.10 of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly (EMRA) states that EMRA will support the preparation of a Retail Strategy / Strategies for the region in accordance with the Retail Planning Guidelines for Planning Authorities 2012 (or any subsequent revision), to update the retail hierarchy and apply floorspace requirements for the region. Accordingly, until such time as this is undertaken the retail development strategy for this Plan will be informed by the provisions of the Retail Planning Guidelines 2012 as they offer direction on retailing matters to be addressed by development plans. The requirements for a Retail Strategy as set out in the Retail Planning Guidelines have been addressed in Chapter 7 of the draft Plan.
- g) The draft Plan is positive to retail development in town centres, for example through the following objective in the draft Plan:

RTCO-01 It is an objective of the Council to encourage the continued vitality and viability of town centres by:

- Identifying and promoting key town and village centre Opportunity Sites for development;
- Promoting the revitalisation of vacant and derelict properties/shop units;
- Promoting ongoing environmental improvements to the public realm;
- Preventing overdevelopment of particular non-retail uses such as fast food outlets, amusement arcades / centres, off licences and betting shops in core retail areas;
- Promoting activities including events, festivals, street markets and farmer's/country markets in appropriate town and village centres in the county; and
- Facilitating sustainable mobility, accessibility and permeability improvements.

As set out in section 4.4 of the Retail Planning Guidelines: *'Planning applications for retail development proposals must comply with the criteria on location, suitability of use, size and scale and accessibility set out in the retail guidelines and development plan / joint or multi-authority retail strategy to ensure that the site chosen is the most suitable and best available site for the type of retailing proposed.'* Therefore, the suitability of all sites must be addressed.

- h) This would not be in the interests of proper planning and sustainable development of the town or county and would be contrary to the DECLGs Retail Planning Guidelines (2012) and accompanying Retail Design Manual. It would constitute prejudging a planning application.
- i) This would be contrary to the Urban Development and Building Heights – Guidelines for Planning Authorities (2018), RSES, NPF and the Core Strategy of the Draft Plan and the fundamental principles of Compact Growth.
- j) Response to proposed changes and amendments to policy objectives and DM Standards

The suggested amendments would;

- fundamentally alter the town centre policies and objectives and development management standards of the Draft Plan;
- give unbalanced emphasis to economic development over other elements to be assessed in a planning application;
- pre-judging planning applications;
- treat Tullamore differently than other settlements in the assessment of planning applications;
- be contrary to the DECLGs be contrary to the
 - Retail Planning Guidelines (2012) and accompanying Retail Design Manual;
 - Urban Development and Building Heights – Guidelines for Planning Authorities (2018)
 - National Planning Framework
 - National Development Plan 2018-2027
 - Regional Spatial and Economic Strategy for the Eastern and Midland Region

Accordingly, no change is recommended.

[Ref: CDP/D/114](#)

Person / Body:

Scott Hobbs Planning on behalf of Grapemont Ltd.

Summary of submissions / observations:

- a) This submission relates to lands of 4.2 ha which comprise Opportunity Site No. 6, 'Coen site' which is located between Church Street and Riverside Tullamore.
- b) The submission gives a planning background to the site outlining that the site had a planning permission for a considerable retail development which expired in 2019. There is currently a planning application with An Bord Pleanála which relates to this site Ref. PL19/96.
- c) States that the following policies are in conflict:

Policy RTCP-07 which states: *'It is Council policy to encourage retail development primarily in core retail areas and to apply the sequential approach in the consideration of the location of retail developments located outside of core retail areas.'*

Policy RTCP-02 which states: *'It is Council policy to promote Tullamore, a Key Town, as the main retail centre in the county and to ensure that the retail quantity, quality and range is of a standard that contributes to the strengthening of the retail economy within Tullamore Town, the county and the region as a whole.'*

- d) The Core Retail Area should be deleted, and development should be focused around all of the Opportunity Sites identified in Tullamore. Appropriate density and mix of uses for

each Opportunity Site could be identified through a Development Brief in the emerging Local Area Plan, in accordance with development proposals already put forward by landowners and providing that the plan is prepared in full consultation with stakeholders, and particularly landowners, to ensure deliverable and viable developments are promoted.

- e) Submits that Tullamore town centre is ill-defined and requests that the inclusion of a clearly defined town centre boundary which incorporates most of the Opportunity Sites identified in the Plan and which would provide clear guidance regarding the potential for retail-led development, would lead to certainty, would lead to delivery of the intentions of the Plan to achieve a strong town centre and one which reduces retail-spend from the County.



- f) Seeks the inclusion of a specific 'retail-led' zoning which should be introduced for this site. The purpose of this zoning is to encourage retail – led mixed use town centre development on a major top tier retail centre and county town. A mix of uses would be appropriate including large scale retail other commercial, recreational, cultural, amenity residential. Development proposals should be of a scale, form and design appropriate to its town centre location and positive consideration will be given to proposals which are demonstrated to be viable and which will be delivered within the plan period. A diversity of uses for both day and evening is encouraged. These areas require high levels of accessibility, including pedestrian, cyclist and public transport (where feasible).
- g) Requests the removal of the Constrained Land Use designation as there is no 'constraint to development':
- a. recognizing that a single landowner owns/ controls a significant proportion of the Opportunity Site, which landowner has private finance available to proceed with development of the site;
 - b. There is no technical constraint to development; and
 - c. There is no flooding issue relating to commercial development at the site, as demonstrated in the Flood Risk Assessment accompanying the submission and as previously accepted by the Council.
- h) Opportunity sites do not necessarily follow coherent boundaries yet the draft Plan requires a coherent approach to their development. Flanagan Properties has no objection to the requirement to ensure that development of one part does not frustrate the development of another but considers it an inappropriate constraint to require all parts to be brought

forward at one time. This unnecessarily constrains sites in the urban footprint and particularly those previously developed or in multiple land ownerships. This is proved by the fact that only one opportunity site has actually been partially built out over the past 15 years.



CE Response:

- a) Noted
- b) Noted
- c) The two policies quoted are not in conflict and are designed to ensure a return to a healthy and vibrant Core Retail Area within Tullamore Town Centre and also a growth in the retail offer for the town of Tullamore, county and wider area.
- d) Retail Planning Guidelines (2012) define retail areas as ‘that part of a town centre which is primarily devoted to shopping’. Therefore, the core retail area in Tullamore contains the primary retail streets of the centre where the main concentration of retail activity takes place. In light of this it is not recommended to change the boundary of the core retail area. It is recommended to insert the red text into chapter 7 as follows for clarity purposes:

Extract from Chapter 7 of draft Plan regarding Core Retail Areas:

*‘Volume 2 of the Development Plan provides for settlement plans for all settlement areas within Offaly (except where a separate Local Area Plan exists). The core retail area of each settlement area has been delineated to identify clearly that part of a town centre which is primarily devoted to shopping as distinct from the wider town or village centre / mixed use zoning objective. **Core retail areas contain the primary retail streets of a centre where the main concentration of retail activity takes place.** Identifying and delineating core retail areas allows a focused approach for retailing and town / village centre action initiatives as well as the proper application of the sequential approach to retail development’.*

The proposal to extend the Core Retail Area into wider areas, would not fit with the current definition for Core Retail Areas. Retail development can still be considered outside the Core Retail Area based on the sequential test as set out in the Retail Planning Guidelines. By setting the Core Retail Area to reflect the streets primarily devoted to shopping, it helps safeguard the vitality and vibrancy of the town centre.

Section 7.2.4 of the draft Plan addresses Opportunity Sites and lists items that are required at planning application stage.

- e) Volume 2 of the draft Plan provides for settlement plans. The core retail area of each settlement area has been delineated to identify clearly that part of a town centre which is primarily devoted to shopping as distinct from the wider town or village centre / mixed use zoning objective. Identifying and delineating core retail areas allows a focused approach for retailing and town / village centre action initiatives as well as the proper application of the sequential approach to retail development.
- f) There is no justification for this specific Land Use Zoning Objective. It is advised not to include it.
- g) Constrained Land Use designations are a requirement in the plan making process as required by the The Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014. The following is an extract from section 12.6.1 of the draft Plan relating to Constrained Land Uses:

“Flood risk areas in settlement plans are represented by a ‘Constrained Land Use’ designation. This designation generally limits new development, but will facilitate existing development uses within these areas that may require small scale development such as small extensions. Development proposals within these areas shall be accompanied by a detailed Flood Risk Assessment, carried out in accordance with The Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014 (or as updated), which shall assess the risks of flooding associated with the proposed development.

Proposals shall only be considered favourably where it is demonstrated to the satisfaction of the Planning Authority that they would not have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities, or increase the risk of flooding to other locations and be in accordance with the proper planning and sustainable development of the area. The nature and design of structural and non-structural flood risk management measures required for development in such areas will also be required to be demonstrated, to ensure that flood hazard and risk will not be increased. Measures proposed shall follow best practice in the management of health and safety for users and residents of the development”.

Consequentially, it is an objective of the Council (LUZO-14) to ‘facilitate the appropriate management and sustainable use of flood risk areas designated as ‘Constrained Land Use’ on Settlement Plan zoning maps’.

As the site in question is deemed to be a ‘brown field’ site there is no impact on the proposed land use zoning, but the Constrained Land Use designation remains as is required by the quoted guidance above, as is required on Flood Zone A & B designated lands.

The basis for the request to change the zoning on these lands is based on a specific flood risk assessment which was undertaken by JBA Consulting. (Appendix attached to submission)

In response to the submission CAAS Ltd. whom have carried out the SFRA for Offaly County Council have advised of the following:

The OPW's 2008 Flood Risk Assessment and Management (FRAM) Study for Tullamore has informed the Strategic Flood Risk Assessment (SFRA) Flood Zones that have, in turn, informed the Land Use Zoning contained in the draft Plan. The site-specific flood risk assessments (provided by submission CDP/D/169) identify that the 2008 FRAM Study:

- “does not account for the drainage scheme put in place after the 2008 event which has cleared the channel and reduced blockages”. This is correct; however, the Office of Public Works (OPW) have deemed the areas to be defended by the Scheme, which are marked as ‘Defended Area’ on the Flood Maps. The subject lands are not located within the defended areas as identified by the OPW”;
- “used a relatively high Manning's N value, of 0.55, to represent channel roughness”. The OPW have indicated to Offaly County Council that the hydraulic resistance of the Tullamore and Barony River channels was initially represented by a Manning's N value of 0.040, which is typical for clear winding watercourses, perhaps going as high as 0.055 in some locations that were extremely heavily vegetated. However, the OPW do not know how the site-specific flood risk assessments got a value of 0.55 for channel roughness.
- “mapping also does not include any changes (by third party land owners) after the scheme was implemented” and that “there have been a number of hydraulically significant changes within the immediate catchment that could serve to reduce water levels in and around the proposed development site”. Whilst the 2008 FRAM Study was completed in 2008 and does not include works that were carried out post the study, it would be contrary to the precautionary principle to assume that any hydraulically significant changes will be maintained by any private land-owner.

Taking into account the evidence outlined above, it would be premature to reduce the extents of the flood zones at this location and therefore changes on this basis would be contrary to the Flood Guidelines. However, the OPW have identified that they intend to review the Flood Maps for Tullamore in light of the development that has taken place since 2008, with new mapping possibly available in late 2021. On the basis of the forgoing, it is not advised to change the zoning at this location. This mapping may be available at the making of the Tullamore Local Area Plan after the making of the Co. Development Plan.

- h) In relation to the timing of the development of Opportunity Sites the draft Development plan stats that *Some of the sites may be owned by different parties and would require an element of site assembly for a coherent development strategy to progress. This approach to re-development is encouraged over a piecemeal approach.* No change to this is advised.

Ref: CDP/D/121**Person / Body:****Axis Architecture on behalf of Sean Garry****Summary of submissions / observations & CE Response:**

Please refer to Ref: CDP/D/14

Ref: CDP/D/125**Person / Body:****Scott Hobbs Planning on behalf of Flanagan Properties Ltd.****Summary of submissions / observations:**

The submission relates to a site known as 'Riverview', in Cloncollog, Tullamore on lands zoned as "Enterprise and Employment" and designated as Constrained Land Use in the Draft Development Plan. The submission states that Riverview has long been recognised as suitable for development. Planning permission has been granted for retail development at the site since 1999, and most recently in 2019 (reference 18/535).

The site is designated as a Constrained Land Use in the draft Plan, by virtue of the Strategic Flood Risk Assessment. However, this takes no recognition of the fact that a detailed Flood Risk Assessment that has been carried out for the land in relation to the planning permission for retail warehousing at the site, and that the Council and an Bord Pleanála have recently accepted through the grant of planning permission (18/535) that retail development is acceptable at this site.

Requests the removal of the 'constraint to development' annotation - recognising that;

- A single landowner owns / controls this site, which landowner has private finance available to proceed with development of the site, when conditions are favourable;
- There is no flooding issue relating to commercial development at the site, as demonstrated in the attached Flood Risk Assessment and as accepted by in the granting of planning permission; and
- There is no other technical constraint to development.

CE Response:

The lands identified in this submission amount to approximately 3.2ha and are located just west of the N52 by-pass and north of the R420 in Cloncollog, Tullamore. It is located on lands that are prone to flooding and accordingly within the Constrained Land Use (CLU) designation as referred to in the Strategic Flood Risk Assessment and Chapter 12 of the draft Plan. The request to change the zoning on these lands is based on a planning permission on the site Ref PL18/535 and a Specific Flood Risk Assessment which was undertaken by JBA Consulting in 2007.

Constrained Land Use Designations are a requirement in the plan-making process as required by The Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014.

The following is an extract from section 12.6.1 of the draft Plan relating to Constrained Land Uses:

“Flood risk areas in settlement plans are represented by a ‘Constrained Land Use’ designation. This designation generally limits new development, but will facilitate existing development uses within these areas that may require small scale development such as small extensions. Development proposals within these areas shall be accompanied by a detailed Flood Risk Assessment, carried out in accordance with The Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014 (or as updated), which shall assess the risks of flooding associated with the proposed development.

Proposals shall only be considered favourably where it is demonstrated to the satisfaction of the Planning Authority that they would not have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities, or increase the risk of flooding to other locations and be in accordance with the proper planning and sustainable development of the area. The nature and design of structural and non-structural flood risk management measures required for development in such areas will also be required to be demonstrated, to ensure that flood hazard and risk will not be increased. Measures proposed shall follow best practice in the management of health and safety for users and residents of the development”.

Consequently, it is an objective of the Council (LUZO-14) to ‘facilitate the appropriate management and sustainable use of flood risk areas designated as ‘Constrained Land Use’ on Settlement Plan zoning maps’.

In response to this submission CAAS Ltd. whom have carried out the SFRA for Offaly County Council have advised of the following:

- i) The OPW’s 2008 Flood Risk Assessment and Management (FRAM) Study for Tullamore has informed the Strategic Flood Risk Assessment (SFRA) Flood Zones that have, in turn, informed the Land Use Zoning contained in the draft Plan. The site-specific flood risk assessments (provided by submission CDP/D/125) identify is dated February 2009 and it pre-dates the Flood Risk Management Guidelines and the Tullamore Flood Relief Scheme. It does not consider the 1 in 1000-year Flood Zone: It does not provide sufficient evidence to make any changes to the Flood Zones included in the SFRA.
- ii) Taking into account the evidence outlined above, it would be premature to reduce the extents of the flood zones at this location and therefore changes on this basis would be contrary to the Flood Guidelines. However, the OPW have identified that they intend to review the Flood Maps for Tullamore in light of the development that has taken place since 2008, with new mapping possibly available in late 2021. On the basis of the forgoing, it is not advised to change the zoning at this location. This mapping may be available at the making of the Tullamore Local Area Plan after the making of the Co. Development Plan.

The members will note that based on the OPW Submission CDP/D/58, whereby the OPW identified that lands within the draft zoning objectives maps for Tullamore zoned as Strategic Residential Reserve and undeveloped ‘Town Centre/Mixed Use’ and ‘Enterprise and Employment’ are located within Flood Zone A, (in the Cloncollog and Riverside area) are consequentially advised to be zoned as Open Space, Amenity and Recreation. The OPW submission therefore impacts on this submission site and it is advised that this site be zoned Open Space, Amenity and Recreation.

[Ref: CDP/D/129](#)

Person / Body:

John Flanagan Developments Ltd.

Summary of submissions / observations:

- a) Submission relates to a site situated between Midland Regional Hospital Tullamore to the west, Ardan Vale to the North and Harbour Walk, to the south, on lands zoned Community Services / Facilities as per the Draft Plan. The lands are also located within Opportunity Site number 9, which is the site of the unfinished Acute Hospital and Primary Care Centre permission granted under TU446207/ 07360.
- b) The submission requests that these lands of 4ha. should be zoned for residential purposes. The lands are free from constraint, can be accessed by vehicular traffic from the by-pass, are owned by a house-builder and is available for development. The current draft zoning is for Community Services/Facilities. *The purpose of this zoning is to protect, provide and allow expansion of a wide range of different community facilities, civic facilities and social services ranging from education and health facilities to places of worships, community centres and childcare facilities. Ancillary facilities such as dedicated open space or sports facilities will normally be facilitated within this zoning objective.*

On such a zoning it is an objective of the Council under objective LUZO-09 to *provide necessary community, social, health, public administration and educational services and facilities.*

The submission considers there is no justification for the continued zoning of all this land within the emerging Development Plan for Community Services and Facilities (CSF) uses and requests amendment to the Community Services / Facilities zoning (i) for residential development on the 4 ha of land and (ii) to allow additional residential care and specialised residential uses within the definition of community services / facilities use.

The submission gives a justification for the lands to be zoned residential, highlighting the ability of the lands to be delivered as a residential development, providing a range of housing types and tenure, and therefore contributing to the population target growth for Tullamore. Also the Compact Growth and Sustainable Mobility principles could also be realised.

The synergy with the adjacent hospital and potential for student accommodation and / or sheltered accommodation / retirement village is highlighted.
- c) It is requested that the Community Services / Facilities zoning is widened to allow for a specialised form of residential development within the overall CSF zoning. It is considered that a mix of residential and (widened) CSF uses on this overall site is appropriate.



CE Response:

- a) Noted
- b) The lands in question comprise a block of strategically located lands which are adjoining the existing Midlands Regional Hospital Tullamore and the site of the unfinished Acute Hospital and Primary Care Centre permission granted under TU446207/ 07360, which is currently subject to a planning application for the construction of a new 4 storey nursing home, step down facility and rehabilitation and convalescence unit reusing the existing structure (Ref. PL20/503).

The purpose of the Community Services and Facilities zoning at this location is to protect, provide and allow expansion of a wide range of different community facilities, civic facilities and social services ranging from education and health facilities to places of worships, community centres and childcare facilities. Ancillary facilities such as dedicated open space or sports facilities will normally be facilitated within this zoning objective.

Land Use Zoning Objective – Community Services/Facilities

It is an objective of the Council to:

LUZO-09 Provide necessary community, social, health, public administration and educational services and facilities.

These lands are zoned for Public Educational Community in the Tullamore Town and Environs Development Plan (TTEDP) 2010- 2016 as extended. In the context existing zoning plan for the area TTEDP 2010- 2016 as extended, the existing development on the adjoining sites, and the current proposal on the site to the north of the submission site, it is considered that there is no justification for the proposal to allow residential development at this location. The lands are identified for future Community Services and Facilities, that would complement the existing hospital and future development in the area, which may lead to a consolidation of the important Health Care function of Tullamore as Key Town and also its employment generation role.

- c) It is noted in **Table 2.3: Summary of criteria utilised to develop the settlement hierarchy for Offaly 2021-2027** of the draft Plan, that the *Midland Regional Hospital Tullamore is a*

Teaching/University hospital for a number of institutions including University College Dublin and University of Limerick, acting as a strong economic driver for the town and also providing a springboard for further linkages to existing and new med-tech businesses and research facilities.

In the context of the Regional Spatial and Economic Strategy, Regional Policy Objective RPO 4.70: *To examine the need for complementary third level outreach educational facilities at Tullamore, particularly with regard to support for Tullamore Regional Hospital and where appropriate, its continued development as a Teaching/University Hospital, together with potential for linkages to existing and new med-tech businesses and research facilities'.*

It is deemed appropriate to allow for student accommodation / residences as part of an overall Masterplan strategy for Opportunity Site No. 9 based on and in conjunction with a third level campus expansion within that opportunity site.

The following sections and policies from the draft Plan are of relevance to the submission lands and their potential development.

9.7 Other Education/Skills Training/Third Level:

The Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-31 states that by 2031 there will be a significant increase in the number of people in the 15-24 years' age cohort which will lead to greater demand for third level education. The Council considers that Offaly has the potential to accommodate multiple campuses based on its sectoral strengths in areas such as food, energy, biodiversity, pharma and Medtech, engineering and advanced manufacturing. Tullamore can provide complementary third level outreach educational facilities supporting the Midland Regional Hospital and its continued development as a Teaching/University Hospital. There also exists an opportunity to develop a centre in the county for exploring/evaluating new technologies in energy provision with Research and Development components based on the expertise available in the Athlone Institute of Technology (AIT), University of Limerick (UL) and Maynooth University nexus.

SICCDP-32 It is Council policy to support the Health Service Executive and other statutory and voluntary agencies in the provision of appropriate healthcare facilities including the development of both the system of hospital care and the provision of community-based primary care facilities.

SICCDP-35 It is Council policy to support the designation of the Midland Regional Hospital Tullamore as a major trauma centre, its continued development as a 'teaching' hospital and the potential of a 'regional' hospice at this location.

The following policies in Chapter 5 are also of relevance:

ENTP-22 It is Council policy to encourage and establish links between County Offaly, Maynooth University, Trinity College Dublin, University of Limerick, Athlone Institute of Technology and Cork Institute of Technology and other higher level colleges as appropriate, which will improve the skills base/education of inhabitants within County Offaly.

ENTP-23 It is Council policy to encourage third level education in County Offaly through the provision of outreach / campus facilities for the accommodation of courses.

ENTP-25 It is Council policy to support the examination of a need for complementary third level outreach facilities in Tullamore, particularly with regard to support for Midland Regional Hospital Tullamore and where appropriate, its continued development as a Teaching / University Hospital, together with potential for linkages to existing and new med-tech businesses and research facilities.

[Ref: CDP/D/146](#)

Person / Body:

Tom McNamara

Summary of submissions / observations:

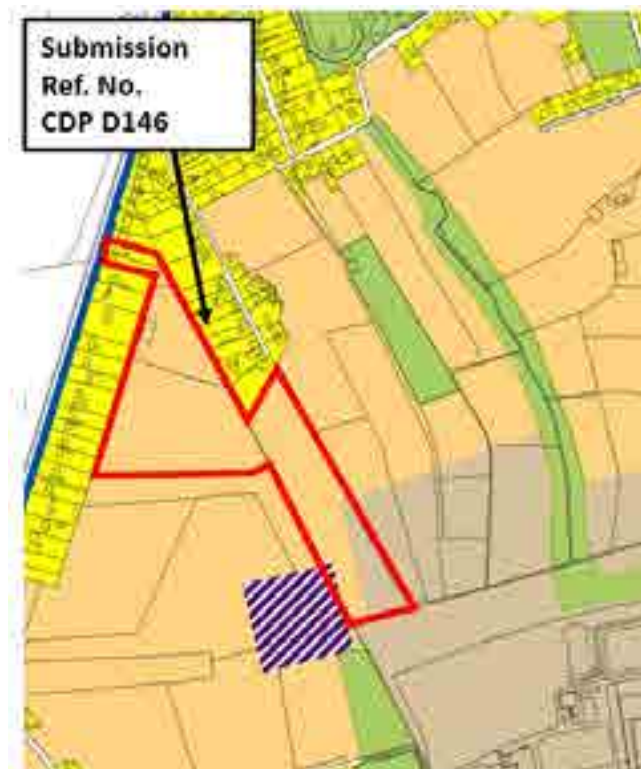
- a) The submission is made in relation to c.9.5 ha (c23.5 acres) of land at Charleville road Tullamore that is, in the majority, zoned Residential under the current Tullamore Town & Environs Development Plan 2010-16 (as extended to 2020). A small portion of the landholding at the south-eastern corner is zoned Business/Employment. Under the Draft County Development Plan, 2021-2027 the lands are proposed to be rezoned to “Strategic Residential Reserve” and will not be considered for development under the life of the new Plan. The submission requests that the lands be zoned as New Residential or Existing Residential in the Draft Plan 2021-2027, in order to facilitate a forthcoming planning application.
- b) A site context is outlined stating the following:
 - (i) The site has an optimum location, off the Charleville Road, in proximity to Charleville Demesne, and circa 1.75km from the Town Centre, and within 15 minutes’ walk of the train station, with a number of recreational/ sporting clubs and National Schools in close proximity.
 - (ii) The landscape of the site is of a flat character, with no restrictions due to landscape classifications, Tree Presentation Orders, (TPOs) Record of Protected Structures or Architectural Conservation Areas.
 - (iii) The lands are not within any predicted flood risk zones.
 - (iv) The site can readily be connected to water services and other utilities as provided along Charleville Road.
 - (v) Road access can be achieved off the Charleville Road via 2 bungalow sites which have been acquired by the landowner.
 - (vi) The lands are currently in the South Environs Masterplan area of the Tullamore Town and Environs Development Plan (TTEDP) 2010-2016.
- c) Offers justification for retaining the Residential Zoning on the submission lands as follows: It is unreasonable and unsustainable to rezone the submission lands to Strategic Residential Reserve as none of the lands in the wider Charleville and Spollenstown areas in the southern portion of the town are zoned New Residential. All of these are proposed

to be rezoned Strategic Residential Reserve and will not be considered for development during the life of the next Plan.

- d) The landowner fully intends to develop these lands in the short term. The developer has assembled the current site through 3 separate land purchases in recent times and now intends to progress a planning application on the lands for residential development.
- e) The submission lands are fully serviceable in the short term and can facilitate immediate development. Full connections to water services, electricity, telecoms, broadband etc. along Charleville Road/St. Colman's Terrace is available without any dependency on the provision of major new infrastructure to service the future development lands in Spollenstown further east.

Previously a successful pre-connection enquiry was issued by Irish Water in relation to a potential residential development on a portion of this landholding.

- f) Zoning and development of the submission lands will help achieve the Strategic Objectives of the Draft Development Plan including;
 - to help County Offaly achieve its targeted population increase over the life time of the plan,
 - the consolidation of the urban area of Tullamore,
 - the reduction of car dependency and increase the use of sustainable mobility in the town, and
 - the provision of high quality housing of a sufficient scale, mix, tenure, sequence, and density.
- g) Zoning and development of the submission lands would help provide a viable alternative to urban generated rural housing in the county.
 - Proposes a low density zone of 10 units per hectare which would complement the existing area and offer an alternative to one off rural dwelling demand.



CE Response:

a) The submission requests that the site be zoned New Residential to allow for residential development.

National Strategic Outcome 1 (NSO 1) of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development 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.'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

Zoning the submission lands for a low density residential development would create a suburban style housing area on the periphery of the town, a move which would not support compact growth. There are other lands identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the development plan, consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

- b) It is noted that the physical attributes of the site are favourable in terms of condition.
- c) The southern part of Tullamore will require significant levels of investment by Irish Water in order to service the lands zoned Strategic Residential Reserve, which are primarily located in the Southern Masterplan area of the Tullamore Town and Environs Development Plan 2010-2016 as extended. While investment is also required to service the lands to the northern part of the settlement of Tullamore, it is considered more feasible, as advised by the Environment and Water Services Section of Offaly County Council to do so over the lifetime of the Draft Plan 2021-2027.
- d) Noted.
- e) Please see (c) above.
- f) The Core Strategy as set out in the draft plan provides for the allocated growth to achieve the population target.

The Core Strategy as set out in Chapter 2 Core Strategy, Settlement Strategy and Housing Strategy of the draft plan outlines the Principle for Growth Section 2.1.4 for the county and as outlined in the response to the Office of the Planning Regulator's (OPR'S) submission CDP/D/172, the zoning plan for Tullamore is built on the principle of the sequential approach.

Section 4.19 (f) of the Development Plan Guidelines 2007 relates to the 'Sequential Approach'. It states *'In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided); (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan'*. It is considered that the Plan adheres to the above section of the Development Plan Guidelines. Accordingly, a paragraph will be inserted into the Plan as follows:

'Sequential Approach:

In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach was taken to the zoning of land for development: (i) Zoning extends outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes given preference (i.e. 'leapfrogging' to more remote areas has been avoided); (ii) A strong emphasis is placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas zoned are contiguous to existing zoned development lands'.

g) There is no provision for low density residential zoned lands in Tullamore as it is a Key town. The average density will be 35 units per hectare as set out in the CE response to the OPR submission in this CE Report.

[Ref: CDP/D/150](#)

Person / Body:

Simon Clear & Associates on behalf of Midland Town and Country Stores

Summary of submissions / observations:

The lands identified in this submission were formerly zoned Industrial in the Tullamore Town and Environs Development Plan 2010-2016 as extended. They are zoned Business /Technology Park in the Draft Plan.

The submission outlines that there is a live permission on the site for a Town and Country Store which expires in 2021 (PL11/47 as extended by EX16006). The permitted development is an Agricultural Retail Store would not be permitted under the Draft Plan, when assessed against the zoning matrix for Business / Technology Park.

The submission requests that the lands be zoned as Enterprise and Employment instead of Business / Technology Park.



CE Response:

- There are two significant areas of Business / Technology Park zoned lands in Tullamore, the Ardan Strategic Enterprise Zone (SEZ) 45ha. and the Ballyduff SEZ 40ha., within the draft zoning plan for Tullamore, excluding the submission site.
The submission site is of a smaller area (8ha.) and is more constrained in configuration due to flood zones in the immediate area.
There are also two significant blocks of Enterprise and Employment Lands zoned in Tullamore in the draft Plan one at Ballyduff SEZ (20 ha) and a second off the bypass, on the eastern side of the town in the Puttaghan area.

The nature of the submission site in terms of its size, configuration and location, and also having regard to the permissions on site would be more appropriately zoned as Enterprise and Employment. It is advised to amend the zoning from Business / Technology Park to Enterprise and Employment as per the submission.

Section 12.4.5 of the draft Plan outlines the Enterprise and Employment Zoning Objective as follows;

This zoning promotes the development of employment uses that reinforce the enterprise and employment function of the subject area as a whole and require high environmental and design standards. Appropriate uses in this zoning include, for example research and development, light industry, retail warehousing, car showrooms, offices, employment and enterprise related uses within a high quality campus/park type development. Both standalone retail and retail as an ancillary part of a business enterprise are open to consideration within this zoning objective subject

to appropriateness in applying the sequential test as detailed in Chapter 4 of the Guidelines for Planning Authorities, Retail Planning, Department of the Environment, Community and Local Government, 2012, and in accordance with proper planning and sustainable development. Uses specifically excluded from this zoning include waste management activities and heavy industrial uses.

Section 12.4.7 of the draft Plan further outlines the Enterprise and Employment Zoning Objective as follows;

This zoning facilitates opportunities for technology based industry and advanced manufacturing, compatible office space and research and development based employment within high quality, highly accessible, campus style settings. The zoning accommodates locations for high end, high quality, value added businesses and corporate headquarters. An emphasis on high quality sustainable design and aesthetic quality will be promoted to enhance corporate image and identity.

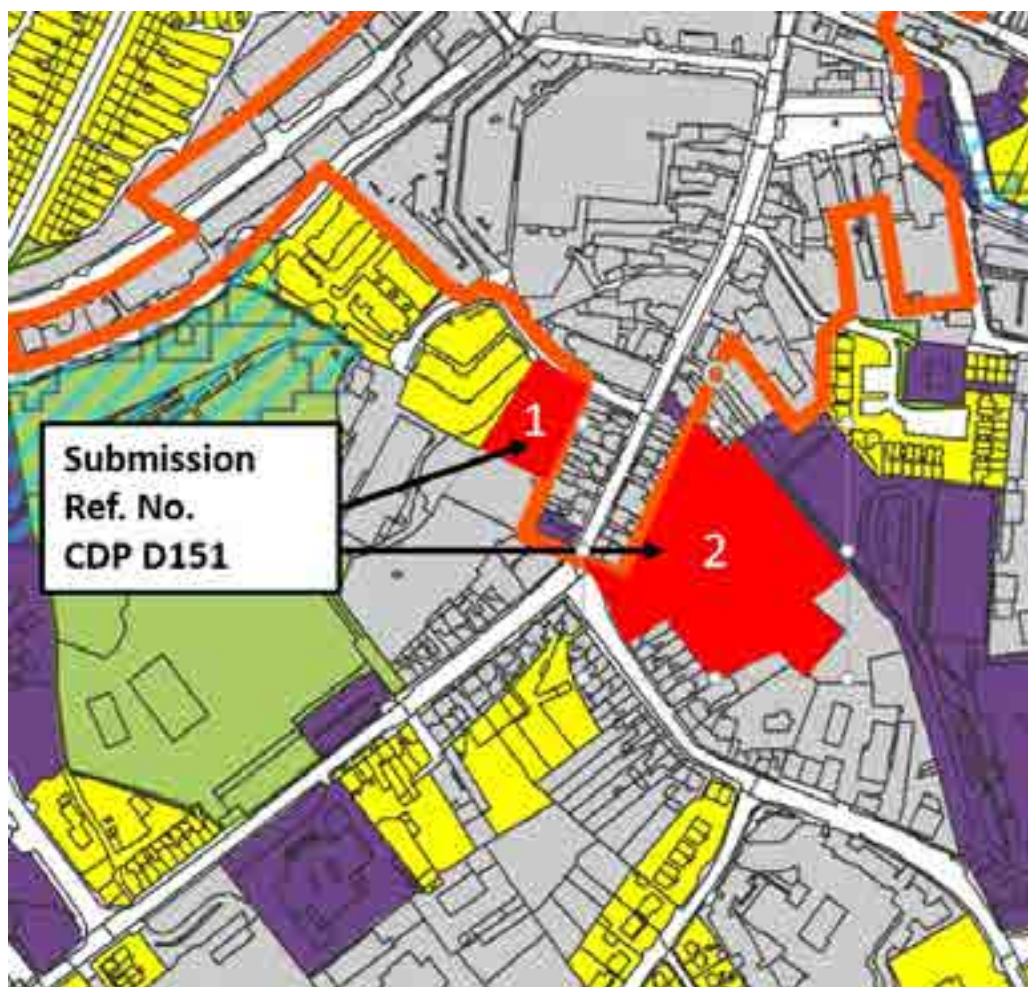
[Ref: CDP/D/151](#)

Person / Body:

Axis Architecture on behalf of Bridgestock Care Ltd.

Summary of submissions / observations:

Requests that the lands identified in the submission represent a significant opportunity for Tullamore town to develop its central core and for that reason would like to see the lands identified in this submission as part of the Core Retail Area of Tullamore.



CE Response:

The lands constitute 2 areas of backlands;

Site 1 is located to the west of High Street and south of Tara Street

Site 2 is located to the east of High Street and North of O'Moore Street – this block forms part of Opportunity Site No. 3.

The proposal to extend the Core Retail Area into this areas, would not fit with the current definition for Core Retail Areas. Accordingly, it is not recommended to change the boundary of the core retail area.

The Retail Planning Guidelines (2012) define retail areas as 'that part of a town centre which is primarily devoted to shopping'. Therefore, core retail areas contain the primary retail streets of a centre where the main concentration of retail activity takes place. In light of this it is proposed to insert the red text into chapter 7 as follows for clarity purposes:

Extract from Chapter 7 of draft Plan regarding Core Retail Areas:

'Volume 2 of the Development Plan provides for settlement plans for all settlement areas within Offaly (except where a separate Local Area Plan exists). The core retail area of each settlement area has been delineated to identify clearly that part of a town centre which is primarily devoted to shopping as distinct from the wider town or village centre / mixed use zoning objective. Core retail areas contain the primary retail streets of a centre where the main concentration of retail activity takes place.'

Identifying and delineating core retail areas allows a focused approach for retailing and town / village centre action initiatives as well as the proper application of the sequential approach to retail development’.

[Ref: CDP/D/153](#)

Person / Body:

Ballycommon Canal Renewal Group

Summary of submissions / observations:

- a) States the long term goal to have this branch of the Grand Canal restored to its former navigable state and propose a number of measures which will facilitate and support this goal. Believes there is major potential to develop various types of tourism and business facilities related to the local waterways as has happened in the UK and on mainland Europe. Acknowledges that this would be a major undertaking both financially and structurally. ‘Unless restorative action is taken in the near future, a very important part of our local industrial and built heritage will be lost to further generations together with the tourism potential it offers’.
- b) References submission to the 2014-2020 Draft Development Plan and acknowledges achievements arising from that; notably
 - The Grand Canal Greenway- (A Way Marked Walking/Cycling Routes) from Kilbeggan to Ballycommon, which currently a work in progress.
 - Restoration of bridges and Silver River aqueduct:
- c) Requests that Offaly County Council, includes an objective to investigate and develop the proposal to a finality for the reopening of the Ballycommon to Kilbeggan branch of the Grand Canal as a full and proper marine navigation

CE Response:

- a) Noted
- b) The work of Ballycommon Canal Renewal Group among other local groups in relation to their support for the Grand Canal greenway is noted.
- c) The draft plan contains the following objective which is deemed appropriate to retain it in the draft plan as is.

TRO-18 It is an objective of the Council to work with the relevant stakeholders to examine the feasibility of developing the Kilbeggan to Ballycommon link of the Grand Canal, as a potential navigational route.

A feasibility study in conjunction with relevant stakeholders including Waterways Ireland and local groups and landowners and Westmeath County Council would be the first step in realising this potential project.

[Ref: CDP/D/154](#)

Person / Body:

Tom Philips & Associates on behalf of the Doorley Family

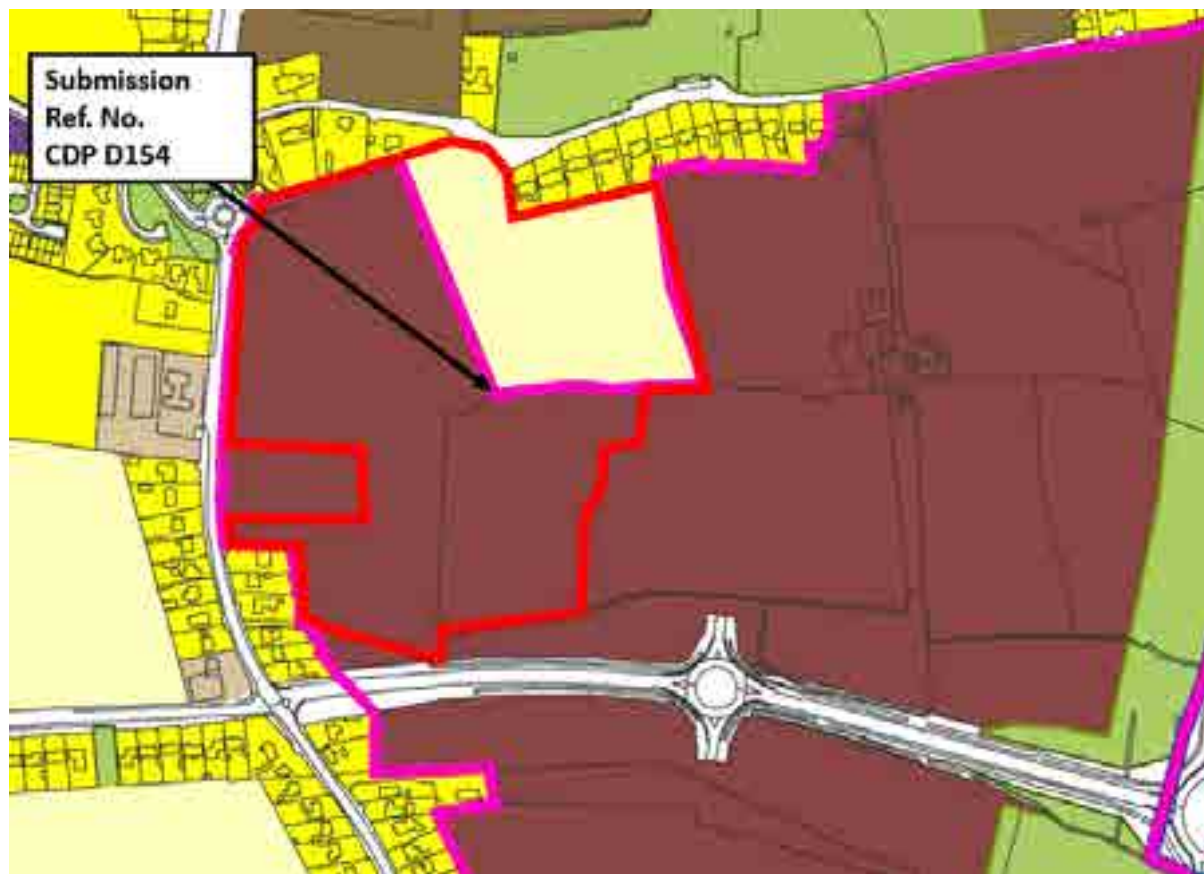
Summary of submissions / observations:

- a) Submits that the lands identified off the Arden Road and known as Arden Lands with an area of 11.7ha in total should retain its zoning as per the Tullamore Town and Environs Development Plan 2010-2016.

Requests that the proposed rezoning of the majority of subject lands from 'Residential' to 'Business / Technology Park' does not proceed as it will both eliminate the possibility to provide residential units; and reduce the likelihood of Tullamore reaching its target for new housing stock in the town over the lifetime of the forthcoming Development Plan.

- b) The Doorley Family has actively engaged with the Planning Authority in the phased development of the subject lands and their proposal is cognisant of local demand and requirements. The proposed rezoning does not take into consideration the ongoing work at the subject lands conducted by the Doorley Family, nor the Application for, *inter alia*: a 90 No. bed nursing home and 77 No. residential unit development, currently before the Planning Authority (Reg. Ref. 20/450) that facilitates a high-quality development in the local area, as part of a residentially focused Masterplan.
- c) States an acceptance of the strategy to zone more land for 'Business / Technology Park' use and welcomes the need for the provision of new and diverse employment streams, but states a belief that there are already adequate alternative and more suitable sites in Tullamore that fulfil that zoning objective.
- d) The submission outlines the Planning Context relating to the submission site, and notes the objective for the Strategic Employment Zone within the context of the Draft Plan, and questions whether the Planning Authority engaged with the relevant healthcare authorities regarding any proposed expansion of the Midland Regional Hospital at Tullamore and/or the provision of any associated facilities and what level of any consultation or engagement took place with the land owners in the proposed 'Strategic Employment Zones'? and if any credence has been given to the content of the *Dublin Midlands Hospital Group Strategy 2018-2023*, which, while acknowledging potential ward expansion at Midland Regional Hospital does not refer to a physical expansion of the hospital's footprint or any other associated development.
- e) Notes Tullamore's role as Key Town as addressed in the National Planning Framework and Regional Social Economic Strategy (RSES) with emphasis on delivering households coming from NPF and sustainable development patterns which promote compact growth, reduce transport demand and encourage low carbon transport modes; and quotes from the RSES in relation to Tullamore, and highlights the importance of housing provision in Tullamore; pointing out that the submission lands would assist in realising these overarching objectives.
- f) In the context of the current planning application (on part of these lands), Pl. Ref. 20/450 for the 90 bed nursing home, 77no. units and a coffee shop, the associated Masterplan and the distributor road objective, it is contended that the proposed Business / Technology zoning is premature.
- g) States that the removal of a roads objective is counterproductive.

- h) Questions if any research has been conducted with regard to the development intentions (or otherwise) of the respective landowners of lands proposed for New Residential zoning?
- i) Details a no. of planning arguments in relation to the context, location, services and infrastructure, which would favour a residential zoning.



CE Response:

- a) The zoning objectives map for Tullamore is informed by the Core Strategy for the County and population projections and zoning allocations therein.
- b) The draft plan had regard to advanced pre-planning discussions on these lands which is illustrated by the delineation of the zoning of New Residential and Business / Technology Park zonings.
- c) There is a requirement from the RSES to identify Strategic Employment Zones for Tullamore as a Key Town. Section 12.6.2 of the Draft Plan outlines the land use zoning objectives in relation to Strategic Employment Zones (SEZs) as follows;

12.6.2 to Strategic Employment Zones (particular to Tullamore)

Reflecting Regional Policy Objective 4.27 of the Regional Spatial and Economic Strategy which states that Key Towns (such as Tullamore) shall act as economic drivers and provide for strategic employment locations to improve the economic base by increasing the ratio of jobs to workers, it is an objective of the Plan to provide two Strategic Employment Zones (SEZ) within the settlement boundary of Tullamore town in the following areas:

- Ardan Road; and

- *Ballyduff.*

The purpose of this objective is to facilitate strategic large scale employment in development zones in a sequential manner to promote sustainable compact growth in tandem with the delivery of infrastructure and enabling services. These zones have development capacity, good accessibility, availability of a land bank of at least 100 acres in size and potential to deliver significant economic development and employment creation.

The proposed Ardan Road SEZ has potential to cater for the expansion of Midland Regional Hospital Tullamore and its continued development as a Teaching/University Hospital and/or to provide a Med or Bio Technology Park with linkages to the Hospital, whilst the proposed Ballyduff SEZ has the potential to provide a Business / Technology Park, leveraging its proximity to the Axis Business Park, Burlington Business Park and Srah IDA Business Park in the area.

The lands at Ardan Road SEZ (which include the submission lands) are identified due to their strategic location in relation to easy access to / from the M6 Motorway, proximity to the Midlands Regional Hospital Tullamore, the availability of a land bank and their potential to deliver significant economic development and employment creation. Notwithstanding the RSES requirement outlined above, a land bank of this scale and potential has been identified as a priority for Tullamore in recent times.

- d) The Planning Authority has had consultation with the IDA, Tullamore and District Chambers and the HSE in relation to the proposed SEZs and other issues relating to Employment zones in Tullamore and the wider county. It is noted that the SEZ requirement has arisen from the RSES and applies to Tullamore Key Town as evidenced in RPO 4.27 of the RSES which states *'Key towns shall act as economic drivers and provide for strategic employment locations to improve their economic base by increasing the ratio of jobs to workers'*.
- e) Tullamore's role as a Key Town in Housing Provision and population growth within the county is outlined in the Chapter 2 of the draft Plan. It is contended that the inclusion of all of the subject lands as residential 11.7ha. in conjunction with other new residential zoned land and mixed use zonings would result in an over zoning of New Residential land uses in the settlement of Tullamore.
- f) It is not considered that the Business / Technology Park Zoning at this location is premature.
- g) An appropriate distributor route objective will form part of any future Master Plan for the area which will achieve the desired traffic access and movement arrangements for this area.
- h) An asset-based approach as advocated by the RSES was applied in forming Volume 2 settlement plans.
- i) Noted, the majority of these considerations apply favourably to the Business /Technology Park zoning of these lands.

[Ref: CDP/D/169](#) (There is a second submission relating to these lands CDP/D/171)

Person / Body:

Destrina Ltd.

Summary of submissions / observations:

- a) The submission relates to a site to the east of the settlement of Tullamore in Cloncollig area on the town side to the N52 bypass and proposes a change to the zoning objective of the subject lands under the Draft Offaly County Development Plan 2021-2027 from “Open space, Amenity and Recreation to “Enterprise and Employment”
Also seeks to remove the designation as “constrained land use” due to alleged flood risk.
- b) The submission includes a more recent and site-specific flood risk assessment as an appendix, that has been carried out by JBA Consulting on behalf of the land owner in 2019 and updated in 2020 as justification for the removal of the Constrained Land Use designation due to flood risk and the proposed rezoning of lands from Open Space Recreation and Amenity to Employment and Enterprise.
- c) The basis of the current flooding designation on the lands appears to be from the Tullamore FRAM model, which was carried out in 2008 after flooding in Tullamore. However, JBA claim to have found a number of observations of interest with the 2008 study, which would suggest that some errors in the modelling may have occurred, such as no account being taken of drainage scheme works and also the use of a high Manning’s N Value of 0.55 for channel roughness. Following a very detailed and robust assessment, JBA identified that part of the submission lands that are actually outside a flood risk zone while the remainder (to the rear) is within Flood Zone B. This is a significant departure from the Strategic Flood Risk Assessment (SFRA) prepared as part of the current Draft Development Plan and would confirm that the subject site is suitable for commercial development. As stated, the JBA site-specific flood risk assessment has confirmed that the subject site does not lie within a high-risk flood zone (flood zone A). Rather, it is partly in zone C and Zone B.
- d) The subject site is located on lands that are within the built-up area of Tullamore and specifically within the heart of the commercial and enterprise/employment area of Tullamore, which benefit from proximity to existing commercial development.

CE Response:

- a) There are 2 derelict structures on site. The majority of the lands to the rear and east of the structures are greenfield. The lands identified in this submission amount to 3.2ha approx., just west of the N52 by-pass and north of the R420 in Cloncollig, Tullamore, in an area that is prone to flooding and accordingly within the Constrained Land Use (CLU) designation as referred to in the Strategic Flood Risk Assessment and Chapter 12 of the draft Plan.
- b) The basis for the request to change the zoning on these lands is based on a specific flood risk assessment which was undertaken by JBA Consulting. (Appendix attached to submission)
- c) In response to this submission CAAS Ltd. whom have carried out the SFRA for Offaly County Council have advised of the following:
The OPW’s 2008 Flood Risk Assessment and Management (FRAM) Study for Tullamore has informed the Strategic Flood Risk Assessment (SFRA) Flood Zones that have, in turn, informed

the Land Use Zoning contained in the Draft Plan. The site-specific flood risk assessments (provided by submission CDP/D/169) identify that the 2008 FRAM Study:

- “does not account for the drainage scheme put in place after the 2008 event which has cleared the channel and reduced blockages”. This is correct; however, the Office of Public Works (OPW) have deemed the areas to be defended by the Scheme, which are marked as ‘Defended Area’ on the Flood Maps. The subject lands are not located within the defended areas as identified by the OPW”;
- “used a relatively high Manning’s N value, of 0.55, to represent channel roughness”. The OPW have indicated to Offaly County Council that the hydraulic resistance of the Tullamore and Barony River channels was initially represented by a Manning’s N value of 0.040, which is typical for clear winding watercourses, perhaps going as high as 0.055 in some locations that were extremely heavily vegetated. However, the OPW do not know how the site-specific flood risk assessments got a value of 0.55 for channel roughness.
- “mapping also does not include any changes (by third party land owners) after the scheme was implemented” and that “there have been a number of hydraulically significant changes within the immediate catchment that could serve to reduce water levels in and around the proposed development site”. Whilst the 2008 FRAM Study was completed in 2008 and does not include works that were carried out post the study, it would be contrary to the precautionary principle to assume that any hydraulically significant changes will be maintained by any private land-owner.

Taking into account the evidence outlined above, it would be premature to reduce the extents of the flood zones at this location and therefore changes on this basis would be contrary to the Flood Guidelines. However, the OPW have identified that they intend to review the Flood Maps for Tullamore in light of the development that has taken place since 2008, with new mapping possibly available in late 2021. On the basis of the foregoing, it is not advised to change the zoning at this location. This mapping may be available at the making of the Tullamore Local Area Plan after the making of the Co. Development Plan.

- d) Noted. The presence of the flood risk as outlined above, at this location means the lands can only be considered for Open Space, Amenity and Recreation and supersedes the merits of its location.

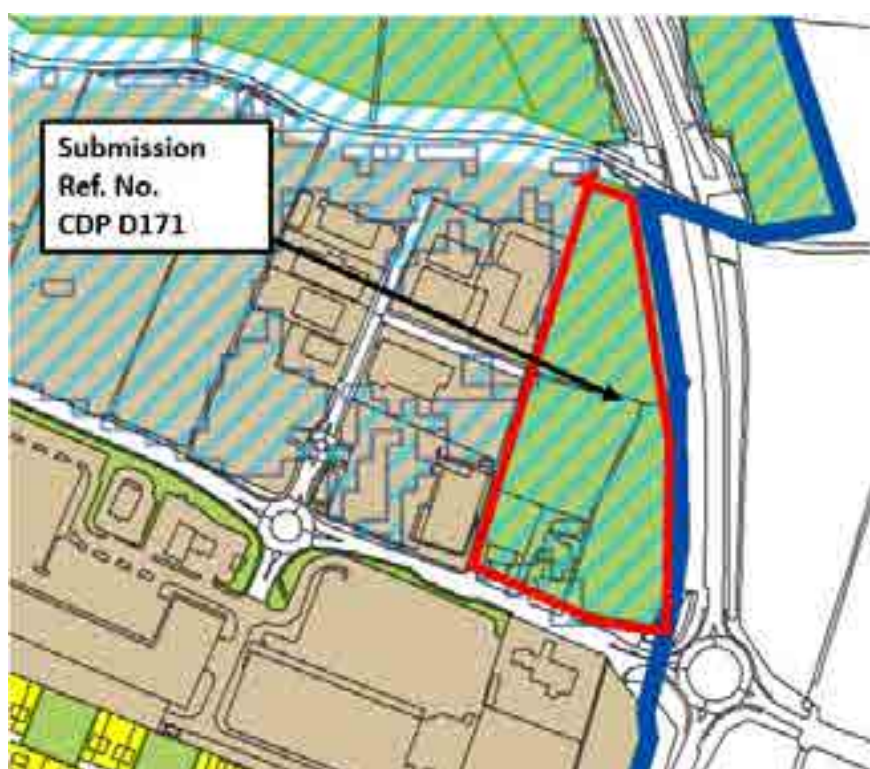
[Ref: CDP/D/171](#) (Please see CDP/D/169 relating to this site also)

Person / Body:

Myles Shortall

Summary of submissions / observations:

- a) Requests that the zoning on a site in Cloncollog, Tullamore adjoining the by-pass should not be changed from its previous zoning of Commercial / Enterprise and Employment in the Tullamore Town and Environs Development Plan 2010-2016 (as extended) to Open Space zoning as shown in the draft Plan.
- b) The town's physical eastern boundary is the bypass and therefore the allowance of future development at this location within the confines of the bypass is entirely consistent with a sustainable development approach on the eastern side of the town.
- c) This route is the main entry point into the town, for significant volumes of traffic and it is important that the Council recognises the potential for a development at this location.



CE Response:

- a) There are 2 derelict structures on site. The majority of the lands to the rear and east of the structures are greenfield. The lands identified in this submission amount to 3.2ha approx., just west of the N52 by-pass and north of the R420 in Cloncollog, Tullamore, in an area that is prone to flooding and accordingly within the Constrained Land Use (CLU) designation as referred to in the Strategic Flood Risk Assessment and Chapter 12 of the draft Plan. Accordingly, it is not recommended to amend the draft Plan in this respect.
- b) Noted
- c) Noted

[Ref: CDP/D/173](#)

Person / Body:

David Spain

Summary of submissions / observations:

- a) Requests that consideration be given to providing a large playground to the North of Tullamore in the Collins Lane area.
This would service some of the largest estates in Co. Offaly from, Drom Liath, Carraig Cluain, Ballin Rí, Eiscir Meadows, Norbury Woods and Silverbrook.
There are nearly 1000 homes in this area of Tullamore with a very young population. It would be more sustainable and add to the sense of community in these areas.
- b) Suggests that a site across the road from Educate Together National School would be an ideal location for such a playground.



CE Response:

- a) The area referred to is a significant residential area in North Tullamore. The draft plan includes significant lands zoned for Open Space, circa 250 ha in total. More specifically there are 4.7ha of lands zoned Open Space circa 300m west of the Educate Together National School which could potentially facilitate a recreational park and a large playground in the future. As part of the forthcoming LAP for Tullamore potential playgrounds / recreational areas and green infrastructure connections will be identified.
- b) The site 'across the road' from Educate Together NS (immediately south) is zoned new residential as per the draft plan and any future development at this location would require

a minimum Public Open Space Area as per the draft Development Management Standards Chapter, which could potentially incorporate a playground for the wider area.

Under planning permissions PL17/231 and PL 18/555 permissions for Silverbrook housing development, a playground and basketball court are provided within the layout drawings. Further the draft Plan includes an area, to the south east, of the Neighbourhood Centre Zoning which could accommodate a playground to serve the area, alternatively, as this proposed land use is open for consideration under the zoning objective.

Ref: CDP/D/176

Person / Body:

Cllr. Tony McCormack

Summary of submissions / observations:

- a) States that the draft development plan seriously restricts the development of Tullamore Town Centre due to the confines of the Tullamore Core Retail Area. Submits that the following areas should be included in the Core Retail Area for Tullamore;
 - Spollen's Car Park,
 - Tanyard,
 - Coen's site on Church Road, and
 - Church road, beside the Lidl development.
- Suggests that the narrowing of the core retail area will create a further unnecessary barrier and restriction to development.
- Also quotes 'it was also stated by IDA in the past that Tullamore needs more retail and restaurants to improve the offering, to attract more FDI'.
- Only one of the nine Opportunity sites, the Texas site, is located in the new "retail core".
- b) There are conflicting comments regarding the requirements for taller buildings - Opportunity Sites 1 and 2 are the only sites identified as being appropriate, though there is no indication why, and it is unclear whether taller buildings are essential or not on such sites.
- c) Housing development or new residential is very restricted on the south side of the town. Most zoned lands seem to be north of the canal, while the majority of the schools and amenities are south of the canal. Balanced growth across both north and south should be reflected in this plan.
- d) The Councils' own land on the Clara road Tullamore is zoned new residential. This land is an 'old quarry' and for years has been used as a dump for building rubble. No tests have been carried out to ascertain whether this land is suitable for building or if works need to be carried out, which could make it uneconomical at present to develop. As

lands for new residential are at a premium, this land should not be included until the proper tests are carried out.

CE Response:

- a) The Retail Planning Guidelines (2012) define retail areas as ‘that part of a town centre which is primarily devoted to shopping’. Therefore, core retail areas contain the primary retail streets of a centre where the main concentration of retail activity takes place. In light of this it is proposed to insert the red text into chapter 7 as follows for clarity purposes:

Extract from Chapter 7 of draft Plan regarding Core Retail Areas:

*‘Volume 2 of the Development Plan provides for settlement plans for all settlement areas within Offaly (except where a separate Local Area Plan exists). The core retail area of each settlement area has been delineated to identify clearly that part of a town centre which is primarily devoted to shopping as distinct from the wider town or village centre / mixed use zoning objective. **Core retail areas contain the primary retail streets of a centre where the main concentration of retail activity takes place.** Identifying and delineating core retail areas allows a focused approach for retailing and town / village centre action initiatives as well as the proper application of the sequential approach to retail development’.*

Volume 2 of the draft Plan provides for settlement plans. The core retail area of each settlement area has been delineated to identify clearly that part of a town centre which is primarily devoted to shopping as distinct from the wider town or village centre / mixed use zoning objective. Identifying and delineating core retail areas allows a focused approach for retailing and town / village centre action initiatives as well as the proper application of the sequential approach to retail development.

The proposal to extend the Core Retail Area into wider areas, would not fit with the current definition for Core Retail Areas. Retail development can still be considered outside the Core Retail Area based on the sequential test as set out in the Retail Planning Guidelines. By setting the Core Retail Area to reflect the streets primarily devoted to shopping, it helps safeguard the vitality and vibrancy of the town centre.

- b) Taller Buildings are addressed in section 7.2.5 of Chapter 7 of the draft Plan titled ‘Retail, Town Centre and Regeneration’.

Two sites are identified as being open for consideration to accommodate taller buildings based on the mix of adjacent building heights, the desire to have higher densities at these brownfield central locations and their extensive site sizes. These two sites are also designated Opportunity Sites;

- (i) Grand Canal Harbour site, Tullamore (Opportunity Site No. 1)
- (ii) Texas site, Tullamore (Opportunity Site No. 2)

Permitting taller buildings at these locations is dependent on assessment by the Planning Authority of the following documents prepared by a prospective applicant / applicant;

- A masterplan and local planning framework to deal with movement, public realm and design;
 - An urban design statement addressing the impacts on the historic built environment;
 - A specific design statement on the individual proposal from an architectural perspective;
 - A visual impact assessment; and
 - Daylight and shadow projection diagrams.
- c) The southern part of Tullamore has an infrastructural deficit and will require significant levels of investment by Irish Water in order to service the lands zoned Strategic Residential Reserve, which are primarily located in the Southern Masterplan area of the Tullamore Town and Environs Development Plan 2010-2016 as extended. While investment is also required to service the lands to the northern part of the settlement of Tullamore, it is considered more feasible, as advised by the Environment and Water Services Section of Offaly County Council to do so over the lifetime of the Draft Plan 2021-2027.
- d) The lands referred to in the submission as the 'Old Quarry' site on the Clara Road which are zoned part 'Industrial' and part 'Public/ Community / Educational' in the Tullamore Town and Environs Development Plan 2010-2016 as extended. (The equivalent zonings in the Draft Plan is 'Industrial and Warehousing' and 'Community Services / Facilities').

The lands are zoned 'new residential' in the draft Plan.

As outlined in the response to submission from the Office of the Planning Regulator Ref: CDP/D/172, there is a requirement arising to reduce the growth rate of Tullamore to 30% down from 33%, and as a consequence the Core Strategy allocation for New Residential in Tullamore has reduced from 43 hectares to 37 hectares. The removal of these lands from the New Residential allocation will Tullamore will contribute towards achieving the revised Core Strategy figure. It is proposed to revert to the zoning as per the previous zoning plan Tullamore Town and Environs Development Plan, (TTEDP) 2010-2016 as extended.

- i.e. Industrial and Warehousing - 2.21ha and
Community Services and Facilities - 1.57ha

[Ref: CDP/D/191](#)

Person / Body: Bernard Heavey

Summary of submissions / observations:

Requests the rezoning of lands at Cappincur, Tullamore, from Agricultural to Commercial / Industrial. Refers to the Pl. Ref.19/132 permission granted to Waterways Ireland for the construction of a maintenance depot with warehouse on a site which forms part of the overall landholding.

Notes that lands are not in flood zone and are directly opposite to Cappincur Industrial Estate and just off the Tullamore by-pass.

CE Response:

The lands in question are outside the draft development plan boundary for Tullamore and have an area of 3.65ha. approximately. They are part of an overall landholding which has the benefit of planning permission Pl. ref. 19/132 - Waterways Ireland for the construction of a maintenance depot with warehousing and ancillary development, which was granted planning permission in April 2020. In the context of the National Planning Framework (NPF) *National Strategic Outcome 1 (NSO 1)* of is to seek 'Compact Growth' across cities, towns and villages the extension of the town boundary to encompass these lands for Commercial / Industrial Zoned lands would not satisfy compact growth.

It is noteworthy that the under the draft Town Plan for Tullamore, Cappincur Industrial Estate has an area 6.86ha of green field zoned lands for potential expansion of appropriate uses.

Also just to the west of the bypass circa 200 metres from the submission site there is a site of 8.5ha zoned for Business /Technology in the draft Plan.

It is contended that these two sites in close proximity to the submission site and other zoned lands within the existing draft zoning plan of Tullamore, including the Strategic Employment Zones SEZ at Ballyduff and Ardan compromise a substantial choice for employment zoned uses for Tullamore to continue its Key Town role as a major employment centre. Please see the table below which summarises available lands under the 3 Employment land use zones for Tullamore.

There are 55ha. of undeveloped Industrial /Warehousing zoned lands available within the draft town zoning plan boundary.

Summary of Employment Land Use Zoned lands in Tullamore under Draft County Development Plan 2021-2027		
Employment Zoned Lands in Tullamore Town Plan as Per Draft County Development Plan 2021-2027	Total (ha)	Unbuilt (ha)
Industrial & Warehousing	127.63	52.21
Business/Technology	91.21	88.57
Enterprise & Employment	170.6	112.25
Total	389.44	253.03

Accordingly, it is recommended not to zone the subject lands.

[Ref: CDP/D/195](#)

Person / Body:

The Hand Family

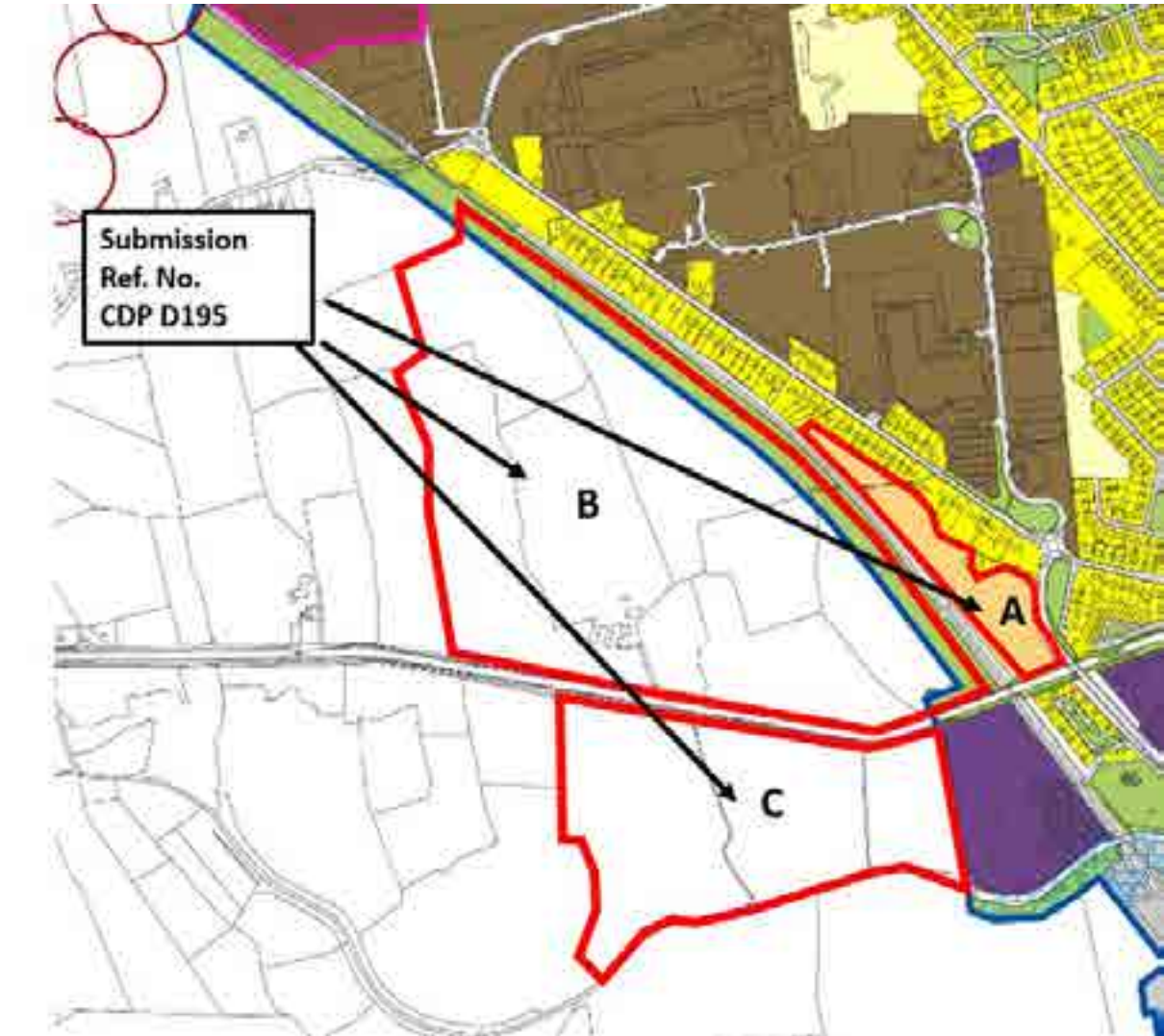
Summary of submissions / observations:

- a) Welcomes the opportunity to make a submission. Supports the plan, which should encourage the business community towards investment and give optimism to younger generations. The plan should provide sufficient land for housing and infrastructure to support quality of life for Tullamore's population and future residents.
- b) Supports the high-level vision of the plan;
 - Effective zoning promotes orderly development by integrating land use and transportation, providing a high quality of life for the county's population, eliminating potential conflicts between incompatible land uses and establishing an efficient basis for investment in public infrastructure and facilities.
 - Ensure alignment of zoning with availability of services, investment in infrastructure and the provision of employment, together with supporting amenities and services.
 - Land is only zoned if it is serviced and/or serviceable within the life of this Plan based on Appendix 3 of the National Planning Framework.
- c) Submits that the lands in Tullamore identified as Area A (3.3 ha.) should be rezoned residential as opposed to 'Strategic Residential Reserve'. These lands were zoned for residential development in the Tullamore Town and Environs Development Plan 2010-2016. The site meets required criteria as follows;
 - Single landowner & ready to go
 - Proximity to town national school and railway station
 - This site is fully serviced with foul sewer, surface water, potable water and natural gas.
- d) Requests that the Planning Authority zone the lands identified as Area B as Enterprise & Employment and Business / Technology Park. This area was zoned as a combination of Residential, Mixed Use, Business/Employment, Public/Community/Educational and Open Space in the 2010-2016 Plan, and is unzoned in the current Tullamore Draft Plan.
 - Site area is 50ha and in one ownership.
 - Serviced with foul sewer, surface water, and potable water.
 - In close proximity to the IDA Park and the Railway Station.

States that in light of Bord na Móna exiting its core energy peat harvesting industry and the significant economic impact this will have on the county there is a

responsibility on the council to ensure there is more than adequate ready to go Enterprise/Employment service sites of significant scale available to be developed.

- e) Identifies Area C as an area which was zoned Residential, Mixed Use, and Open Space in the 2010-2016 Plan, and which is un-zoned in the 2021- 2027 draft Plan. The submission does not wish to pursue the reversal of this zoning.



CE Response:

- a) Noted
- b) Noted
- c) The lands identified in Area A form a site which is constrained due to its configuration; i.e. its relationship to the Railway line, the Grand Canal and the existing development on the Srah Road R443; and accordingly there are more suitable alternative sites which could yield more in-depth residential developments.
- d) The railway line which runs northwest from Tullamore forms a physical and practical development boundary for the town on the northwest quadrant of the settlement. Additionally, the lands identified as Area B in this submission are restricted in terms of vehicular access due to the presence of the Grand Canal and the Railway Line. The lands to the west of this are not proposed for zoning in the current draft plan for Tullamore.
- It is contended that these two sites in close proximity to the submission site and other zoned lands within the existing draft zoning plan of Tullamore, including the Strategic Employment Zones at Ballyduff and Ardán compromise a substantial choice for employment zoned uses for Tullamore to continue its Key Town Role as a major employment centre. Please see the table below which summarises available lands under the 3 employment zones for Tullamore.
 - There are 269.5ha. of undeveloped employment zoned lands (Industrial /Warehousing, Business / Technology and Enterprise & Employment) zoned lands available the within Draft Plan Town boundary.

Summary of Employment Land Use Zoned lands in Tullamore under Draft County Development Plan 2021-2027		
Employment Zoned Lands in Tullamore Town Plan as Per Draft County Development Plan 2021-2027	Total (ha)	Unbuilt (ha)
Industrial & Warehousing	127.63	52.21
Business/Technology	91.21	88.57
Enterprise & Employment	170.6	112.25
Total	389.44	253.03

- e) Noted

3.2.1.2 Birr (including Crinkill)

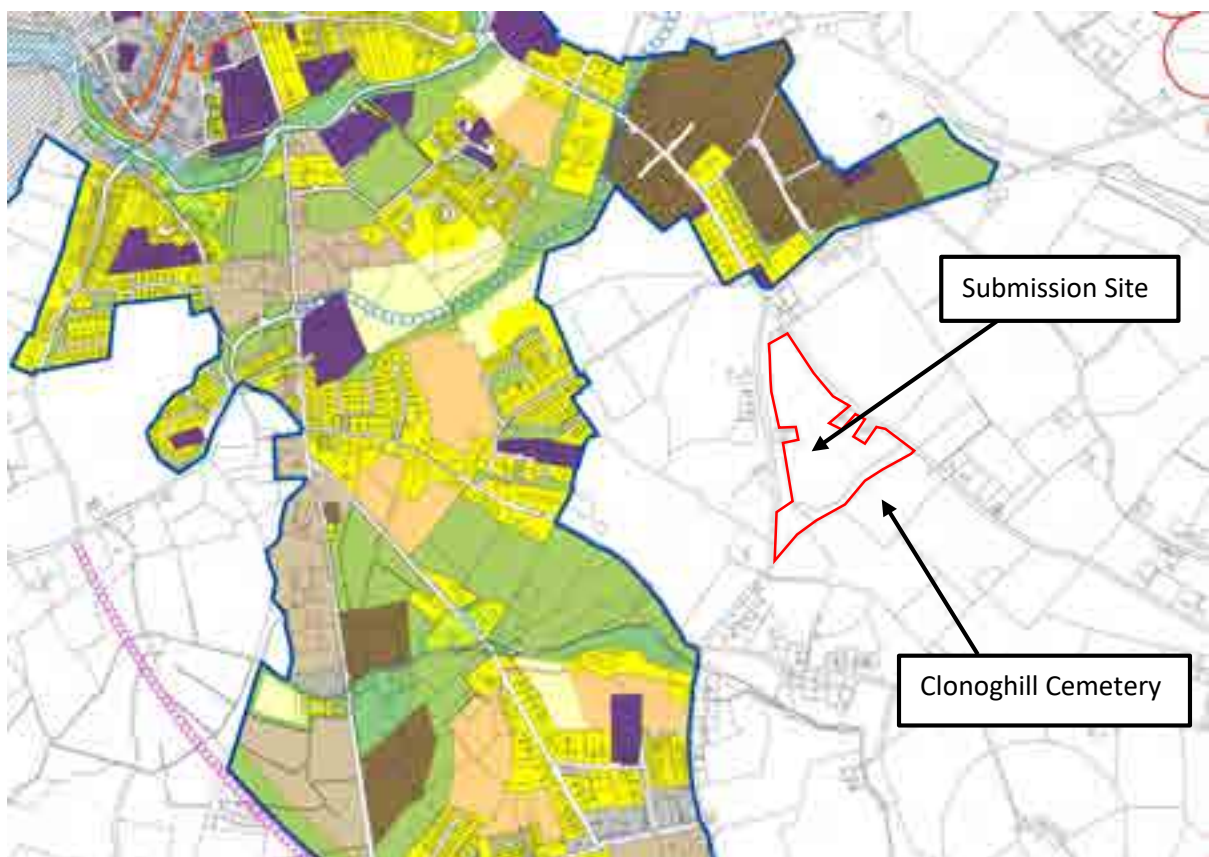
Ref: CDP/D/07

Person / Body:

Carmel Tierney

Summary of submission / observation:

That c. 7.5 ha of undeveloped greenfield land located in the townland of Clonoghil Upper to the south east of Birr Town be zoned for residential development.



CE Response:

The submission requests that 7.5ha of land is zoned for new residential development, and by association, be included within the development boundary of Birr Town.

National Strategic Outcome 1 (NSO 1) of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'

Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development 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.'

Under the Core Strategy, as amended, for the county (Chapter 2 of the draft Plan), Birr, including Crinkill Village, is allocated 13.9ha for new residential development over the lifetime of the Plan. The 13.9ha of 'New Residential' zoning has been identified within the existing built-up footprint of Birr and Crinkill, with Birr town as the primary focus of the overall settlement, consistent with the above provisions of the NPF and RSES.

In addition, guiding new residential development to sites within the existing built-up footprint of the settlement is a measure that meets a number of the other National Strategic Outcomes which underpin the NPF, including NSO4 (Sustainable Mobility), NSO9 (Sustainable Management of Water, Waste and other Environmental Resources), and NSO8 (Transition to a Low Carbon and Climate Resilient Society).

Furthermore, the NPF sets out a two-tier approach to land zoning as follows:

Tier 1: Serviced Zoned Land

This zoning comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development. These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands. Inclusion in Tier 1 will generally require the lands to be within the footprint of or spatially sequential within the identified settlement.

Tier 2: Serviceable Zoned Land

This zoning comprises lands that are not currently sufficiently serviced to support new development but have potential to become fully serviced within the life of the plan i.e. the lands are currently constrained due to the need to deliver some or all development services required to support new development, i.e. road or footpath access including lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity. These lands may be positioned within the existing built-up footprint of a settlement, or contiguous to existing developed lands or to tier 1 zoned lands, where required to fulfil the spatially sequential approach to the location of the new development within the identified settlement.

By reason of locational context, the submission lands cannot be categorised as either Tier 1 lands or Tier 2 lands per the above and therefore are not developable within the plan period. According to the NPF, such lands should not be zoned for development.

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core

Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

Accordingly, it is advised that the site remain not zoned and outside the development boundary of Birr Town, in accordance with the draft Plan.

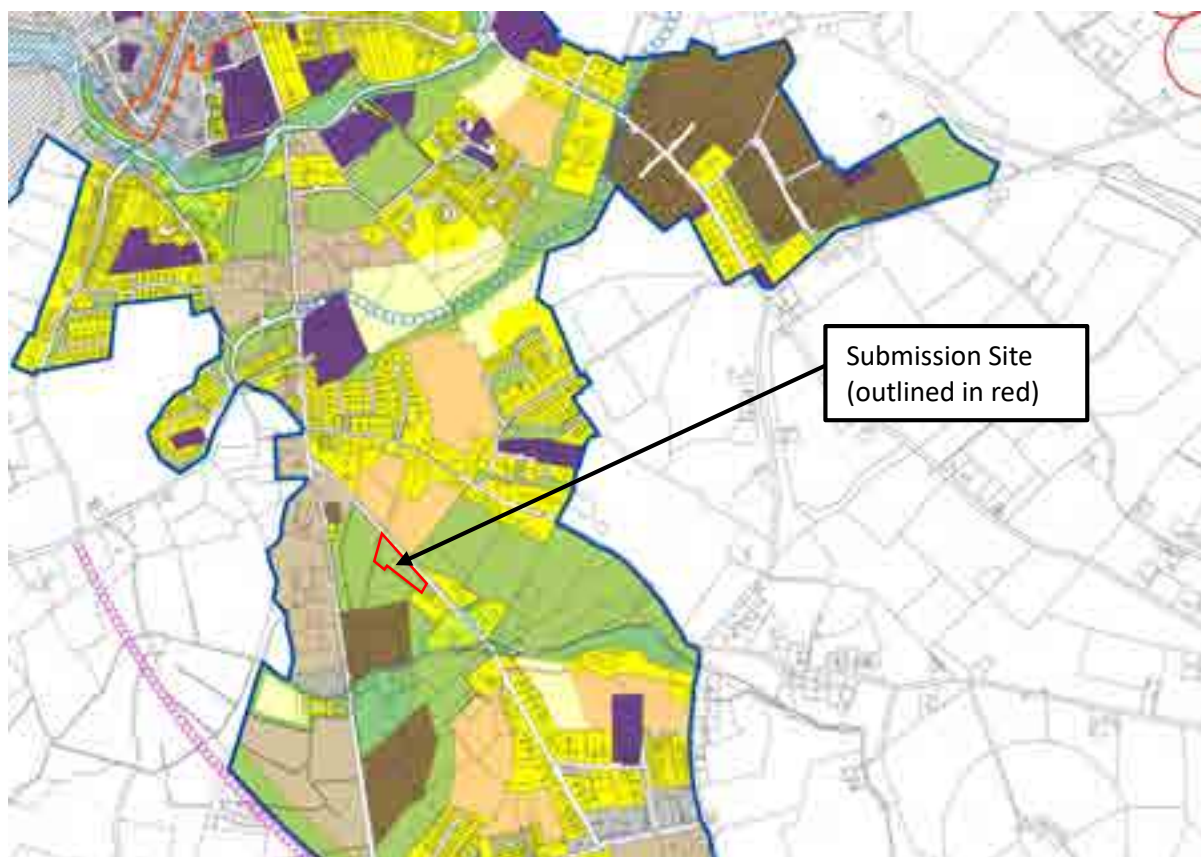
Ref: [CDP/D/10](#)

Person / Body:

Brendan & Maeve Garry

Summary of submission / observation:

That 0.65 ha of undeveloped greenfield land located on the west side of Military Road in the townland of Seefin in Birr be zoned for residential development.



CE Response:

Under the draft Plan, the submission site is zoned '*Open Space, Amenity and Recreation*'. In accordance with the Land Use Zoning Matrix contained in Chapter 12 of the draft Plan, '*Residential – Multiple (two or more units)*' is a use which is '*Not Normally Permitted*' on land zoned '*Open Space, Amenity and Recreation*'. The submission requests that the 0.65 ha site be zoned '*New Residential*', a zone under which multiple dwellings is '*Permitted in Principle*'.

National Strategic Outcome 1 (NSO 1) of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'

Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development 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.'

Under the Core Strategy, as amended, for the county (Chapter 2 of the draft Plan), Birr, including Crinkill Village, is allocated 13.9ha for new residential development over the lifetime of the Plan. The 13.9ha of 'New Residential' zoning has been identified within the existing built-up footprint of Birr and Crinkill, with Birr town as the primary focus of the overall settlement, consistent with the above provisions.

In addition, guiding new residential to sites within the existing built-up footprint of the settlement is a measure that meets a number of the other National Strategic Outcomes which underpin the NPF, including NSO4 (Sustainable Mobility), NSO9 (Sustainable Management of Water, Waste and other Environmental Resources), and NSO8 (Transition to a Low Carbon and Climate Resilient Society).

The submission includes an indicative concept for 8 no. houses on the 0.65 ha site, which equates to a density of 12 dwellings per hectare, which, the submission contends, would align with the established pattern of housing on the road. The NPF recognises that *'Historically, low-density housing development has been a feature of Ireland's housing landscape in cities, towns, villages and the countryside. To avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas'*. This is reflected in National Policy Objective 35 under the NPF.

NPO 35 - Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

To zone the submission site (0.65ha) 'New Residential' would have the effect of exceeding the allocation for Birr/Crinkill under the Core Strategy, which would mean that the same quantum of land already designated for 'New Residential' would have to be omitted elsewhere in the town.

Notwithstanding the above, the submission site and its immediate environs act as an important natural green buffer between the urban settlements of Birr and Crinkill, a condition that Council will

wish to retain in order to preserve the individual identity of each of these two settlement, particularly Crinkill as a Village.

Accordingly, it is advised to retain the zoning on the site in accordance with the draft Plan.

Ref: CDP/D/83

Person / Body:

Oxmantown Settlement Trust

Summary of submission / observation:

Chapter 2 – Core Strategy, Settlement Strategy, Housing Strategy

- a) Refers to *Rebuilding Ireland, Action Plan for Housing and Homelessness*, (July 2016) and specifically their intent to work with Council in respect of achieving Pillar 4 of the Action Plan, which seeks to improve the rental sector.

Chapter 4 – Biodiversity and Landscape

- b) Refers to drug use / anti-social behaviour on Birr Castle Estate lands, and raises concerns with regards to security issues of Birr Castle Estate land adjacent to the proposed extension of the Birr Distributor Road north of Lidl connecting the N52 with the Banagher Road.
- c) Refers to the control of littering and fly-tipping as being a problem on the Birr Castle Estate lands.
- d) Refers to the control of litter and invasive plant species (Himalayan Balsam and Japanese Knotweed) on the riverbanks.

Chapter 6 – Tourism and Recreational Development

- e) Refers to the achievements, and recognises Council's input, with regards tourism initiatives to date within the Birr Castle Estate, including castle tours operated by the Birr Scientific and Heritage Foundation and the ILOfar telescope.
- f) Supports the Dark Sky objective.
- g) Expresses interest in exploring the feasibility of an Energy Park on Birr Castle Estate lands, in a similar model to how land for the ILOfar project was provided.

Chapter 7 – Retail and Town Centre Strategy, and Regeneration

- h) Queries the inclusion of St. John's Hall in Birr as an 'Opportunity Site', considering that the building is a protected structure.

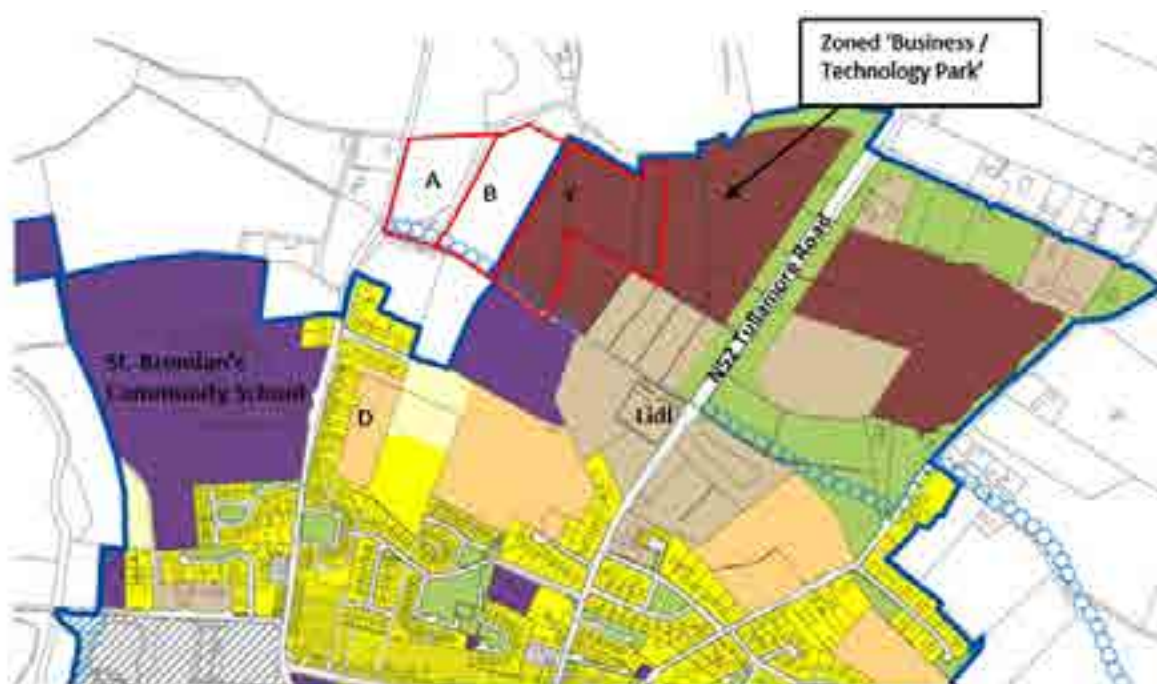
Chapter 10 – Built Heritage

- i) That regulations pertaining to protected structures be reviewed to take account of current planning acts, energy ratings and health & safety.
- j) That the following properties be removed from the Record of Protected Structures:
 - 1 Rosse Row (RPS Ref. 49-282)

- 2 Rosee Row (RPS Ref. 49-281)
 - 3 Rosse Row (RPS Ref. 49-280)
- k) That the following property be included on the Record of Protected Structures:
- Kiltimony Lodge
- l) That Council should consider reducing the speed limit on the R439 (Banagher Road) north of Birr, to reduce further damage to the built heritage caused by traffic/road vibrations, referring specifically to previous damage to the road side wall associated with Tullanisk Park (RPS Ref. 49-06) and Tullanisk Gate Lodge (RPS Ref. 49-08).

Chapter 12 – Land Use Zoning

- m) That c. 1.7 ha of undeveloped greenfield land (referenced 'A' on the extract of the draft Plan zoning map below), located on the northern end of Birr town, be zoned 'New Residential'
- n) That c. 2.5 ha of undeveloped greenfield land (referenced 'B' on the extract of draft Plan zoning map below), located on the northern end of Birr town, be zoned 'Business / Technology Park', which would extend the zoning of land in the same ownership (referenced 'C' on the map below).
- o) Referring to undeveloped greenfield land to the rear of houses at Cappaneale in Birr (referenced 'D' on the extract of the draft Plan zoning map below), that Council consider implications for this site in terms of boundary treatment and security issues when making decisions on planning applications for development of adjoining land.



CE Response:

- a) Noted. The availability of private housing for the rental sector plays an important role in meeting the housing needs of the existing and future population of the county.

In terms of carrying out works to a protected structure to improve the living standards such as the building energy rating etc., Section 57(1) of the Planning and Development Act 2000 (as amended), states that works to a protected structure requires planning permission, where the works would materially affect the character of the protected structure, or any element of the protected structure which contributes to its special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest.

Chapter 10 of the draft Plan includes policy and objectives in relation to protected structures, including BHP-01, as follows:

BHP-01 It is Council policy to ensure the protection, sympathetic and sensitive modification, alteration, extension or reuse of protected structures or parts of protected structures, and the immediate surrounds included and proposed for inclusion in the Record of Protected Structures that are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, together with the integrity of their character and setting.

Development Management Standards in Chapter 13 of the draft Plan include DMS-31 and DMS 93, which relate to works to protected structures. The requirement for planning permission, and the content of a planning application, can be discussed by way of a pre-planning meeting with the Development Management Section of Offaly County Council. An owner or occupier of a protected structure may also make a written request to the Planning Authority to issue a Section 57 Declaration as to the type of works, which it considers would or would not materially affect the character of the structure or any element of the structure that contributes to its special interest.

No change to the draft Plan.

- b) While a reduction in crime and anti-social behaviour can be achieved through the careful consideration of site layout and building design in new developments at planning application stage, control of anti-social behaviour is outside the remit of the county development plan.

In respect of continuing the section of the Birr distributor road between the N52 Tullamore Road and the Banagher Road, this section of road was subject to an application under Part 8 of the Planning and Development Regulations 2001-2020, a process which included a period of public notice from 23rd July to 4th September 2020, during which submissions from the public were invited. The Part 8 application was passed by the elected members at the September 2020 Council meeting.

No change to the draft Plan.

- c) The legislation which governs the management of litter is the Litter Pollution Act, 1997 (as amended). As a requirement of the Act, Offaly County Council has produced a Litter Management Plan 2016-2018 which has been extended to 2021 and is responsible for keeping public places in the county clear of litter.

The following objectives are contained in Chapter 11 'Water Services and Environment'.

ENVO-05 It is an objective of the Council to implement the Eastern-Midlands Regional Waste Management Plan 2015-2021; the Council's Litter Management Plan and Waste Bye-Laws.

ENVO-06 It is an objective of the Council to use statutory powers to prohibit the illegal deposit and disposal of waste materials, refuse and litter, and to authorise and regulate, waste disposal within the county in an environmentally sustainable manner.

- d) In terms of invasive plant species, under Chapter 4 of the draft Plan (Biodiversity and Landscape), the Council recognises that both invertebrate and plants, can represent a major threat to local, regional, and national biodiversity, with their prevalence accelerated by climate change, and that both Japanese Knotweed and Himalayan Balsam are becoming more prevalent in this regard. The Council has been controlling Japanese Knotweed since 2008 and Himalayan Balsam on the Camcor catchment since 2018.

The Biodiversity and Landscape chapter includes the following relevant policies and objectives:

BLP-31 It is Council policy to continue to deliver and support measures for the prevention, control and/or eradication of invasive species within the county, and to seek details of how these species will be managed and controlled where their presence is identified.

No change to the draft Plan.

- e) The Council recognises the importance of Birr Castle, Gardens and Science Centre for tourism in the town and wider region, with the following noted in Chapter 6 'Tourism and Recreation' of the draft Plan.

6.1.1 Birr Castle, Gardens and Science Centre

Birr Castle is an impressive castle located within Birr Town. Its award winning 50 hectares of gardens hosts rare trees and flowers, wildlife and walking routes along its rivers, lake and waterfalls and a playground that boasts the largest treehouse in Ireland. It has a science gallery and museum and an astrophysics observing facility known as the Irish Low Frequency Array (I-LOFAR) that connects Ireland to the international LOFAR Telescopes and which is addressed further in Chapter 5 Economic Development Strategy. The I-LOFAR facility builds on the science, astronomy and engineering history of Birr Castle, for example, from its 19th century Great Leviathan Telescope.

Chapter 6 also includes the following policy and objective in respect of the designation of Birr as a Tourism Destination Town:

TRP-25 It is Council policy to support Birr's role as a Tourism Destination Town having particular regard to its built heritage including Birr Castle, Gardens and Science Centre, its accessibility and proximity to key tourism destinations including natural amenities, and recreational opportunities including the Slieve Bloom Mountains, Lough Boora Discovery Park and Banagher marina on the River Shannon.

TRO- 20 It is an objective of the Council to build on Birr's role as a Destination Town in particular having regard to its built heritage and proximity to key tourism attractions.

No change to the draft Plan.

- f) Noted. Chapter 6, Tourism and Recreation, of the draft Plan includes the following objective in respect of exploring the potential for a Dark Sky area in the county:

TRO-13 It is an objective of the Council to explore the potential for a Dark Sky area in County Offaly which is an area possessing an exceptionally or distinguished quality of

starry nights and a nocturnal environment that is specifically protected for its scientific, natural, educational, cultural heritage and / or public enjoyment.

No change to the draft Plan.

- g) Noted. Chapter 6, Tourism and Recreation, of the draft Plan includes the following objective in respect of exploring the potential for an Energy Park in the county:

***TRO-12** It is an objective of the Council to investigate the feasibility of an Energy Park with educational and amenity facilities, relating to any future development of renewable energy projects of significant scale that comes forward over the lifetime of this plan. Any development of renewable energy on cutaway bog will be required to provide increased opportunities for amenity access and education facilities.*

No change to the draft Plan.

- h) The site at St. John's Hall has been included as part of the opportunity site in Birr for the purposes of exploring the potential for access to the land at the rear. The Council recognise that St. John's Hall itself is a protected structure (RPS Ref. 53-307) and will be preserved and protected accordingly.

No change to the draft Plan.

- i) In terms of carrying out works to a protected structure such as works to upgrade building energy rating, Section 57(1) of the Planning and Development Act 2000 (as amended), states that works to a protected structure requires planning permission, where the works would materially affect the character of the protected structure, or any element of the protected structure which contributes to its special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest.

Changing legislation in this regard is the function of central government / Oireachtas.

No change to the draft Plan.

- j) In respect of the request for 3 no. properties on Rosse Row to be removed from the Record of Protected Structures, please refer to Section 6 of the CE Report which addresses submissions relating to Protected Structures.
- k) In respect of the request to have Kiltimony Lodge added to the Record of Protected Structures, this building was included as a new addition to the Record of Protected Structures in the draft Plan.
- l) Setting speed limits on roads is outside the remit of the county development plan.

No change to the draft Plan.

- m) Under the draft Plan, the site is not zoned and located outside the development boundary of Birr. The submission requests that the site be zoned 'New Residential'.

In terms of residential zoning, *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that '*From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...*'. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and

Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that *'Residential development 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.'*

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

There are other lands identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for Birr over the lifetime of the development plan, consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

Under the revised Core Strategy, as amended, for the county (Chapter 2 of the draft Plan), Birr, including Crinkill Village, is allocated 13.9ha for new residential development over the lifetime of the Plan. The 13.9ha of 'New Residential' zoning has been identified within the existing built-up footprint of Birr and Crinkill, with the focus on consolidated and sequential growth from the town centre outwards. To zone an additional 4ha of land 'New Residential' at the location would far exceed the Core Strategy allocation for the town, and would require the 'New Residential' zoning already designated to be removed from land which is sequentially closer to the town centre.

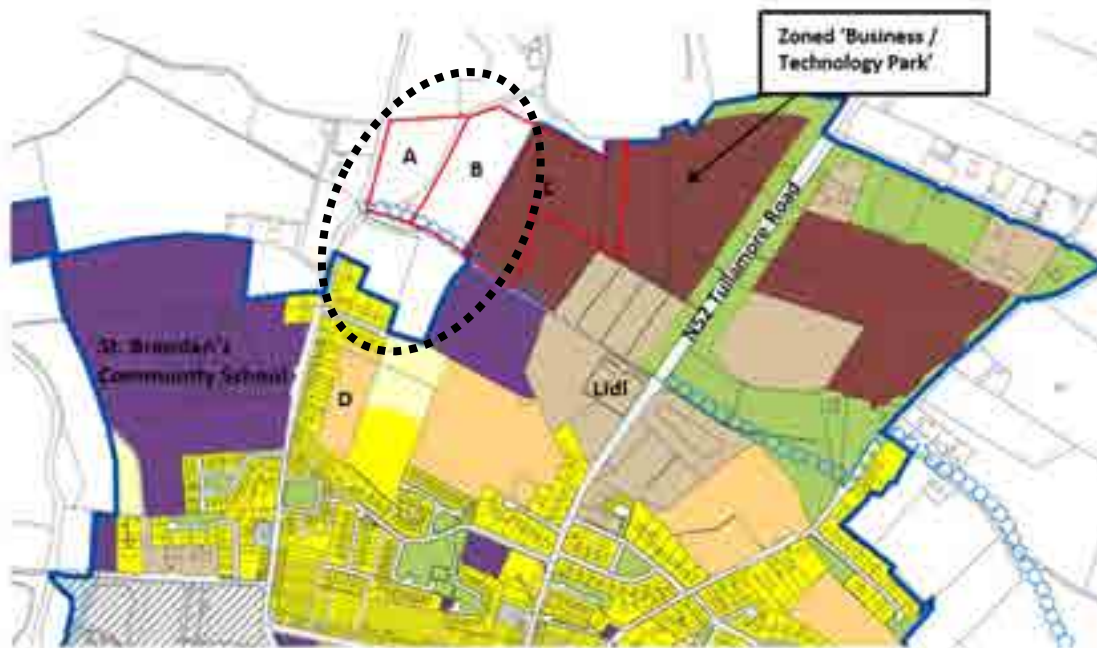
Accordingly, it is advised that the site (submission site A) remain not zoned and outside the development boundary of Birr Town, in accordance with the draft Plan.

- n) Under the draft Plan, the site is not zoned and located outside the development boundary of Birr. The submission requests that the site be zoned 'Business/ Technology Park'.

For land north of Lidl / west of the N52 Tullamore Road, the Birr zoning map in the draft Plan shows c. 11.5ha of land zoned 'Business/ Technology Park', and a further c. 2.5ha zoned 'Enterprise and Employment'. The 'Business/ Technology Park' zoning represents an aspiration towards technology based industry and advanced manufacturing, compatible office space and research and development based employment within high quality, highly accessible, campus style settings. It is considered that there is sufficient land zoned 'Business/ Technology Park' to allow for such a campus to be developed.

Submission site 'B' appears to have potential to form a natural extension of the 'Business/ Technology Park' zoning at this location, with no environmental constraints, including flood risk, identified. However, it is considered to be premature to zone this area of land in the absence of a full review of all un-zoned land both sides of the proposed Birr Distributor Road (area circled in with dashed black line on map below). A further evaluation can take place in the next development plan review or LAP process.

Accordingly, it is advised that the site (submission site B) remain not zoned and outside the development boundary of Birr Town, in accordance with the draft Plan.



- o) Any future planning applications will be assessed against national and regional planning policy including Section 28 guidelines and all relevant policies, objectives and development management standards contained in the current 2014-2020 County Development Plan, and when adopted, the 2021-2027 County Development Plan.

Chapter 13 of the draft Plan contains development management standards against which planning applications are assessed. Development management standard DMS-17 'Landscaping and Boundary Treatment', requires a landscaping and boundary treatment plan to be submitted with applications for residential developments in towns and villages.

No change to the draft Plan.

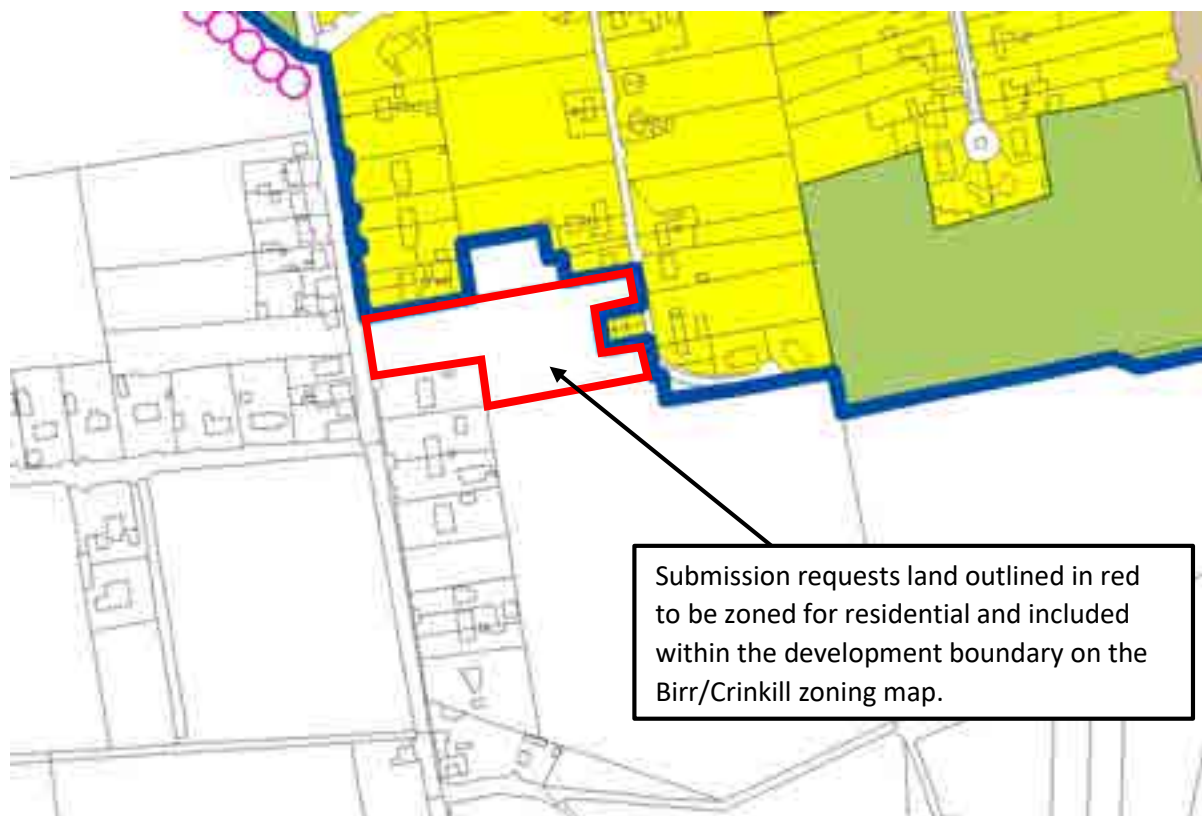
Ref: CDP/D/90

Person / Body:

Fiona Breen

Summary of submission / observation:

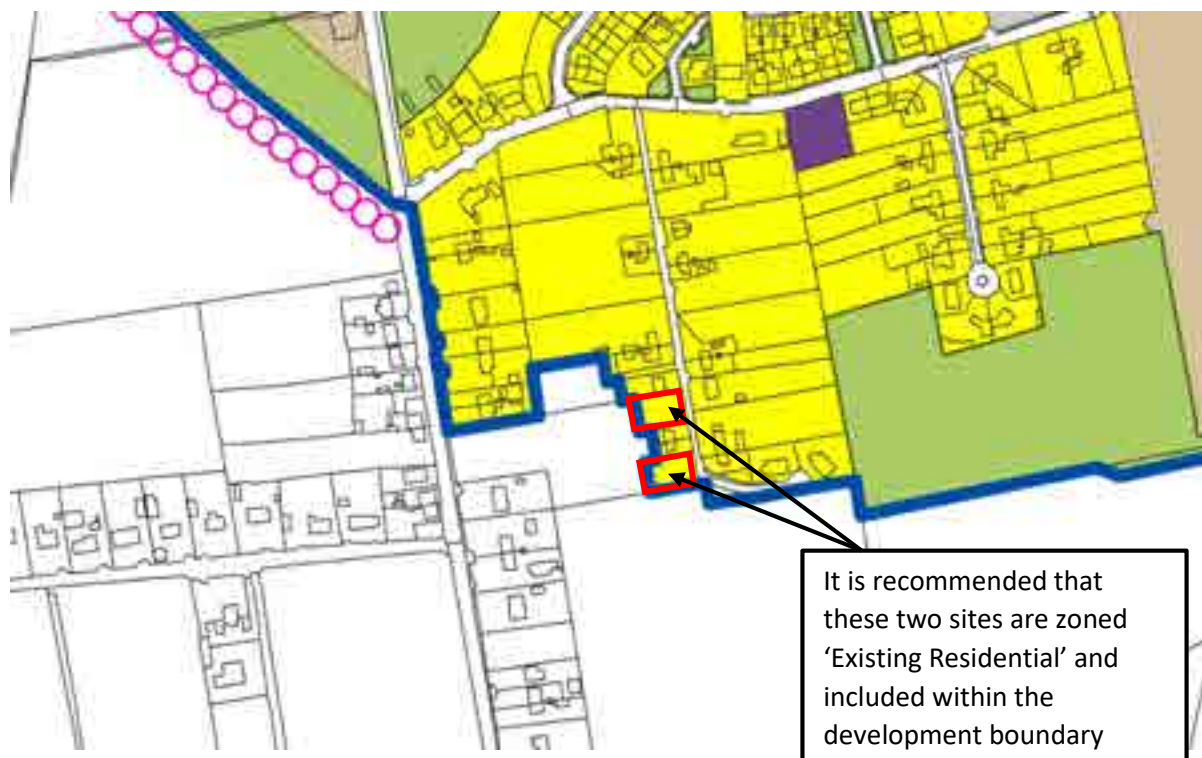
That c. 1ha of undeveloped land on the south-western end of Crinkill Village, located between the N62 and Leinster Villas, be zoned residential and included within the development boundary for Crinkill.



CE Response:

Under the draft Plan, the submission site is not zoned and located outside the development boundary for Crinkill Village. The submission is requesting that the site be zoned residential similar to adjoining land to the north and east. As shown in the draft Plan zoning map extract above, land to the north and east is zoned ‘Existing Residential’ which relates to land which is already developed or has an extant permission for housing. The submission site is undeveloped. However, it is noted that planning permission for 2 no. houses was granted on part of the submission site on 22/10/2020 (Pl. Ref. 20/75).

Accordingly, it is recommended that the sites relating to the 2 no. dwellings granted under Pl. Ref. 20/75 be zoned ‘Existing Residential’ and the development boundary for Crinkill Village (which is part of the larger Birr / Crinkill zoning map), be extended accordingly, extract from amended zoning map shown below. The area of land to be zoned ‘Existing Residential’ is c. 0.2ha.



In respect of the remaining land associated with the submission, this remains undeveloped with no extant permission. Zoning the land for housing would require applying the 'New Residential' zone.

National Strategic Outcome 1 (NSO 1) of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development 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.'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

There are other lands identified as being more appropriately located closer to the centre to deliver the Core Strategy housing allocation for Birr and Crinkill over the lifetime of the development plan, consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

Under the amended Core Strategy for the county (Chapter 2 of the draft Plan), Birr, including Crinkill Village, is allocated 13.9ha for new residential development over the lifetime of the Plan. The 13.9ha of 'New Residential' zoning has been identified within the existing built-up footprint of Birr and Crinkill, with the focus on consolidated and sequential growth from the town centre outwards. To zone an additional 0.8ha of land 'New Residential' at the location would exceed the Core Strategy allocation, and would require the 'New Residential' zoning already designated to be removed from land which is sequentially closer to the town and village centres.

Accordingly, it is advised that the remainder of the submission site remain not zoned and outside the development boundary of Crinkill Village, in accordance with the draft Plan.

[Ref: CDP/D/93](#)

Person / Body:

Birr 20:20 Vision CLG

Summary of submission / observation:

- a) That the policies and objectives of the County Development Plan are suitably flexible to allow all stakeholders to respond to the challenges associated with the Covid-19 pandemic. The submission refers specifically to Chapter 12 'Land Use Zoning Objectives' generally and more specifically to Section 12.7 under Chapter 12.
- b) That the County Development Plan be used as an opportunity to make provision formally for Traveller Specific Accommodation within each Municipal District.
- c) That the County Development Plan should commit to evolving a weed control plan for the County that eliminates the use of toxic chemicals for weed control as soon as possible and most certainly within the lifetime of the Plan. And that a more restrictive definition of what and where is a weed so that the job of weed control becomes a positive contributor to the exercise of pursuing biodiversity.

CE Response:

- a) The Council recognises that Covid-19 pandemic is the greatest threat the Irish economy has faced since the global financial crisis. At the time of finalising the draft Offaly County Development Plan the country was emerging from an unprecedented lockdown in attempts to slow down the spread of Covid-19. This lockdown resulted in disruption to almost all sectors of the economy. The economic impact of this lockdown on the national and global economy is unclear and is dependent on a number of factors including; the extent of the disruption, success rates of a vaccine, the speed of any recovery, the impact on household incomes, and international investment into the country. In September 2020 the Government published a 'Resilience and Recovery Plan for Living with COVID 19' to manage the risk associated with the pandemic and deal with the social and economic consequences.

Notwithstanding the above, the Offaly County Development Plan is a land use plan and overall strategy for the proper planning and sustainable development of the county for the period 2021-2027. The content of the draft Plan aligns with international, European, national, regional and local policy and legislation, in addition to Ministerial Guidelines / policy Directives.

In terms of Chapter 12 'Land Use Objectives', Section 10 of the Planning and Development Act 2000 (as amended) requires that development plans comprise objectives for the zoning of lands for particular purposes, in the interest of proper planning and sustainable development. Effective zoning promotes orderly development by integrating land use and transportation, providing a high quality of life for the county's population, eliminating potential conflicts between incompatible land uses and establishing an efficient basis for investment in public infrastructure and facilities.

The submission makes specific reference to Section 12.7 under Chapter 12, which relates to applications for development which, if granted, would materially contravene the County Development Plan. As stated under Section 12.7 of the draft Plan, the granting of a permission which materially contravenes the County Development Plan is a reserved function of the Council's Members, exercisable following a public consultation process and consideration of a report prepared by the Chief Executive. The procedure for granting permission by material contravention is set out under Section 34(6) of the Planning and Development Act 2000 (as amended).

No change to the draft Plan.

- b) Section 10(2)(i) of the Planning and Development Act 2000 (as amended) requires that a development plan includes objectives for the provision of accommodation for travellers, and the use of particular areas for that purpose. The Council recognises the needs of the Travelling Community within the county. These are addressed and delivered within the context of an adopted Traveller Accommodation Programme 2019-2024 and subsequent programmes, subject to funding.

In terms of the remit under the County Development Plan, the draft Plan supports the delivery of the Offaly Traveller Accommodation Programme 2019 – 2024. Objective HO-05 refers;

HO-05 It is an objective of the Council to provide suitable housing accommodation and living conditions for the Traveller community in accordance with the Offaly Traveller Accommodation Programme 2019 – 2024, and any subsequent programme adopted by the Council.

The Core Strategy under Chapter 2 of the draft Plan provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses in the Development Plan. It identifies the quantum, location and phasing of development for the Plan period linked back to a county population target, in the form of a settlement hierarchy. The population target for the county, as set by the NPF Implementation roadmap, includes all sections of society including the Travelling Community. The housing needs of the Travelling Community is monitored through the Offaly Traveller Accommodation Programme 2019 – 2024, with anticipated growth and associated housing need provided for in the draft County Development Plan by way of policy which supports delivery of accommodation for the Travelling Community, in addition to the use of land for Traveller Accommodation being 'Open for Consideration' in the 'Town Centre/Mixed Use', 'Existing Residential' and 'New Residential' zones, as per the zoning matrix in Chapter 12 of the draft Plan.

No change to the draft Plan.

- c) In respect of general weed control in the county, the County Development Plan has no remit in this regard. In recognition of the threat of invasive plant species, the draft Plan includes Policy BLP-31 and Objectives BLO-18 and BLO-19 under Chapter 4 'Biodiversity and Landscape'.

BLP-31 It is Council policy to continue to deliver and support measures for the prevention, control and/or eradication of invasive species within the county, and to seek details of how these species will be managed and controlled where their presence is identified.

BLO-18 It is an objective of the Council to require, as part of the planning application process, the appropriate eradication/control of invasive species when identified on site or in the vicinity of a site, in accordance with Regulation 49 of the European Communities (Birds and Natural Habitats) Regulations 2011 to 2015.

BLO-19 It is an objective of the Council to continue to maintain mapping identifying the location of invasive species in the county in conjunction with the National Biodiversity Data Centre.

No change to the draft Plan.

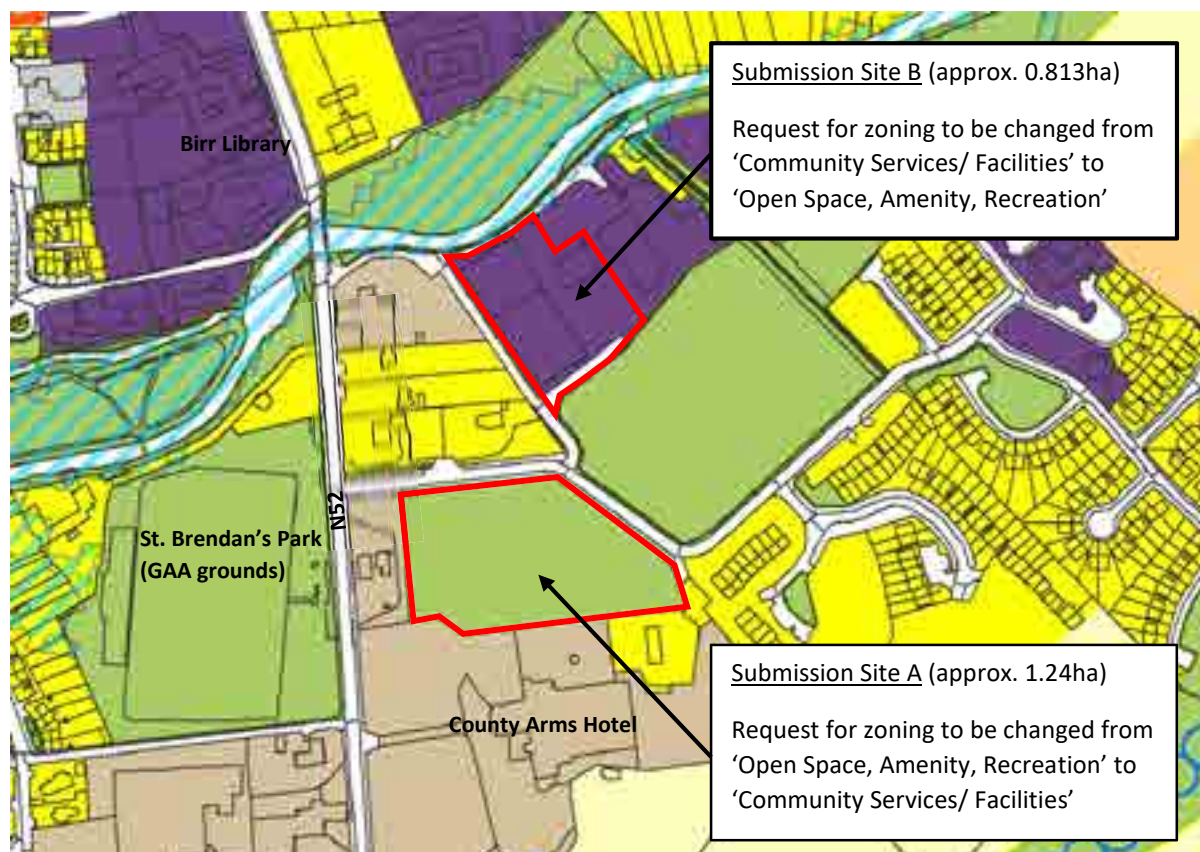
[Ref: CDP/D/96](#)

Person / Body:

Birr Rugby Club Executive Committee and Trustees

Summary of submission / observation:

- a) That the zoning of approx. 1.24ha of land (identified as Site A in the map below) located east of the N52 at Scurragh in Birr Town, comprising playing fields associated with Birr Rugby Club, be changed from 'Open Space, Amenity, Recreation' to 'Community Services/ Facilities'.
- b) That the zoning of approx. 0.813 ha of land (identified as Site B in the map below) located east of the N52 at Scurragh in Birr Town, comprising the Birr Rugby Club clubhouse and former tennis courts, be changed from 'Community Services/ Facilities' to 'Open Space, Amenity, Recreation'.



CE Response:

Submission Site A, measuring approx. 1.24ha, is located immediately to the rear / east of the Applegreen Service Station on the N52 south of Birr Town Centre. The site comprises a fenced field with flood lights around the perimeter, and is used as a training pitch as part of the overall Birr Rugby Club facility. The land is zoned 'Open Space, Amenity, Recreation' in the draft Plan. Under the current Birr Town Development Plan 2010-2016 (extended to 2020), the land is zoned similarly, 'Open Space, Sports, Recreation, Amenity'.

The submission requests that the zoning of the land be changed to 'Community Services / Facilities'.

Submission Site B, measuring approx. 0.813ha, is located immediately south of the Camcor River, further north of Site A. The land comprises the clubhouse for the Birr Rugby Club and also remnants of former tennis courts, which is now used for car parking as part of the rugby club. The land is zoned 'Community Services / Facilities' in the draft Plan. Under the current Birr Town Development Plan 2010-2016 (extended to 2020), the land is zoned similarly, 'Public, Community, Educational'.

The submission requests that the zoning of the land be changed to 'Open Space, Amenity, Recreation'.

The rationale provided for the re-zonings is vague however it does state that allowing the re-zoning of Site B to 'Open Space, Amenity, Recreation', would result in '*no loss of green space to the Town Plan*', which suggests that the rationale for rezoning Submission Site A to 'Community Services / Facilities' is to allow it to be developed rather than retaining the land for playing fields / open space.

In respect of Site A, it is assumed the rationale for the rezoning is to allow for development, particularly having regard to the previous An Bord Pleanála decision on 15/11/2018 (Offaly County Council Pl. Ref. 17/296) to refuse permission for a Primary Care Centre on the land.

As outlined in Chapter 12 'Land Use Zoning Objectives' in the draft Plan, the purpose of 'Community Services / Facilities' zoning is to protect, provide and allow expansion of a wide range of different community facilities, civic facilities and social services ranging from education and health facilities to places of worships, community centres and childcare facilities. Ancillary facilities such as dedicated open space or sports facilities will normally be facilitated within this zoning objective.

The objective under the draft Plan for the 'Community Services / Facilities' zoning is as follows:

LUZO-09 Provide necessary community, social, health, public administration and educational services and facilities.

The following table sets out the uses which are 'Permitted in Principle' and 'Open for Consideration' on land zoned 'Community Services / Facilities'.

Permitted in Principle					
Childcare Facility - Crèche, Nursery and Playschool	Community Facility (hall, centre or recreational use)	Education / Enterprise Centre	Golf Course / Pitch and Putt	Hospital	Library
Open Space (Public)	Playground	Playing Pitches / Sports Club	School / Third Level Education		
Open for Consideration					
Bring Bank / Civic Amenity	Car Parking	Cemetery	Chemist/Pharmacy	Craft Industry	Dentist/ Doctor Surgery
Funeral Home	Leisure Centre / Gym	Nursing Home / Retirement Village	Office	Primary Care Centre, Health Centre and Clinics	Residential Care
Restaurant / Café	Training Centre	Utility Structures	Water-based Recreational Activities	Waste to Energy Facilities	Workshops

The NPF sets out a number of overarching aims to support environmental policy at an EU level, with one of the aims based on 'Protecting, Conserving and Enhancing Our Natural Capital' including 'Protecting and valuing our important and vulnerable habitats, landscapes, natural heritage and green spaces'.

National Policy Objective 52

The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital.

In respect of green spaces in urban areas, the NPF provides the following commentary:

Green belts and green spaces in our cities, towns and villages play an integral role as part of the fabric of our settlements, either through their use for community recreation and amenity purposes, supporting biodiversity or as a natural delineation of the settlement itself, forming the interface between urban and rural areas.

Green spaces and parks have a role in determining the quality of life in and sustainability of, our settlements. Green belts adjoining our urban areas also fulfil a strategic purpose, as a potential asset for future, planned development as an urban extension, particularly at a city scale.

National Policy Objective 62

Identify and strengthen the value of greenbelts and green spaces at a regional and city scale, to enable enhanced connectivity to wider strategic networks, prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas.

The Healthy Placemaking Strategy outlined under the Eastern and Midland Region Assembly RSES seeks to improve both physical and social infrastructure to create places that are healthy and attractive to live, work, visit and invest in, and identifies that ‘Recreation and Open Space’ as being one of the key elements of healthy placemaking.

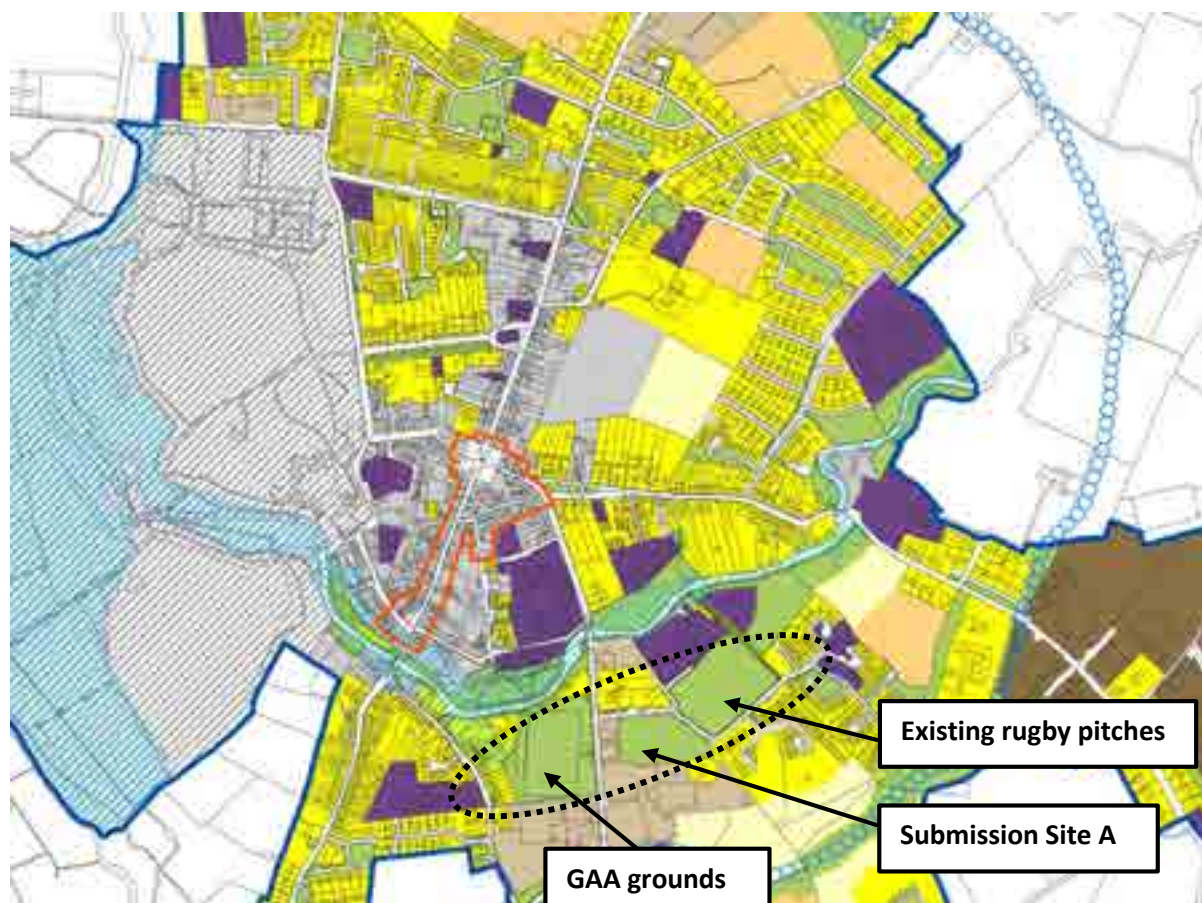


Healthy Placemaking Strategy (Figure 9.2 of EMRA RSES)

The provisions of the NPF and RSES in this regard are supported within Chapter 9 of the draft Plan, which deals with ‘Social Inclusion, Community and Cultural Development’. Under this chapter, the Council recognises its role in protecting existing sport / recreation and open space areas and ensuring that adequate land is zoned for development to accommodate sporting and recreational facilities, both active and passive. Policy SICDP-17 refers:

SICCDP-17 It is Council policy to preserve the land use of existing public and private recreation areas, including sports clubs, built leisure facilities and open space areas. In exceptional circumstances, a change of use may be sought, but must demonstrate that alternative recreational provisions are provided in a suitable location. Further, it is Council policy to identify, where possible and appropriate, sites for possible future extensions of public open space areas and amenities within settlement plans.

In respect of Submission Site A, and referring to the draft Plan zoning map extract below, it is considered that this site, along with the adjoining rugby pitches and GAA grounds further west, is an important open / green space resource for the town and should be protected as such.



In respect of Submission Site B, part of the site is occupied by the clubhouse and car parking for the Birr Rugby Club with the remaining area being grass. Considering the location of the site adjacent to the Camcor River and association of the clubhouse with adjoining rugby pitches, a rezoning to 'Open Space, Amenity and Recreation' is considered appropriate and would create a green link with the river corridor. Under the 'Open Space, Amenity and Recreation' zoning objective, uses such as sports pitches, sports clubs and public open space are 'Permitted in Principle' / deemed generally acceptable.

Accordingly, it is recommended that the zoning of Site A remain 'Open Space, Amenity, Recreation', as per the draft Plan; and that the zoning of Site B be changed from 'Community Services / Facilities' to 'Open Space, Amenity, Recreation'.

Ref: CDP/D/97**Person / Body:****Birr Tidy Towns and Birr 20:20****Summary of submission / observation:**

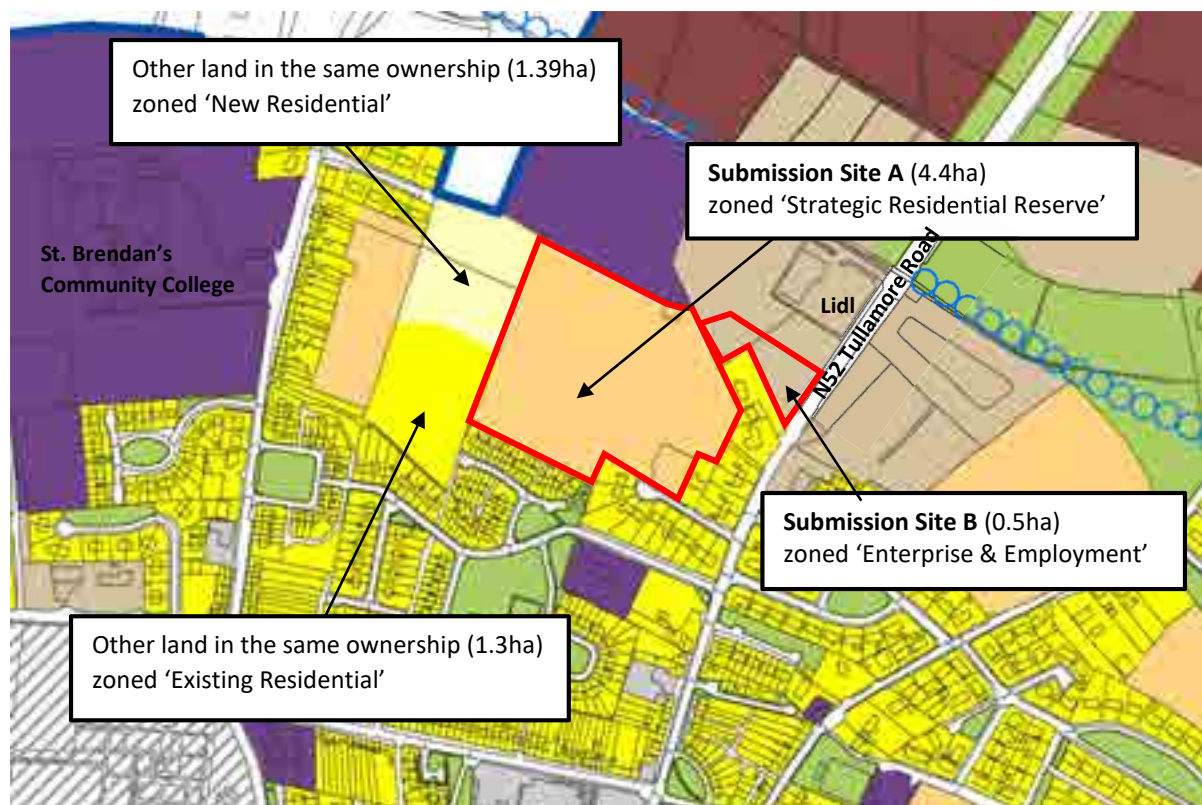
This submission requests that Offaly County Council reassess its herbicide policy in the Birr Municipal District adopting a zero tolerance policy on herbicide use as soon as possible with a reduction in herbicide usage implemented in the meantime. The submission refers to the Dun Laoighaire Rathdown County Council Weed Control on Hard Surfaces Plan 2018.

CE Response:

Notwithstanding that the manual removal of weeds using scuffling and hand pulling is labour intensive, it is considered that this submission in its content supports Target 1.2.1 of the All Ireland Pollinator Plan 2015-20 to increase the area of public land that is managed in a pollinator friendly way. It is therefore proposed to add in a policy in Chapter 4: **'It is Council policy to support alternative landscape maintenance regimes which promote and work towards the reduction and ultimate elimination of use of herbicides in Parks and public land, while supporting the National Bee Pollinator Plan in promoting bee friendly habitats.'**

Ref: CDP/D/127**Person / Body:****Mark Gilligan****Summary of submission / observation:**

- a) Submission Site A - That the zoning of approx. 4.4ha of undeveloped greenfield land located north of McAuley Drive and west of the N52 Tullamore Road, Birr, be changed from 'Strategic Residential Reserve' to 'New Residential' in the draft Plan.
- b) Submission Site B - That the zoning of approx. 0.5ha of undeveloped greenfield land located immediately south of Lidl on the western side of the N52 Tullamore Road, Birr, be changed from 'Enterprise and Employment' to 'New Residential' in the draft Plan.



CE Response:

Under the draft Plan, Submission Site A is zoned 'Strategic Residential Reserve', while Submission Site B is zoned 'Enterprise and Employment'. The submission requests that both sites be zoned 'New Residential' in the draft Plan.

In terms of residential zoning, *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that '*From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...*'. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that '*Residential development 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.*'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

Submission Site A is zoned 'Strategic Residential Reserve' as there are other lands identified as being more appropriately located to deliver the Core Strategy housing allocation for Birr over the lifetime of the development plan, consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

Under the revised Core Strategy, as amended, for the county (Chapter 2 of the draft Plan), Birr, including Crinkill Village, is allocated 13.9ha for new residential development over the lifetime of the Plan. The 13.9ha of 'New Residential' zoning has been identified within the existing built-up footprint of Birr and Crinkill, with the focus on consolidated and sequential growth from the town centre outwards. To zone an additional 4ha of land 'New Residential' at the location would far exceed the Core Strategy allocation for the town, and would require the 'New Residential' zoning already designated to be removed from land which is sequentially closer to the town centre, contrary to NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

Submission Site B is zoned 'Enterprise and Employment', which is considered a suitable zone considering the site frontage and direct access to the N52 Tullamore Road.

Accordingly, in respect of Site A and Site B, it is advised to retain the zoning in accordance with the draft Plan.

[Ref: CDP/D/132](#)

Person / Body:

Holly Breen / Barry Dwyer

Summary of submission / observation:

That the SFRA be reviewed to confirm that the flood risk mapping is accurate in respect of a property on the south side of Castle Street in Birr.

CE Response:

The Constrained Land Use Zone layer is a combination of Flood Zones A and B. It shows areas that are subject to a 0.1% Annual Exceedance Probability (AEP) – what is often referred to as a 1 in 1,000 year flood. The Flood Zones have been informed by various indicators of flood risk, including sophisticated predictive modelling. Many of the areas included in the 0.1% AEP area will be a distance from areas that are frequently flooded. Many of the areas included in the 0.1% AEP area will not have been known by residents to have flooded previously. It is not considered necessary to modify the flood zones on foot of this submission.

No change recommended to the draft Plan.

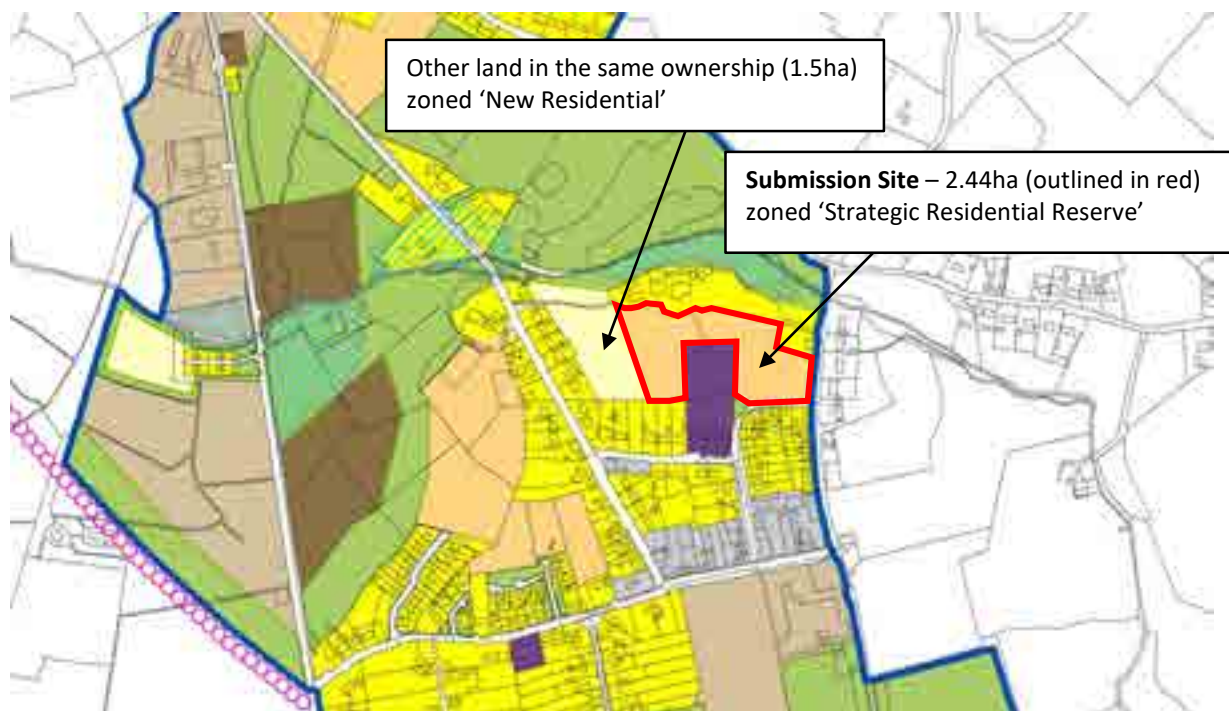
[Ref: CDP/D/138](#)

Person / Body:

Destrina Ltd.

Summary of submission / observation:

That the zoning of approx. 2.44ha of undeveloped greenfield land located on the east side of Military Road north of Crinkill Village, be changed from 'Strategic Residential Reserve' to 'New Residential' in the draft Plan.



CE Response:

The submission site is located east of Military Road, on the northern end of Crinkill Village, and immediately north of Crinkill National School, with frontage to School Road to the east and (within the larger landholding) backland access from Military Road to the west. The submission site has an area of 2.44ha approx. and is part of a larger landholding of 4.68ha, noting that 1.5ha of the landholding has been zoned 'New Residential' in the draft Plan, while a further 0.7ha is occupied by the National School and in the draft Plan is zoned 'Community Services/ Facilities'.

Under the draft Plan, the submission site is zoned 'Strategic Residential Reserve'. The submission requests that the site be zoned 'New Residential'.

In terms of residential zoning, *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that '*From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...*'. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that '*Residential development 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.*'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

In this case, a proportion of the overall landholding (1.5ha) was zoned 'New Residential' while the remaining land (2.44ha) was zoned 'Strategic Residential Reserve'.

1.5ha of 'New Residential' equates to 45 houses at a density of 30 dwellings per hectare. With an existing housing stock in Crinkill Village of 270 houses (Census 2016), an additional 45 houses would result in an 17% increase in the housing stock over the Plan period of 2021-2027, which is considered a sustainable level of growth and consistent with the *'Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, 2009'*.

The 1.5ha zoned 'New Residential' is considered sufficient to meet the housing needs of Crinkill Village over the lifetime of the 2021-2027 Plan. Further 'New Residential' zoned land at this location is not required as there are other lands identified as being more appropriately located to deliver the Core Strategy housing allocation for Birr over the lifetime of the development plan, consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

Furthermore, to zone an additional 2.44ha of land 'New Residential' at the location would far exceed the Core Strategy allocation for Birr/Crinkill, and would require the 'New Residential' zoning to be removed from land which is sequentially closer to the town or village centres, contrary to NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

Accordingly, it is recommended to retain the zoning of the submission lands in accordance with the draft Plan.

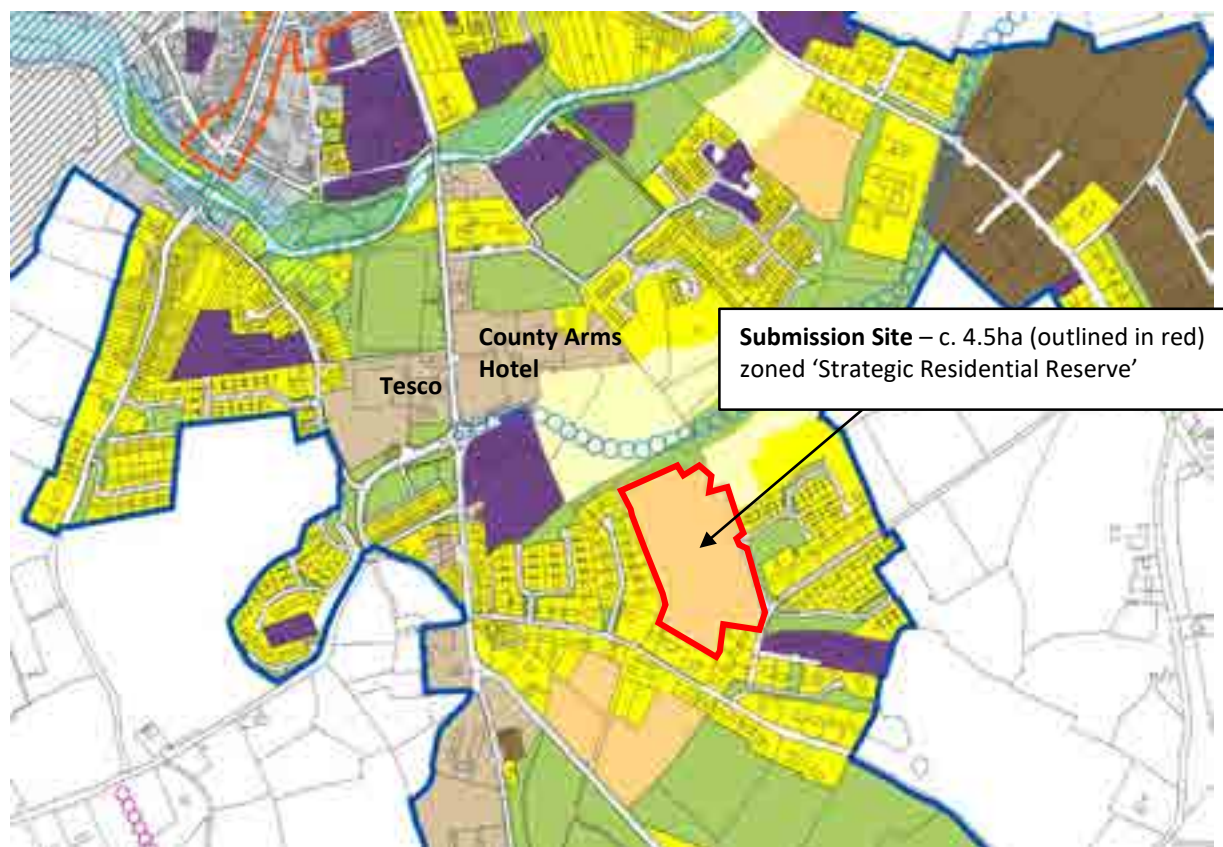
[Ref: CDP/D/139](#)

Person / Body:

ECAN Ltd.

Summary of submission / observation:

That the zoning of approx. 4.5ha of undeveloped greenfield land located on the east side of Military Road north of Crinkill Village, be changed from 'Strategic Residential Reserve' to 'New Residential' in the draft Plan.



CE Response:

This site, of approx. 4.5ha, is located on the southern end of Birr Town, has road frontage and access from the eastern side at Corr na Meala. The site is otherwise bounded by the rear of houses on Hillside to the west and Seffin Avenue to the south.

Under the draft Plan, the submission site is zoned 'Strategic Residential Reserve'. The submission requests that the site be zoned 'New Residential'.

In terms of residential zoning, *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that '*From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...*'. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that '*Residential development 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.*'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core

Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

Section 4.19 (f) of the Development Plan Guidelines 2007 relates to the 'Sequential Approach'. It states *'In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided); (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan'*.

Under the revised Core Strategy, as amended, for the county (Chapter 2 of the draft Plan), Birr, including Crinkill Village, is allocated 13.9ha for new residential development over the lifetime of the Plan. The 13.9ha of 'New Residential' zoning has been identified within the existing built-up footprint of Birr and Crinkill, with the focus on consolidated and sequential growth from the town centre outwards, consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02. To zone an additional 4.5ha of land 'New Residential' at the location would far exceed the Core Strategy allocation for the town, and would require the 'New Residential' zoning already designated to be removed from land which is sequentially closer to the town centre, contrary to NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

Accordingly, it is recommended to retain the zoning of the submission lands in accordance with the draft Plan.

3.2.1.3 Edenderry

Ref: [CDP/D/22](#)

Person / Body:

Murray Architectural Services on behalf on Mr. Patrick Gilson

Summary of submissions / observations:

A request to zone land in Edenderry for residential or industrial use.

CE Response:

A Local Area Plan is in effect for Edenderry 2017-2023 which will be reviewed / varied after the adoption of the Offaly County Development Plan 2021-2027. Chapter 2 of the draft plan includes the following relevant objective: **CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in

the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

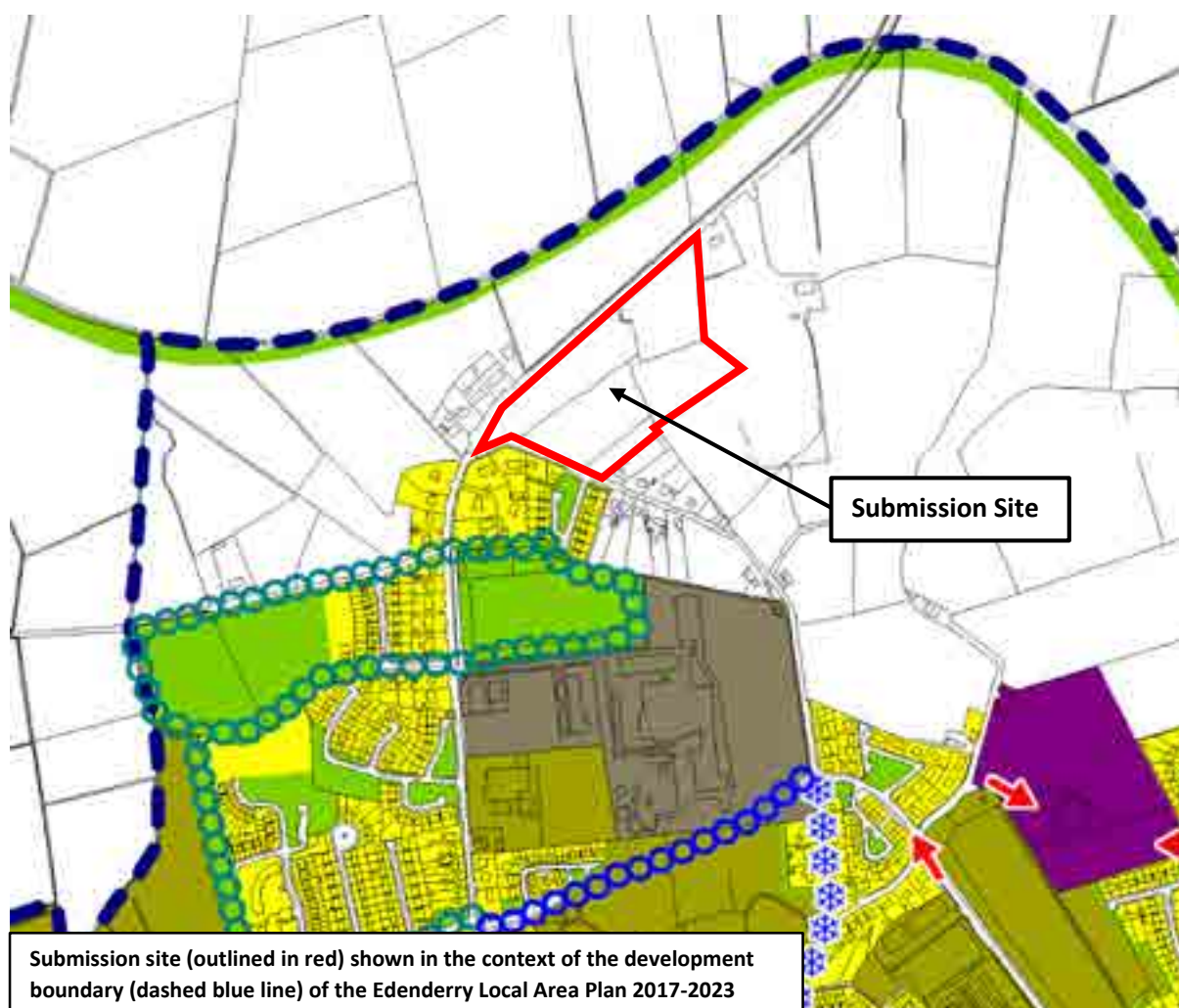
[Ref: CDP/D/185](#)

Person / Body:

John Mangan

Summary of submissions / observations:

That land at Clonmellon, Edenderry be zoned for residential development.



CE Response:

A Local Area Plan is in effect for Edenderry 2017-2023 which will be reviewed / varied after the adoption of the Offaly County Development Plan 2021-2027. Chapter 2 of the draft plan includes the following relevant objective:

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core

Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

No change to the draft Plan.

3.2.1.4 Portarlinton

[Ref: CDP/D/23](#)

Person / Body:

Cllr. Aidan Mullins of Laois County Council

Summary of submissions / observations:

- a) Request that Portarlinton be designated as a 'Self-Sustaining Growth Town' instead of a 'Self-Sustaining Town'.
- b) Requests that Derryounce Lakes and Trails be referred to in the following objective, **RDO-07** It is an objective of the Council to support the development of Lough Boora Discovery Park as a National Peatlands Centre and to support the development of further strategic linkages with the local and regional green infrastructure network.

CE Response:

- a) Portarlinton has experienced rapid population growth of 24% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.435 which indicates a poor economic function (above 0.7 is a strong economic function according to the RSES). It is located within the area mapped as 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining.

Section 3.2 of the RSES addresses 'The Core Region'. It states the following:

'Some areas in the Core Region have emerged mainly as commuting towns, experiencing high rates of population growth but with a weak level of services and functions for their resident populations. These towns will require 'catch up' investment in local employment and services in order to become more self-sustaining and to improve sustainable mobility, particularly in those places where there are high levels of car dependency.'

The 'growth enables for the Core region include:

- *To promote continued growth at more sustainable rates, while providing for increased employment and improved local economies, services and functions to allow towns become more self-sustaining and to create the quality of life to attract investment.*

- *‘Catch up’ investment to promote consolidation and improvement in the sustainability of those areas that have experienced significant population growth but have a weak level of services and employment for their residents’.*

Accordingly, it satisfies the description of a settlement that falls within the description of ‘Self-Sustaining Town’ in the RSES where catch-up investment is required to balance the high levels of residential expansion.

- b) It is not proposed to locate a National Peatlands Centre at Derrycastle Lakes and Trails and so it is not recommended to insert reference to Derrycastle Lakes and Trails into objective RDO-07 as requested. Reference is made to Derrycastle Lakes and Trails in policy TRP-19 as follows;

TRP-19 It is Council policy to further investigate the potential of and opportunities for the development of existing and new trails in County Offaly to include a mixture of walking, cycling and driving trails, for the provision of appropriate services along these trails, and for the development of linkages between these trails and key tourism assets both within Offaly and adjoining counties. An example includes Derrycastle Experience Lake and Trails and its potential linkage to the People’s Park in Portarlington and the wider linkages to the Mount Lucas windfarm. The Council will only support such developments where it is demonstrated that no significant environmental effects would arise as a consequence of their construction or operation.

[Ref: CDP/D/24](#)

Person / Body:

Portarlington Community Development Association

Summary of submissions / observations:

- a) Request that Portarlington be designated as a ‘Self-Sustaining Growth Town’ instead of a ‘Self-Sustaining Town’.
- b) Requests that Derrycastle Lakes and Trails be referred to in the following objective, **RDO-07** It is an objective of the Council to support the development of Lough Boora Discovery Park as a National Peatlands Centre and to support the development of further strategic linkages with the local and regional green infrastructure network.

CE Response:

- a) Same response as (a) in CDP/D/23.
b) Same response as (a) in CDP/D/23.

Ref: CDP/D/27**Person / Body:****Portarlington Enterprise Centre Ltd.****Summary of submissions / observations:**

- a) Request that Portarlington be designated as a 'Self-Sustaining Growth Town' instead of a 'Self-Sustaining Town'.
- b) Requests that Derrycastle Lakes and Trails be referred to in the following objective, **RDO-07** It is an objective of the Council to support the development of Lough Boora Discovery Park as a National Peatlands Centre and to support the development of further strategic linkages with the local and regional green infrastructure network.

CE Response:

- a) Same response as (a) in CDP/D/23.
- b) Same response as (a) in CDP/D/23.

Ref: CDP/D/52**Person / Body:****Councillor Eddie Fitzpatrick****Summary of submissions / observations:**

- a) Request that Portarlington be designated as a 'Self-Sustaining Growth Town' instead of a 'Self-Sustaining Town'.
- b) Requests that Derrycastle Lakes and Trails be referred to in the Rural Economic Chapter of the Plan.

CE Response:

- a) Same response as (a) in CDP/D/23.
- b) Derrycastle Lakes and Trails is referred to in Chapter 6 Tourism and Recreational Development (see policy below) where it is considered to be appropriately located rather than in the Rural Economic Strategy of Chapter 5 Economic Development.

TRP-19 It is Council policy to further investigate the potential of and opportunities for the development of existing and new trails in County Offaly to include a mixture of walking, cycling and driving trails, for the provision of appropriate services along these trails, and for the development of linkages between these trails and key tourism assets both within Offaly and adjoining counties. An example includes Derrycastle Experience Lake and Trails and its potential linkage to the People's Park in Portarlington and the wider linkages to the Mount Lucas windfarm. The Council will only support

such developments where it is demonstrated that no significant environmental effects would arise as a consequence of their construction or operation.

[Ref: CDP/D/82](#)

Person / Body:

Laois County Council

Summary of submissions / observations:

- a) The submission states that *'Portarlinton is very much a self-sustaining town'* however notwithstanding this the submission requests that it be considered a self-sustaining growth town. The submission refers to Growth Enablers in the EMRA region and to the Portarlinton Joint Local Area Plan 2018-2024.
- b) Seeks a policy objective to prepare a joint Portarlinton Local Area Plan.
- c) Reference sought to be made in Chapter 5 Economic Development to Portarlinton Enterprise Centre (which is in Co. Laois) as an e-working space. This serves the Offaly and Laois catchment of Portarlinton.
- d) Seeks a policy to be inserted stating: It is Council policy to collaborate with Laois County Council to recognise Portarlinton's role as a trailhead for the Derryounce Experience Lakes and Trails and develop a strategy to capitalise on this quality natural amenity.

CE Response:

- a) Appendix A of the RSES refers to the 10-year population growth 2006-2016, Functional Urban Areas, jobs v resident works ratio from 2016 census as considerations in compiling the asset-based approach to feed into the settlement / core strategy (i.e. growth strategy). This clearly places Portarlinton as a Self-Sustaining Town. Portarlinton has experienced rapid population growth of 24% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.435 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it satisfies the description of a settlement that falls within the description of 'Self-Sustaining Town' in the RSES where catch-up investment is required to balance the high levels of residential expansion.

The Growth Enables listed in the submission relate to the region, however the Growth Enablers specific to the area of the region in which Portarlinton is located i.e. the 'Core Region' are set out below. The focus is on continued growth at more sustainable rates in order to improve quality of life and to provide 'catch-up' investment to improve the sustainability of such settlements.

- To promote continued growth at more sustainable rates, while providing for increased employment and improved local economies, services and functions to allow towns become more self-sustaining and to create the quality of life to attract investment.

- 'Catch up' investment to promote consolidation and improvement in the sustainability of those areas that have experienced significant population growth but have a weak level of services and employment for their residents.

Section 3.2 of the RSES addresses 'The Core Region'. It states the following:

'Some areas in the Core Region have emerged mainly as commuting towns, experiencing high rates of population growth but with a weak level of services and functions for their resident populations. These towns will require 'catch up' investment in local employment and services in order to become more self-sustaining and to improve sustainable mobility, particularly in those places where there are high levels of car dependency.'

The submission quotes sections of the Portarlington Local Area Plan 2018-2024 (which predates the RSES), however this will require review / variation on adoption of the County Development Plan; which is in line with what the RSES states namely;

Section 12.2 of RSES:

'Section 27 of the Planning and Development Act 2000 requires that a planning authority shall ensure, when making a development plan or a local area plan, that the plan is consistent with any regional spatial and economic strategy in force for its area'.

Section 12.3 of RSES:

'These provisions mean that all city/county development plans will be subject to review during 2019/21, and broadly aligned to address a six-year period to 2026/27. It is expected that all local area plans, including those to replace town plans, will be similarly brought into alignment during or immediately after the 2019-21 development plan review period'.

- b) Offaly County Council will need to consider varying / reviewing Local Area Plans to bring them in line with the new Core Strategy in the Co. Development Plan 2021-2027. This would concern Edenderry and Portarlington as they are the only LAPs in situ currently. It is recommended to amend Policy CSO-02 in order to refer to the names of the Local Area Plans and give a timescale for their preparation:

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlington Joint Local Area Plan and Edenderry Local Area Plan during the plan period of the County Development Plan 2021-2027 ~~if required~~, to ensure consistency with the provisions of the Core Strategy.

CSO-04 It is an objective of the Council to make Local Area Plans for Tullamore and Birr **during the plan period of the County Development Plan 2021-2027**. During the transition period between adoption of this County Development Plan and the adoption of the Local Area Plans for Tullamore and Birr, the objectives (including zoning objectives), policies and standards in this County Development Plan shall apply to Tullamore and Birr.

- c) Reference should be made in Chapter 5 Economic Development to Portarlington Enterprise Centre (which is in Co. Laois) as an e-working space. This serves the Offaly side as well as Laois side of Portarlington.

In Section 5.5.4 of the Draft Plan the following should be inserted in relation to remote working:

Portarlington Enterprise Centre on the Laois side of Portarlington provides remote working space for the wider Portarlington catchment.

- d) The following policy in the draft plan addresses Derryounce. The following red inserted text is recommended in recognising Portarlington as a trailhead.

TRP-19 It is Council policy to further investigate the potential of and opportunities for the development of existing and new trails in County Offaly to include a mixture of walking, cycling and driving trails, for the provision of appropriate services along these trails, and for the development of linkages between these trails and key tourism assets both within Offaly and adjoining counties. An example includes Derryounce Experience Lake and Trails and its potential linkage to the People's Park in Portarlington **(with potential for Portarlington as a trailhead)** and the wider linkages to the Mount Lucas windfarm. The Council will only support such developments where it is demonstrated that no significant environmental effects would arise as a consequence of their construction or operation.

3.2.1.5 Clara

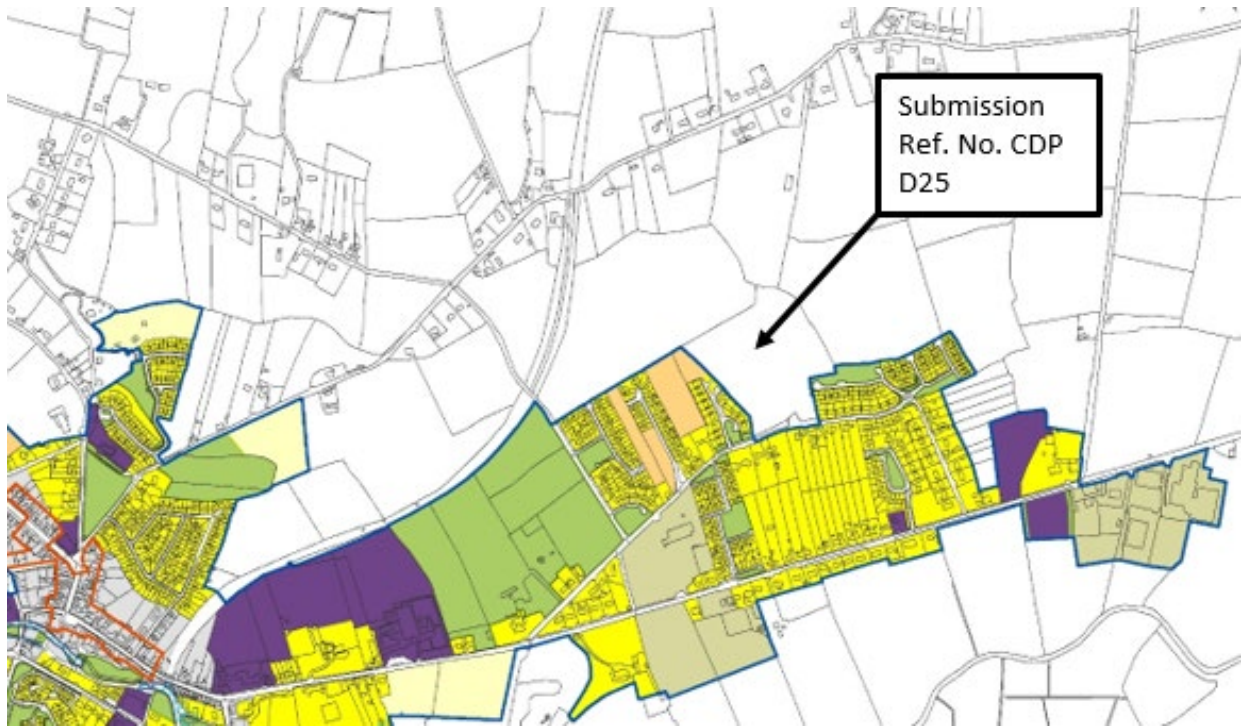
[Ref: CDP/D/25](#)

Person / Body:

West End Properties Ltd

Summary of submission / observation:

The purpose of this submission is to seek designation of lands of 5.29 hectares at Heather Grove, Kilcoursey, Clara with a Specific Local Objective for 'serviced sites' within the Draft Plan 2021-27. The submission includes an indicative site layout of serviced sites.





The submission makes reference to the;

- Specific Local Objective being in compliance with National Policy Objective 18b of the National Planning Framework: Project Ireland 2040 to develop a programme for ‘new homes in small towns and villages’ providing serviced sites with appropriate infrastructure to attract people to live in small towns and villages, which in turn will provide an alternative to rural generated housing elsewhere;
- The previous grant of permission, on the landholding, Planning Reference, 06/905, for 126 no. houses;
- The unkempt state of the subject lands which have been identified under the Derelict Sites Act 1990;
- The development of the site allowing the footpath network to be extended to other residential areas.

CE Response:

Noted. No further action required.

Under the amended Core Strategy for the county (Chapter 2 of the Draft Plan), Clara is allocated 8.1 hectares for new residential development over the lifetime of the Plan. The Clara Town Plan in the Draft Plan works within the parameters set out in the Core Strategy as well as guiding 'New Residential' zonings within the existing built-up footprint of the settlement is a measure that also meets a number of National Strategic Outcomes which underpin the NPF, including NSO1 (Compact Growth), NSO4 (Sustainable Mobility), NSO9 (Sustainable Management of Water, Waste and other Environmental Resources), and NSO8 (Transition to a Low Carbon and Climate Resilient Society).

Notwithstanding that the subject land is serviced with water mains and sewer, zoning it 'New Residential';

- Would not support compact growth as there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the development plan, consistent with NSO 1 and RSO 2;
- Would constitute undesirable urban sprawl; and
- Would result in population growth for the town significantly in excess of that allocated for Clara in the Core Strategy for the county in Chapter 2 of the Draft Plan, and accordingly it is recommended that this site remain not zoned.

Ref: [CDP/D/36](#)**Person / Body:**

Bernie Henry, Clara Heritage Committee

Summary of submission / observation:

The submission requests that the following areas be given consideration within the Clara Town Plan to the preservation of industrial engineering features along the river within the town and the making of the river more accessible to the public;

The submission relates to the potential of Clara's;

- natural amenities such as the river, its setting and its industrial engineering features, the Town Green, the Clara Bog and associated greenways, blueways and brownways; and
- industrial and architectural heritage, such as old stone walls, development of architectural trails, old railway infrastructure, machinery, development of an industrial museum and amenity spaces in old factory buildings on the Ballycumber Road and the development of a Genealogy Library in the town.

CE Response:

Noted. Most of the issues raised in this submission are addressed in the Clara Settlement Plan with specific objectives contained in Section 3 Economic Development, Section 5 Biodiversity and Landscape and Section 7 Critical Infrastructure. Notwithstanding this, it is proposed to amend the following objectives in the Clara Town Plan (red text);

- EDO-06 Improve the overall attractiveness of Clara for visitors to the town, including the enhancement of the visual amenity of the town and its approaches and through the encouragement of new or extended facilities for tourists, including quality tourist accommodation, 'linkages with' tourist activities and attractions 'in the area such as Lough Boora Discovery Park, Clonmacnoise Mónastic site, Lemanaghan, Pilgrims Road and the Midlands Cycling Destination.'
- EDD-08 Encourage the establishment of a Clara Heritage 'and Architectural Trail' incorporating Clara Bog, the towns industrial heritage sites, 'the establishment of an industrial museum', ancient abbeys, cemeteries and nature walks.
- KIO-04 Improve and upgrade all approach roads to the town as a method of enhancing the first impression of the town, 'including, the restoration, maintenance and preservation of old stone walls along these approach roads.'

No further action is required in relation to the proposal to provide a Genealogy Library in the town as it is considered that the 'Community Services/Facilities' zoning as the existing library allows for such a use.

[Ref: CDP/D/57](#)

Person / Body:

Josephine Killeen

Summary of submission / observation:

This submission requests that lands of circa 3 acres at New Road, Clara be zoned 'New Residential' in the Draft Plan as the lands are served by public water mains and public sewerage mains and to zone these lands would be a natural progression on this road.

CE Response:

The land subject to this submission, as shown below, is located on the New Road outside the town, peripheral to the town centre, shops and schools, where the pattern of development in the vicinity of the site is linear one off houses.



Under the amended Core Strategy for the county (Chapter 2 of the Draft Plan), Clara is allocated 8.1 hectares for new residential development over the lifetime of the Plan. The Clara Town Plan in the Draft Plan works within the parameters set out in the Core Strategy as well as guiding 'New Residential' zonings within the existing built-up footprint of the settlement is a measure that also meets a number of National Strategic Outcomes which underpin the NPF, including NSO1 (Compact Growth), NSO4 (Sustainable Mobility), NSO9 (Sustainable Management of Water, Waste and other Environmental Resources), and NSO8 (Transition to a Low Carbon and Climate Resilient Society).

Notwithstanding that the subject land is serviced with water mains and sewer, zoning it 'New Residential';

- Would not support compact growth as there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the development plan, consistent with NSO 1 and RSO 2;
- Would constitute undesirable urban sprawl;
- Would not be consistent with the national and regional policy objective for delivering sustainable mobility and transition to a low carbon and climate resilient society in that it increases car dependency amongst the local population; and
- Would result in population growth for the town significantly in excess of that allocated for Clara in the Core Strategy for the county in Chapter 2 of the Draft Plan.

Ref: CDP/D/59**Person / Body:****Clara Community Council****Summary of submission / observation:**

This submission states that parking has become a hazard and parking improvements should be cemented into the Plan while further parking is required in the vicinity of Clara Bog.

CE Response:

No further action proposed in relation to parking as this issue is both acknowledged within and addressed in the Clara Town Plan in the Draft Plan by objectives;

- supporting the provision of public off-street car parks off Church Street and to the rear of Main Street and River Street (KIO-10);
- preparing a Traffic Management Plan for Clara Town Centre (KIO-02);
- facilitating and implementing measures to reduce or manage traffic associated with schools to regularise movement patterns and ease congestion (KIO-05).

The Clara Town Plan also includes an objective to investigate the feasibility of providing a future relief road to the north east of the town (KIO-01).

It is proposed however to make an amendment to Objective NHO-07 to include investigating the feasibility of providing additional parking at Clara Bog as follows (additional text in red);

Investigate the feasibility of providing an additional boardwalk **and additional parking** on Clara Bog in the location shown on the Clara Settlement Plan Objectives Map subject to consideration of necessary environmental considerations.

Ref: CDP/D/60**Person / Body:****Brian Sheridan****Summary of submission / observation:**

This submission states that Clara's parking requires immediate attention, as does the traffic flow around the town.

CE Response:

No action proposed as this issue is both acknowledged within and addressed in the Clara Town Plan in the Draft Plan by objectives;

- supporting the provision of public off-street car parks off Church Street and to the rear of Main Street and River Street (KIO-10);
- preparing a Traffic Management Plan for Clara Town Centre (KIO-02);
- facilitating and implementing measures to reduce or manage traffic associated with schools to regularise movement patterns and ease congestion (KIO-05).

The Clara Town Plan also includes an objective to investigate the feasibility of providing a future relief road to the north east of the town (KIO-01).

[Ref: CDP/D/68 and 151](#)

Person / Body:

James Gibbons

Summary of submission / observation:

- a) This submission requests that the Council implement its own policy from the Draft Plan in dealing with buildings of vernacular architecture in Clara town, for instance BHP-21 which states that it is Council policy to support proposals to refurbish vernacular structures that are in a run down or derelict condition. The submission proceeds to give a number of examples from the past and relating to current Part 8 developments where Mr Gibbons feels that the Council has not supported the preservation of vernacular structures in the town.
- b) Mr Gibbons queries how the Council is addressing the issue of dereliction in the town, particularly in complying with the requirements of the Derelict Sites Register.
- c) The applicant is concerned about a draft Part VIII proposal. He notes 'Council policy to support proposals to refurbish vernacular structures that are in a run down or derelict condition'
- d) The submission states that the description of a house in Clara (RPS Ref. No. 12-50) is incorrect and should not be on the list of Protected Structures while the nearby Grove Cottage which is not on the list should be. The list of Protected Structures in Clara Town according to Mr Gibbons should be reviewed.
- e) The submission states that Clara Bog and Durrow Abbey in the county need to be adequately signposted and promoted.
- f) In addition, Mr Gibbons states that the Clara Plan should refer to the land purchased by the Council at Drayton Villas in the town which could incorporate the proposed housing planned for the Bogtown area of the town. The submission finishes by stating that there should be a roundabout provided in Raheen.
- g) The submission provides information in relation to the development of the building, noting that the 'detached four-bay two-storey house' was originally built as a series of houses and became semi-detached in late 1920s, with historic photograph provided.

CE Response:

- a) Noted.
- b) Noted. The Council carries out its statutory requirements in accordance with the Derelict Sites Act 1990 and Section 59 of the Planning and Development (Amendment) Act 2018.
- c) The subject Protected Structure that that his submission refers to is not in council ownership. The council have supported similar projects when owners wished to renovate and return such a structure to a viable use, through the Built Heritage Investment Scheme (BHIS). Financial assistance is provided to assist with the conservation and restoration of protected structures. The BHIS is for the repair and conservation of structures that are protected under the Planning and Development Acts, with grants ranging from €2,500 to maximum of €10,000, covering a maximum of 50% of the cost of approved repairs.
- d) Both this property and the adjoining properties form part of the NIAH survey. Those structures which have been attributed a rating value regional importance in the inventory are recommended by the Minister to the planning authority for inclusion. Both properties were removed from the RPS by the Members as part of the CDP 2009-2015 process.

- e) It is noted that in Chapter 6 Tourism and Recreational Development that it is an objective of the Council to develop proposals in conjunction with the OPW for Durrow Abbey and Monastic Site to become a key tourist attraction in County Offaly whilst it is an objective of the Clara Town Plan to encourage the establishment of a Clara Heritage Trail incorporating Clara Bog, the towns industrial heritage sites, ancient abbeys, cemeteries and nature walks, along with providing a footpath linking the town with Clara Bog.
- f) A site north of Drayton Villa at Kilbride which is in the ownership of the Council is zoned New Residential in the draft Clara Town Plan.
- g) Cartographic references show the earlier semi-detached houses. It is therefore proposed amend text as required in the description of RPS 12-50 (red text below) in include reference to the structure as; “originally built as a series of houses and became semi-detached in late 1920” and notify NIAH of agreed changes.



[Ref: CDP/D/81](#)

Person / Body:

Clara Heritage Committee

Summary of submission / observation:

This submission states that the prospect of a complete loop walk along the river and connecting through the hills to the Clara Bog would make a fantastic addition to Clara town.

CE Response:

No action proposed. The Clara Town Plan in the Draft Plan has a number of objectives which provide for the development of walking and cycling routes along the old Clara- Banagher railway (NHO-02) and along the River Brosna (NHO-01) and a pathway linking Clara Bog to the town (NHO-06), in addition to an objective to investigate the feasibility of providing an additional boardwalk on Clara Bog (NHO-07).

[Ref: CDP/D/86](#)

Person / Body:

Claire Collins

Summary of submission / observation:

This submission states in relation to Clara that given (a) the ribbon development immediately outside this boundary through to the bridge; (b) the slight westerly extension on the opposite side of the road to include the industrial site therein; and (c) the potential to add housing within this ribbon development, without extending it, the development boundary should be shifted outwards to include this ribbon development area which is a mix of residential, enterprise, employment and industrial.

CE Response:

The Planning Authority notes the submission and in response has re-examined the areas referred to in the submission in both a site visit and desk top analysis. It is noted that the properties along the Ballycumber Road are in two main groups; one abutting the Plan area and another located further out the Ballycumber Road outside the 50km speed limits. It is proposed to only include the line of houses and former service station that abuts the existing plan area as shown below as they are essentially connected to the footprint whilst the other properties further out the road are somewhat detached from the town.



Draft Plan



**Proposed
Amendment**

Ref: CDP/D/105**Person / Body:****Aidan Leonard****Summary of submission / observation:**

This submission requests;

- a) The 4 storey building known as Inchmore House in Clara and adjacent buildings that currently have Protected Structure status be delisted as the status would restrict his ability to renovate or sell the property;
- b) In addition to the 4 acres of his land on the Kilcoursey Road in Clara, the remaining 6 acres of land be zoned residential also; and
- c) That his landholding on the Tullamore to Clara Road within the speed limit be considered for rezoning to commercial/retail for the purposes of a filling station.

CE Response:

- a) Noted. This significant property, one of several fine homes built for the Goodbody family in Clara and as such form an integrated collection (including Clara House, Drayton Villa, Kilcoursey House, Cork Hill House etc.).

It should be noted that the NIAH images shown were taken in 2004, and that the property has altered since through both vandalism and certain works carried out without planning permission. Comparison of one façade shown below.



2004



2019

Planning permission may be sought for protected structures where material changes are proposed.

Financial assistance is provided to assist with the conservation and restoration of protected structures. The Built Heritage Investment Scheme (BHIS) is for the repair and conservation of structures that are protected under the Planning and Development Acts, with grants ranging from €2,500 to maximum of €10,000, covering a maximum of 50% of the cost of approved repairs.

For large scale projects such as Inchmore House, owners may also consider the Historic Structures Fund which was established for conservation works to heritage structures, in both private and public ownership. The primary focus of the Historic Structures Found is on conservation and enhancement of historic structures and buildings for the benefit of communities and the public.

It is recommended that this property should remain on Offaly's Record of Protected Structures.

- b) No further action proposed. As maps referred to in the written submission were not attached to it, it is not possible to comment on the specific site that the submission refers to. Notwithstanding this, it should be noted that in recommending what areas should be zoned for development on the Kilcoursey Road, regard has been had to;
- the extent of Flood Zone A (high flood risk) and Flood Zone B (moderate flood risk) in the area (represented by a Constrained Land Use designation on zoning maps) and was cognisant of the need to avoid proposing highly vulnerable uses on such lands; and
 - the parameters set out in the amended Core Strategy in Chapter 2 of the Draft Plan which allocated a total of 8.1 hectares for the whole of the town over the Plan period. It should be noted in this regard that the submission proposes that an additional 6 hectares of his land be zoned New Residential which would result in a level of growth for the town far exceeding the projected growth for Clara in the core strategy.
- c) No further action proposed. Similarly, to above, as maps referred to in the written submission were not attached to it, it is not possible to comment on the specific site that the submission refers to. It should be noted that if a site is not zoned for development, it does not automatically preclude a service station in the proposed location. Any proposal would be assessed having regard to relevant Development Management Standards in Chapter 13 of the Draft Plan.

[Ref: CDP/D/158](#)

Person / Body:

Patrick Little, Axis Architecture on behalf of client Brendan Kenny

Summary of submission / observation:

This submission states that Mr Kenny fully supports the proposed rezoning of his lands at the Mill Race, Clara (from 'Public/Community/Educational' in 2014-2020 County Development Plan to 'Town Centre/Mixed' in the Draft Plan and is currently in the process of developing plans for the site which will bring significant development to the town.

**CE Response:**

Noted. No further action required.

Ref: CDP/D/160**Person / Body:****Future Analytics on behalf of Independent Trustee Company (Delta 77)****Summary of submission / observation:**

This submission requests that the proposed Offaly County Development Plan 2021-2027 makes provision for the subject lands in Clara, lying between the R420 to the north and the Curragh Road to the south (shown below) to have their zoning designation amended to 'New Residential'. The subject site is zoned 'Residential' in the Offaly County Development Plan 2014-20.

The submission states that;

- The subject site is a sequentially appropriate site for development, ranking 6th amongst the 10 no. sites assessed based on proximity to the town centre;
- The subject site is a sequentially appropriate site for development, ranking 6th amongst the 10 no. sites assessed based on proximity to the town centre and a select number of key facilities and amenities;
- The subject site ranks better in both assessments than 2 no. sites that are proposed in the Draft Plan to be zoned as 'New Residential';

- Informed by the above rankings, following the application of the sequential approach and the graded prioritisation of centrally located lands, the subject site is necessary to meet the land requirement for residential development in Clara and to deliver housing in a sequential manner;
- Zoning the subject site for residential uses is required to ensure consistency in the Draft Plan with respect to the Core Strategy's policies relating to the use of a sequential approach to residential development and its actual application to land-use zoning in the Draft zoning maps.
- The designation of the subject site as 'New Residential' in the Offaly County Development Plan 2021–2027 would enable the efficient delivery of a development on this site over the lifetime of the new Plan, with I.T.C. (Delta 77) committed to the delivery of housing on the subject site.



CE Response:

Do not zone 'New Residential'.

To zone the subject lands of 2.8 hectares 'New Residential' in the Plan as proposed in this submission would bring the overall 'New residential' zoning total for the Clara Settlement Plan to 10 hectares which would result in population growth for the town significantly in excess of the 8.1 hectares allocated for Clara in the amended Core Strategy Table for the county in Chapter 2 of the Draft Plan.

I consider that the difference from the subject site and sites at Raheen and Kilcoursey that are zoned 'New Residential' are negligible. Indeed, it is noted that the distance from the subject site to the town centre referred to in the submission only relates to its nearest point and the linear nature of the subject site actually means that the mid and furthest point of the site is a similar distance from the town centre as the Raheen and Kilcoursey sites.

I consider that the 'Sequential Approach' contained in this submission are skewed towards making the case for the appropriateness of zoning the subject site as 'New Residential' in the Draft Plan due to the selection of criteria such as accessibility to the M6 motorway (which actually promotes unsustainable commuting patterns) and proximity to the swimming pool rather than other facilities in the town such as the towns community centre or GAA grounds.

The Clara Town Plan in the Draft Plan works within the parameters set out in the Core Strategy as well as Policy Objective 3c from the NPF and Regional Policy Objective 3.2 of EMRA RSES by guiding in excess of 30% of its residential growth within the built footprint of the settlement.

While the site at Raheen is not as close to the town centre as some other sites, the zoning of this site is justified having regard the likely social nature of the housing to be provided for which will meet a demonstrated need in the town. Offaly County Council owns this site of 2.4 hectares and has appointed an external design team to the project and Stage 1 funding has been approved by the DHPLG for 38 no. social housing units which will offset the financial out lay of the Council in purchasing the site.

The zoning of lands at Kilcoursey in the south east of the town as 'New Residential' meanwhile will provide an important counter balance for the south of the town relative to the three parcels of lands zoned 'New Residential' to the north and is located close to important facilities such as the community centre, GAA grounds and St. Francis Primary School.

3.2.1.6 Ferbane

[Ref: CDP/D/56](#)

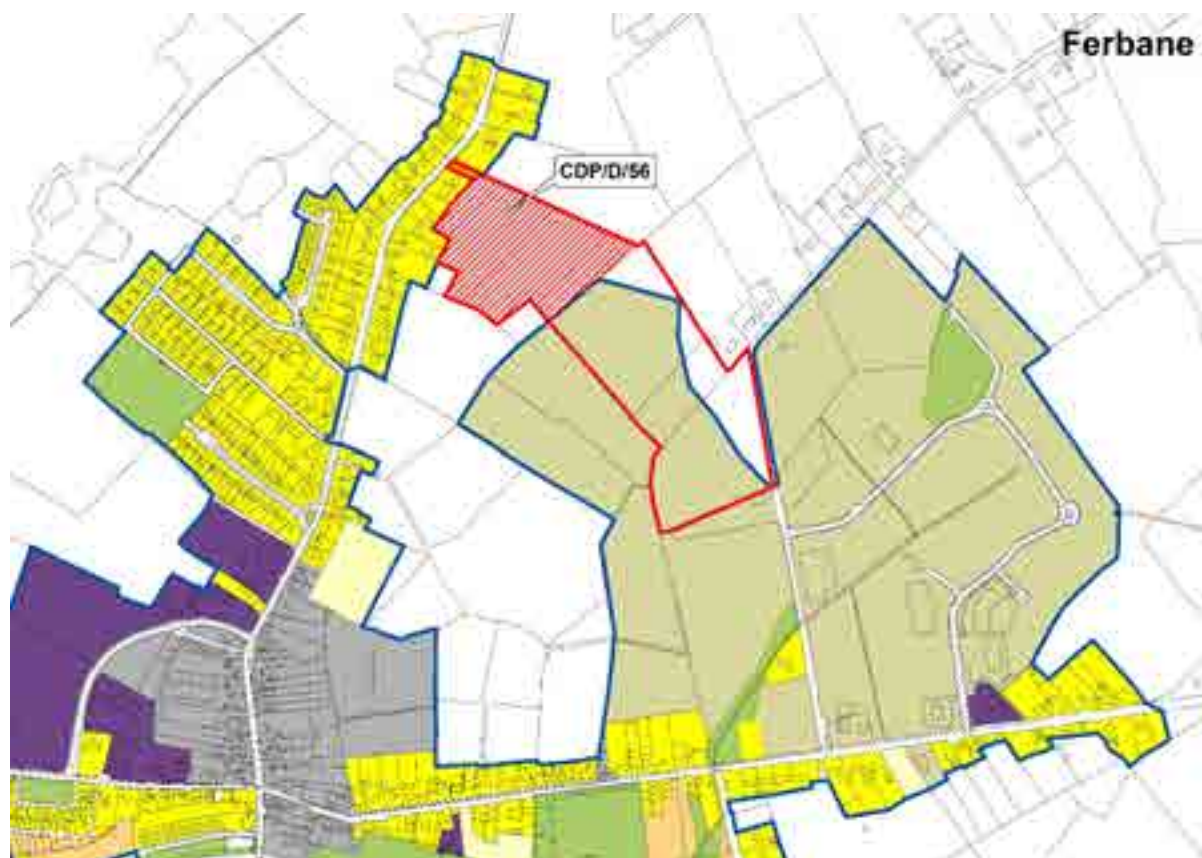
Person / Body:

Mr Ronan Corcoran

Summary of submission / observation:

This submission requests in relation to the subject landholding at Ballyvora, Ferbane that 5.65 hectares of land be zoned 'Enterprise and Employment' and 3.85 hectares be zoned 'New Residential' in the Draft Plan (shown in red hatch below). It should be noted that 5.19 hectares of this landholding is zoned 'Enterprise and Employment' in the existing 2014-2020 Plan.

The submission proceeds to refer to the accessibility of the site with road frontage available onto the N62 and its proximity to the proposed Relief Road in the Draft Plan, that the site is close to services and does not flood, while there also exists numerous community and sporting facilities in the town.



CE Response:

It is recommended to retain the 'Enterprise and Employment' zoning to the north west of the landholding in addition to an extra triangular portion, 0.46 hectares in size, having regard to the zoning of a large land bank as 'Enterprise and Employment' in the vicinity of the site and the potential accessibility offered by the N62 should the proposed north eastern relief route from the Ferbane Business Park westwards on to the N6, the route of which, as shown in the Selected Objectives Map in the Ferbane Settlement Plan, runs along the north eastern boundary of the site is developed.

As regards the proposal to zone the 3.85 hectares parcel to the north west of the landholding as 'New Residential', it is considered that this action would not be in the interests of the proper planning and sustainable development of the area as to do so;

- Would result in population growth for the town significantly in excess of the 5.3 hectares allocated for Ferbane in the revised Core Strategy for the county in Chapter 2 of the Draft Plan.
- Would not support compact growth as there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the development plan, consistent with NSO 1 and RSO 2;
- Would constitute undesirable urban sprawl and leapfrogging other sequentially appropriate sites; and
- Would not be consistent with the following National Strategic Objectives from the National Planning Framework; NSO4 delivering sustainable mobility and NSO8 transition to a low carbon and climate resilient society, in that it would increase car dependency amongst the local population due to its peripheral location in the town.

Ref: CDP/D/120**Person / Body:**

Colum Keegan

Summary of submission / observation:

This submission requests that the zoning of his property, the Schoolhouse, adjacent to the Fairgreen in Ferbane be changed from 'Community Services/Facilities' to either 'Existing Residential' or 'Mixed Use' as this zoning places an unreasonable restriction on the possible development of the property which is essential to ensure its proper maintenance as a Protected Structure.

CE Response:

No further action proposed. It is considered that the proposed 'Community Services/Facilities' zoning for this detached four-bay single-storey former primary school, built c.1840 which is a Protected Structure, Ref. 20-014, compliments other community uses in the vicinity of the site; the Ferbane Heritage Centre, the town's playground and the Church of Ireland ruins (an important part of the town's Green Infrastructure). In addition, the buildings location next to the old Church of Ireland and possibly the schoolmaster's house, form a coherent group of ecclesiastical and educational structures which the proposed 'Community Services/Facilities' zoning is best placed to preserve.

It should be noted also that provision for 'Established/Non-Conforming Uses' is allowed for in the Draft Plan under LUZO-12 in Chapter 12 Land Use Zoning Objectives which states that it is an objective of the Council to: "Generally support reasonable extensions and improvements to premises that accommodate established/non-conforming uses, where it is considered by the Planning Authority that the proposed development would not be injurious to the amenities of the area and would be consistent with the proper planning and sustainable development of the area."

[Ref: CDP/D/122](#)**Person / Body:****Ferbane Tidy Towns****Summary of submission / observation:**

This submission makes a number of suggestions regarding the Ferbane Town Plan in the Draft Plan;

- a) Consider expanding wording of Strategic Aims for the town as set out in Section 1.5 to incorporate the 4 strands of a Green Infrastructure Plan produced by the Tidy Towns Group as part of their Community Action Plan for the town;
- b) Include an objective on reviewing the existing empty building stock to evaluate and promote re-use of buildings;
- c) In relation to Opportunity Site 2, consider adding ‘completion of street corridor of Old Chapel Lane’
- d) Consider making reference to the opportunity for a green open space/town park at the Fairgreen area in Section 2.4 ‘Fairgreen’ in the Plan;
- e) Consider making reference in the Town Centre Objectives listed in Section 2.5 of the Town Plan to open space amenity, sustainable drainage and lighting, rationalising overhead cables, provision of civic artwork in the town, carry out general streetscape/public realm works at other crossing/junctions in the town not just Ballyclare Road and Main Street, provide for town park/green open space, improvements to approaches to the town;
- f) Consider adding an objective to Section 4: Residential to support residential communities in maximising use of their residential open space;
- g) Consider expanding wording of Strategic Aim for Biodiversity and Landscape to incorporate the 4 strands of a Green Infrastructure Plan produced by the Tidy Towns Group as part of their Community Action Plan for the town;
- h) Tidy Towns group would welcome a discussion on cycling walking connectivity to bogs, Clonmacnoise and Grand Canal;
- i) Tidy Towns group would welcome a workshop on the routes proposed in Fig 5.5 to clarify location and context;
- j) In relation to linear park along and pedestrian bridge across the River Brosna referred to in NHO-05, note that this is a riparian woodland noted in Tidy Towns Biodiversity Management Plan while the existing pedestrian bridge is the existing railway bridge;
- k) Provide a wetland amenity area to the south west of the town where drainage leads to tributaries of the Brosna and is therefore potential for use in sustainable drainage systems. Also note that there is a horse shoe area of the former alignment of the Brosna which is a wetland area;
- l) Tidy Towns would welcome a review of designation of open space zoning such as wetland area, Fairgreen, Church of Ireland graveyard etc.

CE Response:

- a) Noted. There is no need to refer specifically to the 4 strands of a Green Infrastructure Plan produced by the Tidy Towns Group as part of their Community Action Plan within Strategic Aim 6 in the Town Plan. Instead it is recommended that reference should be made in Section 5 ‘Biodiversity and Landscape’ to the Green Infrastructure Plan produced by the Tidy Towns Group as part of their Community Action Plan for the town. The additional paragraph to be inserted shall be as follows;

“In May 2019, a Green Infrastructure Plan for Ferbane was developed by the Ferbane Tidy Towns Group which encapsulates specific projects within the environmental context of green infrastructure. The environmental context of the Green Infrastructure Plan has 4 strands;

1. Access, health and well-being;
2. Natural Heritage;
3. Sustainable Drainage; and
4. Cultural Heritage.

The Council has consulted with this Green Infrastructure Plan and a previous Biodiversity Management Strategy from 2014 prepared on behalf of the Tidy Towns Group in the preparation of this Town Plan and the development of public realm, biodiversity, landscape and green infrastructure related policies and objectives in Ferbane over the plan period.”

It is considered necessary to amend Strategic Aim 6 as follows (additional text in bold for emphasis);

‘Strategic Aim: Provision of ecological connectivity and walking and cycling infrastructure throughout the town which both links Ferbane’s existing Green Infrastructure such as Ferbane Bog, River Brosna, Gallen Wood, Ballylin Amenity Woodland and Former Cow Park and Church of Ireland Ruins **and new civic areas and green infrastructure which may develop during the plan period**’.

- b) Noted. No further action required in Draft Plan. This is an operational issue for the Councils Building Control Section who monitor vacancy and the Councils Regeneration Section relating to identification of relevant national funding schemes to address re-use of this building stock. The Council’s Regeneration section are open to new ideas for projects from the local community and working with communities in developing these ideas and pursuing relevant funding. It should be noted that it is an objective of the Council in the draft Town Plan, TCO-10 to “*Continue to pursue funding avenues and apply for funding under the Rural Regeneration and Development Fund and other funds to reinforce Ferbane Town Centre.*” It should be noted that Chapter 7 of the Draft Plan contains a specific objective, RO-04 to establish a database of strategic brownfield and infill sites so that brownfield land re-use can be managed and co-ordinated across multiple stakeholders as part of an active land management process.
- c) Noted. It is recommended to add in an additional point to the requirements of a masterplan for Opportunity Site No. 2 in Section 2.3 ‘Opportunity Sites’ (p.10) as follows;
“New development front onto Old Chapel Lane shall provide active frontage and a well-considered public realm”.
- d) Noted. It is proposed to amend the objective TCO-09 as follows (additional text in red for emphasis); **“Provide a high quality civic space or town park at the old fire station/Fairgreen at the intersection of the town’s relief road and the Main Street.”**
- e) Noted. The vast majority of these issues are addressed in other sections of the Town Plan. Notwithstanding this, it is proposed to amend the objective TCO-06 as follows (additional text in red for emphasis);
“Explore the feasibility of providing a pieces of civic art within the town centre.”
- f) Noted. No further action required, the recreational use of public spaces within housing developments is not within the scope of this Plan. It should be noted that DMS 21 details the requirements for developers to fulfil with regards to public open spaces in housing developments.
- g) See response a) above.

- h) Noted. The Council will endeavour to include all stakeholders in consultations regarding specific projects or plans in the future regarding developing connections with Ferbane Town and nearby bogs, the Grand Canal Greenway and Clonmacnoise;
- i) Noted. The Council will endeavour to include all stakeholders in consultations (in whatever format they take) regarding the development of specific projects or plans in the future as shown in Figure 5.5 of the Town Plan.
- j) Noted. Whilst Map 5.5 shows indicative potential green infrastructure (GI) linkages which will require further study at project level, it is considered good practice to refer to consideration of environmental sensitivities and Inland Fisheries Ireland guidance in relation to objectives relating to provision of GI linkages in the vicinity of the River Brosna as follows (additional text in bold for emphasis);
- “NHO-01:** Work with the relevant stakeholders to examine the feasibility of developing an amenity route along the disused Clara-Banagher railway and the banks of the River Brosna in Ferbane, **taking into account the environmental sensitivities of the site and Inland Fisheries Guidance document, Planning for Watercourses in the Urban Environment.**
- NHO-05:** Provide a linear park along and a pedestrian bridge across the River Brosna to the south east of the town centre, **taking into account the environmental sensitivities of the site and Inland Fisheries Guidance document, Planning for Watercourses in the Urban Environment.**
- NHO-06:** Provide a wetland amenity area to the south west of the town as shown in the Ferbane Town Objectives Map, **taking into account the environmental sensitivities of the site and Inland Fisheries Guidance document, Planning for Watercourses in the Urban Environment.”**
- k) Noted. No further action required as specific location of SUDs is determined at project level. Chapter 13 outlines the development management standards relating to SUDs that developments have to comply with; DMS 23 (Residential), DMS 71 (Industry and Warehousing) and DMS 72 (Business and Technology Parks).
- l) Noted. No further action required. The Council is satisfied with the scope of Green Infrastructure network provided for in the Town Plan and the specific objectives included to facilitate its development over the plan period.

[Ref: CDP/D/136](#)

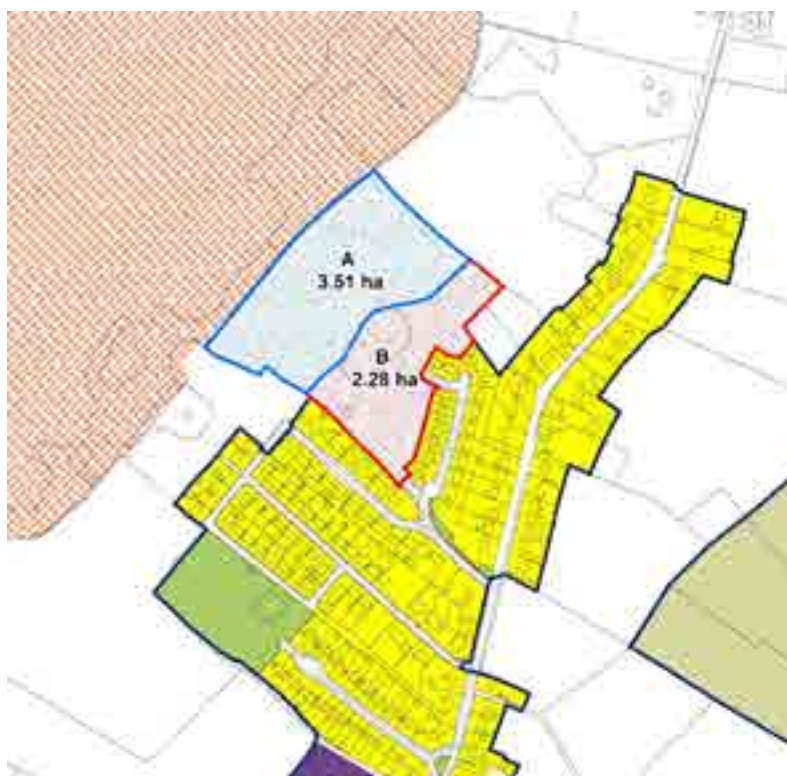
Person / Body:

Samleigh Properties

Summary of submission / observation:

The purpose of this submission is to seek a retain the zoning of existing lands that are currently zoned (in part) for Residential within the Offaly County Development Plan 2014-2020 County Development Plan as such along with having an additional area zoned New Residential in the new Plan. The submission states that the potential removal of zoning of the subject lands, which has undergone significant investment to date and where a previous scheme was partially completed with adequate infrastructural investment to date and with a significant and realistic expectation that the investment (through a difficult economic cycle) would enable the completion of the development is unfairly

prejudiced by the subsequent de-zoning of lands. The submission further refers to the subject site being located adjacent to residential estates and is within walking distance of the town centre and a range of community facilities, and that other sites closer to the town have potential infrastructural limitations in relation to access, pedestrian linkages and proximity to floodplains.



CE Response:

Site A

No further action proposed. The Planning Authority does not consider the zoning of this site of 3.51 hectares to be in the interests of the proper planning and sustainable development of the area as to do so;

- Would result in population growth for the town significantly in excess of the 5.3 hectares allocated for Ferbane in the amended Core Strategy Table.
- Would not support compact growth as there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the development plan, consistent with NSO 1 and RSO 2;
- Would constitute undesirable urban sprawl;
- Would not be consistent with the following National Strategic Objectives from the National Planning Framework; NSO4 delivering sustainable mobility and NSO8 transition to a low carbon and climate resilient society, in that it would increase car dependency amongst the local population due to its peripheral location in the town; and
- Would potentially impact upon the adjacent European Designated site, Ferbane Bog SAC from the development of site A shown below.

It should also be noted that there does not exist any significant infrastructural limitations with the three parcels of New Residential zoned land in the Ferbane Town Plan in relation to access, pedestrian linkages and proximity to floodplains as stated by the applicant.

Site B

It is noted that there is a current planning application for 24 dwellings at further information (Ref. 20/461) and that permission was previously granted for housing developments on site (Ref. 04/539 & 05/1446) which were partly taken up. Developing this brownfield site, although peripheral, would finish off the previously unfinished housing development and would provide needed public open space to serve adjacent Ard Glas and Ballyvora Grove development as well as the subject site. The Ballyvora woodland area within Site B should be zoned 'Public Open Space, Amenity and Recreation' and would provide an attractive backdrop and could potentially link in with future public open space. It is recommended that 1.87 ha of Site B has shown below be zoned 'New Residential' with the remaining 0.41 ha zoned 'Open Space, Amenity and Recreation'.



3.2.1.7 Banagher

Ref: CDP/D/182

Person / Body:

Aideen Madden

Summary of submission / observation:

- a) Welcomes the objective to promote Offaly as a place to visit and stay and to make the towns and villages more attractive.
- b) That the litter problem around Banagher Marina requires attention.

- c) That the road to the rear of Silver Line Cruisers and Carrickcraft at Banagher Marina needs to be enhanced, including planting, and that the concrete railings at Carrickcraft require maintenance.

CE Response:

- a) Noted. The 'Strategic Vision' for the county is *'To create a sustainable and competitive county that supports the health and wellbeing of our people and places, from urban to rural, with access to employment opportunities supported by high quality housing and physical, social and community infrastructure for all, in a climate resilient manner and with respect for our biodiversity.'*

No change to the draft Plan.

- b) The legislation which governs the management of litter is the Litter Pollution Act, 1997 (as amended). As a requirement of the Act, Offaly County Council has produced a Litter Management Plan 2016-2018 which has been extended to 2021 and is responsible for keeping public places in the county clear of litter.

The following objectives are contained in Chapter 11 'Water Services and Environment'.

ENVO-05 It is an objective of the Council to implement the Eastern-Midlands Regional Waste Management Plan 2015-2021; the Council's Litter Management Plan and Waste Bye-Laws.

ENVO-06 It is an objective of the Council to use statutory powers to prohibit the illegal deposit and disposal of waste materials, refuse and litter, and to authorise and regulate, waste disposal within the county in an environmentally sustainable manner.

No change to the draft Plan.

- c) The Council recognises the importance of improving and maintaining the quality of the public realm, including streets and streetscapes, in towns and villages. In this regard, draft Plan Chapter 8 'Sustainable Transport Strategy' includes the following objective:

SMAO-13 It is an objective of the Council to improve and maintain regional and county roads in line with the annual roads programme and allocated budgets.

In addition, under the Banagher Town Plan (Volume 2 of the draft Plan) it is noted that it will be the Council's intention to continually improve the public realm, identifying elements that contribute positively and maintaining them while seeking to identify and resolve issues that detract from the quality of the public realm. Objective TCO-06 in the Banagher Town Plan reads as follows:

TCO-06 Further improve the public realm, which includes streets, footpaths, parks, squares, bridges and public buildings and facilities, to provide Banagher with an enhanced sense of identity.

No change to the draft Plan.

3.2.1.8 Kilcormac

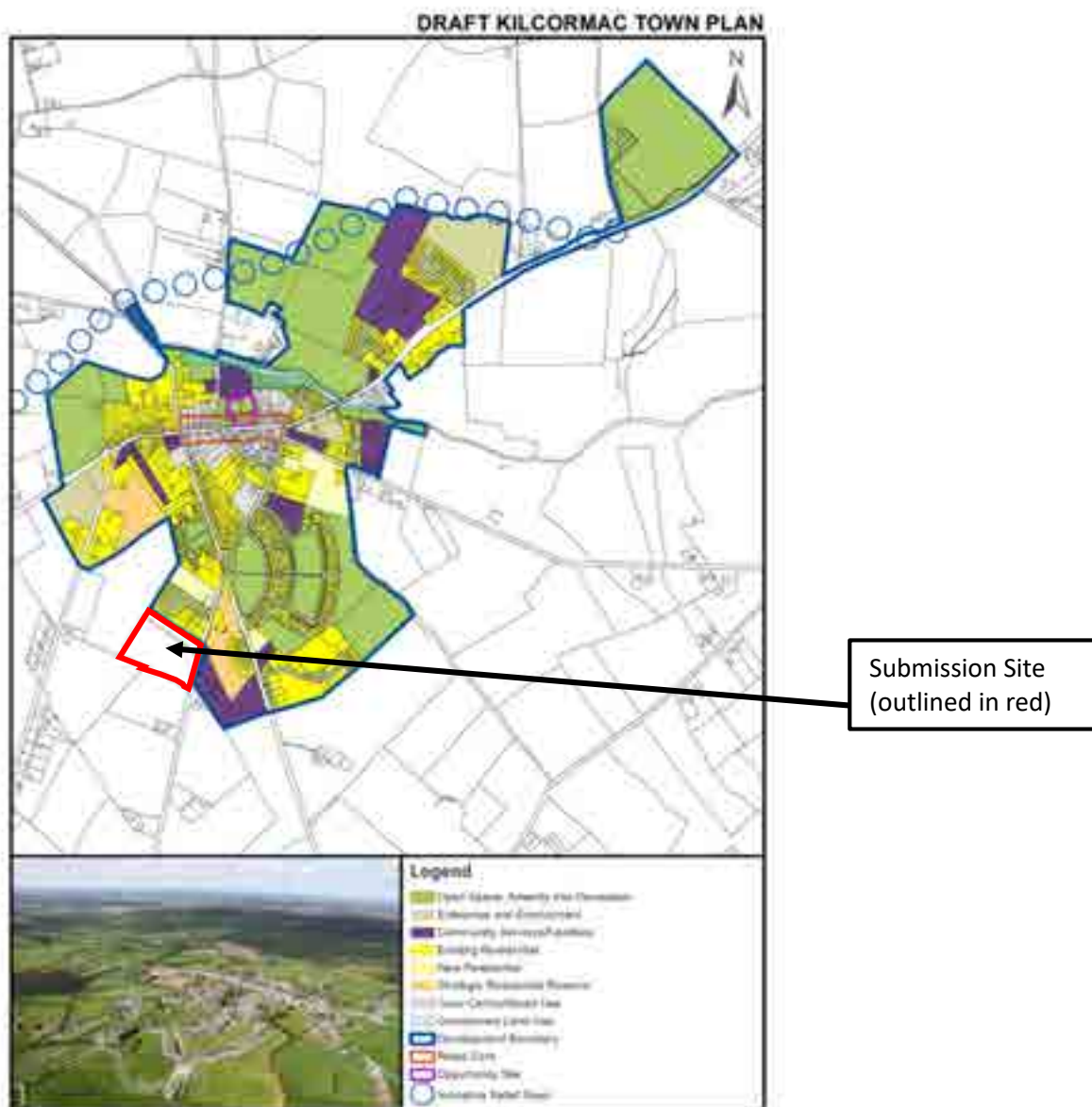
Ref: CDP/D/18

Person / Body:

CNN Construction

Summary of submission / observation:

That a 2.27 ha greenfield site fronting the Kinnitty Road on the southern end of Kilcormac Town be suitably zoned to allow the use of the land for 'retirement living accommodation' (including independent living, assisted living, full care residential); and by association extend the development boundary of the town; and to adopt a Site Specific Local Objective which would seek to restrict the use of the land for retirement living accommodation.



CE Response:

The site is not zoned and located outside the development boundary of the Kilcormac Town Plan in the draft Plan. The submission is requesting that site be zoned to allow for retirement living accommodation, with an indicative figure of 60 no. housing units, including independent living, assisted living and full care residential.

The submission contends that the provision of such housing would cater for a local demand but also a larger catchment of the ageing population within the county and would not conflict with the Core Strategy population allocation for the town of Kilcormac.

In line with the requirements of Section 10(2A)(f) of the Act, the draft Plan (2021-2027) sets out a settlement hierarchy for the county and, for the Plan period, provides details of total projected population growth of towns and aggregate population growth of the rural area (smaller towns, villages, sráids, open countryside), with the total population growth aligning with the County figure set under the NPF Implementation Roadmap.

SSP-01 *It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table*

Kilcormac is a town with a 2016 Census population of 935 persons. The settlement hierarchy, as per the EMRA RSES, has been applied to the Core Strategy of the draft Plan (Table 2.2, Chapter 2). Based on this RSES settlement hierarchy approach, which includes a robust asset-based analysis (Table 2.3 of the draft Plan), Kilcormac has been designated as a 'Smaller Town', a classification which, along with villages, Sráids and open countryside, is part of the 'rural' area settlement typology.

The Settlement Strategy in Chapter 2 states that the rural area which includes smaller towns, villages, Sráids and the open countryside shall be promoted for regeneration and local employment and services with targeted rural housing policies; and that housing can still be located in towns, villages, Sráids including the open countryside, but at an appropriate scale that does not detract from the capacity of the larger towns in the county to deliver homes more sustainably.

CSP-02 *It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.*

The Core Strategy allocates 57 dwellings for Kilcormac to 2027, with an associated new residential land zoning of 2.7 ha, reflective of the town's capacity to absorb commensurate population and employment growth over the Plan period, growth which matches the scale and function of the town.

The Core Strategy allocates total population growth to each settlement. A retirement village of any scale constructed within the development boundary will increase the number of residents in the village, and thus would be accounted for in any subsequent census of population, noting that the census of population is a key tool in determining population growth forecasting for any settlement. As such, the population allocation for Kilcormac includes all residential accommodation, including housing for older people.

As required under Section 94(3) of the Planning and Development Act 2000 (as amended), a Housing Strategy has been prepared as part of the draft Plan. While the Core Strategy deals with the overall population allocation and settlement hierarchy for the county, the purpose of the Housing Strategy, prepared by Future Analytics Consultants, is to ensure that the development plan provides for the

housing needs of the existing and future population of the area, including, as per Section 94(3) of the Act, *'the special requirements of elderly persons'*.

The draft Plan contains suitable policy and objectives in this regard, including HP-02 and HP-07 in Chapter 2, and development management standards DMS-05, DMS-08, DMS-20, DMS-81 in Chapter 13.

The NPF and RSES clearly indicate that in addition to the type of accommodation actually built, it is the range of services and amenities accessible to older people that is key to creating age friendly communities.

NPF, Section 6.4 – Age Friendly Communities

As more people live longer lives, they will want to stay healthy and independent, live in their own homes and communities and keep to a minimum their use of in-patient and out-patient hospital services. Government policy is to support older people to live with dignity and independence in their own homes and communities for as long as possible. In providing a more seamless and appropriate continuum of housing choices with appropriate supports for older people and a built environment that is attractive, accessible and safe, older people will be supported and motivated to enjoy more active, healthy and connected lives and to age confidently and comfortably in their community.

This further reinforces the need for well-designed lifetime adaptable infill and brownfield development close to existing services and facilities, supported by universal design and improved urban amenities, including public spaces and parks as well as direct and accessible walking routes. The provision of such accommodation can provide opportunities for older people to downsize from larger houses within their existing communities. This may be integrated with more supportive communal and specialist care accommodation that will be required by some older people.

National Policy Objective 30

Local planning, housing, transport/ accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.

EMRA RSES, Section 9.2 – Age Friendly Communities

The RSES recognises that many factors that contribute to a good quality of life for older people are community-based and that all sectors– government, businesses, voluntary groups, service providers, local authorities and the public – have a role in creating an age-friendly society.

This requires high quality healthcare and public services and, where appropriate, the choice of affordable care in the home or in the community for our older citizens. Quality placemaking should also integrate the principles of universal access in the design of buildings, housing, public realm, amenities and transport services to create places that are safe, easy to move around and accessible to all.

RPO 9.1: Local authorities shall ensure the integration of age friendly and family friendly strategies in development plans and other relevant local policy and decision making, including provision for flexible housing typologies, buildings and public spaces that are designed so that

everyone, including older people, disabled people and people with young children can move around with ease, avoiding separation or segregation.

This is also reflected in the following draft Plan policy:

SICCDP-11 It is Council policy that residential care homes for older people, retirement homes, nursing homes, independent living units, assisted living units, retirement villages and sheltered accommodation are located within defined settlement boundaries and are appropriate in scale to the size of the settlement. The provision of these accommodation types within the open countryside is considered only in such cases where it is clearly demonstrated that due to the nature of the services to be provided, the open countryside is necessary and that no suitable alternative sites are available within a nearby settlement.

The submission notes that the proportion of the Kilcormac ED population that is over 65 years is 16% (2016 Census), compared to the national average of 13.4%, suggesting that this highlights aspects of rural isolation. The draft Housing Strategy notes (from Census 2016) that the proportion of population over 65 years of age across the Birr MD area as a whole is, at 16%, significantly higher than the national average, with Shinrone Ed at 20% and Birr Town ED at 15.6%.

Considering the national and county level trends of an ageing population, and the associated policy framework embedded in the NPF and RSES, it is considered imperative that any retirement living development proposal, of a scale envisaged for the submission site, is directed to urban settlements of a scale capable of providing the necessary services and amenities to deliver the expectations of age friendly communities. NPF commentary below:

NPF, Section 6.4 – Age Friendly Communities

This further reinforces the need for well-designed lifetime adaptable infill and brownfield development close to existing services and facilities, supported by universal design and improved urban amenities, including public spaces and parks as well as direct and accessible walking routes

The *National Statement – Housing Options for Our Ageing Population*, as referred to the submission, is focused around 6 principles. The first principle, 'Ageing in Place', is particularly relevant to responding to this submission.

1. Ageing in Place

Where you live impacts on how you live, therefore choosing the right location is critical. It is about focusing on supporting our existing and new communities in a sustainable manner by securing high quality design elements that provide greater quality of life for all. To best facilitate social interaction and to provide appropriate support for our older people, housing should be located close to amenities and services to enhance their general independence.

Appendix A to the above mentioned *National Statement* outlines 12 no. case studies, with the range of schemes demonstrating, in different ways, how a suitable location can help older people to age in a place whether in an urban/ suburban town or a rural village setting. The key lesson from these case studies is that the size of a scheme for older people needs to match the scale of the settlement. Eight of the case studies comprise developments of between 30 and 70 units, and another one comprises 316 units, with all nine of these developments located in large urban settlements, including Dublin City, Dundalk, Naas, Limerick City. The other three case studies comprise a development of 12 units in Ennis, 12 units in Clonlara, Clare and 15 units in Leighlinbridge, Carlow. Census 2016 shows that

Clonlara has a population of 504 persons and Leighlinbridge has a population of 914, comparable in scale to Kilcormac (population of 935).

The Core Strategy allocates 57 no. new dwellings to 2027, with an associated new residential land zoning of 2.7 ha, and is reflective of the town's capacity to absorb commensurate population and employment growth over the Plan period, growth which matches the scale and function of Kilcormac as a 'Smaller Town'.

Any purpose built retirement scheme should be of scale relative to the size and function of the town, consistent with the NPF and *National Statement – Housing Options for Our Ageing Population*. It is considered that such a scheme, similar in scale to the smaller case studies referred to in the *National Statement – Housing Options for Our Ageing Population*, could be accommodated on undeveloped / brownfield infill sites close to the town centre of Kilcormac.

Accordingly, it is advised that the submission site remain not zoned and outside the development boundary of Kilcormac Town, in accordance with the draft Plan.

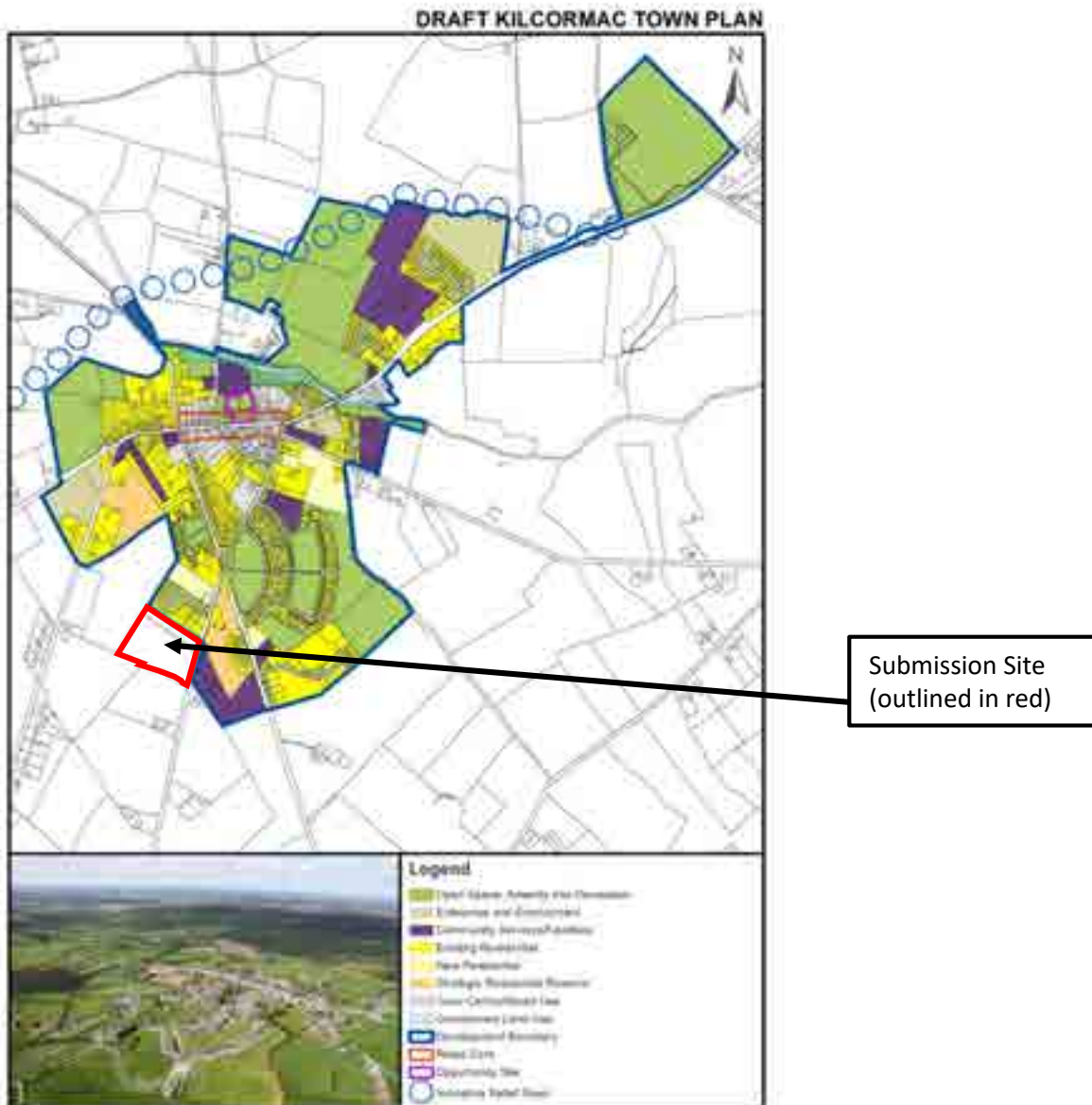
[Ref: CDP/D/188](#)

Person / Body:

Cllr. Eddie Fitzpatrick

Summary of submission / observation:

That a 2.27 ha greenfield site fronting the Kinnitty Road on the southern end of Kilcormac Town be zoned in the draft Plan.



CE Response:

Please refer to submission ref. CDP/D/18.

3.2.2 Villages

3.2.2.1 Bracknagh

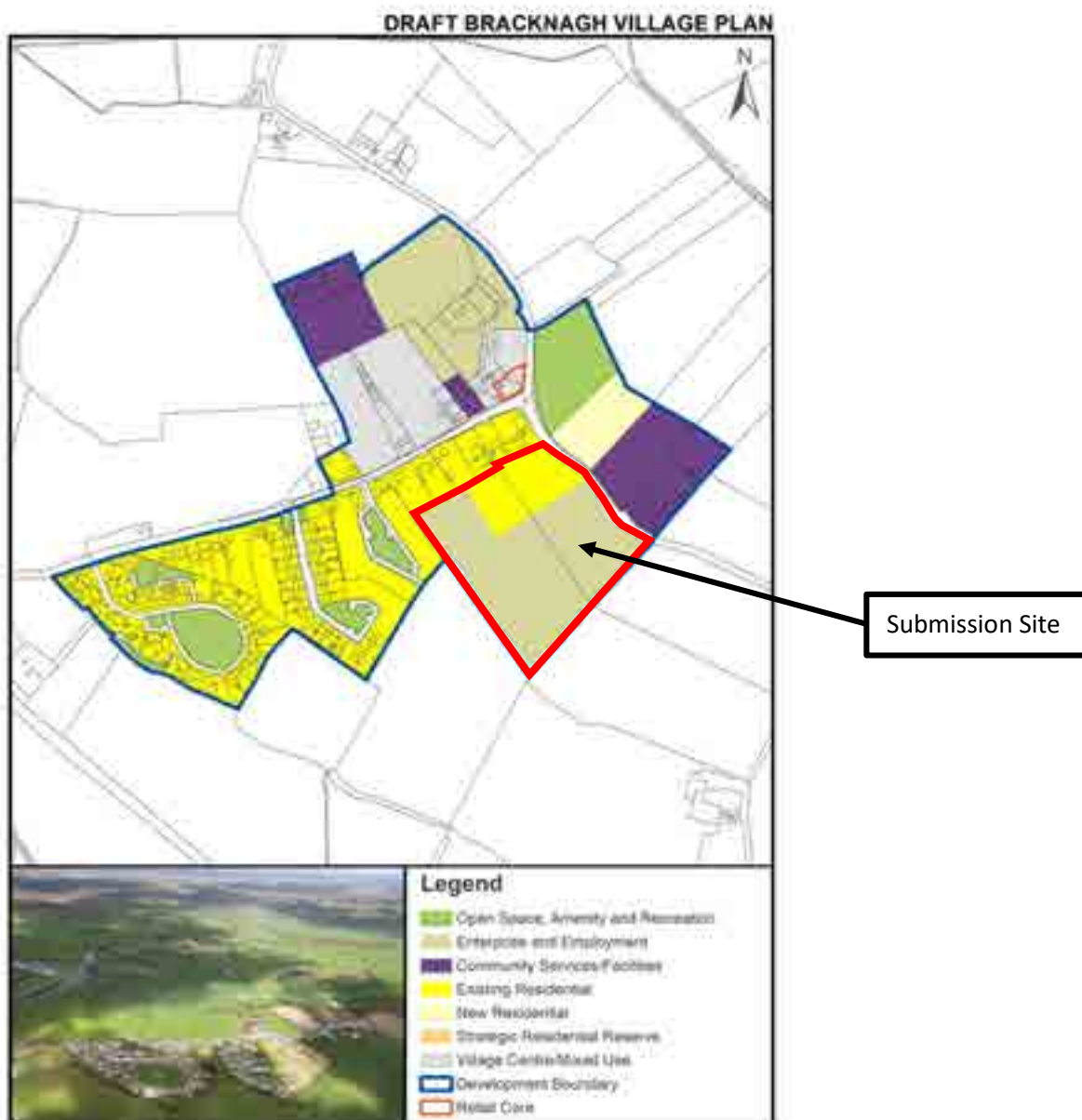
[Ref: CDP/D/51](#)

Person / Body:

David Allen

Summary of submission / observation:

That undeveloped greenfield land (c. 5 ha) fronting the R419 regional road on the east side of Bracknagh Village be zoned 'New Residential'.



CE Response:

Under the draft Bracknagh Village Plan, approximately 1 hectare of the submission site (north-east corner) is zoned 'Existing Residential', with the remaining part of the site (approximately 4 hectares) zoned 'Enterprise and Employment'.

In terms of residential zoning, *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development 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.'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

Section 4.19 (f) of the Development Plan Guidelines 2007 relates to the 'Sequential Approach'. It states *'In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided); (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan'*.

The submission site is considered to be peripheral to the village centre. There are other lands identified as being more appropriately located to deliver the Core Strategy housing allocation for Bracknagh Village consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

Furthermore, the amended Core Strategy provides for a total of 26.2ha of land to be zoned 'New Residential' across all the villages in the county, a quantum which has been allocated in full. To zone the submission site (c. 4ha) 'New Residential' would have the effect of exceeding the total allocation for villages under the Core Strategy, which would mean that the same quantum of land already designated for 'New Residential' would have to be omitted from Bracknagh Village or from another village in the county.

In terms of the 'Enterprise and Employment' zone, this provides for employment generating uses and services to enable the village to develop and grow in population in a sustainable manner. Chapter 2 (Core Strategy) of the draft Plan identifies 20 no. *principles for growth* upon which to encourage the focus of new development, with the following most relevant to this submission:

- (v) Aligning population, employment, community and housing growth in a balanced fashion;
- (vii) Moving towards self-sustaining rather than long distance commuter driven activity;
- (viii) In order to achieve more balanced and sustainable development, some settlements need to attract increased population, whereas others need more jobs, amenities or better transport links;
- (ix) Addressing the legacy of rapid unplanned growth, by facilitating amenities, jobs and services catch-up, together with a slower rate of population growth in recently expanded commuter settlements;

- (xii) Developing the designated Key Town of Tullamore of sufficient scale and quality to be a driver of regional growth, investment and prosperity, followed by Self-Sustaining Growth Towns and Self-Sustaining Towns to grow to a sustainable level. Other towns need to be promoted for regeneration, local employment and managed levels of growth, and the rural area which includes villages, Sráids and the open countryside, shall be promoted for regeneration and local employment and services with targeted rural housing policies;
- (xvii) Promoting economic development and enterprise activity.

The policy framework for Villages under the Settlement Strategy (Section 2.5, Chapter 2) is consistent with above principles for growth.

SSP-12 It is Council policy to support housing and repopulation taking place within villages in a consolidated, sustainable and sequential manner, and to promote the provision of serviced sites supported by Irish Water in order to attract people to build their own homes and live in villages, whilst also managing the levels of growth at an appropriate scale to ensure compliance with the Core Strategy Table.

SSP-13 It is Council policy to facilitate the expansion of and provision of new mixed-use and employment-generating development within villages at an appropriate size and scale subject to normal planning requirements.

SSP-14 It is Council policy that there will be a presumption in favour of small developments of differing scale and character rather than larger, more homogenous urban-scaled housing 'estates'. (For example 3 separately designed 10-house developments would generally be preferable to a single homogenous suburban style 30-house development). This approach would be more likely to create a sense of individualism and differing aspirations to each development.

The provision of '*Enterprise and Employment*' zoned land in the draft Bracknagh Village Plan accords with the above policy framework, encouraging and facilitating self-sustaining growth.

Accordingly, it is advised to retain the zoning on the site in accordance with the draft Plan.

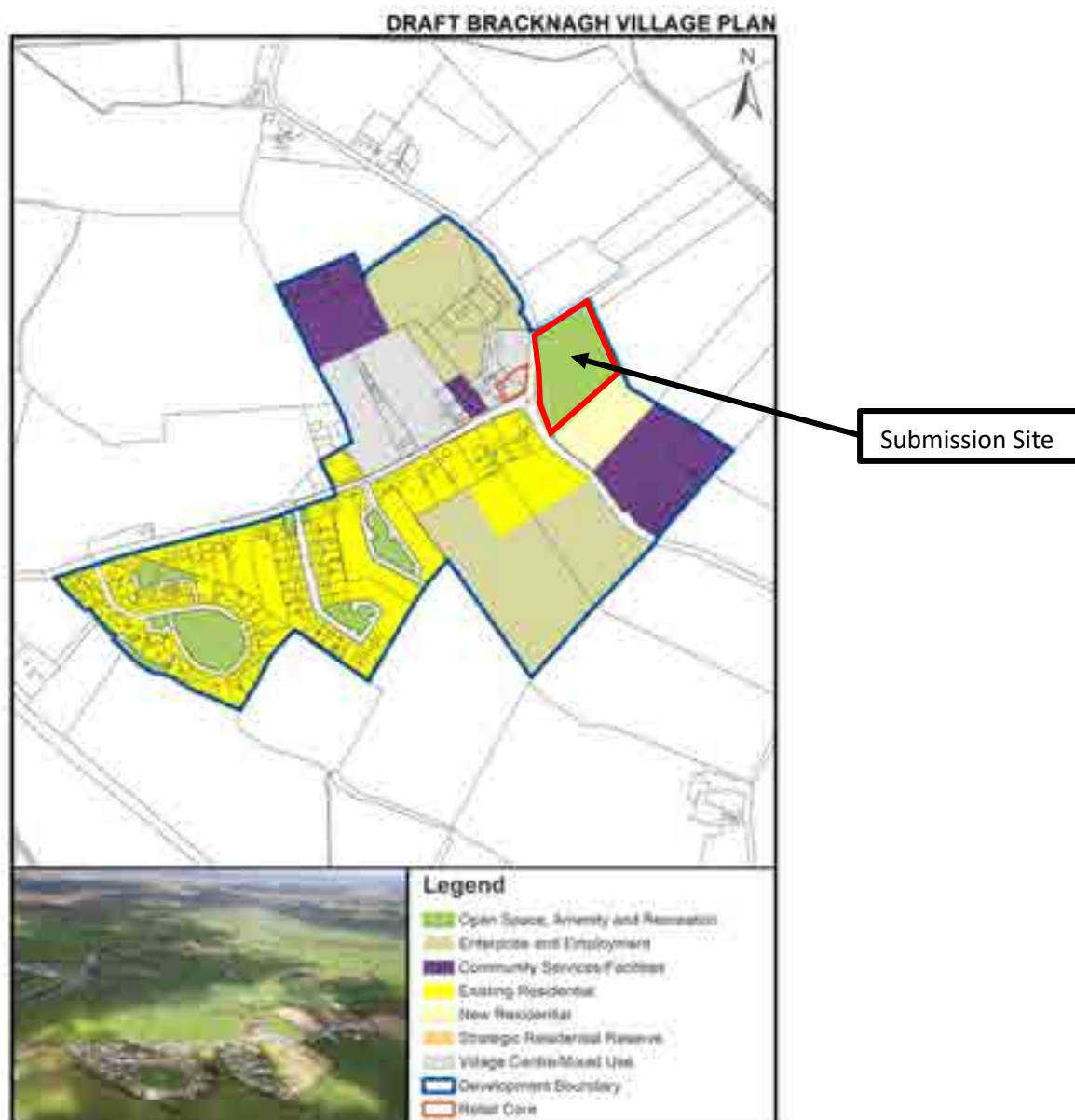
[Ref: CDP/D/53](#)

Person / Body:

Cllr. Eddie Fitzpatrick

Summary of submission / observation:

That undeveloped greenfield land (c. 1.2 ha) fronting the R419 regional road on the east side of Bracknagh Village be zoned 'New Residential'.



CE Response:

Under the draft Bracknagh Village Plan, the submission site is zoned ‘Open Space, Amenity and Recreation’, the objective of which is to ‘Protect and improve the provision, attractiveness, accessibility and amenity value of public open space, amenity and recreation’. Chapter 9 (Social Inclusion, Community and Cultural Development) of the draft Plan states that the Planning Authority has a role in protecting existing sport / recreation and open space areas and ensuring that adequate land is zoned for development to accommodate sporting and recreational facilities, both active and passive.

SICCDP-19 It is Council policy to support the development of dedicated youth spaces in towns and villages and the development of multi-function spaces in Sráids and the open countryside.

SICCDO-02 It is an objective of the Council to develop open spaces throughout the county which will encourage a range of recreational and amenity activities that will cater for both active and passive needs.

Consistent with SICCDP-19 and SICCCDO-02, it is an objective of the draft Bracknagh Village Plan to provide a village green.

SO5 To provide a village green / public amenity area in the centre of the village on land zoned 'Open Space, Amenity & Recreation'.

The submission requests that this area of land is zoned '*New Residential*'. *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that '*From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...*'. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that '*Residential development 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.*'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

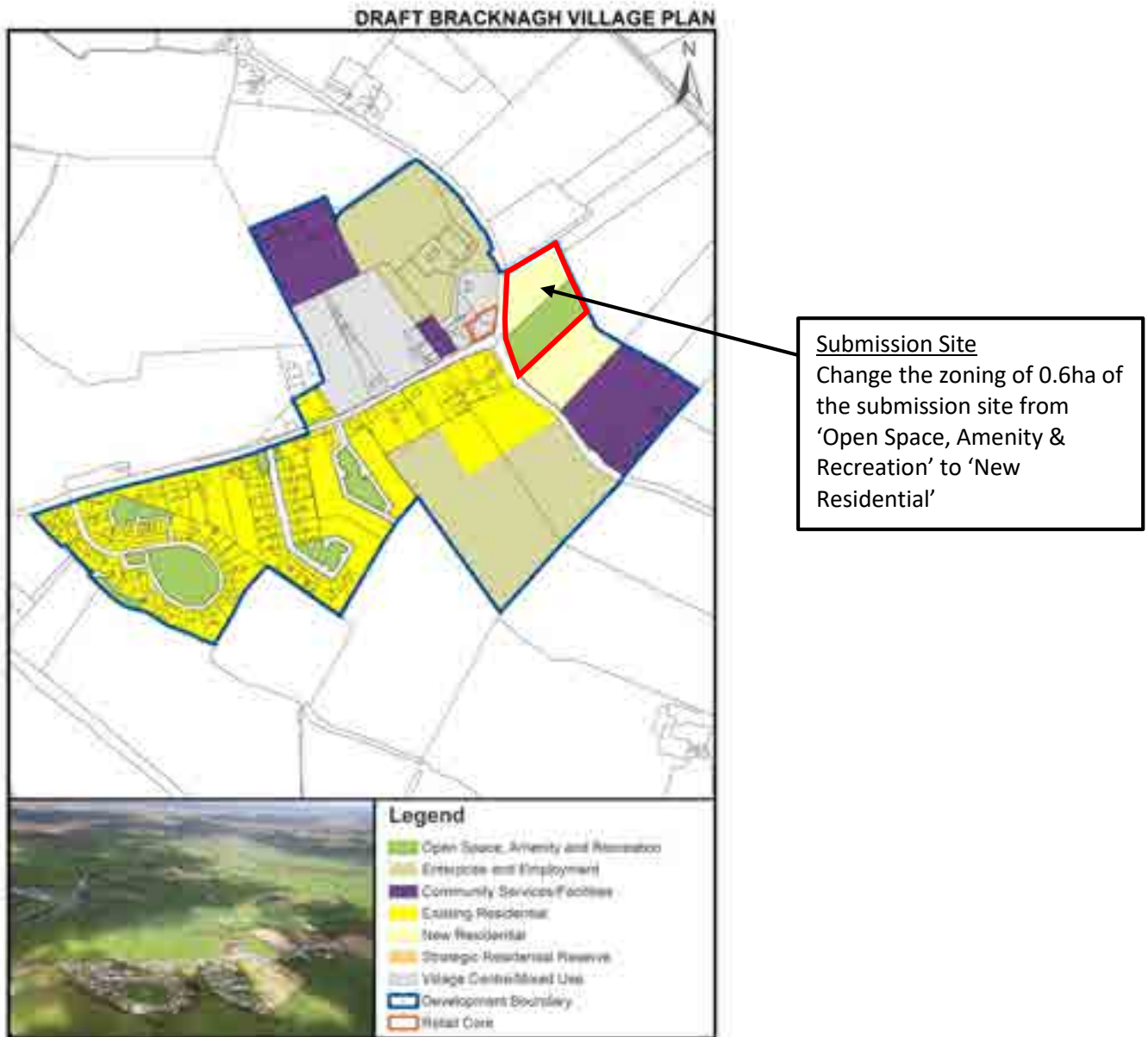
CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

The draft Bracknagh Village Plan made provision for a quantum of land zoned 'New Residential' sufficient to meet the population growth target of the Core Strategy, and in terms of location, consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

The amended Core Strategy provides for a total of 26.2ha of land to be zoned 'New Residential' across all the villages in the county, equating to an additional 2.5ha. As outlined in greater detail in the response to the OPR submission, and specifically referring to Appendix 5 to that response, additional 'New Residential' zonings have been allocated to a number of villages in the county, including Bracknagh. For Bracknagh, an additional 0.6ha has been allocated. This additional zoning has been identified on part of the land to which this submission relates, with the remaining part of the site retaining the 'Open Space, Amenity and Recreation' zone.

Accordingly, it is recommended that the zoning of 0.6ha of the submission site, as shown on the zoning map below, be changed from 'Open Space, Amenity and Recreation' to 'New Residential'.



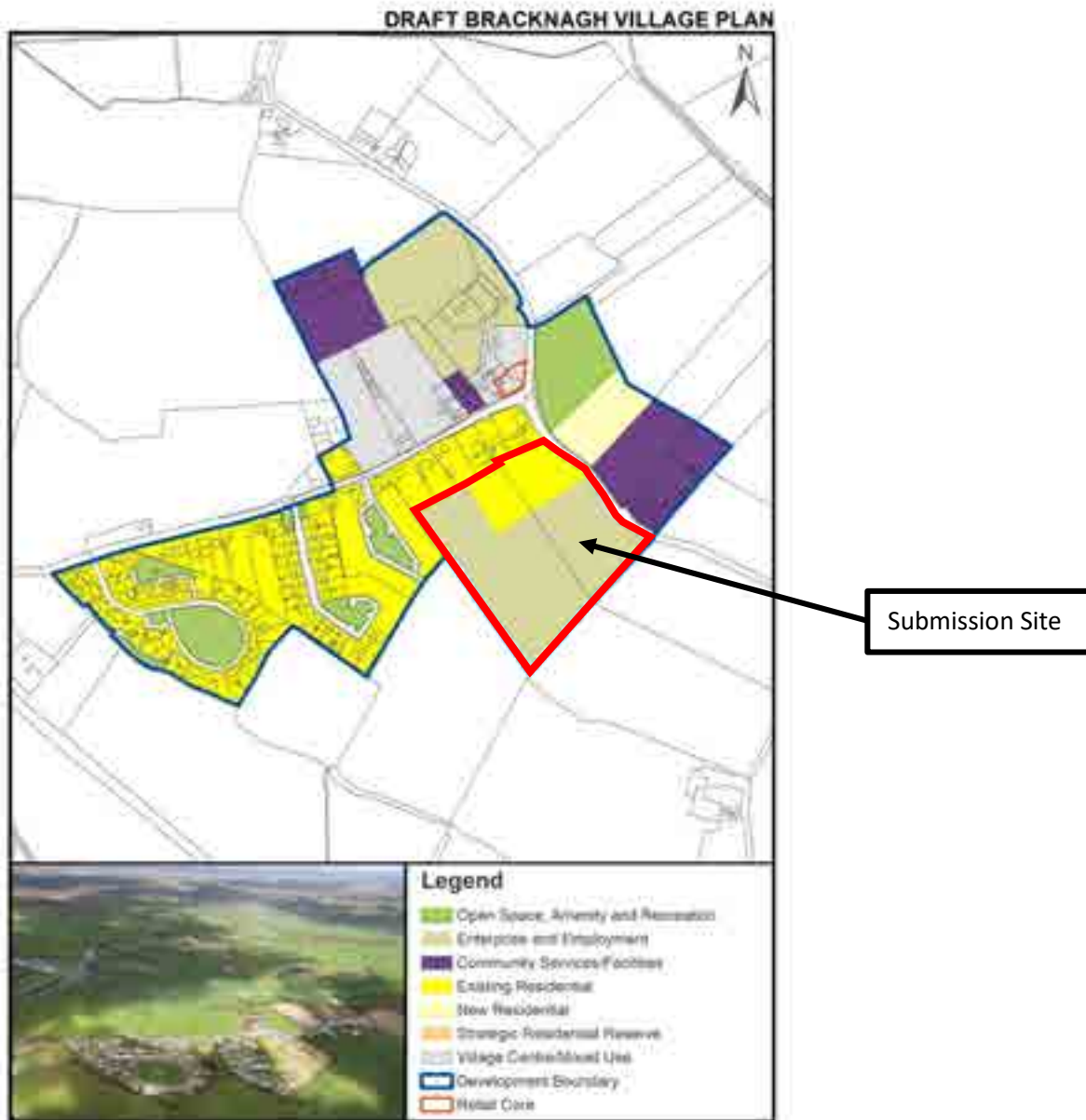
[Ref: CDP/D/55](#)

Person / Body:

Cllr. Eddie Fitzpatrick

Summary of submission / observation:

This submission is made in support of submission ref. CDP/D/51, that undeveloped greenfield land (c. 5 ha) fronting the R419 regional road on the east side of Bracknagh Village be zoned 'New Residential'.



CE Response:

Please see CDP/D/51 above. It is advised to retain the zoning on the site in accordance with the draft Plan.

3.2.2.2 Clonbullogue

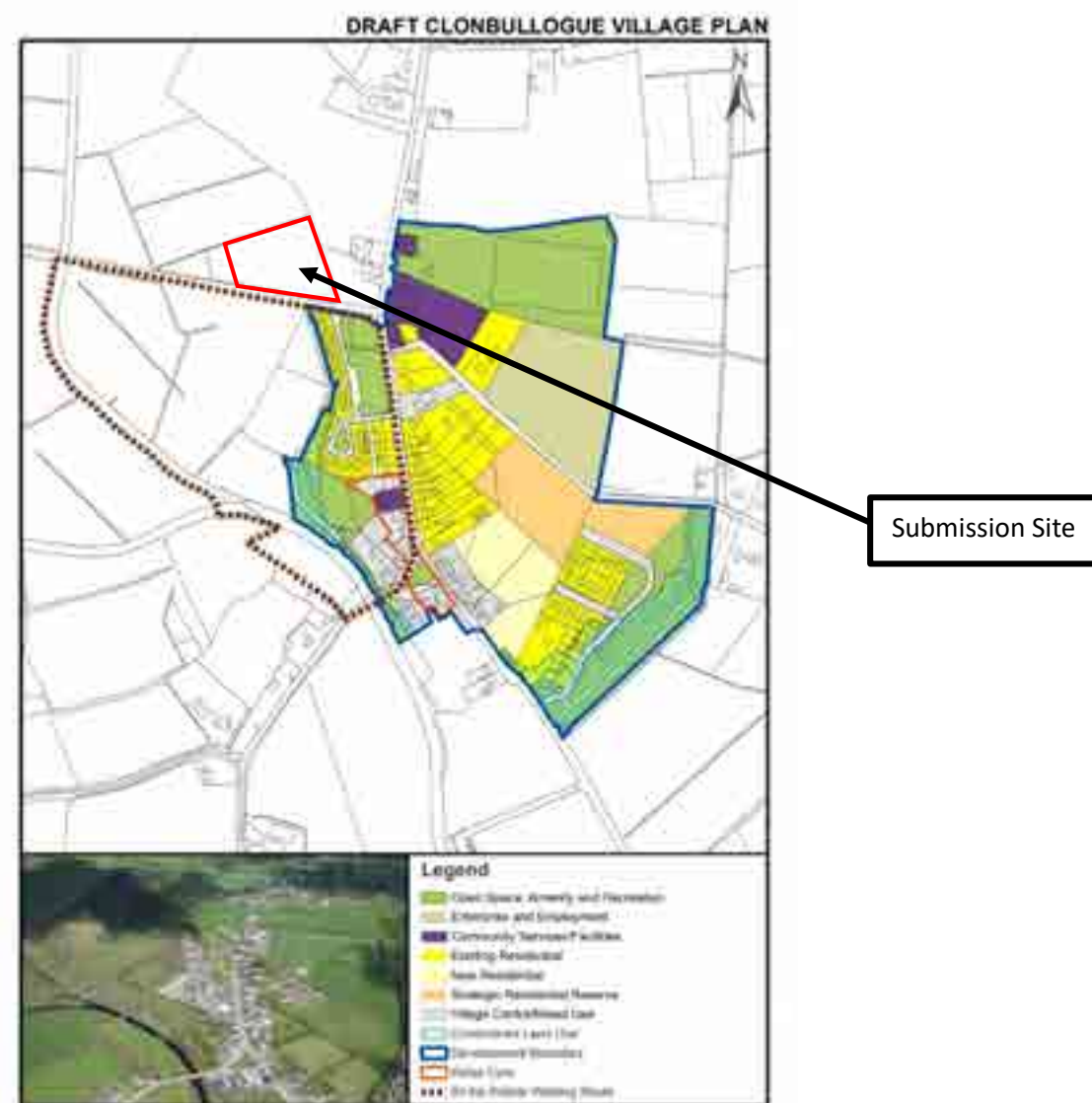
[Ref: CDP/D/181](#)

Person / Body:

Denis Guilfoyle

Summary of submission / observation:

That undeveloped greenfield land (c. 1.1 ha) north of Clonbullogue Village be zoned ‘New Residential’ and included within the development boundary of the village.



CE Response:

The site is located on the northern end of the village, accessed off a local road L1003. Under the draft Plan, the site is not zoned and located outside the development boundary of Clonbullogue Village.

The submission requests that the site be zoned 'New Residential'.

National Strategic Outcome 1 (NSO 1) of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development 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.'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

Section 4.19 (f) of the Development Plan Guidelines 2007 relates to the 'Sequential Approach'. It states *'In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided); (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan'*.

The submission site is considered to be peripheral to the village centre. There are other lands identified as being more appropriately located to deliver the Core Strategy housing allocation for Clonbullogue Village consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02. Furthermore, the amended Core Strategy provides for a total of 26.2ha of land to be zoned 'New Residential' across all the villages in the county, a quantum which has been allocated in full. To zone the submission site (1.1ha) 'New Residential' would have the effect of substantially exceeding the total allocation for villages under the Core Strategy, which would mean that the same quantum of land already designated for 'New Residential' would have to be omitted from Clonbullogue Village or from another village in the county.

Accordingly, it is advised that the site remain not zoned and outside the development boundary of the Clonbullogue Village Plan, in accordance with the draft Plan.

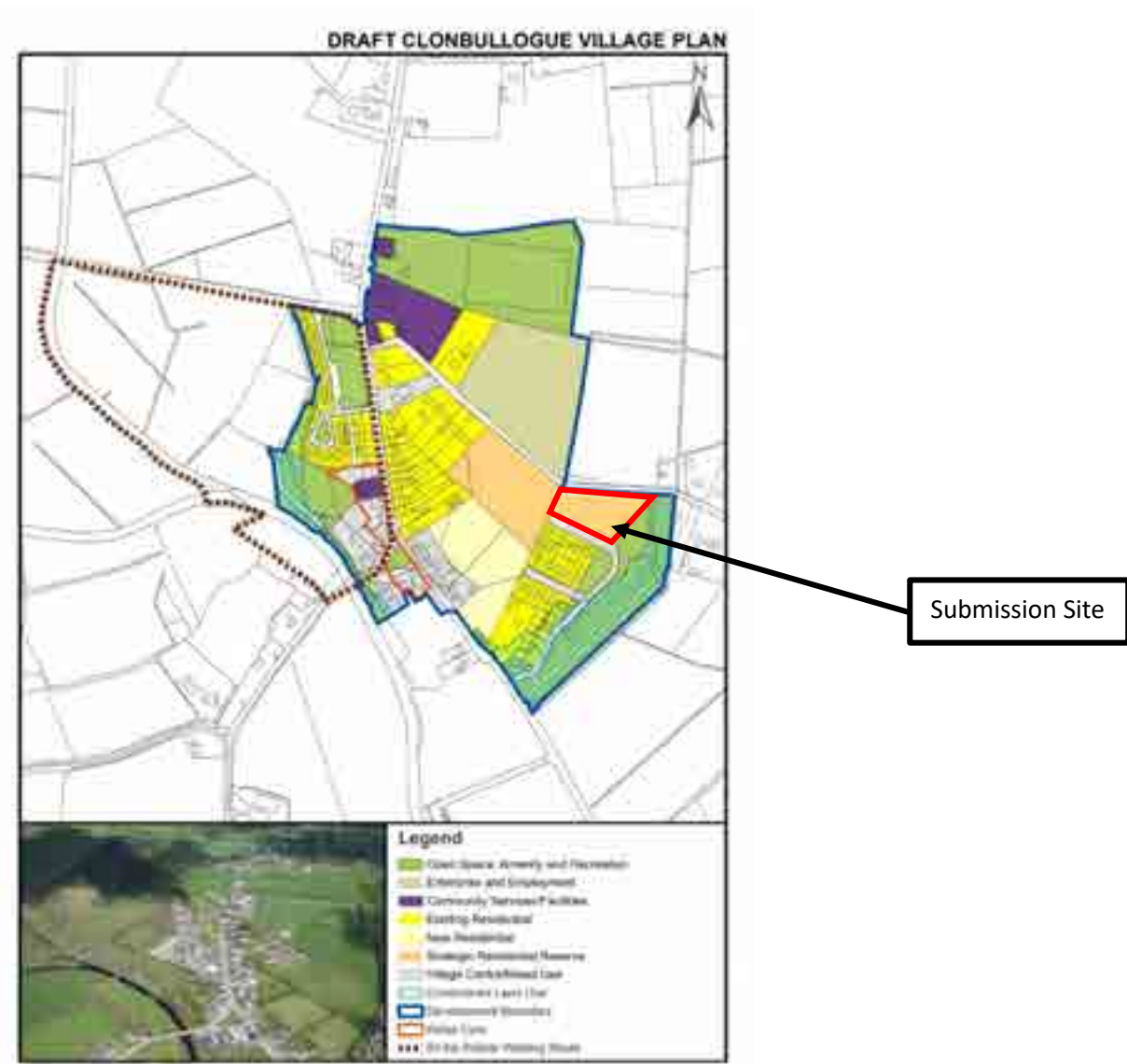
[Ref: CDP/D/194](#)

Person / Body:

Nicholas & Catherine Ann O'Neill

Summary of submission / observation:

That the zoning of undeveloped greenfield land (c. 0.8 ha) in the south-west of Clonbullogue Village be changed from 'Strategic Residential Reserve' to 'New Residential'.



CE Response:

The site is located directly to the north of Figle Manor housing estate on the south-eastern side of Clonbullogue Village. Under the draft Plan, the site is within the development boundary of the village and zoned 'Strategic Residential Reserve', which means it is not required to deliver the housing growth target for the village over the life time of the Plan, 2021-2027, but may have future potential, to be reviewed as part of the preparation of subsequent development plans.

The submission requests that the site be zoned 'New Residential'.

National Strategic Outcome 1 (NSO 1) of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development 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.'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

Section 4.19 (f) of the Development Plan Guidelines 2007 relates to the 'Sequential Approach'. It states *'In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided); (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan'*.

The submission site is considered to be peripheral to the village centre. There are other lands identified as being more appropriately located to deliver the Core Strategy housing allocation for Clonbullogue Village consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02. Furthermore, the amended Core Strategy provides for a total of 26.2ha of land to be zoned 'New Residential' across all the villages in the county, a quantum which has been allocated in full. To zone the submission site (0.8ha) 'New Residential' would have the effect of exceeding the total allocation for villages under the Core Strategy, which would mean that the same quantum of land already designated for 'New Residential' would have to be omitted from Clonbullogue Village or from another village in the county.

Accordingly, it is advised that the site remain zoned 'Strategic Residential Reserve', in accordance with the draft Plan.

3.2.2.3 Geashill

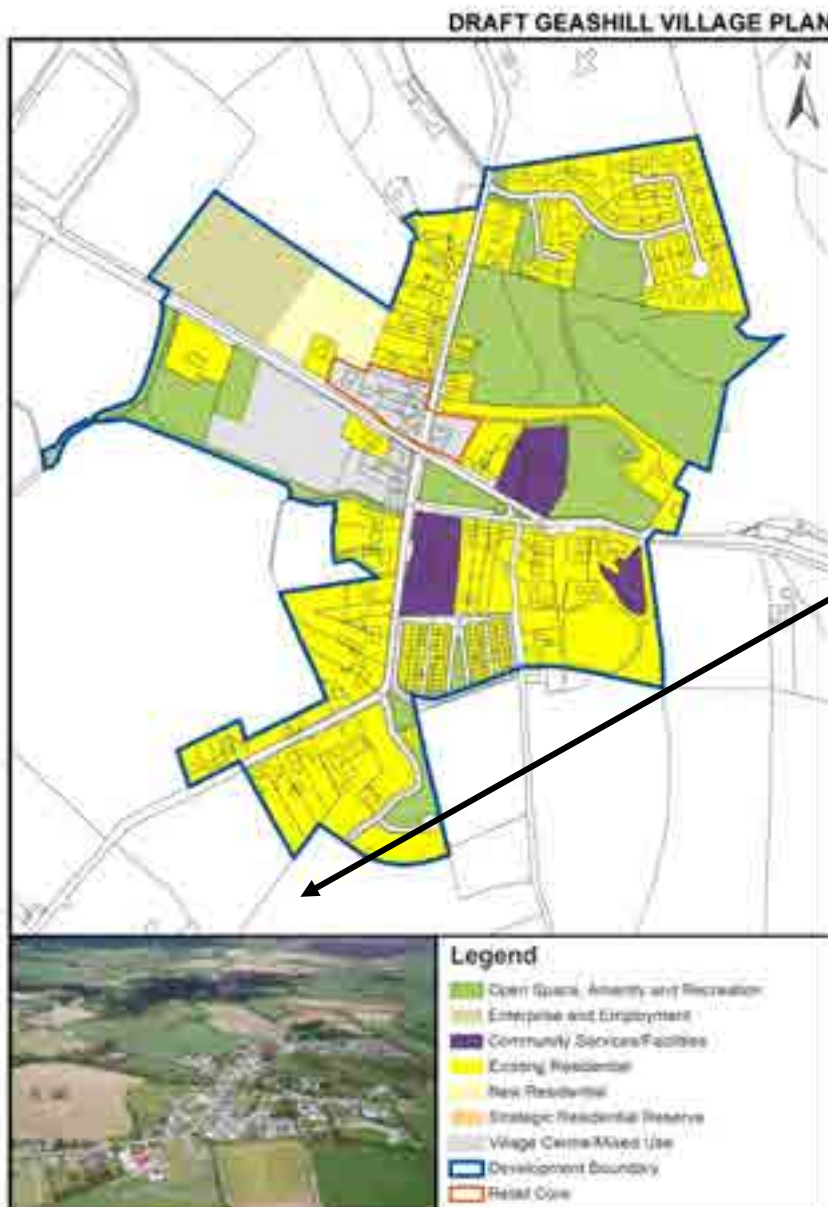
[Ref: CDP/D/29](#)

Person / Body:

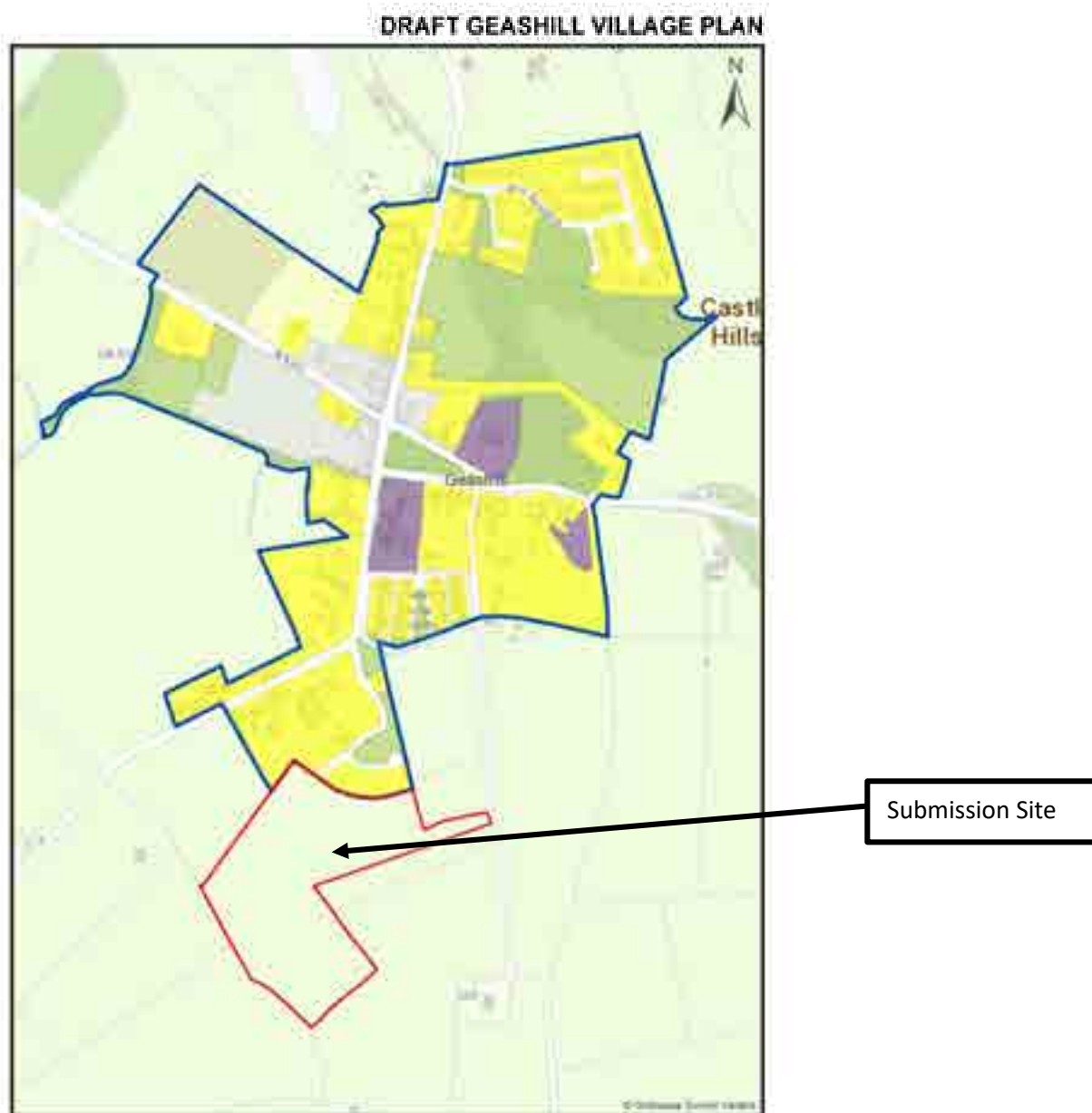
Daniel Scally

Summary of submission / observation:

That undeveloped greenfield land (c. 5.4 ha) on the south side of Geashill Village be zoned 'New Residential'. A discrepancy is noted in the written part of the submission, which refers to land adjacent to the Árd Rídhá housing estate on the north side of the village. It is assumed that the submission map is correct, which refers to land on the south side of the Village, east of Ballydownan Road and immediately south of a previously unfinished housing estate called Ballydownan.



Submission Site
(see map below for wider context)



CE Response:

Under the draft Plan, the site is not zoned and located outside the development boundary of the Geashill Village Plan. The submission requests that the site be zoned to allow for residential development, and by association included within the development boundary of the village.

National Strategic Outcome 1 (NSO 1) of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development 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.'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

Section 4.19 (f) of the Development Plan Guidelines 2007 relates to the 'Sequential Approach'. It states *'In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided); (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan'*.

The submission site is considered to be peripheral to the village centre. There are other lands identified as being more appropriately located to deliver the Core Strategy housing allocation for the village over the lifetime of the development plan, consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

Furthermore, the amended Core Strategy provides for a total of 26.2ha of land to be zoned 'New Residential' across all the villages in the county, a quantum which has been allocated in full. To zone the submission site (5.4ha) 'New Residential' would have the effect of substantially exceeding the total allocation for villages under the Core Strategy, which would mean that the same quantum of land already designated for 'New Residential' would have to be omitted from Geashill Village or from another village in the county.

3.2.2.4 Killeigh

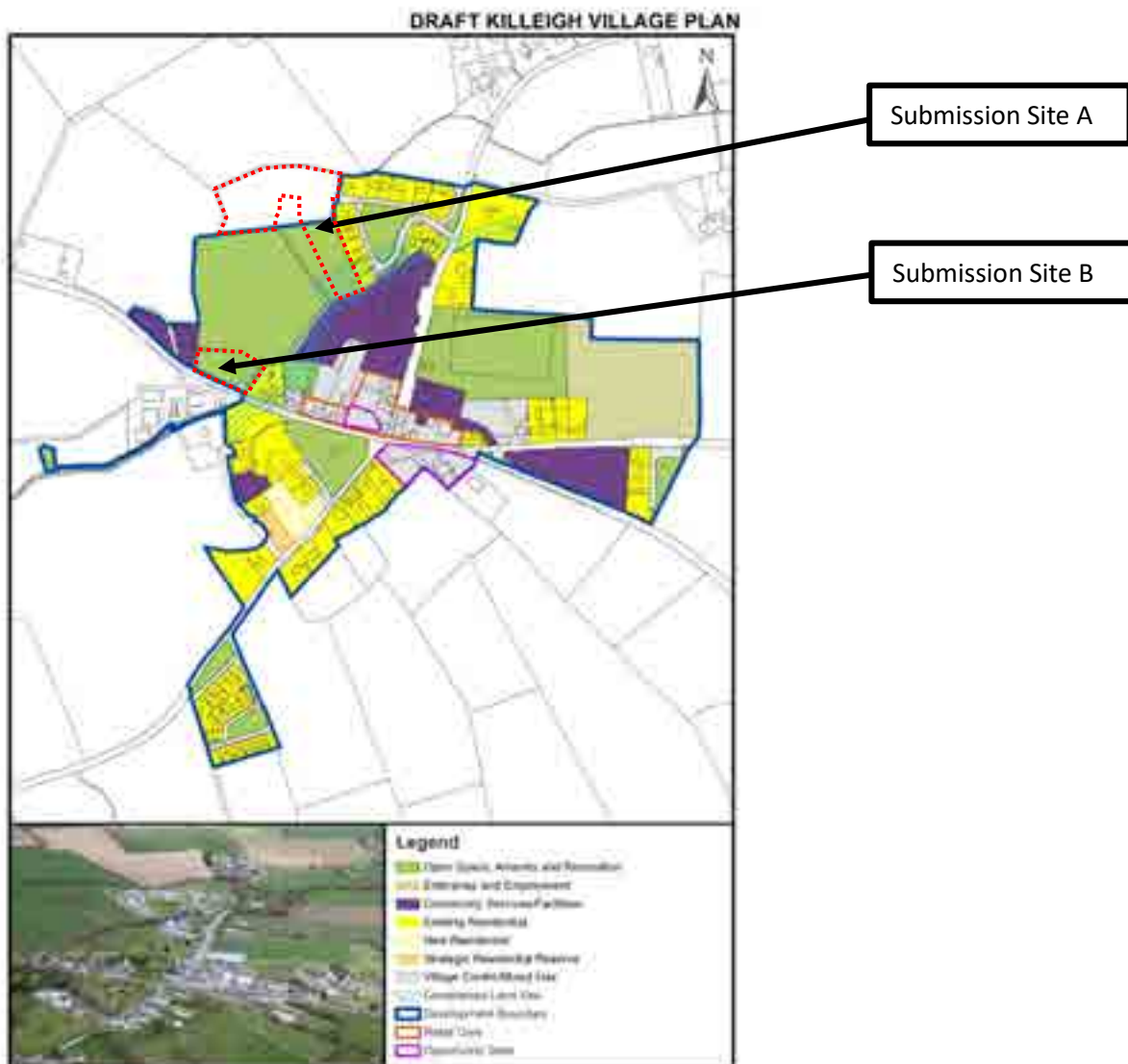
Ref: CDP/D/05

Person / Body:

Justin & Gerard Heffernan

Summary of submission / observation:

- a) That undeveloped greenfield land (c. 1.89 ha) located immediately west of the Millbrook Grove housing estate on the north side of Killeigh Village be zoned for residential development.
- b) That undeveloped greenfield land (c. 0.44 ha) fronting the N80 located immediately east of the macra / community hall on the west side of Killeigh Village be zoned for residential development.



CE Response:

- a) Under the draft Killeigh Village Plan, part of the submission site is zoned ‘Open Space, Amenity and Recreation’, with the remaining part of the site located outside the development boundary for the village, thus this part of the site is not zoned. In accordance with the Land Use Zoning Matrix contained in Chapter 12 of the draft Plan, ‘Residential – Multiple (two or more units)’ is a use which is ‘Not Normally Permitted’ on land zoned ‘Open Space, Amenity and Recreation’. The submission requests that the site be zoned to allow for residential development, and by association included within the development boundary of the village.

National Strategic Outcome 1 (NSO 1) of the National Planning Framework (NPF) is to seek ‘Compact Growth’ across cities, towns and villages. In this regard, the National Planning Framework states that ‘From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...’. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF’s NSO1 stating that ‘Residential development 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.’

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

- Section 4.19 (f) of the Development Plan Guidelines 2007 relates to the ‘Sequential Approach’. It states *‘In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. ‘leapfrogging’ to more remote areas should be avoided); (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan’.*

The submission site is considered to be peripheral to the village centre. Zoning the submission lands for residential development would create a relatively large suburban style housing estate on the periphery of the village, a move which would not support compact growth. There are other lands identified as being more appropriately located to deliver the Core Strategy housing allocation for the village over the lifetime of the development plan, consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

Furthermore, the amended Core Strategy provides for a total of 26.2ha of land to be zoned 'New Residential' across all the villages in the county, a quantum which has been allocated in full. To zone the submission site (1.89ha) 'New Residential' would have the effect of exceeding the total allocation for villages under the Core Strategy, which would mean that the same quantum of land already designated for 'New Residential' would have to be omitted from Killeigh Village or from another village in the county.

In addition, and by reference to the draft zoning map for Killeigh Village and also the Strategic Flood Risk Assessment which accompanies the draft Plan, part of the submission site is identified as being affected by the 1 in 100-year flood risk, being the flood risk of highest probability in terms of flood events, and is shown on the draft Killeigh Village zoning map as 'Constrained Land Use', a designation which generally limits new development. In accordance with *'The Planning System and Flood Risk Management - Guidelines for Planning Authorities'* 2009, highly vulnerable development, which includes housing, is deemed inappropriate in areas where flood risk is of the highest probability.

- b) Under the draft Killeigh Village Plan, the submission site is zoned *'Open Space, Amenity and Recreation'*. In accordance with the Land Use Zoning Matrix contained in Chapter 12 of the draft Plan, *'Residential – Multiple (two or more units)'* is a use which is 'Not Normally Permitted' on land zoned *'Open Space, Amenity and Recreation'*. The submission requests that the site be zoned to allow for residential development.

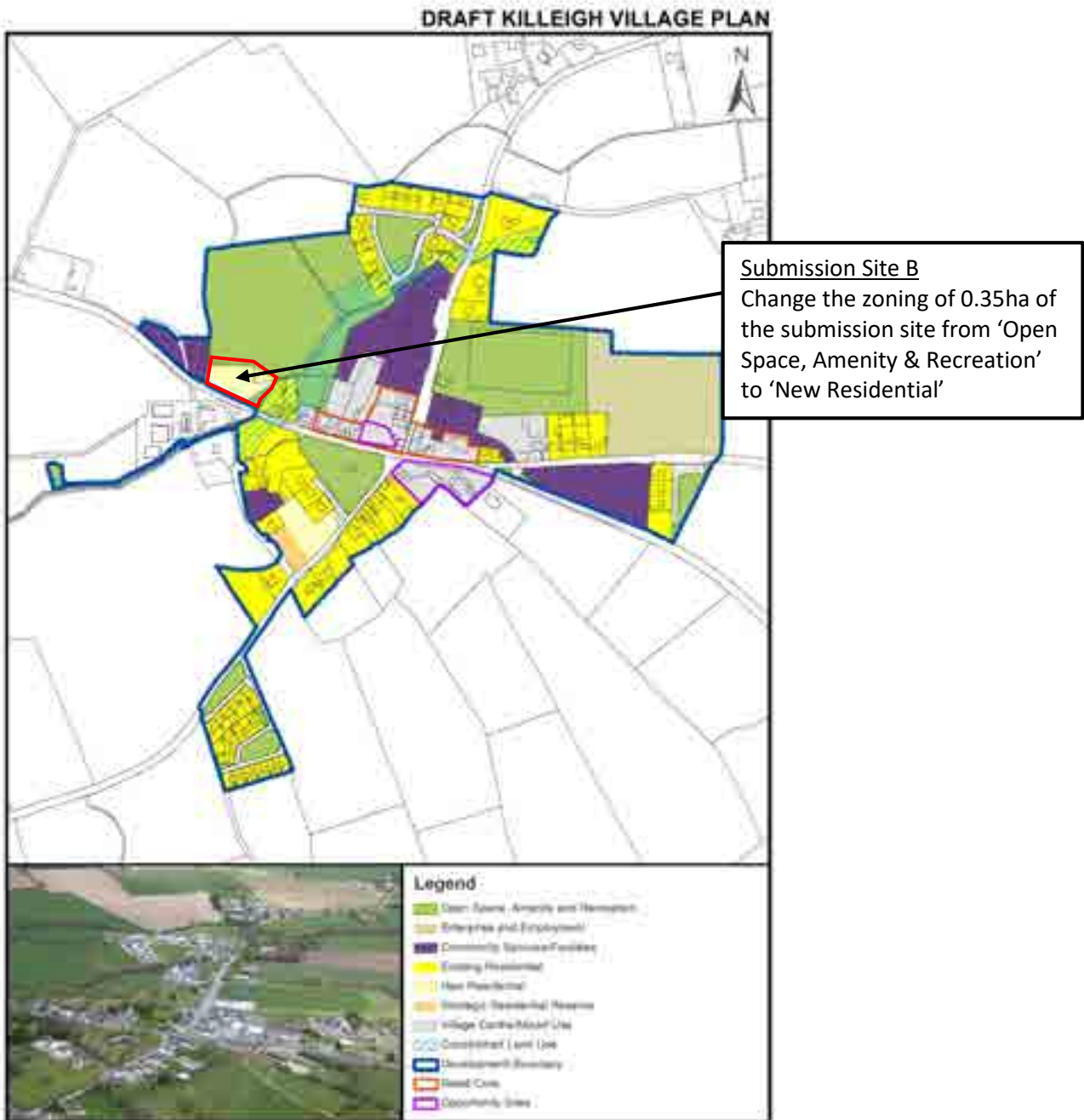
By reference to the draft zoning map for Killeigh Village and also the Strategic Flood Risk Assessment which accompanies the draft Plan, part of the submission site is identified as being affected by the 1 in 100-year flood risk, being the flood risk of highest probability in terms of flood events, and is shown on the draft Killeigh Village zoning map as 'Constrained Land Use', a designation which generally limits new development. In accordance with *'The Planning System and Flood Risk Management - Guidelines for Planning Authorities'* 2009, highly vulnerable development, which includes housing, is deemed inappropriate in areas where flood risk is of the highest probability.

The north-west corner of the submission is identified as an 'Area of Archaeological Potential', which relates to the space in the immediate vicinity of all the archaeological sites listed on the 'Record of Monuments and Places', with protection afforded to these sites under the National Monuments (Amendment) Act, 1994. In this case, the archaeological site / feature comprises the remains of a large Franciscan Abbey.

However, the amended Core Strategy provides for a total of 26.2ha of land to be zoned 'New Residential' across all the villages in the county, equating to an additional 2.5ha over the quantum zoned in the draft Plan. As outlined in greater detail in the response to the OPR submission, and specifically referring to Appendix 5 to that response, additional 'New Residential' zonings have been allocated to a number of villages in the county, including Killeigh. For Killeigh, Site B under this current submission, being the site which fronts the N80, west of the Village centre, has been identified for allocation of 'New Residential' zoning. The extent of the site that is suitable for 'New Residential' zoning has been informed by the alignment of the CLU zone, as shown on the zoning map, and also the presence of an 'Area of Archaeological Potential' (remains of a Franciscan Abbey), therefore the area zoned 'New Residential' is 0.35ha.

Accordingly, in respect of Site A, it is advised to retain the zoning and development boundary in accordance with the draft Plan; and in respect of Site B, it is recommended that the zoning of

0.35ha of the submission site, as shown on the zoning map below, be changed from 'Open Space, Amenity and Recreation' to 'New Residential'.



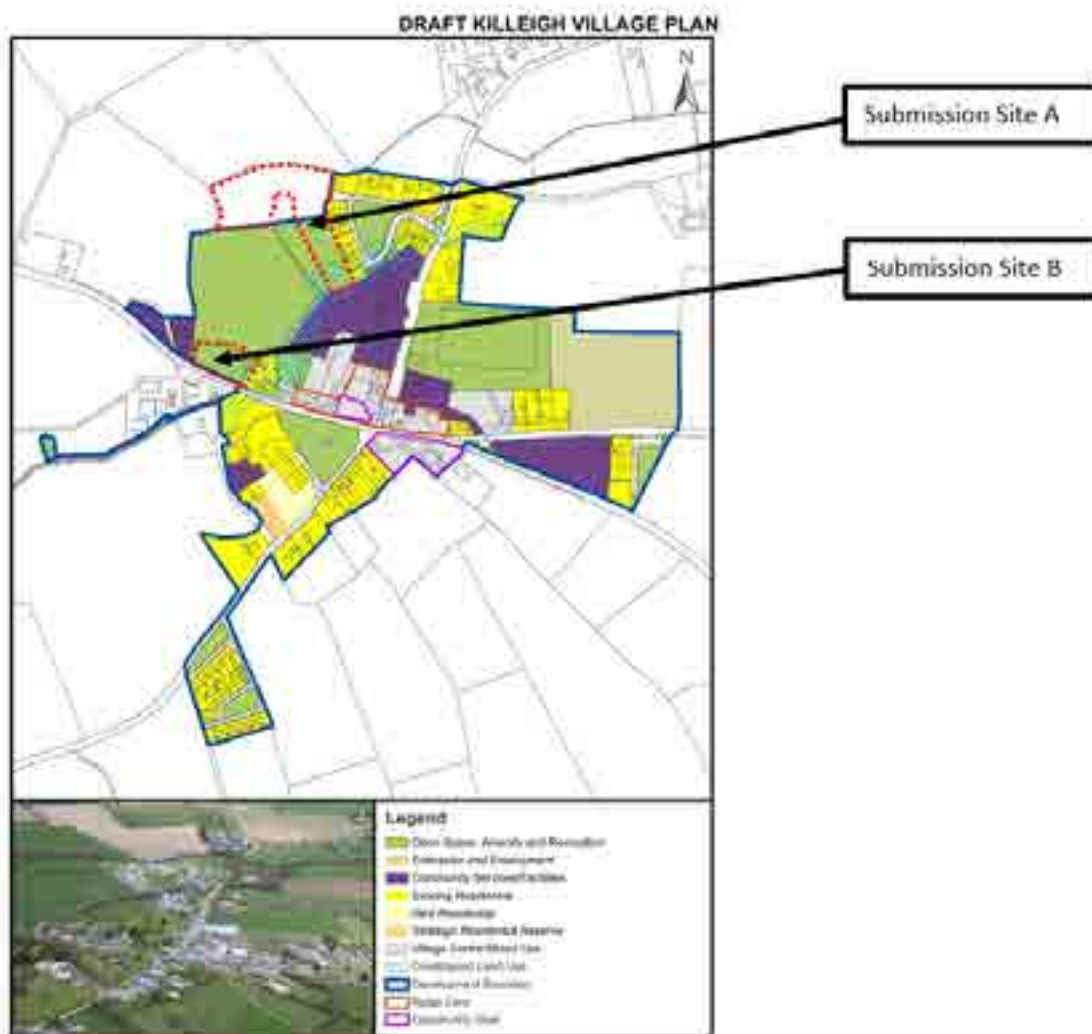
[Ref: CDP/D/12](#)

Person / Body:

Justin & Gerard Heffernan

Summary of submission / observation:

- a) That undeveloped greenfield land (c. 1.89 ha) located immediately west of the Millbrook Grove housing estate on the north side of Killeigh Village be zoned for residential development.
- b) That undeveloped greenfield land (c. 0.44 ha) fronting the N80 located immediately east of the macra / community hall on the west side of Killeigh Village be zoned for residential development.



CE Response:

Please refer to submission ref. CDP/D/05.

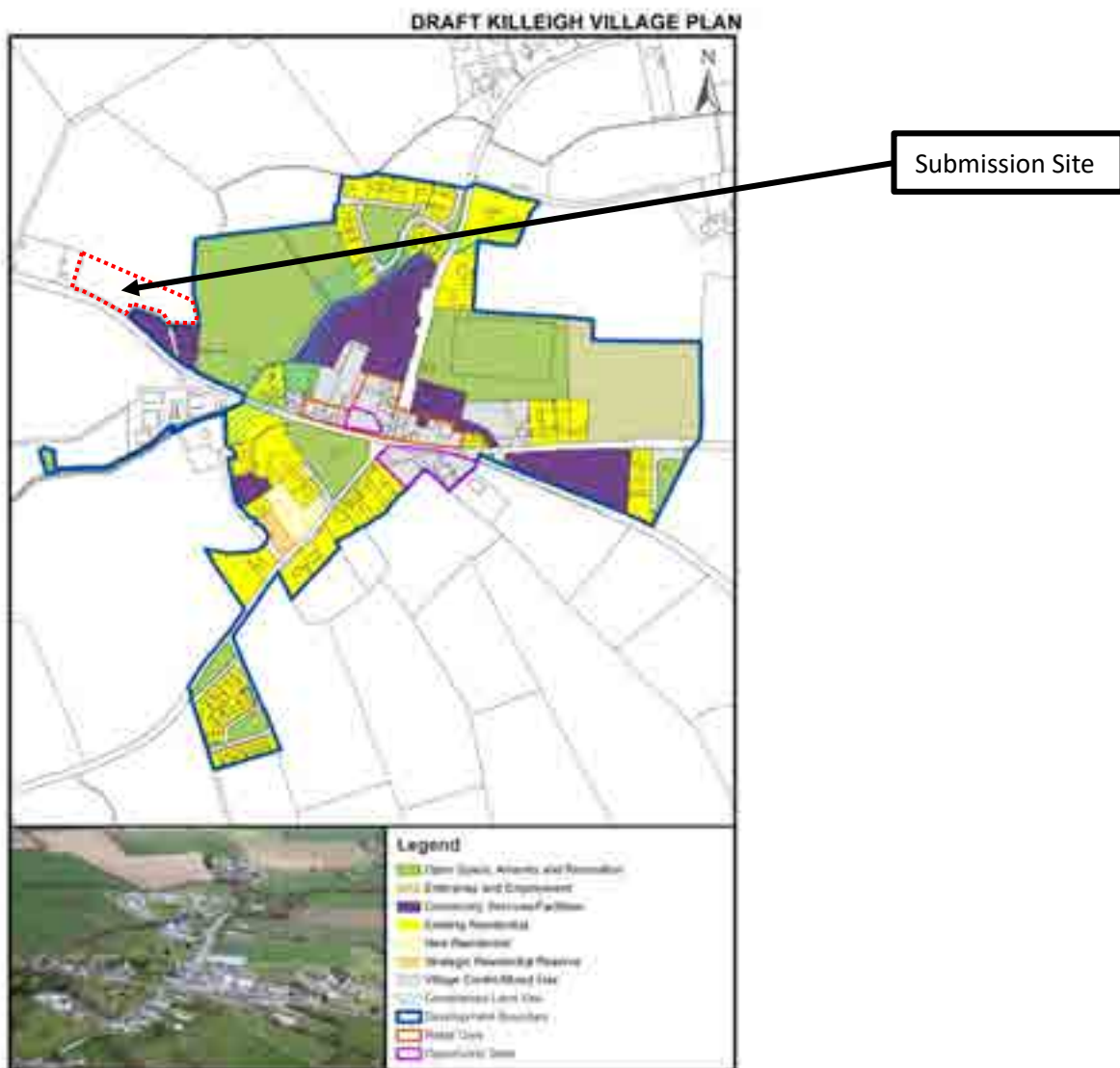
[Ref: CDP/D/20](#)

Person / Body:

Ken Matthews

Summary of submission / observation:

- a) Supports the redevelopment of the Macra Hall in Killeigh as a community facility.
- b) That undeveloped greenfield land (c. 1.25 ha) fronting the N80 located west of the macra community hall on the west side of Killeigh Village be zoned for residential development.



CE Response:

- a) The submission, in respect of support for the community centre, is noted.
- b) The submission requests land to be zoned to allow for residential development, and by association included within the development boundary of the village. Under the draft Plan, this land is not zoned and located outside the development boundary of the Killeigh Village Plan.

National Strategic Outcome 1 (NSO 1) of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development 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.'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

Section 4.19 (f) of the Development Plan Guidelines 2007 relates to the 'Sequential Approach'. It states *'In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided); (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan'*.

The submission site is considered to be peripheral to the village centre, and with frontage to a section of the N80 road with a 100km per hour speed zone, thus outside the lower 50km per hour zone. There are other lands identified as being more appropriately located to deliver the Core Strategy housing allocation for the village over the lifetime of the development plan, consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

Furthermore, the amended Core Strategy provides for a total of 26.2ha of land to be zoned 'New Residential' across all the villages in the county, a quantum which has been allocated in full. To zone the submission site (1.25ha) 'New Residential' would have the effect of exceeding the total

allocation for villages under the Core Strategy, which would mean that the same quantum of land already designated for 'New Residential' would have to be omitted from Killeigh Village or from another village in the county.

Accordingly, it is recommended that the site remained not zoned and outside the development boundary of the village in accordance with the draft Plan.

Ref: CDP/D/32

Person / Body:

Neasan Rowan

Summary of submission / observation:

Supports the use of the '*Open Space, Amenity and Recreation*' zone on undeveloped land that is identified as being 'Constrained Land Use' (flood prone land) to the rear of Millbrook Grove housing estate and National School in the Killeigh Village Plan.

CE Response:

Submission noted.

Ref: CDP/D/33

Person / Body:

Stephanie Rowan

Summary of submission / observation:

Supports the identification of 'Constrained Land Use' (flood prone land) on land to the rear of Millbrook Grove housing estate and National School in the Killeigh Village Plan.

CE Response:

Submission noted.

Ref: CDP/D/34**Person / Body:****Steven Wynne****Summary of submission / observation:**

In relation to the Killeigh Village Plan:

- a) Supports the identification of 'Constrained Land Use' (flood prone land).
- b) Supports the identification of Killeigh Village as being part of the rural area under the Core Strategy.
- c) That the Killeigh Village Plan include a brief description of archaeological heritage with an associated objective.
- d) Supports compact growth for Killeigh Village, and avoidance of urban sprawl.

CE Response:

- a) Noted.
- b) Noted.
- c) The archaeological significance of Killeigh is recognised under the Built Heritage chapter (Chapter 10) of the draft Plan. It is considered reasonable to include further reference in this regard in the Killeigh Village Plan.

Accordingly, it is recommended that the 'Settlement Context' section be amended and that a new Housing and Sustainable Communities Objective be added, as follows (changes in red):

Settlement Context: Killeigh is an attractive village situated at the crossroads of the N80 and local roads. It is strategically positioned approximately 8km from Tullamore and 26km from Portlaoise. The village is centred around a village green at the crossroads and has generally expanded in a linear fashion along the constituent roads. The village is affected by a flood zone which generally follows the watercourse running through the village. There are also a number of archaeological features in the village. **Killeigh Village contains a number of key sites of archaeological significance including the site of the Franciscan Friary, the site of the Augustinian Priory, the site of the Augustinian Nunnery and the Holy Wells.**

Proposed new objective under 'Housing and Sustainable Communities Objectives':

New development shall have regard to the existing character of the village and will be required to protect the setting of sites and features of archaeological significance.

- d) Noted.

Ref: CDP/D/35**Person / Body:****Carla Carey****Summary of submission / observation:**

In relation to the Killeigh Village Plan:

- a) Supports the identification of Killeigh Village as being part of the rural area under the Core Strategy.
- b) Supports the identification of 'Constrained Land Use' (flood prone land)
- c) That the Killeigh Village Plan include a brief narrative on archaeological heritage.
- d) Supports compact growth for Killeigh Village, and avoidance of urban sprawl.

CE Response:

- a) Noted.
- b) Noted.
- c) See CE Response (c) of CDP/D/34.
- d) Noted.

Ref: CDP/D/37**Person / Body:****Paul Maher****Summary of submission / observation:**

In relation to the Killeigh Village Plan:

- a) Supports the identification of Killeigh Village as being part of the rural area under the Core Strategy.
- b) Supports the identification of 'Constrained Land Use' (flood prone land).
- c) That the Killeigh Village Plan include a brief narrative on archaeological heritage, and that the zoning map include reference to 'Areas of Archaeological Potential'.
- d) Supports compact growth for Killeigh Village, and avoidance of urban sprawl.

CE Response:

- a) Noted.
- b) Noted.

- c) In respect of the archaeological significance of Killeigh, please see CE Response (c) of CDP/D/34.

In respect of 'Areas of Archaeological Potential', these relate to the space in the immediate vicinity of all the archaeological sites listed on the 'Record of Monuments and Places', with protection afforded to these sites under the National Monuments (Amendment) Act, 1994. The Record of Monuments and Places is maintained by the National Monuments Service, which is part of the Department of Culture, Heritage and the Gaeltacht. The Department can list or de-list archaeological sites from the Record, as such the 'Areas of Archaeological Interest' shown on a zoning map cannot be relied upon for the lifetime of the County Development Plan without cross referencing with the Record of Monuments and Places maintained by the Department of Culture, Heritage and the Gaeltacht.

The protection of archaeological sites is transposed into the draft Plan under the Built Heritage chapter (Chapter 10), noting the following policy and objective:

BHP-37 It is Council policy that any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance) shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the 'preservation in situ' of archaeological remains and settings, in accordance with Government policy. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a licenced archaeologist.

BHO-05 It is an objective of the Council to protect archaeological sites and monuments, and archaeological objects, which are listed in the Record of Monuments and Places, and to seek their preservation in situ (or at a minimum, preservation by record) through the planning process.

Accordingly, it is recommended that 'Areas of Archaeological Interest' are not shown on zoning maps, and therefore no change to the draft Plan in this regard.

- d) Noted.

Ref: CDP/D/40

Person / Body:

Ian McLoughlin

Summary of submission / observation:

In relation to the Killeigh Village Plan:

- a) Supports the compact growth approach with village centre sites identified for new development.
- b) Supports the redevelopment of the Macra Hall as a community facility.
- c) Supports the potential extension of the Seven Blessed Wells walking route.
- d) Supports the identification of 'Constrained Land Use' (flood prone land) in the Killeigh Village Plan.

CE Response:

Submission is noted.

Ref: CDP/D/44**Person / Body:**

Peadar Coyle

Summary of submission / observation:

In relation to the Killeigh Village Plan and location for new residential development in the village, specifically any further development west of Millbrook Grove housing estate:

- a) Supports the objective for balanced and sustainable growth.
- b) Supports the identification of 'Constrained Land Use' (flood prone land)
- c) That development has potential to impact on sites of archaeological significance.
- d) Supports the Healthy Place Making and Infrastructure Objectives in relation to traffic calming and road safety measures.

CE Response:

The submission is noted.

Ref: CDP/D/45**Person / Body:**

Sean Keohane

Summary of submission / observation:

In relation to the Killeigh Village Plan:

- a) Supports the identification of Killeigh Village as being part of the rural area under the Core Strategy.
- b) Supports the identification of 'Constrained Land Use' (flood prone land).
- c) That the Killeigh Village Plan include a brief narrative on archaeological heritage, and that the zoning map include reference to 'Areas of Archaeological Potential'.
- d) Supports compact growth for Killeigh Village, and avoidance of urban sprawl.

CE Response:

- a) Noted.

- b) Noted.
- c) In respect of the archaeological significance of Killeigh, please see CE Response (c) of CDP/D/34.

In respect of 'Areas of Archaeological Potential', these relate to the space in the immediate vicinity of all the archaeological sites listed on the 'Record of Monuments and Places', with protection afforded to these sites under the National Monuments (Amendment) Act, 1994. The Record of Monuments and Places is maintained by the National Monuments Service, which is part of the Department of Culture, Heritage and the Gaeltacht. The Department can list or de-list archaeological sites from the Record, as such the 'Areas of Archaeological Interest' shown on a zoning map cannot be relied upon for the lifetime of the County Development Plan without cross referencing with the Record of Monuments and Places maintained by the Department of Culture, Heritage and the Gaeltacht.

The protection of archaeological sites is transposed into the draft Plan under the Built Heritage chapter (Chapter 10), noting the following policy and objective:

BHP-37 It is Council policy that any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance) shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the 'preservation in situ' of archaeological remains and settings, in accordance with Government policy. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a licenced archaeologist.

BHO-05 It is an objective of the Council to protect archaeological sites and monuments, and archaeological objects, which are listed in the Record of Monuments and Places, and to seek their preservation in situ (or at a minimum, preservation by record) through the planning process

Accordingly, it is recommended that 'Areas of Archaeological Interest' are not shown on zoning maps, and therefore no change to the draft Plan.

[Ref: CDP/D/47](#)

Person / Body:

Gearoid McHugh and Nicola Corbet

Summary of submission / observation:

In relation to the Killeigh Village Plan:

- a) Supports the identification of Killeigh Village as being part of the rural area under the Core Strategy.
- b) Supports the identification of 'Constrained Land Use' (flood prone land).
- c) That the Killeigh Village Plan include further details on archaeological heritage.
- d) That any new development takes account of traffic and road safety issues.

CE Response:

- a) Noted.
- b) Noted.
- c) In respect of the archaeological significance of Killeigh, please see CE Response (c) of CDP/D/34.
- d) Issues regarding road safety and traffic calming are noted. The following objectives are included in the draft Killeigh Village Plan.

SO9 To protect the carrying capacity, efficiency and road safety of the N80 through Killeigh.

SO10 To promote traffic calming measures and road safety in the village including investigating the feasibility of providing a pedestrian crossing at the school.

Ref: CDP/D/48**Person / Body:**

James Dilleen

Summary of submission / observation:

In relation to the Killeigh Village Plan:

- a) Supports the use of 'Open Space, Amenity & Recreation' zoning in respect of land with archaeological significance.
- b) Supports the identification of opportunity sites which are not constrained by flood risk.
- c) Supports the use of 'Open Space, Amenity & Recreation' zoning in respect of undeveloped flood prone land.
- d) Supports the location of 'New Residential' and 'Strategic Reserve' zonings within the village.
- e) Supports a balanced approach to new development and preservation of archaeological heritage.

CE Response:

The submission is noted.

Ref: CDP/D/49**Person / Body:**

Murtagh and Theresa Brennan

Summary of submission / observation:

In relation to the Killeigh Village Plan:

- a) Supports the identification of 'Constrained Land Use' (flood prone land).
- b) Supports the identification of Killeigh Village as being part of the rural area under the Core Strategy.
- c) Supports compact growth for Killeigh Village, and avoidance of urban sprawl.

CE Response:

Submission is noted.

Ref: CDP/D/78**Person / Body:**

Rebecca & Michael Cuddihy

Summary of submission / observation:

In relation to the Killeigh Village Plan:

- a) Supports the identification of Killeigh Village as being part of the rural area under the Core Strategy.
- b) Supports the identification of 'Constrained Land Use' (flood prone land).
- c) That the Killeigh Village Plan include further details on archaeological heritage.

CE Response:

- a) Noted.
- b) Noted.
- c) In respect of the archaeological significance of Killeigh, please see CE Response (c) of CDP/D/34.

Ref: CDP/D/84**Person / Body:**

Brendan Lynam

Summary of submission / observation:

In relation to the Killeigh Village Plan:

- a) That the 'Settlement Context' section refer to archaeological significance of the village.
- b) That all sites of the former monastic settlement, architectural fragments and other archaeological and historical points are protected and marked to retain the heritage of this village for future generations.

- c) That CFRAM (Catchment Flood Risk Assessment and Management) should be updated prior to any further development of the village, and that the stream north and east of the village is in poor ecological health.
- d) That further traffic calming measures should be explored, a village bypass should be prioritised, and speed limits lowered.
- e) Supports Settlement Objective SO1 (balanced and sustainable growth) and that this aligns with the healthy place making and infrastructure objectives.

CE Response:

- a) In respect of the archaeological significance of Killeigh, please see CE Response (c) of CDP/D/34.
- b) Architectural and archaeological heritage is covered under the Built Heritage chapter (Chapter 10) of the draft Plan. In terms of architectural heritage, any structure that the Council considers to be of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social or technical point of view is included on the Register of Protected Structures. The current Record of Protected Structures for the entire county, with recommended additions and deletions, is included as part of the draft Plan. In addition, archaeological heritage, in terms of sites and features of historical and archaeological importance in the county are listed in the Record of Monuments and Places, as required under Section 12 of the National Monuments (Amendment) Act, 1994. The Record of Monuments and Places is maintained by the National Monuments Service, which is part of the Department of Culture, Heritage and the Gaeltacht.
- c) It is not within the scope of the Plan to review and update the OPW's Catchment Flood Risk Assessment and Management (CFRAM) Study, processes or outputs. Management of flood risk at CFRAM level is part of a process that is separate to the County Development Plan.

The Strategic Flood Risk Assessment (SFRA) undertaken for the Plan has taken into account various factors, including indicators of flood risk and climate change, and has delineated flood zones for zoned settlements in the County. This includes a flood zone for the town of Killeigh, including at Millbrook Grove. Written provisions have been integrated into the Plan that will contribute towards the management of flood risk throughout the County. Future proposals for development in Killeigh will need to comply with the requirements of these provisions in order to be granted permission.

Chapter 3 (Climate Action and Energy) of the draft Plan includes the following relevant policies in relation to flood risk assessment and CFRAM studies.

CAEP-51 It is Council policy to require a Site-specific Flood Risk Assessment (FRA) for all planning applications in areas at risk of flooding (fluvial, pluvial or groundwater), even for developments deemed appropriate in principle to the particular Flood Zone. The detail of these site-specific FRAs will depend on the level of risk and scale of development. A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) and available information from the CFRAM Studies shall be consulted with to this effect.

CAEP-53 It is Council policy to work with other bodies and organisations, as appropriate, to help protect critical infrastructure, including water and wastewater, within the county,

from risk of flooding. Any potential future variations to the Plan shall consider, as appropriate any new and/or emerging data, including, when available, any relevant information contained in the CFRAMS Flood Risk Management Plans and as recommended in the SFRA for the Plan.

CAEP-57 It is Council policy to work with the OPW and other relevant Departments and agencies to implement the recommendations of the CFRAM programme to ensure that flood risk management policies and infrastructure are progressively implemented, and to also work with catchment-based Flood Planning Groups, (including where catchments go beyond the Council's administrative boundary) in the development and implementation of catchment-based strategies for the management of flood risk – including those relating to storage and conveyance.

Ecology is an issue that has been considered in detail by the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) and measures have been integrated into the Plan to ensure that future developments contribute towards the protection of ecology.

In respect of the maintenance of the watercourses, the draft Plan includes the following policy under Chapter 3 – Climate Action and Energy.

CAEP-66 It is Council policy to encourage and facilitate the maintenance of rivers and waterways by statutory authorities and the cleaning of drains in urban areas where appropriate subject to the requirements of OPW Best Practice Guidelines.

d) Issues regarding traffic calming and the bypass are noted. The following objectives are included in the draft Killeigh Village Plan.

SO10 To promote traffic calming measures and road safety in the village including investigating the feasibility of providing a pedestrian crossing at the school.

SO12 To investigate the feasibility of providing a bypass for Killeigh, taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of this County Development Plan relating to sustainable mobility. Any future proposals for roads corridors shall be consistent with the other provisions contained in this County Development Plan including Section 8.5.4 Corridor and Route Selection Process. To protect from development any reservation bands / corridors for this bypass so as to avoid compromising the construction of the road.

Setting speed limits on roads is outside the remit of the county development plan.

e) Noted.

[Ref: CDP/D/85](#)

Person / Body:

Killeigh Residents / Development Association

Summary of submission / observation:

In relation to the Killeigh Village Plan:

- a) Supports balanced growth which is sustainable and appropriate to scale, size and character of the village, in addition to archaeological significance and infrastructural capacity in terms of water services.
- b) That the Killeigh Village Plan refers to archaeological heritage.
- c) That the zoning map include reference to archaeological areas in the village.
- d) That a condition requiring top soil strip work carried out by an archaeologist before development work can proceed, be placed on planning permissions for development of land where there is potential for the presence of an archaeological site or feature.
- e) Refers to context of the 2 no. opportunity sites identified on the zoning map.
- f) Supports the identification of 'Constrained Land Use' in the context of new development in the town.
- g) Raises a concern regarding the use of water harvesting in future housing developments, in terms of the impact on flood measures during times of major rain periods.
- h) Supports the objective to maintain and expand the existing service provision in the village commensurate with population growth, particularly in relation to capacity of the national school and broadband infrastructure.
- i) Recognises the Council's commitment to the re-development of the Macra Hall as a community centre and also notes the commitment of the Killeigh Community Centre Development Association (KCCDA) and the whole community on this project.
- j) Supports the objective to upgrade, consolidate and expand the public lighting and footpath network in the village, and notes that similar objectives under the current county development plan (2014-2020) were not fully met, specifically in relation to providing public lighting for Lock Close, extending public lighting from village to Lock Close, and also moving overhead cables to underground.
- k) Supports the objective to improve public amenities/recreational facilities, including exploring the possibility of extending The Seven Blessed Wells of Killeigh walking northwards along the river/stream.
- l) Refers to the current condition of The Seven Blessed Wells & Walkway and recommend that the area be closed off to the public as public safety would be a major concern.
- m) Supports the objective of protecting the carrying capacity, efficiency and road safety of the N80 through Killeigh.
- n) That the speed limit brought further out of the village, and the possibility of reducing the speed limit from 100km to 80km on the outskirts of the village.
- o) Supports the objective of promoting traffic calming measures and road safety in the village including the investigation the feasibility of providing a pedestrian crossing at the school.
- p) Supports the objective of protecting the Irish Water Eastern and Midlands Water Supply Project pipeline corridor from inappropriate development that would prejudice the delivery of the project.

- q) Refers to the objective to investigate the feasibility of providing a bypass for Killeigh, but note that no potential route is shown on the Killeigh Plan Map.

CE Response:

- a) Noted.
- b) In respect of the archaeological significance of Killeigh, please see CE Response (c) of CDP/D/34.
- c) Archaeological areas or 'Areas of Archaeological Potential', relate to the space in the immediate vicinity of all the archaeological sites listed on the 'Record of Monuments and Places', with protection afforded to these sites under the National Monuments (Amendment) Act, 1994. The Record of Monuments and Places is maintained by the National Monuments Service, which is part of the Department of Culture, Heritage and the Gaeltacht. The Department can list or de-list archaeological sites from the Record, as such the 'Areas of Archaeological Interest' shown on a zoning map cannot be relied upon for the lifetime of the County Development Plan without cross referencing with the Record of Monuments and Places maintained by the Department of Culture, Heritage and the Gaeltacht.

The protection of archaeological sites is transposed into the draft Plan under the Built Heritage chapter (Chapter 10), noting particularly the following policies and objective:

BHP-33 It is Council policy to support and promote the protection and appropriate management and sympathetic enhancement of the county's archaeological heritage within the Plan area, in particular by implementing the Planning and Development Act 2000 (as amended) and the National Monuments Act 1930 (as amended).

BHP-37 It is Council policy that any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance) shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the 'preservation in situ' of archaeological remains and settings, in accordance with Government policy. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a licenced archaeologist.

BHO-05 It is an objective of the Council to protect archaeological sites and monuments, and archaeological objects, which are listed in the Record of Monuments and Places, and to seek their preservation in situ (or at a minimum, preservation by record) through the planning process.

Accordingly, it is recommended that 'Areas of Archaeological Potential' are not shown on zoning maps, and therefore no change to the draft Plan in this regard.

- d) Chapter 10 of the draft Plan deals with 'Built Heritage', under which the Council recognises that National Monuments Acts 1930-2004 provides for the protection of all previously unknown archaeology that becomes known (for example, through ground disturbance, fieldwork, or the discovery of sites underwater).

In addition, the use of 'Areas of Archaeological Potential', is relevant as these relate to the area around archaeological sites or features listed on the 'Record of Monuments and Places', with protection afforded to these sites under the National Monuments (Amendment) Act, 1994. Such

areas around archaeological sites reflect the potential presence of further features of archaeological interest. In this regard, Policies BHP-37 and BHP-38 under Chapter 10 of the draft Plan are relevant, as follows:

BHP-37 It is Council policy that any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance) shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the 'preservation in situ' of archaeological remains and settings, in accordance with Government policy. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a licenced archaeologist.

BHP-38 It is Council policy to ensure that archaeological excavation is carried out according to best practice as outlined by the National Monuments Service, Department of Culture, Heritage and the Gaeltacht, the National Museum of Ireland and the Institute of Archaeologists of Ireland and to protect previously unknown archaeological sites and features, where they are discovered during development works.

In addition, the Development Management Standards chapter (Chapter 13) of the draft Plan, includes development management standard DMS-96 'Archaeological Sites' which provides the basis for the Council to request an Archaeological Impact Assessment and Method Statement, a Conservation Plan, Visual Impact Assessment for development in the vicinity of an archaeological site.

DMS-96 Archaeological Sites

Development in the vicinity of archaeological sites shall accord with the requirements of the Framework and Principles for the Protection of Archaeological Heritage, DAHG (1999) and shall be designed to have minimal impact on archaeological features. There is a presumption in favour of avoiding developmental impacts on archaeological heritage and of in-situ preservation of archaeological sites and monuments.

- An Archaeological Impact Assessment and Method Statement will be required to support development proposals that have the potential to impact on archaeological features.
- A Conservation Plan may be required for development in the vicinity of a site or monument, to ensure the ongoing protection of the monument and its setting.
- A Visual Impact Assessment may be required for development proposals in the vicinity of upstanding remains.

No change to the draft Plan in this regard.

- e) Noted. There is a permission on one of the 'Opportunity Sites'. Permission was granted under Pl. Ref. 17339 on the 22/03/2018 for 5 no. houses. Construction has not started to date and the permission expires after 5 years. As such, it is considered appropriate to retain the 'Opportunity Site' status for the land.
- f) Noted.

- g) The draft Plan contains the following policy under Chapter 3 'Climate Change and Energy' and development management standards under Chapter 13, in respect of the management of surface water drainage.

CAEP-63 It is Council policy to minimise and limit the extent of hard surfacing and paving and require the use of sustainable urban drainage systems (SuDs) where appropriate, for new developments or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risks.

DMS-22 Green Infrastructure Masterplan

A Green Infrastructure Masterplan shall be prepared for applications of 20 houses or more, which addresses the following;

- Retention and enhancement where possible of existing wetland habitat, hedgerow, woodlands, meadows and habitats of species protected under European legislation and National Wildlife Acts;
- The creation of new green infrastructure assets such as public open space, green roofs, green walls, tree planting and natural pollination zones;
- Increased and improved ecological corridor connectivity and pedestrian and cycle path linkages with existing green infrastructure assets in the area. Where a large site adjoins a green corridor, a public open space or an area of high ecological value, any new public open space on the site should be contiguous to same to encourage visual continuity and expansion of biodiversity which can assist in expanding the green infrastructure network; and
- A consideration of existing flood risk areas, wetlands and proposed SuDs systems.

Phasing proposals shall ensure that open space to serve units in a given phase is completed to the satisfaction of the Planning Authority, prior to the initiation of the succeeding phase.

DMS-23 Sustainable Urban Drainage Systems (SuDS)

Applications for new developments shall include details of how SuDS have been satisfactorily incorporated into the design of the scheme. In addition, applications must demonstrate clearly how the incorporation of SUDS can benefit the overall scheme or contribute to the area by an end use that:

- Is functional to the scheme,
- has an amenity value; or,
- has a habitat creation value.

DMS-24 Surface Water Management

Surface water shall not be permitted to flow on to the public road. Accesses and road frontage should be designed in such a manner as to deal with surface water and ensure that it does not impact on the public road. Existing roadside drainage shall be maintained by the incorporation of a suitably sized drainage pipe. Each application shall be accompanied by design calculations or appropriate evidence to support the size of the pipe selected.

Applications for substantial hard-surfaced areas must demonstrate methods of controlling and limiting surface water run-off such as;

- Use of permeable paving/surfaces;

- Bio-retention areas; and
- Swales (which should be maintainable), such that rainfall is not directed immediately to surface drains.

No change to the draft Plan.

- h) Noted.
- i) Noted.
- j) Support regarding the objective for footpaths and street lighting is noted. With regards to undergrounding of cables, it is recommended that the following new objective be included in the Killeigh Village Plan:

To support the undergrounding of overhead cables in the village.

- k) Noted.
- l) A decision to close The Seven Blessed Wells & Walkway is outside the remit of the County Development Plan. However, improvement of the walkway would be covered by the following objective which is included in the Village Plan.

SO8 To improve public amenities / recreational facilities in the village, including exploring the possibility of extending The Seven Blessed Wells of Killeigh walking route northwards along the river/stream.

- m) Noted.
- n) Changing speed limits is outside the remit of the County Development Plan.
- o) Noted.
- p) Noted.
- q) In respect of a bypass for Killeigh, Chapter 8 'Sustainable Transport Strategy' includes the following objectives:

SMAO-09 It is an objective of the Council to facilitate the development of the national secondary road network in Offaly through the continued construction, upgrading and improvement of the national secondary roads in the county, the N62, the N52 and the N80 where on examination it is found to be feasible, including as outlined in the accompanying table:

(The table under Policy SMAO-09 refers to 6 no. schemes, one of which reads as follows:

To co-operate with Transport Infrastructure Ireland in the examination of the feasibility of providing a bypass for the following towns and villages, taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, including section 8.5.4 Corridor and Route

Selection Process. Where lines are shown on the maps in Volume 2, they are indicative only.

- N52: Kilcormac
- N80: Killeigh

SMAO-14 It is an objective of the Council to examine the feasibility of providing future relief roads adjacent to the following towns and villages, taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, including section 8.5.4 Corridor and Route Selection Process. Where lines are shown on the maps in Volume 2, they are indicative only.

- Tullamore
- Birr
- Clara
- Ferbane
- Portarlinton
- Cloghan
- Killeigh
- Geashill
- Cloneygowan
- Edenderry
- Kilcormac

No change to the draft Plan.

Ref: CDP/D/87

Person / Body:

Noelle Spollen

Summary of submission / observation:

In relation to the Killeigh Village Plan:

- a) Supports balanced growth which is sustainable and appropriate to scale, size and character of the village, in addition to archaeological significance and infrastructural capacity in terms of water services.
- b) That the Killeigh Village Plan refers to archaeological heritage.
- c) That the zoning map include reference to archaeological areas in the village.
- d) That a condition requiring top soil strip work carried out by an archaeologist before development work can proceed, be placed on planning permissions for development of land where there is potential for the presence of an archaeological site or feature.
- e) Refers to context of the 2 no. opportunity sites identified on the zoning map.

- f) Supports the identification of 'Constrained Land Use' in the context of new development in the town.
- g) Raises a concern regarding the use of water harvesting in future housing developments, in terms of the impact on flood measures during times of major rain periods.
- h) Supports the objective to maintain and expand the existing service provision in the village commensurate with population growth, particularly in relation to capacity of the national school and broadband infrastructure.
- i) Recognises the Council's commitment to the re-development of the Macra Hall as a community centre and also notes the commitment of the Killeigh Community Centre Development Association (KCCDA) and the whole community on this project.
- j) Supports the objective to upgrade, consolidate and expand the public lighting and footpath network in the village.
- k) Supports the objective to improve public amenities/recreational facilities, including exploring the possibility of extending The Seven Blessed Wells of Killeigh walking northwards along the river/stream.
- l) Refers to the current condition of The Seven Blessed Wells & Walkway and recommend that the area be closed off to the public as public safety would be a major concern.
- m) Supports the objective of protecting the carrying capacity, efficiency and road safety of the N80 through Killeigh.
- n) Supports the objective of promoting traffic calming measures and road safety in the village including the investigation the feasibility of providing a pedestrian crossing at the school.
- o) Supports the objective of protecting the Irish Water Eastern and Midlands Water Supply Project pipeline corridor from inappropriate development that would prejudice the delivery of the project.
- p) Refers to the objective to investigate the feasibility of providing a bypass for Killeigh, but note that no potential route is shown on the Killeigh Plan Map.

CE Response:

- a) Noted.
- b) In respect of the archaeological significance of Killeigh, please see CE Response (c) of CDP/D/34.
- c) Archaeological areas or 'Areas of Archaeological Potential', relate to the space in the immediate vicinity of all the archaeological sites listed on the 'Record of Monuments and Places', with protection afforded to these sites under the National Monuments (Amendment) Act, 1994. The Record of Monuments and Places is maintained by the National Monuments Service, which is part of the Department of Culture, Heritage and the Gaeltacht. The Department can list or de-list archaeological sites from the Record, as such the 'Areas of Archaeological Interest' shown on a zoning map cannot be relied upon for the lifetime of the County Development Plan without cross referencing with the Record of Monuments and Places maintained by the Department of Culture, Heritage and the Gaeltacht.

The protection of archaeological sites is transposed into the draft Plan under the Built Heritage chapter (Chapter 10), noting particularly the following policies and objective:

BHP-33 It is Council policy to support and promote the protection and appropriate management and sympathetic enhancement of the county's archaeological heritage

within the Plan area, in particular by implementing the Planning and Development Act 2000 (as amended) and the National Monuments Act 1930 (as amended).

BHP-37 It is Council policy that any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance) shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the 'preservation in situ' of archaeological remains and settings, in accordance with Government policy. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a licenced archaeologist.

BHO-05 It is an objective of the Council to protect archaeological sites and monuments, and archaeological objects, which are listed in the Record of Monuments and Places, and to seek their preservation in situ (or at a minimum, preservation by record) through the planning process.

Accordingly, it is recommended that 'Areas of Archaeological Potential' are not shown on zoning maps, and therefore no change to the draft Plan in this regard.

- d) Chapter 10 of the draft Plan deals with 'Built Heritage', under which the Council recognises that National Monuments Acts 1930-2004 provides for the protection of all previously unknown archaeology that becomes known (for example, through ground disturbance, fieldwork, or the discovery of sites underwater).

In addition, the use of 'Areas of Archaeological Potential', is relevant as these relate to the area around archaeological sites or features listed on the 'Record of Monuments and Places', with protection afforded to these sites under the National Monuments (Amendment) Act, 1994. Such areas around archaeological sites reflect the potential presence of further features of archaeological interest. In this regard, Policies BHP-37 and BHP-38 under Chapter 10 of the draft Plan are relevant, as follows:

BHP-37 It is Council policy that any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance) shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the 'preservation in situ' of archaeological remains and settings, in accordance with Government policy. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a licenced archaeologist.

BHP-38 It is Council policy to ensure that archaeological excavation is carried out according to best practice as outlined by the National Monuments Service, Department of Culture, Heritage and the Gaeltacht, the National Museum of Ireland and the Institute of Archaeologists of Ireland and to protect previously unknown archaeological sites and features, where they are discovered during development works.

In addition, the Development Management Standards chapter (Chapter 13) of the draft Plan, includes development management standard DMS-96 'Archaeological Sites' which provides the basis for the Council to request an Archaeological Impact Assessment and Method Statement, a

Conservation Plan, Visual Impact Assessment for development in the vicinity of an archaeological site.

DMS-96 Archaeological Sites

Development in the vicinity of archaeological sites shall accord with the requirements of the Framework and Principles for the Protection of Archaeological Heritage, DAHG (1999) and shall be designed to have minimal impact on archaeological features. There is a presumption in favour of avoiding developmental impacts on archaeological heritage and of in-situ preservation of archaeological sites and monuments.

- An Archaeological Impact Assessment and Method Statement will be required to support development proposals that have the potential to impact on archaeological features.
- A Conservation Plan may be required for development in the vicinity of a site or monument, to ensure the ongoing protection of the monument and its setting.
- A Visual Impact Assessment may be required for development proposals in the vicinity of upstanding remains.

No change to the draft Plan in this regard.

e) Noted.

f) Noted.

g) The draft Plan contains the following policy under Chapter 3 'Climate Change and Energy' and development management standards under Chapter 13, in respect of the management of surface water drainage.

CAEP-63 It is Council policy to minimise and limit the extent of hard surfacing and paving and require the use of sustainable urban drainage systems (SuDs) where appropriate, for new developments or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risks.

DMS-22 Green Infrastructure Masterplan

A Green Infrastructure Masterplan shall be prepared for applications of 20 houses or more, which addresses the following;

- Retention and enhancement where possible of existing wetland habitat, hedgerow, woodlands, meadows and habitats of species protected under European legislation and National Wildlife Acts;
- The creation of new green infrastructure assets such as public open space, green roofs, green walls, tree planting and natural pollination zones;
- Increased and improved ecological corridor connectivity and pedestrian and cycle path linkages with existing green infrastructure assets in the area. Where a large site adjoins a green corridor, a public open space or an area of high ecological value, any new public open space on the site should be contiguous to same to encourage visual continuity and expansion of biodiversity which can assist in expanding the green infrastructure network; and

- A consideration of existing flood risk areas, wetlands and proposed SuDs systems.

Phasing proposals shall ensure that open space to serve units in a given phase is completed to the satisfaction of the Planning Authority, prior to the initiation of the succeeding phase.

DMS-23 Sustainable Urban Drainage Systems (SuDS)

Applications for new developments shall include details of how SuDS have been satisfactorily incorporated into the design of the scheme. In addition, applications must demonstrate clearly how the incorporation of SUDS can benefit the overall scheme or contribute to the area by an end use that:

- Is functional to the scheme,
- has an amenity value; or,
- has a habitat creation value.

DMS-24 Surface Water Management

Surface water shall not be permitted to flow on to the public road. Accesses and road frontage should be designed in such a manner as to deal with surface water and ensure that it does not impact on the public road. Existing roadside drainage shall be maintained by the incorporation of a suitably sized drainage pipe. Each application shall be accompanied by design calculations or appropriate evidence to support the size of the pipe selected.

Applications for substantial hard-surfaced areas must demonstrate methods of controlling and limiting surface water run-off such as;

- Use of permeable paving/surfaces;
- Bio-retention areas; and
- Swales (which should be maintainable), such that rainfall is not directed immediately to surface drains.

No change to the draft Plan.

h) Noted.

i) Noted.

j) Noted.

k) Noted.

l) A decision to close The Seven Blessed Wells & Walkway is outside the remit of the County Development Plan. However, improvement of the walkway would be covered by the following objective which is included in the Village Plan.

SO8 To improve public amenities / recreational facilities in the village, including exploring the possibility of extending The Seven Blessed Wells of Killeigh walking route northwards along the river/stream.

No change to the draft Plan.

m) Noted.

n) Noted.

- o) Noted.
- p) In respect of a bypass for Killeigh, Chapter 8 ‘Sustainable Transport Strategy’ includes the following objectives:

SMAO-09 It is an objective of the Council to facilitate the development of the national secondary road network in Offaly through the continued construction, upgrading and improvement of the national secondary roads in the county, the N62, the N52 and the N80 where on examination it is found to be feasible, including as outlined in the accompanying table:

(The table under Policy SMAO-09 refers to 6 no. schemes, one of which reads as follows:

To co-operate with Transport Infrastructure Ireland in the examination of the feasibility of providing a bypass for the following towns and villages, taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, including section 8.5.4 Corridor and Route Selection Process. Where lines are shown on the maps in Volume 2, they are indicative only.

- N52: Kilcormac
- N80: Killeigh

SMAO-14 It is an objective of the Council to examine the feasibility of providing future relief roads adjacent to the following towns and villages, taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, including section 8.5.4 Corridor and Route Selection Process. Where lines are shown on the maps in Volume 2, they are indicative only.

- Tullamore
- Birr
- Clara
- Ferbane
- Portarlinton
- Cloghan
- Killeigh
- Geashill
- Cloneygowan
- Edenderry
- Kilcormac

No change to the draft Plan

Ref: CDP/D/94**Person / Body:****David Flaherty****Summary of submission / observation:**

In relation to the Killeigh Village Plan:

- a) Supports the identification of Constrained Land in terms of flood risk.
- b) Any further residential zonings would place undue pressure on existing amenities in the village.
- c) Traffic in the village is a concern, alleviated by lesser residential zoning.
- d) Supports the draft Plan zoning map for Killeigh in terms of proper future development.

CE Response:

The submission is noted.

Ref: CDP/D/98**Person / Body:****Shaun & Aoife Martin****Summary of submission / observation:**

In relation to the Killeigh Village Plan:

- a) Supports the identification of Killeigh Village as being part of the rural area under the Core Strategy.
- b) Supports the open space zoning in the village.
- c) Supports the inclusion of the flood zone / 'Constrained Land Use' on the zoning map.
- d) That the zoning map should include archaeological features.

CE Response:

- a) Noted.
- b) Noted.
- c) Noted.
- d) In respect of archaeological features / sites, these are listed on the 'Record of Monuments and Places', with protection afforded under the National Monuments (Amendment) Act, 1994. The Record of Monuments and Places is maintained by the National Monuments Service, which is part of the Department of Culture, Heritage and the Gaeltacht. The Department can list or de-list archaeological sites from the Record, as such sites shown on a zoning map cannot be relied upon

for the lifetime of the County Development Plan without cross referencing with the Record of Monuments and Places maintained by the Department of Culture, Heritage and the Gaeltacht.

The protection of archaeological sites is transposed into the draft Plan under the Built Heritage chapter (Chapter 10), noting the following policy and objective:

BHP-37 It is Council policy that any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance) shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the 'preservation in situ' of archaeological remains and settings, in accordance with Government policy. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a licenced archaeologist.

BHO-05 It is an objective of the Council to protect archaeological sites and monuments, and archaeological objects, which are listed in the Record of Monuments and Places, and to seek their preservation in situ (or at a minimum, preservation by record) through the planning process

Accordingly, it is recommended that archaeological sites are not shown on zoning maps, and therefore no change to the draft Plan.

Ref: CDP/D/131

Person / Body:

Gordon McDonnell

Summary of submission / observation:

In relation to the Killeigh Village Plan:

- a) That any new development takes account of traffic and road safety issues.
- b) That any future development takes account of flooding issues.

CE Response:

- a) Issues regarding road safety and traffic calming are noted. The following objectives are included in the draft Killeigh Village Plan.

SO9 To protect the carrying capacity, efficiency and road safety of the N80 through Killeigh.

SO10 To promote traffic calming measures and road safety in the village including investigating the feasibility of providing a pedestrian crossing at the school.

No change to the draft Plan.

- b) The Strategic Flood Risk Assessment (SFRA) undertaken for the Plan has taken into account various factors, including indicators of flood risk and climate change, and has delineated flood zones for zoned settlements in the County. This includes a flood zone for the town of Killeigh, including at Millbrook Grove. Written provisions have been integrated into the Plan that will

contribute towards the management of flood risk throughout the County. Future proposals for development in Killeigh will need to comply with the requirements of these provisions in order to be granted permission.

Chapter 3 (Climate Action and Energy) of the draft Plan includes the following relevant policies in relation to flood risk assessment and CFRAM studies.

CAEP-51 It is Council policy to require a Site-specific Flood Risk Assessment (FRA) for all planning applications in areas at risk of flooding (fluvial, pluvial or groundwater), even for developments deemed appropriate in principle to the particular Flood Zone. The detail of these site-specific FRAs will depend on the level of risk and scale of development. A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) and available information from the CFRAM Studies shall be consulted with to this effect.

CAEP-53 It is Council policy to work with other bodies and organisations, as appropriate, to help protect critical infrastructure, including water and wastewater, within the county, from risk of flooding. Any potential future variations to the Plan shall consider, as appropriate any new and/or emerging data, including, when available, any relevant information contained in the CFRAMS Flood Risk Management Plans and as recommended in the SFRA for the Plan.

CAEP-57 It is Council policy to work with the OPW and other relevant Departments and agencies to implement the recommendations of the CFRAM programme to ensure that flood risk management policies and infrastructure are progressively implemented, and to also work with catchment-based Flood Planning Groups, (including where catchments go beyond the Council's administrative boundary) in the development and implementation of catchment-based strategies for the management of flood risk – including those relating to storage and conveyance.

No change to draft Plan.

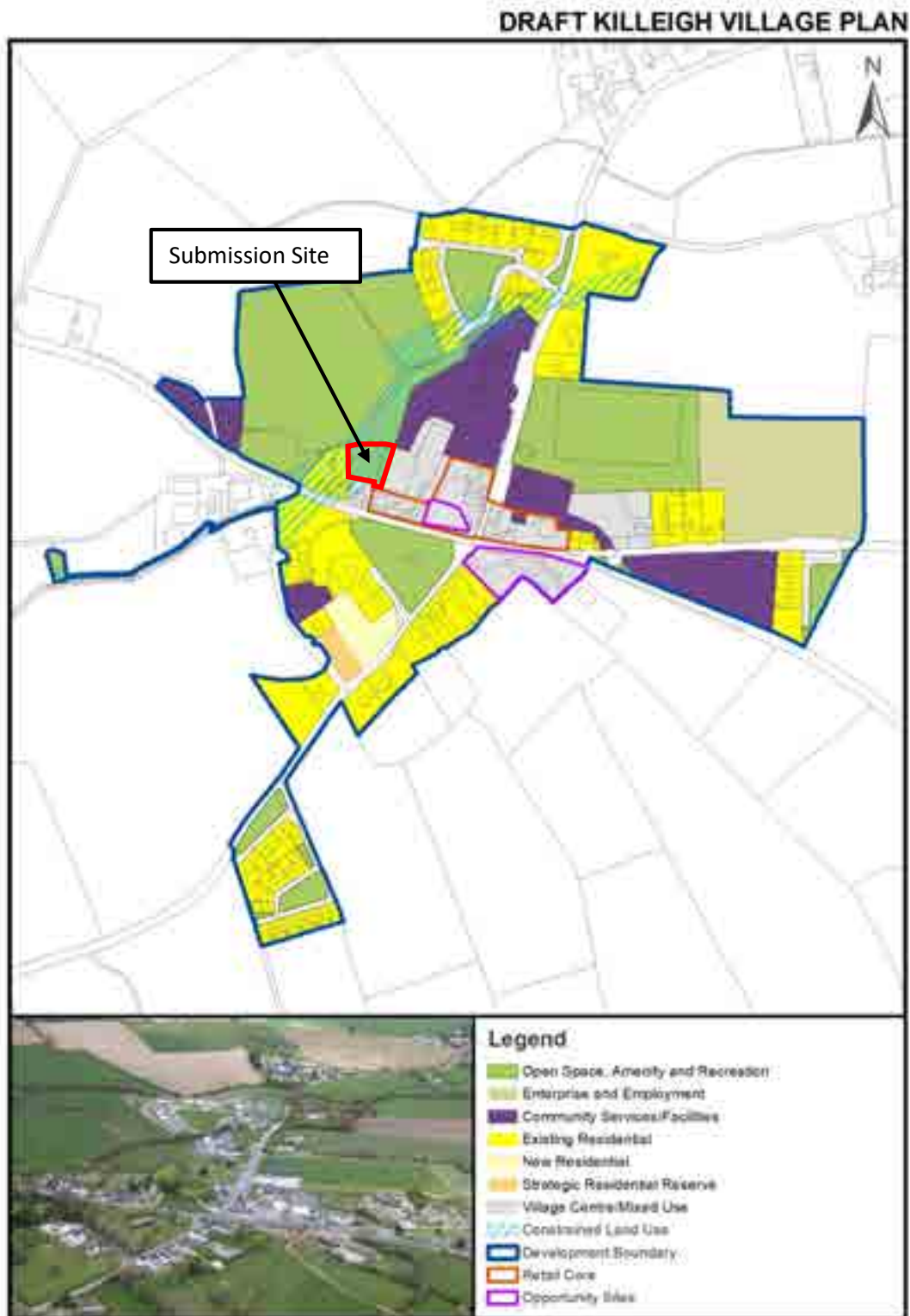
Ref: CDP/D/135

Person / Body:

John McEllduff & Rory Phelan

Summary of submission / observation:

- a) That the zoning of approx. 0.2ha of land in Killeigh Village be changed from 'Open Space, Amenity, Recreation' to 'New Residential' in the draft Killeigh Village Plan.
- b) That there isn't enough land zoned for 'New Residential' in the draft Killeigh Village Plan.



CE Response:

- a) The Flood Guidelines require that land use zoning in the County Development Plans takes into account SFRA Flood Zones. The lands are located within Flood Zone A and have not been previously developed. There are alternative lands available for various land uses in areas that are subject to less flood risk. As a result:

- “Open Space, Amenity and Recreation” is an appropriate land use for these lands; and
- “New Residential” land use zoning would not be in compliance with the Ministerial Guidelines.

No change to the draft Plan.

- b) A sufficient quantum of land, without any identified environmental constraints, are identified to deliver the Core Strategy housing allocation for Killeigh Village over the lifetime of the development plan.

No change to the draft Plan.

Ref: CDP/D/143

Person / Body:

Phil and Suzanne O’Reilly

Summary of submission / observation:

In relation to the Killeigh Village Plan:

- a) Supports balanced growth which is sustainable and appropriate to scale, size and character of the village, and the village maintaining its rural status.
- b) Supports cluster style compact residential zoning for the village.
- c) Refers to the 2 no. opportunity sites identified on the zoning map, for which one has a grant of permission for houses.
- d) Supports the identification of ‘flood zones’ in the context of new development in the town.
- e) Supports the objective to maintain and expand the existing service provision in the village commensurate with population growth, particularly in relation to capacity of the national school.
- f) Supports the objective to upgrade, consolidate and expand the public lighting and footpath network in the village.

CE Response:

- a) Noted.
- b) Noted. The lands zoned ‘New Residential have been identified as being most appropriately located to deliver the Core Strategy housing allocation for Killeigh over the lifetime of the development plan, consistent with the NPF, RSES and draft Plan policy CSP-02 and CSO-02. No change to draft Plan.
- c) Noted. There is a permission on one of the ‘Opportunity Sites’. Permission was granted under Pl. Ref. 17339 on the 22/03/2018 for 5 no. houses. Construction has not started to date and the permission expires after 5 years. As such, it is considered appropriate to retain the ‘Opportunity Site’ status for the land. No change to draft Plan.
- d) Noted.

- e) Noted.
- f) Noted.

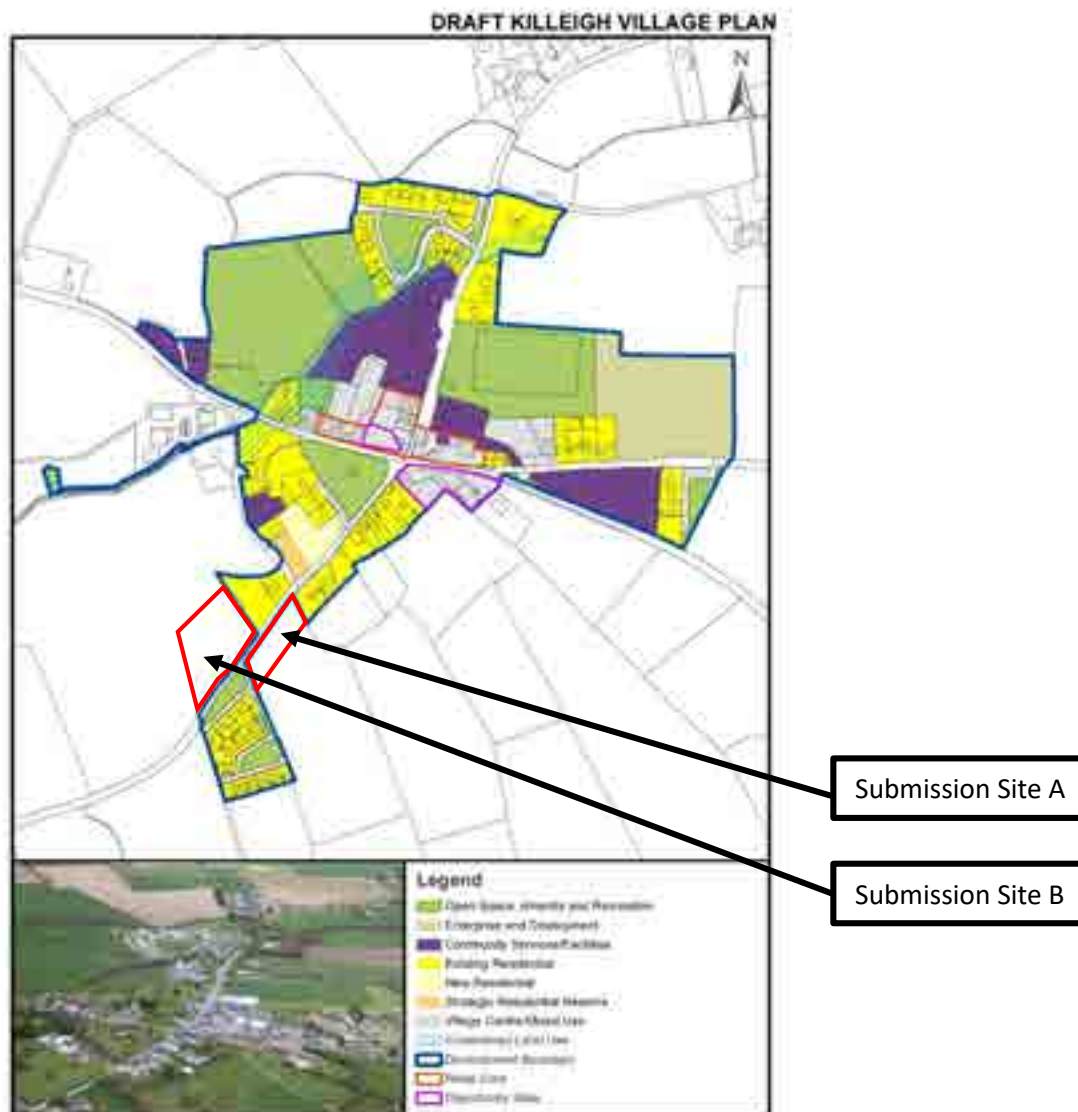
Ref: CDP/D/192

Person / Body:

James Choiseul

Summary of submission / observation:

- a) That undeveloped greenfield land (c. 0.5 ha) located on the east side of the L2002 in Killeigh Village, identified as Submission Site A on the draft Plan zoning map below, be zoned 'New Residential' and included within the development boundary of the village.
- b) That undeveloped greenfield land (c. 1.1 ha) located on the west side of the L2002 in Killeigh Village, identified as Submission Site B on the draft Plan zoning map below, be zoned 'New Residential' and included within the development boundary of the village.



CE Response:

Under the draft Plan, both sites are not zoned and located outside the development boundary of Killeigh Village. The submission requests that both sites be zoned ‘New Residential’ and included within the development boundary of the village.

National Strategic Outcome 1 (NSO 1) of the National Planning Framework (NPF) is to seek ‘Compact Growth’ across cities, towns and villages. In this regard, the National Planning Framework states that ‘From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...’. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF’s NSO1 stating that ‘Residential development 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.’

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

Section 4.19 (f) of the Development Plan Guidelines 2007 relates to the 'Sequential Approach'. It states *'In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided); (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan'*.

The submission site is considered to be peripheral to the village centre. There are other lands identified as being more appropriately located to deliver the Core Strategy housing allocation for Killeigh Village consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02. Furthermore, the amended Core Strategy provides for a total of 26.2ha of land to be zoned 'New Residential' across all the villages in the county, a quantum which has been allocated in full. To zone the submission site (1.6ha) 'New Residential' would have the effect of exceeding the total allocation for villages under the Core Strategy, which would mean that the same quantum of land already designated for 'New Residential' would have to be omitted from Killeigh Village or from another village in the county.

Accordingly, it is advised that both sites remain not zoned and outside the development boundary of Killeigh Village, in accordance with the draft Plan.

3.2.2.5 Moneygall

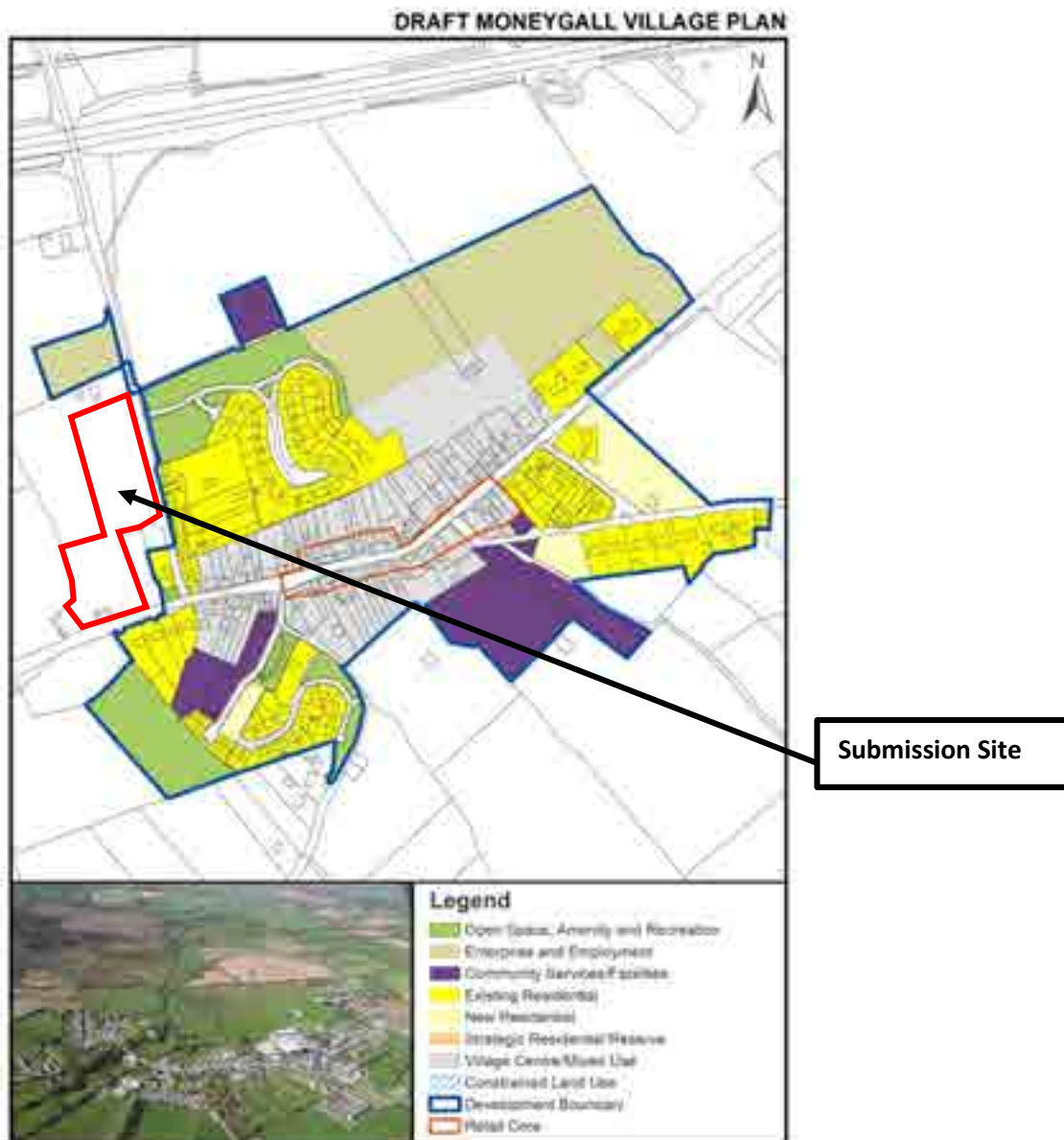
Ref: [CDP/D/179](#)

Person / Body:

Jim Guilfoyle

Summary of submission / observation:

That land of approximately 2ha in area located on the western side of the R490 in Moneygall Village be zoned 'New Residential' and included within the development boundary of the village.



CE Response:

The site is not zoned and located outside the development boundary of Moneygall Village in the draft Plan. The submission requests that the land be zoned 'New Residential' in the draft Plan.

The *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development 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.'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

The submission site is considered to be peripheral to the village centre. There are other lands identified as being more appropriately located to deliver the Core Strategy housing allocation for Moneygall Village consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02. Furthermore, the amended Core Strategy provides for a total of 26.2ha of land to be zoned 'New Residential' across all the villages in the county, a quantum which has been allocated in full. To zone the submission site (2ha) 'New Residential' would have the effect of substantially exceeding the total allocation for villages under the Core Strategy, which would mean that the same quantum of land already designated for 'New Residential' would have to be omitted from Moneygall Village or from another village in the county.

Accordingly, it is advised that the site remain not zoned and outside the development boundary of the Moneygall Village Plan, in accordance with the draft Plan.

3.2.2.6 Mucklagh

[Ref: CDP/D/69](#)

Person / Body:

Mucklagh Tidy Villages Group

Summary of submission / observation:

In relation to the Mucklagh Village Plan:

- a) Supports the draft Village Plan, particularly Settlement Objectives SO2 (consolidated settlement), SO7 (enhance public realm), SO8 (improve public amenities), SO9 (upgrade public lighting and footpaths), SO10 (potential cycle lane and public lighting linking the village to Charleville Road, and SO11 (promote traffic calming measures and road safety)
- b) Requests works to enhance the Charleville Turrets.

CE Response:

- a) The support for Settlement Objectives SO2, SO7, SO8, SO9, SO10 and SO11, is noted. No change to the draft Plan.

- b) In respect of the reference to the Charleville Turrets, otherwise known as the Mucklagh Gates to the Charleville Demesne, these were reconfigured and conserved as part of the Tullamore Bypass Project.

The preservation and enhancement of Charleville Demesne, and specific to this submission, the Mucklagh Gates (part of Protected Structure RPS Ref. 33-2) is suitably covered under Chapter 10 (Built Heritage) of the draft Plan, noting the following policies:

BHP-28 It is Council policy to encourage the protection, conservation, promotion and enhancement of Country Houses, Gardens and Demesnes in the county and support public awareness, enjoyment of and access to these sites where appropriate.

BHP-29 It is Council policy to encourage the conservation, preservation, restoration and protection in their original setting of mausoleums and monuments: follies, grottoes; garden buildings and other structures of particular beauty or historic, environmental, architectural or industrial significance.

BHP-30 It is Council policy to discourage development that would lead to a loss of, or cause damage to, the character, the principle components of, or the setting of Country Houses, Gardens and Demesnes.

In terms of investigating any specific projects or ideas for the public realm in the vicinity of the Mucklagh Gates, including ideas to form part of a tidy towns plan, the Council will continue to work with the local community, including the Tidy Towns organisation, through the co-operation of the Planning Authority, Municipal District, Heritage Officer and County Architect.

No change to the draft Plan.

[Ref: CDP/D/144](#)

Person / Body:

Mucklagh Community Development CLG

Summary of submission / observation:

In terms of the Mucklagh Village Plan:

- a) To provide for the development of a safe identifiable footpath and cycle path between Mucklagh and Tullamore, and to provide for public lighting from Mucklagh Bridge to Charleville Roundabout.
- b) To provide hi-speed broadband to the village, which would benefit all members of the community including school, businesses, remote working and residents.
- c) To provide carpark facilities at Mucklagh Community Centre with car charging facilities.
- d) To provide footpaths, cycle lane, pedestrian crossing, and lighting from Screggan Cross to the village to facilitate a connection between the village and the new Mucklagh Schoolboys/girls Community Soccer Club facilities.

- e) To widen and make safe the entrance to Brocca Road and to provide footpath, cycle lane and lighting from top of Brocca Road to Shamrocks GAA grounds.
- f) To connect residents of Brocca Road up to the main sewage system.
- g) To provide environmental plans for landscaping to include native species trees.
- h) To provide a community playground and exercise fitness zone areas.
- i) To provide community childcare facilities.
- j) To provide facilities for older people to meet and to have services provided such as meals on wheels, connectivity to others and other services.
- k) To improve transport service such as more access to bus services.

CE Response:

- a) At present, there is a continuous footpath from Mucklagh to Tullamore however there are sections of the footpath which are substandard, particularly the stretch of road between Charleville Roundabout and Ballard Lane / old Kinnitty Road. The draft Mucklagh Village Plan contains the following policy:

SO10 To investigate the feasibility of providing a cycle lane and public lighting linking Mucklagh to Charleville Road in Tullamore

In terms of street lighting, there are no street lights along the stretch of the N52 between Mucklagh Bridge and Charleville Roundabout.

It is recommended that the policy in the Mucklagh Village Plan be expanded as follows:

SO10 To investigate the feasibility of **upgrading footpaths and** providing a cycle lane **to link Mucklagh Village to Charleville Road in Tullamore Town.**

Proposed new policy:

To investigate the feasibility of providing public lighting between Mucklagh Bridge and Charleville Roundabout.

- b) Under Chapter 5 'Economic Development Strategy' the Council recognises that access to quality high speed broadband is essential for economic growth, sustainable development (by facilitating remote working and reducing long distance commuting), social inclusion and an enhanced quality of life for all. The follows policy and objectives are contained in the draft Plan.

ENTP-47 It is Council policy to support and facilitate the delivery of the National Broadband Plan and the Offaly Digital Strategy as a means of developing further opportunities for enterprise, employment, education, innovation and skills development.

ENTO-14 It is an objective of the Council to work with government agencies and telecommunication providers to facilitate the delivery of high speed broadband to all premises in Offaly.

ENTO-17 It is an objective of the Council to avail of funding opportunities for the provision of Wi-Fi and broadband in the county to support economic development and social inclusion.

No change to the draft Plan.

- c) The current car parking area associated with the Community Centre is a gravelled yard. It is reasonable to include an objective to support an upgrade. In respect of electric vehicles, draft Plan Chapter 8 'Sustainable Transport Strategy' contains the following policy in respect of electric vehicles.

SMAP-02 It is Council policy to support the growth in the use of electric vehicles, autonomous vehicles and fuel cell vehicles; prioritise car parking spaces for these vehicles; and facilitate the provision of battery charging infrastructure and refuelling infrastructure for these vehicles where considered appropriate.

It is recommended that the following new objective be included in the Mucklagh Village Plan:

To support the development of car parking at Mucklagh Community Centre, to include electric car charging points.

- d) The Mucklagh Schoolboys/girls Community Soccer Club has purchased land adjacent to the junction between the Mucklagh Road and N52 bypass, approx. 180m west of the development boundary of the village. It is recommended that the following new objective be included:

To investigate the feasibility of providing a footpath, cycle path, public lighting and, if necessary, a pedestrian crossing, to link the potential new grounds of the Mucklagh Schoolboys/girls Community Soccer Club with the village core.

- e) It is recommended that the following new objective be included:

To investigate the feasibility of improving the junction between Mucklagh Road and Brocca Road and providing a footpath, cycle lane and public lighting from the Brocca Road junction south to Shamrocks GAA grounds.

- f) Irish Water is responsible for the operation of public water and waste water services nationally including, strategic planning, policy development, service provision, customer service and capital investment planning and delivery. As per Policy WSP-17 (Chapter 11 'Water Services and Environment') in the draft Plan, the Council supports the changeover from septic tank to mains sewer, subject to agreement with Irish Water.

WSP-17 It is Council policy to encourage and support a changeover from septic tanks/private wastewater treatment plants to public collection networks wherever feasible, subject to connection agreements with Irish Water and to ensure that any future development connects to the public wastewater infrastructure where it is available.

No change to the draft Plan.

- g) It is recommended that the following new objective be included:

To promote public realm improvements including native tree planting and pollinator friendly planting projects in the village.

- h) It is recommended that Policy SO8 in the Village Plan be amended as follows:

SO8 To ~~improve~~ support the provision of public amenities / recreational facilities in the village, including a community playground and exercise fitness zone areas.

- i) The Council supports the function of the County Childcare Committee. Policy SICCDP-09 (Chapter 9 ‘Social Inclusion, Community and Cultural Development’) refers:

SICCDP-09 It is Council policy to assist the County Childcare Committee in identifying priority areas within the county for the provision of childcare facilities.

No change to the draft Plan.

- j) The Council recognises that the county has an ageing population through the implementation of the ‘Offaly Age Friendly County Strategy 2018-2021. In this Strategy, the Offaly Age Friendly Alliance sets out the goals and priorities for 2018-2021 and describes how it aims to help Offaly to become a great county within which to grow old. The draft Plan supports this strategy via policy SICCDP-10 (Chapter 9 ‘Social Inclusion, Community and Cultural Development’).

SICCDP-10 It is Council policy to support ‘the Offaly Age Friendly County Programme 2018-2021’ as implemented by the Offaly Age Friendly Alliance (and any updated editions) and any key actions in relation to the physical environment.

No change to the draft Plan.

- k) The draft Plan contains the following policies in Chapter 8 ‘Sustainable Transport Strategy’ to encourage and facilitate improved bus links.

SMAP-15 It is Council policy to support and facilitate the operation of existing bus services and to facilitate the provisions of improved facilities and services for bus users in towns and villages including the provision of set down areas for coaches and bus shelters at all bus stops where feasible.

SMAP-16 It is Council policy to support the Local Link Rural Transport Programme 2018-2022 in County Offaly and subsequent programmes which provides for social and economic connectivity between settlements and rural areas.

No change to the draft Plan.

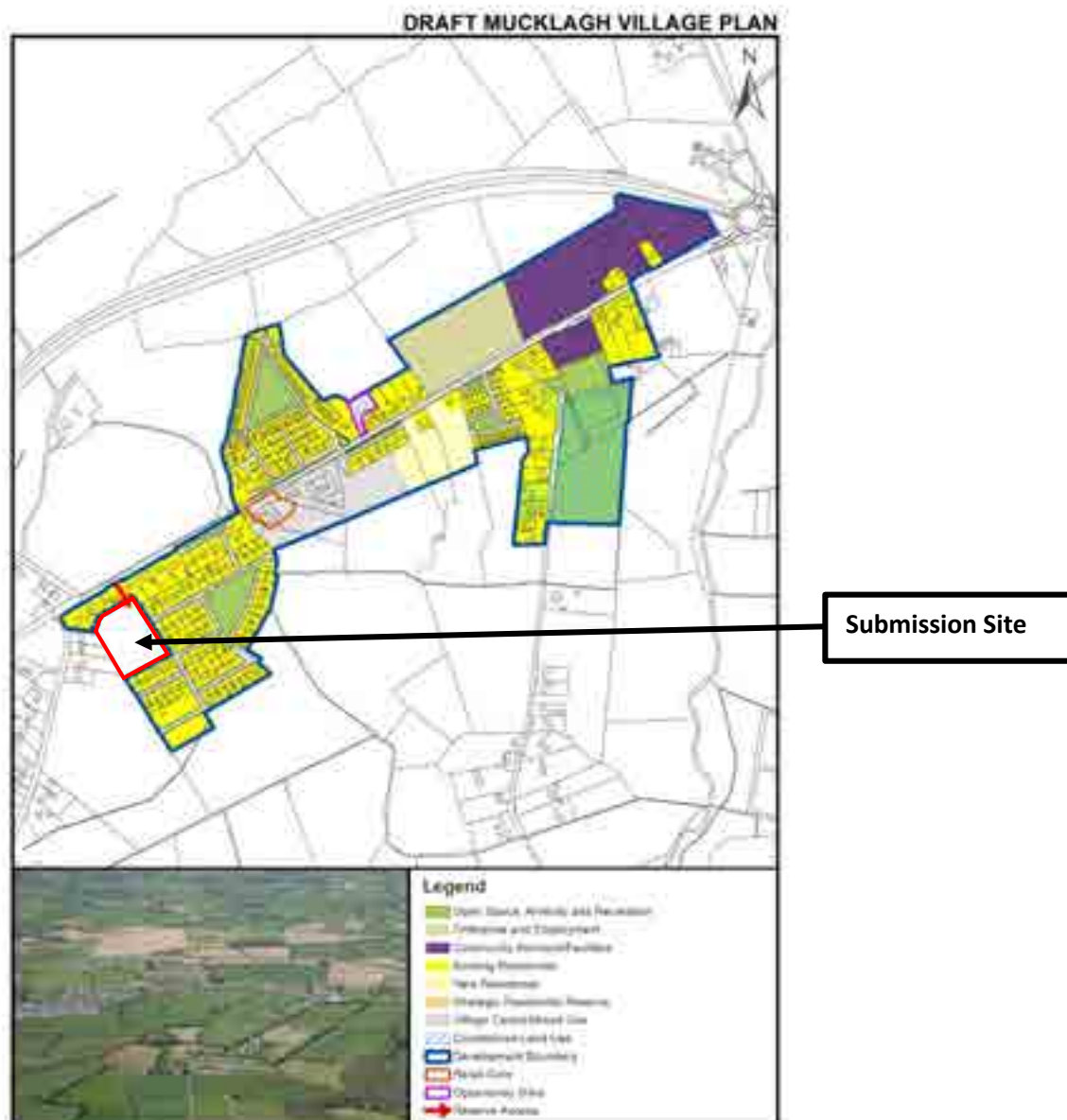
[Ref: CDP/D/162](#)

Person / Body:

The Spain Family

Summary of submission / observation:

That c. 1.6ha of undeveloped greenfield land, west of Tegan Court in Mucklagh, be zoned either ‘New Residential’ or ‘Enterprise and Employment’ in the draft Plan.



CE Response:

The submission site is an infill site located at the western end of Mucklagh Village. It abuts houses in Tegan Court to the east and south, and rear of houses fronting local roads to the north and west. The site has access from the east through Tegan Court. Planning permission for one single dwelling was granted for part of the site on 28/07/2020 (Pl. Ref. 19/265), noting the that house site is 0.12ha within the larger 1.6ha submission site.

The submissions site is not zoned and located outside the development boundary of Mucklagh Village in the draft Plan. The submission requests that the land be zoned 'New Residential' or 'Enterprise and Employment' in the draft Plan.

In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities,

towns and villages...'. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development 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.'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

Section 4.19 (f) of the Development Plan Guidelines 2007 relates to the 'Sequential Approach'. It states *'In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided); (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan'.*

The submission site is considered to be peripheral to the village centre. There are other lands identified as being more appropriately located to deliver the Core Strategy housing allocation for the village over the lifetime of the development plan, consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

Furthermore, the amended Core Strategy provides for a total of 26.2ha of land to be zoned 'New Residential' across all the villages in the county, a quantum which has been allocated in full. To zone the submission site (1.6ha) 'New Residential' would have the effect of exceeding the total allocation for villages under the Core Strategy, which would mean that the same quantum of land already designated for 'New Residential' would have to be omitted from Mucklagh Village or from another village in the county.

In terms of the alternative request for an 'Enterprise and Employment' zoning, Section 10 of the Planning and Development Act 2000 (as amended) requires that development plans comprise objectives for the zoning of lands for particular purposes, in the interest of proper planning and sustainable development and particularly focused on providing a high quality of life for the county's population and eliminating potential conflicts between incompatible land uses. The submission site is surrounded by residential development, accessed through Tegan Court, a residential neighbourhood. There are other lands identified closer to the core of the Village, better located in terms of adjoining uses, and at a quantum that is suitable in scale to support new enterprise and employment uses for the Village, consistent with draft Plan policy SSP-13.

SSP-13 It is Council policy to facilitate the expansion of and provision of new mixed-use and employment-generating development within villages at an appropriate size and scale subject to normal planning requirements.

Accordingly, it is advised that the site remain not zoned and outside the development boundary of the Mucklagh Village Plan, in accordance with the draft Plan.

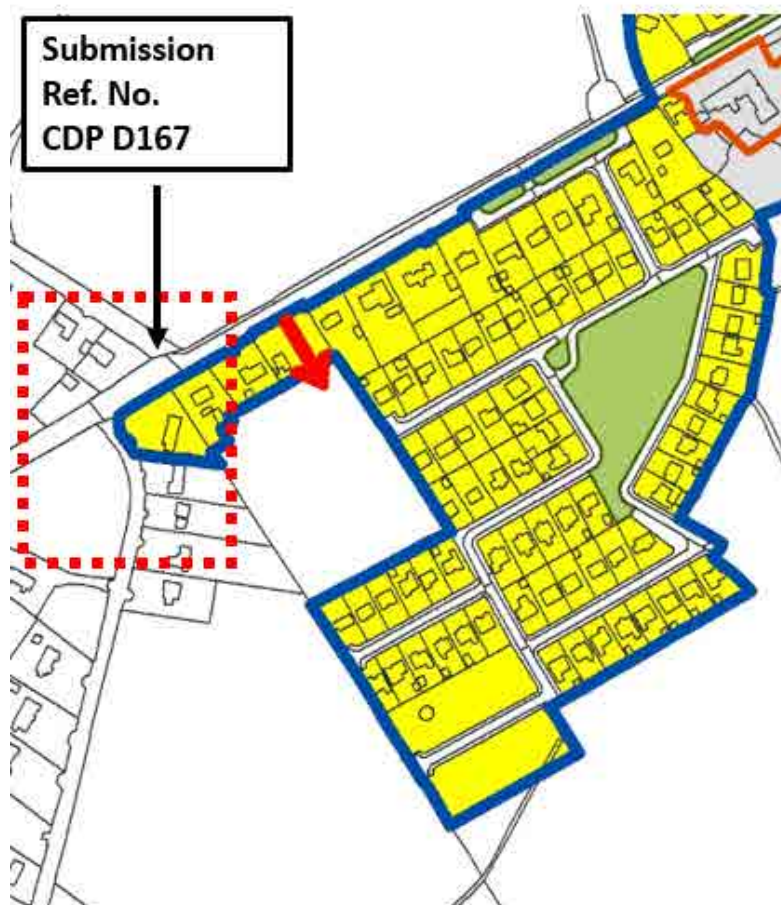
[CDP/D/167](#)

Person / Body:

David Spain

Summary of submissions / observations:

Requests that the Council consider traffic calming for Mucklagh village. There are a lot of cars travelling at inappropriate speeds into the village especially from South of the village through Screggan Cross.



CE Response:

The Village plan for Mucklagh contained in Volume 2 of the Draft Offaly County Development Plan 2021-2027, includes the following objective in relation to traffic calming in the village of Mucklagh.

SO11 *To promote traffic calming measures and road safety in the village.*

Accordingly, it is considered that the request in the submission is addressed in the Draft Plan.

3.2.2.7 Pollagh/Lemanaghan

Ref: CDP/D/140

Person / Body:

Eileen Devery

Summary of submission / observation:

Referring to the Pollagh/Lemanaghan Village Plan:

- a) That the list of services and facilities in the village be updated.
- b) That Objective SO3 promote existing community facilities.
- c) That Turraun Wetlands be included under Objective SO4, in terms of reference to the 'Lough Boora Parklands and Drinagh Wetlands' cycling route.
- d) That Pollagh be promoted for water sports on the River Brosna and the Grand Canal.
- e) That the village be promoted as a canal side village.
- f) That Objective SO5 include a reference to a cycle/walking route between the National School and Lemanaghan.
- g) That Objective SO7, which relates to biodiversity, be more specific.
- h) That an objective be included which seeks to improve the appearance of Plunkett Bridge.
- i) That the village plan supports better management / awareness of flood risk.
- j) That the village plan supports the longer term possibility of developing a river walk along the River Brosna and public green space in the village.

CE Response:

- a) It is recommended that the section 'Services and Facilities' in the Village Plan be amended as follows:

Services and Facilities: Community Shop ~~and Youth Space~~, Men's Shed, ~~Shop~~, Pub, National School, Roman Catholic Church, GAA Grounds, Community Centre (~~including Youth Space~~), Bring Centre. ~~Soccer Pitch~~. The village is served by the Local Link bus service.

- b) It is recommended that Objective SO3 in the Village Plan be amended as follows:

- SO3 To ~~promote the maintain and expand~~ expansion of the local service provision in the village, and to maintain and support existing local and community services including the Community Shop.
- c) The Turraun Wetlands is included as a route within the overall Lough Boora Discovery Park. It is recommended that Objective SO4 in the Village Plan be amended as follows:
- SO4 To promote Pollagh-Lemanaghan as a destination on the Grand Canal Greenway and the proposed 'Shannon Monastic Greenway', and 'Lough Boora Parklands and Drinagh Wetlands' cycling routes contained in Figure 6.14 of Volume 1 of this County Development Plan and as a destination close to the Turraun Wetlands and to support uses, infrastructure and development that achieve this objective.
- d) The Waterways Corridor Study 2002 makes reference to the potential of Pollagh for better canal-side village ambiance. However, any proposals involving the Grand Canal should be done in consultation with the relevant agencies including Waterways Ireland. In this regard Policies TRP-02 and TRP-18 in the 'Tourism and Recreational' chapter of the draft Plan read as follows:
- TRP-02 It is Council policy to continue to support and encourage increased co-ordination, cohesion and linkages between agencies involved in tourism development, for example, Fáilte Ireland, Waterways Ireland, Bord na Móna, National Parks and Wildlife Service, Coillte and Offaly County Council.*
- TRP-18 It is Council policy to support in conjunction with relevant landowners and recreational / tourism agencies, the maintenance of and enhanced access to the countryside, waterways, monuments, historic properties, for recreational and tourism purposes. Access should be planned and managed in a manner that protects environmental sensitivities, ecological corridors and the ability of local infrastructure to support increased tourism.*
- It is recommended that a new objective be included in the Village Plan as follows:
- To promote Pollagh-Lemanaghan as a canal-side village / stop-off destination for boats travelling on the Grand Canal and to support uses, infrastructure and development that achieve this objective, while having regard to Policies TRP-02 and TRP-18 under Chapter 6 'Tourism and Recreation'.
- e) It is recommended that the following new objective be included in the Village Plan:
- To promote tourism initiatives in the village including the potential of the River Brosna and Grand Canal for watersports, while having regard to Policies TRP-02 and TRP-18 under Chapter 6 'Tourism and Recreation'.
- f) It is recommended that Objective SO5 in the Village Plan be amended as follows:
- SO5 To improve pedestrian facilities in the village including pedestrian links between the Community Shop and Bridge. ~~and between Pollagh and Lemanaghan,~~

And that the following new objective be included:

To investigate the feasibility of providing a footpath between Pollagh and Lemanaghan.

- g) It is recommended that Objective SO7 in the Village Plan be amended as follows:
- SO7 To enhance biodiversity in the village, including the promotion of pollinator projects and pollinator friendly planting schemes in the village.
- h) It is recommended that the following new objective be included in the Village Plan:
- To improve the appearance of Plunkett Bridge.
- i) Flood risk areas in settlement plans, including that for Pollagh/Lemanaghan, are represented by a 'Constrained Land Use' designation. Objective SO2 in the village plan refers to the Constrained Land Use zoning.
- SO2 Constrained Land Use zoning shall be developed in accordance with Section 12.6, Objective LUZO-14 in Volume 1 of this County Development Plan.
- No change to the draft Plan.
- j) It is recommended that the following new objective be included in the Village Plan:
- To improve public amenities in the village, such as a walkway along the River Brosna and the provision of an area of public open space in the village.

3.2.2.8 Shannonbridge

Ref: CDP/D/19

Person / Body:

Shannonbridge Action Group

Summary of submission / observation:

- a) That Specific Objective SO6 under the Shannonbridge Village Plan be modified to include reference to the tourism value which lies within the cultural landscape of the Shannonbridge area.
- b) That the County Development Plan indicate potential future uses for West Offaly Power Station, following possible decommissioning.
- c) That a new Specific Objective to refer to a potential Green Energy Hub be included under the Economic Development and Regeneration Objectives of the Shannonbridge Village Plan.
- d) That additional land be zoned for green / open space within the Shannonbridge Village Plan.

CE Response:

- a) The inclusion of a reference to the cultural landscape in Specific Objective SO6 under the Shannonbridge Village Plan is considered reasonable given the association of Shannonbridge Village and Clonmacnoise with the Shannon River /Callows and SAC, SPA and pNHA designations.

Accordingly, it is advised that the submission in this respect be accepted and Specific Objective SO6 under the Shannonbridge Village Plan be amended as follows:

SO6 To make provision for developments that establish Shannonbridge as a visitor base for Clonmacnoise monastic site, **its cultural landscape**, and as a destination along the proposed Shannon Monastic Greenway and Shannon Blueway as contained in Figure 6.14 of Volume 1 of this County Development Plan and to encourage uses and development that achieve this objective.

- b) The Economic Development chapter (Chapter 5) in Volume 1 of the draft Plan addresses the after use of the power station in Shannonbridge, noting the following Objective:

RDO-08 It is an objective of the Council to consider proposals for the potential re-purposing of both Shannonbridge and Edenderry peat powered electricity generating plants on their closure.

- c) The Climate Action and Energy chapter (Chapter 3) in Volume 1 of the draft Plan recognises the significant potential to develop a Green Energy Hub in County Offaly, which focuses on the higher order aspects of the industry such as research, new technologies, headquarter development, assembly, maintenance and financing, due to its extensive area of peatlands, its long history in power generation and its proactive position in relation to renewable energy developments over the past decade. In this regard, Chapter 3 of the draft Plan includes the following policy:

CAEP-14 It is Council policy to investigate the potential for a Green Energy Hub on peatlands in the county and facilitate it if possible.

The Economic Development chapter (Chapter 5) also makes reference to a Green Energy Hub as an example of a potential after-use for industrial peatland and its associated infrastructure.

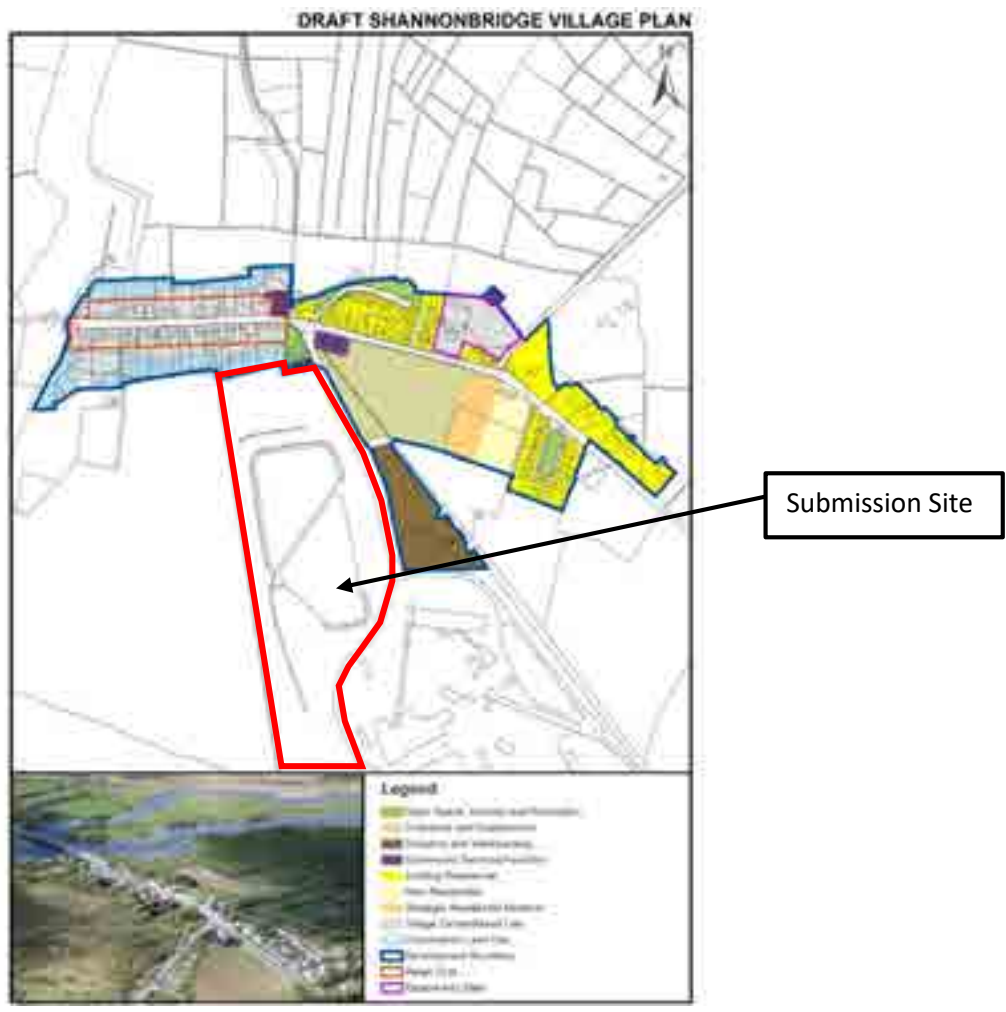
RDO-05 It is an objective of the Council to support the longer-term strategic planning for industrial peatland areas, which should include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure including workshops, office buildings and industrial sites, which addresses environmental, economic and social issues including employment and replacement enterprise reflecting the current transition from employment based around peat extraction. Examples of after use and re-purposing of workshops and production facilities could include outreach training centres, gravel extraction, bike-hire facilities, enterprise space / co-working facilities, aquaculture, herb growing, resource management / recycling centre, climate change mitigation (such as through renewable energy, carbon sink, data centres, battery energy storage, afforestation including native woodland, a Green Energy Hub, flood management), and tourism (such as through peatways, recreational forestry, wilderness, eco-tourism based on biodiversity, and a designation of a National Peatlands Heritage Park).

As such, further investigations will be conducted in due course to establish the most appropriate location for a Green Energy Hub for County Offaly. It is considered that the above policy base contained in the draft Plan is sufficient to underpin this ambition.

Accordingly, it is advised that a separate objective to explore the potential for a Green Energy Hub specifically for Shannonbridge is not necessary.

- d) The submission requests that approximately 12 ha of land south of the village be zoned for green / open space. The land, shown on the map and aerial below, borders the wastewater pumping station

to the northeast, local road to the east and extends south to the West Offaly Power Station main facility. Under the draft Plan, the land is not zoned and not included within the development boundary of the Shannonbridge Village Plan.



There is an existing green space in the village, located west of the church. The space has been recently developed with a new playground and grassed area with seating. It is considered that the new playground development offers a high level of amenity for a village of the size of Shannonbridge, population 175 (Census 2016). However, given the policy framework in the draft Plan seeking to improve the tourism draw for villages on the Shannon, there is scope for further opportunity to develop open space / amenity provision within the village of Shannonbridge, to attract visitors through the village from the marina.

It is noted however that much of the submission lands were used for ash disposal as part of the former Shannonbridge Power Station, which raises some concerns with regards to the suitability of the lands for public amenity and recreation. In addition, the northern end of the submission site is identified as being flood prone, which also may present difficulties with regards to access for public amenity.

Under the Economic Strategy Chapter (Chapter 5) of the draft Plan, the Council notes the closure of ESB's peat fired electricity generating plants at Shannonbridge and Edenderry this decade. In this regard, the Council will encourage appropriate repurposing of the power plants at Shannonbridge and Edenderry. Objectives RDO-05 under Chapter 5 reads as follows:

RDO-08 It is an objective of the Council to consider proposals for the potential re-purposing of both Shannonbridge and Edenderry peat powered electricity generating plants, on their closure.

With the intent of RDO-08, and having regard to flooding issues and the former use of the submissions lands for disposal of ash associated with the former Shannonbridge Power Station, it is considered that zoning the submission site for open space is, at this stage, pre-mature, pending further investigations.

Accordingly, it is recommended that the submission site is not zoned, therefore no change to the Shannonbridge Village zoning map in this regard, however it is recommended that Objectives RDO-08 under Chapter 5 of the draft Plan be amended to read as follows (new text is shown in red):

RDO-08 It is an objective of the Council to consider proposals for the potential re-purposing of both Shannonbridge and Edenderry peat powered electricity generating plants, on their closure, and the appropriate rehabilitation of associated lands.

3.2.2.9 Shinrone

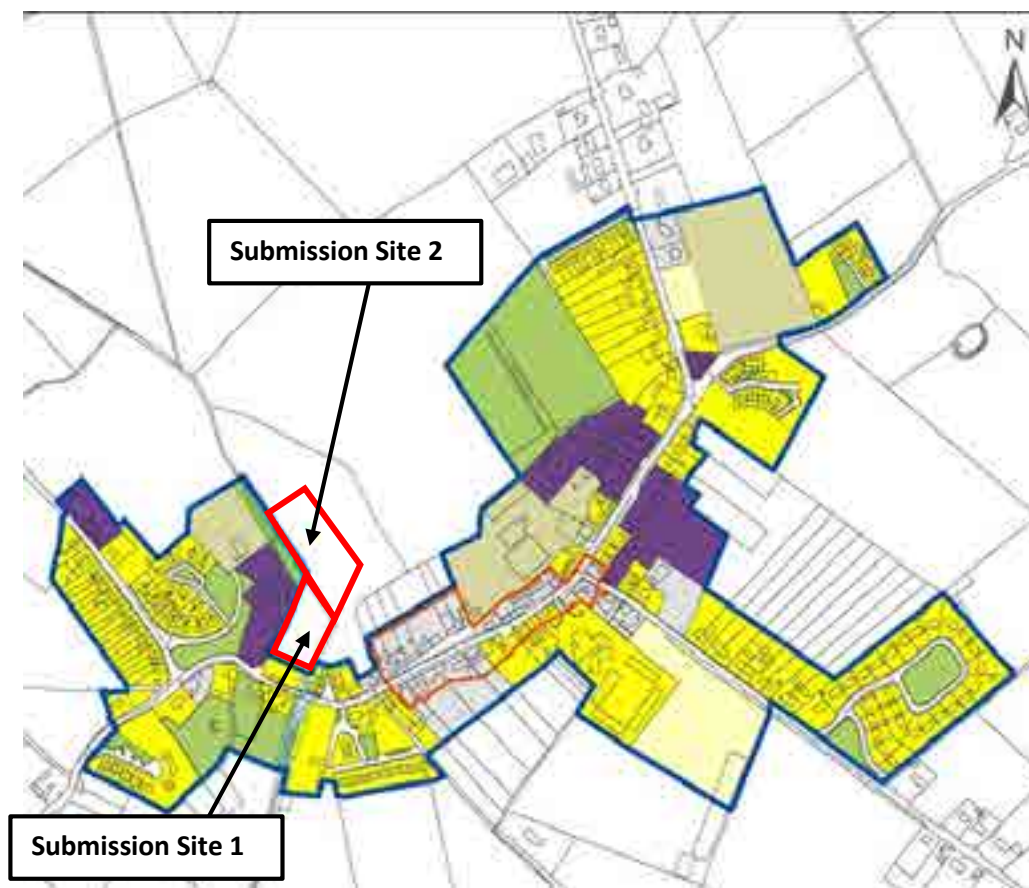
Ref: [CDP/D/110](#)

Person / Body:

Tommy Kennedy

Summary of submission / observation:

- a) That c. 0.5ha of land (identified as Site 1 on the map below), be zoned 'New Residential' in the draft Shinrone Village Plan.
- b) That c. 0.9ha of land (identified as Site 2 on the map below), be zoned 'New Residential' in the draft Shinrone Village Plan.



CE Response:

Under the draft Plan, Sites 1 and 2 are not zoned and located outside the development boundary of the Shinrone Village Plan.

In terms of residential zoning, *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that '*From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'*. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that '*Residential development 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.*'

Compact growth and adherence to the Core Strategy is provided for in Chapter 2 of the draft Plan as follows:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

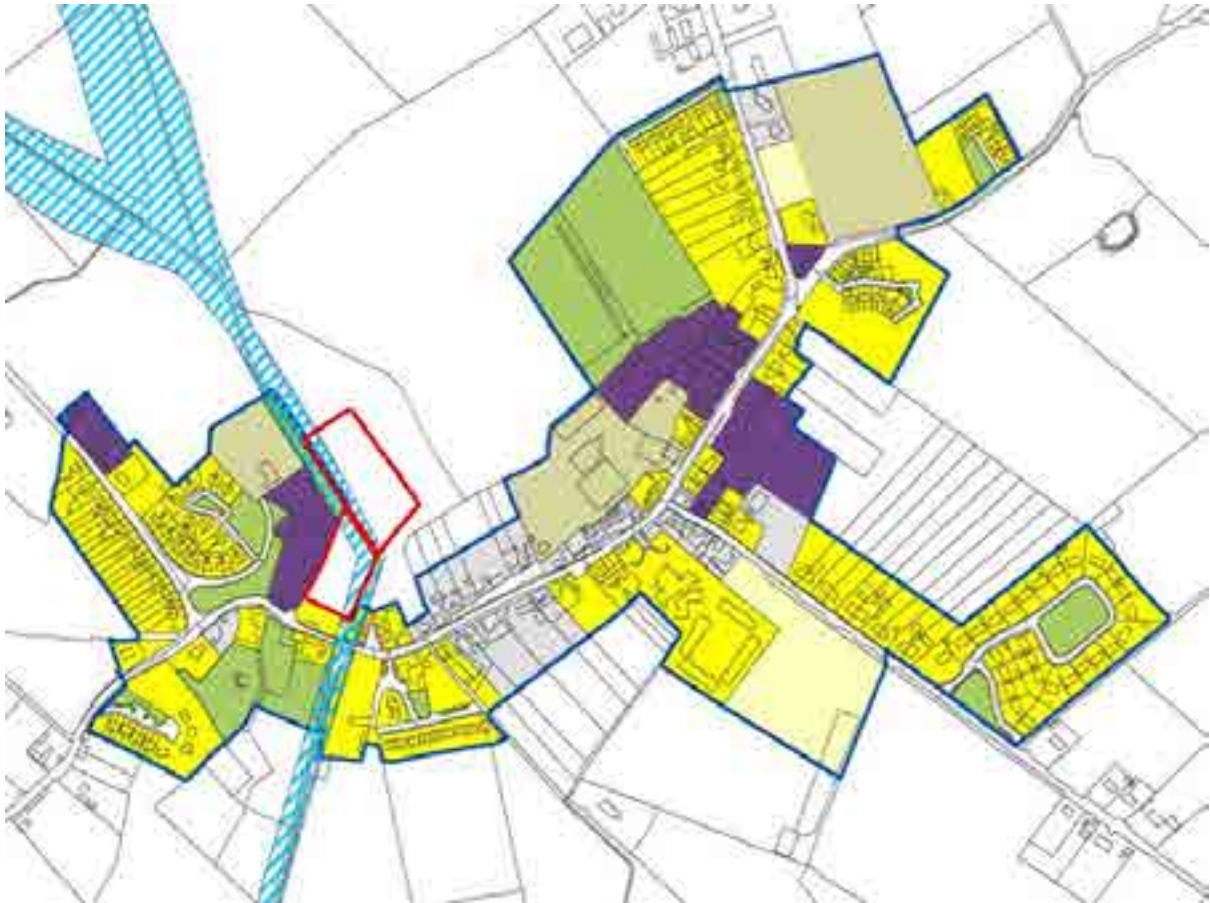
CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations of Local Area Plans if required, to ensure consistency with the provisions of the Core Strategy.

Section 4.19 (f) of the Development Plan Guidelines 2007 relates to the 'Sequential Approach'. It states *'In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided); (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan'*.

The submission site is considered to be peripheral to the village centre. There are other lands identified as being more appropriately located to deliver the Core Strategy housing allocation for the village over the lifetime of the development plan, consistent with NSO 1, RSO 2 and draft Plan CSP-02 and CSO-02.

Furthermore, the amended Core Strategy provides for a total of 26.2ha of land to be zoned 'New Residential' across all the villages in the county, a quantum which has been allocated in full. To zone the submission site (1.4ha) 'New Residential' would have the effect of exceeding the total allocation for villages under the Core Strategy, which would mean that the same quantum of land already designated for 'New Residential' would have to be omitted from Shinrone Village or from another village in the county.

In addition, and by reference to the Strategic Flood Risk Assessment which accompanies the draft Plan, part of both Site 1 and Site 2 are identified as being affected by the 1 in 100-year flood risk (see map draft Plan zoning map extract below with flood zone overlaid), being the flood risk of highest probability in terms of flood events, a designation which generally limits new development. In accordance with *'The Planning System and Flood Risk Management - Guidelines for Planning Authorities'* 2009, highly vulnerable development, which includes housing, is deemed inappropriate in areas where flood risk is of the highest probability.



Accordingly, it is advised that both sites remain not zoned and outside the development boundary of Shirrone Village, in accordance with the draft Plan.

3.2.2.10 Walsh Island

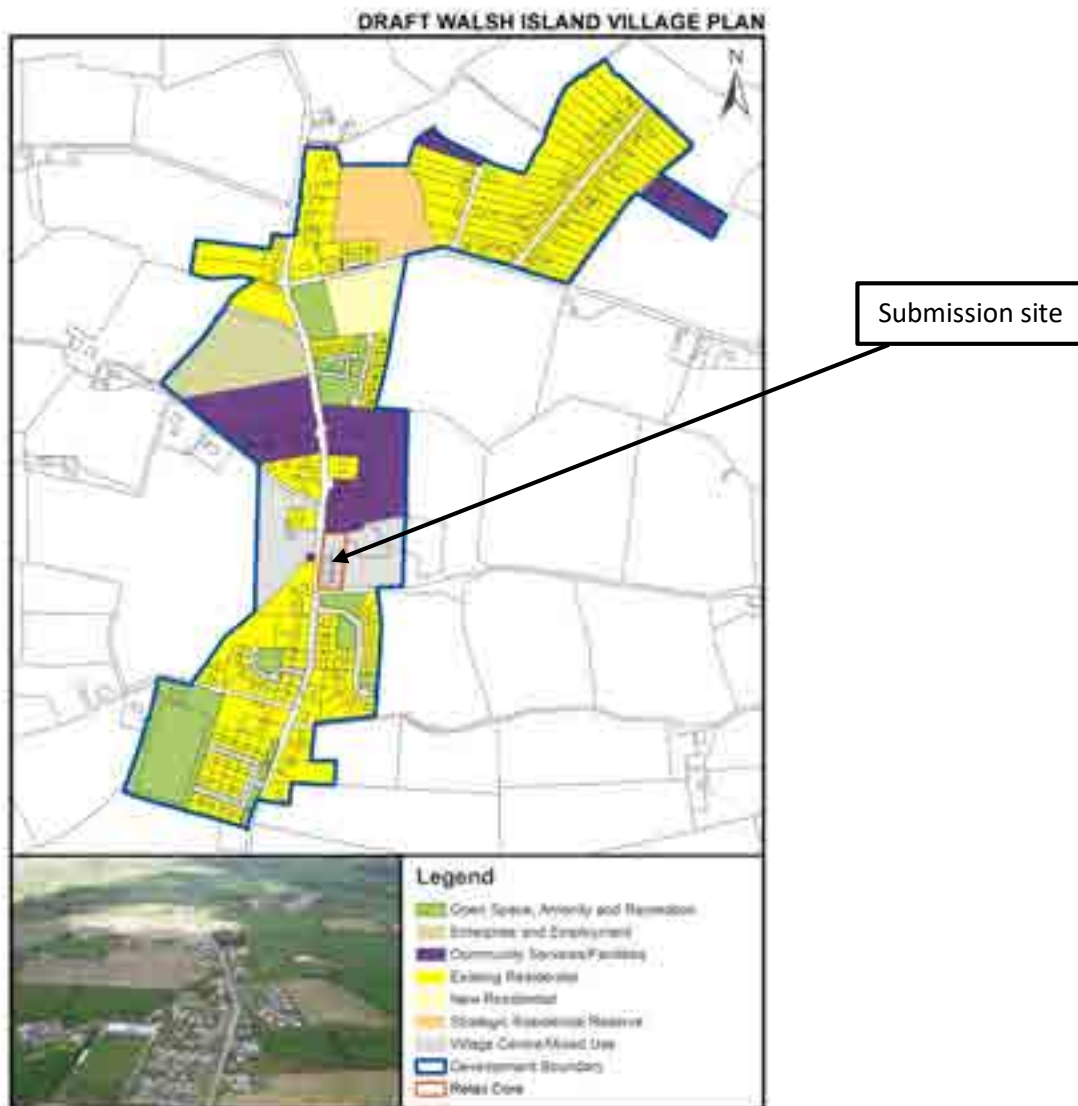
Ref: [CDP/D/01](#)

Person / Body:

Paul Flint

Summary of submission / observation:

That land (0.4ha), which currently comprises a public house, called The Hoppers, an attached shop, currently vacant, and also a detached dormer style dwelling, in the village of Walsh Island, be zoned to allow residential development.



CE Response:

Under the draft Walsh Island Village Plan, the submission site is zoned 'Village Centre / Mixed Use'. In accordance with the Land Use Zoning Matrix contained in Chapter 12 of the draft Plan, 'Residential – Multiple (two or more units)' is a use which is 'Permitted in Principle' on land zoned 'Village Centre / Mixed Use'.

A use which is 'Permitted in Principle' is generally acceptable subject to the normal planning process, compliance with the relevant policies and objectives, standards and requirements as set out in the County Development Plan, and in accordance with the proper planning and sustainable development of the area. The draft Walsh Island Village Plan also identifies this site as being the 'Core Retail Area' for the village. Under the draft Plan, the core retail area of each settlement has been delineated to identify clearly that part of a town / village centre which is primarily devoted to shopping as distinct from the wider town or village centre / mixed use zoning objective. Reference in this regard is made to Policy RTCP-06 under Chapter 7 of the draft Plan, which reads as follows:

RTCP-06 - It is Council policy to encourage retail development, including new forms of shopping which relates to the regeneration of existing town and village centres. Proposals, which would

undermine the vitality and viability of retail core areas or town centres, as a whole shall not be permitted.

Accordingly, it is advised to retain the zoning on the site in accordance with the draft Plan.

3.2.3 Sráids

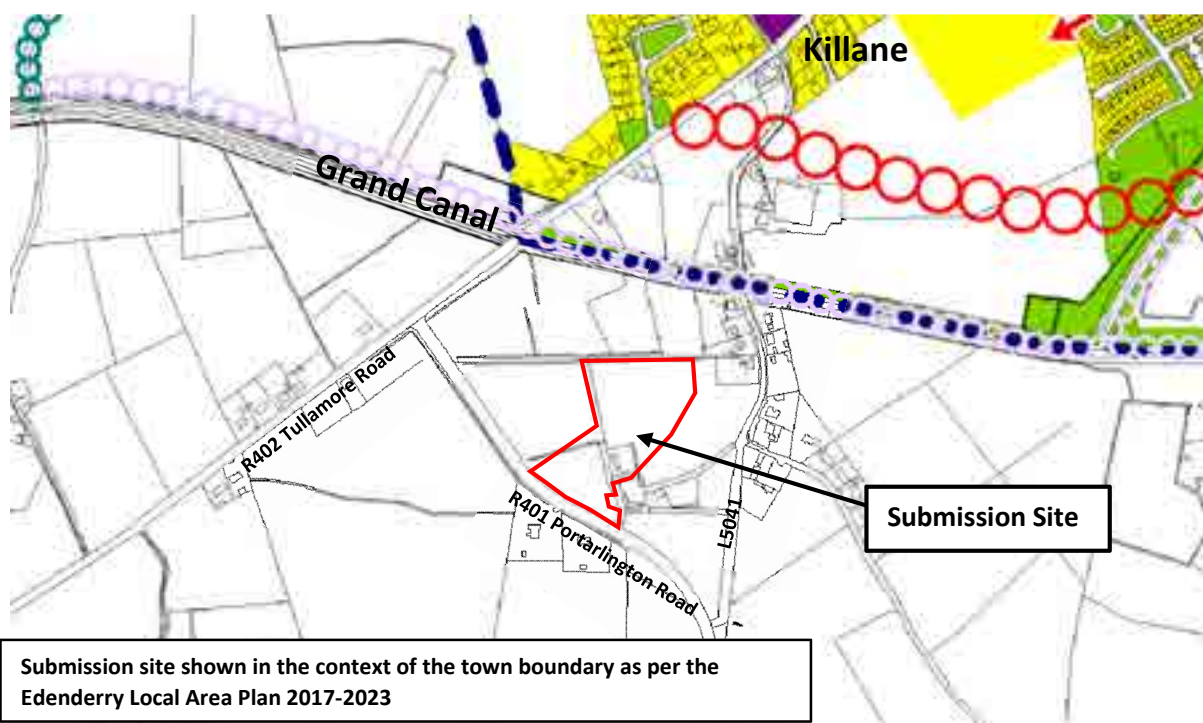
Ref: [CDP/D/148](#)

Person / Body:

Laurence & Karen Feeney

Summary of submission / observation:

That a new Sráid be designated on c. 2.8ha site in the rural townland of Drumcooley, Edenderry, allowing for the development of 10 to 12 houses each on a c. 0.2ha site.



CE Response:

The submission site has an area of approx. 2.8ha with frontage to the R401 Edenderry to Portarlinton Road. The site comprises open fields and outbuildings associated with the larger landholding of Drumcooley House.

The submission requests that the site be designated a 'Sráid' in the draft Plan, a settlement type which falls within the 'Rural' settlement typology in the County Settlement Hierarchy.

Sráids, which comprise unzoned land, are very small, sometimes embryonic rural settlements with a very small amount of development to date. Generally, a Sráid will have a loose gathering of existing development (primarily housing) and some public services i.e. a church, school, shop etc. The concept of Sráids evolved during the preparation of the County Development Plan 2003-2009 as a measure to be implemented in order to act as an alternative to piecemeal development activity; to provide alternatives to the sporadic provision of “one-off” houses in the countryside; and also to address rural de-population and decline in certain areas, in particular within the identified traditional rural settlement network.

The draft Plan includes a policy framework for Sráids, including:

SSP-17 It is Council policy to encourage the sustainable, balanced development of the Sráids in an incremental manner, with the emphasis on small scale development over a medium to long-term period, in keeping with the character of the settlement.

SSP-18 It is Council policy that where a multi-unit residential development (2 to 4 houses) is proposed within the boundary of a Sráid, the onus will be on the developer to justify the demand for housing proposed.

SSP-19 It is Council policy that any development shall be centred on the focal point of the settlement assisting in creating a ‘centre’ with a greater sense of place, and shall be subject to the satisfactory provision of infrastructure and services.

SSP-20 It is Council policy to facilitate the provision of appropriately scaled commercial development within Sráids. This may include limited new mixed-use development, including employment generating development, childcare and other appropriate commercial development.

The draft Plan includes two new Sráids, namely Kilclonfert and Ballycommon. Kilclonfert Sráid comprises a traditional crossroads settlement with a church, graveyard, GAA grounds, community centre and a cluster of single dwellings.

Ballycommon Sráid comprises a settlement around the Grand Canal bridge, with licenced premises / coffee shop, self-catering accommodation, GAA grounds, a number of single dwellings. Ballycommon Sráid is also centred on access to the Grand Canal Greenway, with potential to cater for trailhead facilities, with its tourism potential identified in the Waterways Corridor Study 2002.

These two new Sráids have both evolved organically over time, with each having a sense of identity and purpose with an identifiable focal point.

This submission proposed a new Sráid, to comprise 10 to 12 new house sites on unserviced rural land. The submission refers to the proximity of the site to Edenderry town, stating that many services and amenities are within walking distance. It is important to clarify that the site is located on the R401 Portarlinton Road, in the rural area and outside the development boundary of Edenderry Town. There is no footpath connection to Edenderry Town.

The indicative site layout plan produced as part of the submission shows a low-density housing development requiring the construction of new internal roads, footpaths and streetlighting.

The submission states that the creation of a new Sráid at this location would assist in controlling rural housing in the area. Rural housing is controlled via the rural housing policy set out under Chapter 2 of the draft Plan. The creation of a Sráid at this location would have the effect of bypassing the rural

housing policy, for the reason that demonstrating a rural housing need (Policy SSP-21, Chapter 2, draft Plan) is not required for a house on land within the development boundary of a Sráid.

National Strategic Outcome 1 (NSO 1) of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'

Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development 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.'

Guiding new residential development to sites within the existing built-up footprint of the settlement is a measure that meets a number of the other National Strategic Outcomes which underpin the NPF, including NSO4 (Sustainable Mobility), NSO9 (Sustainable Management of Water, Waste and other Environmental Resources), and NSO8 (Transition to a Low Carbon and Climate Resilient Society).

The submission proposal, for all intents and purposes, constitutes a low-density, car-dependant housing estate on un-serviced land in the rural area.

No change to the draft Plan.

3.2.3.1 Blueball

[Ref: CDP/D/17](#)

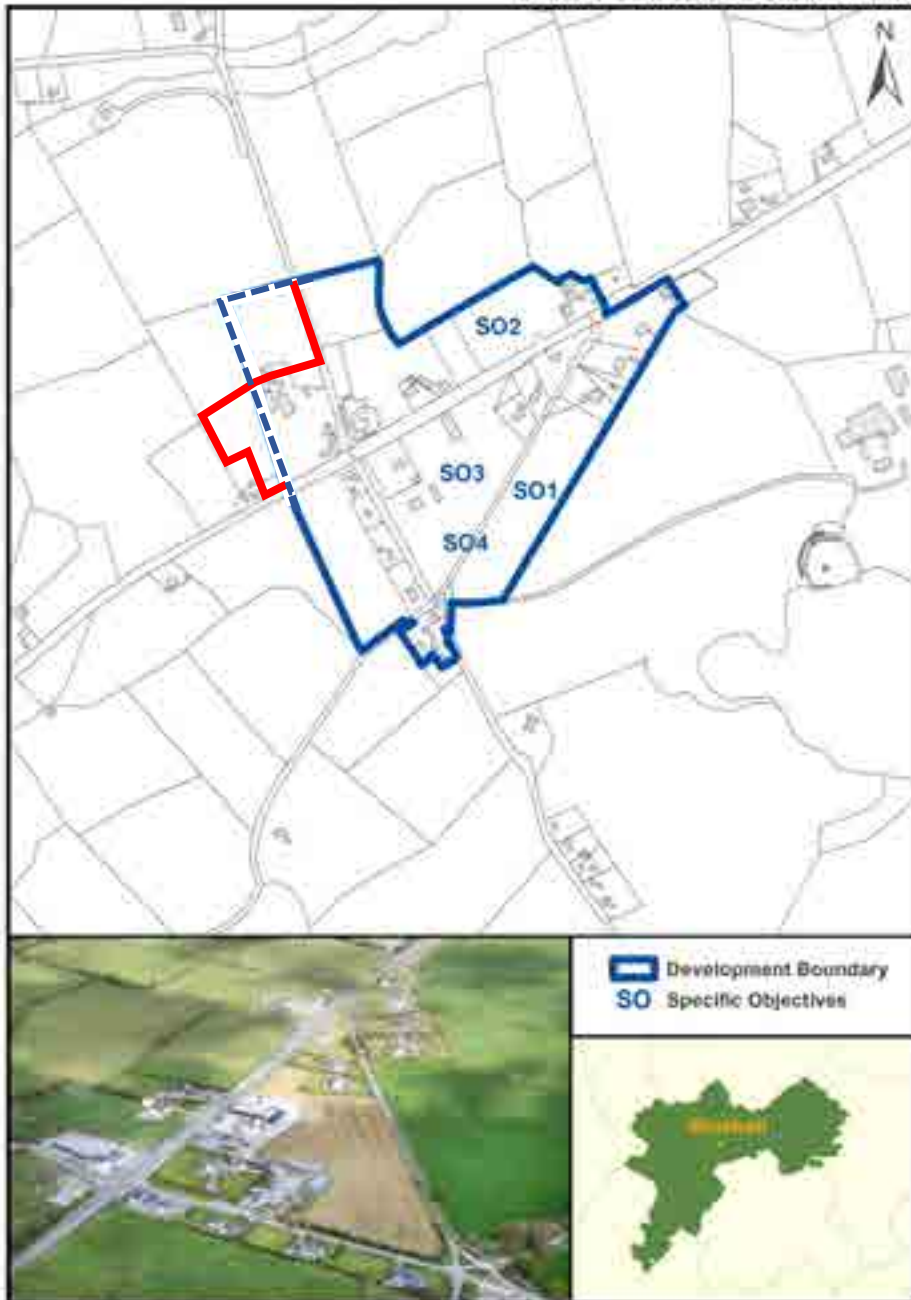
Person / Body:

Joe Lawless

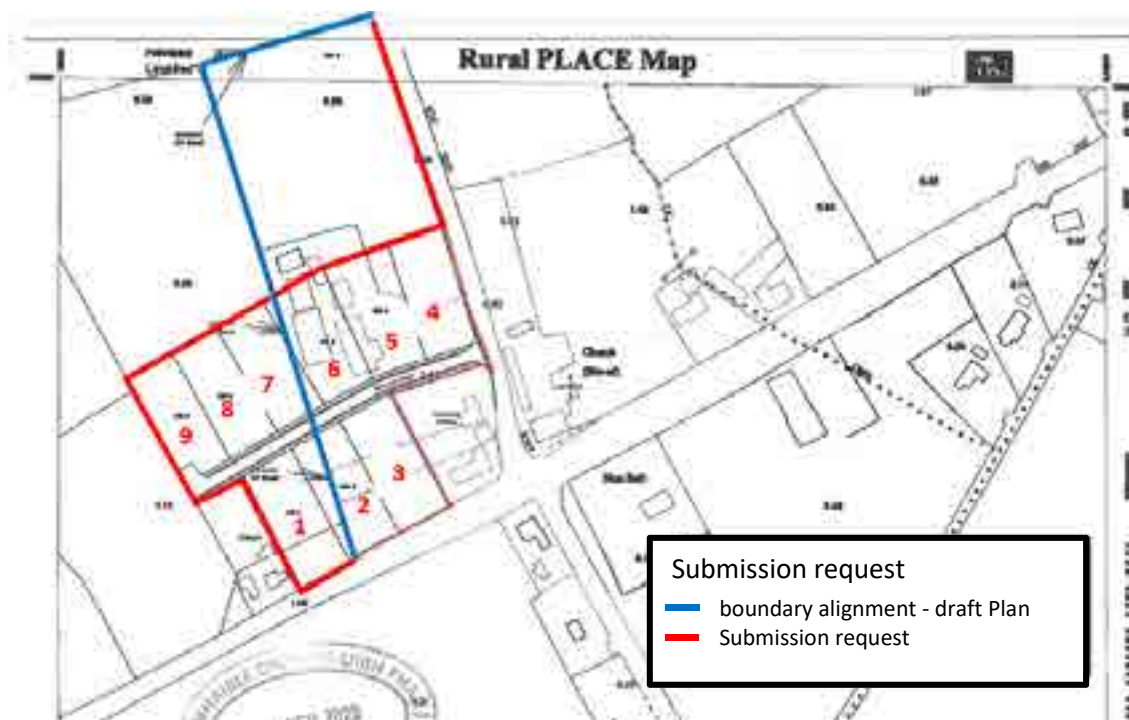
Summary of submission / observation:

That the development boundary of Blueball Sráid be extended to include additional land to the northwest.

DRAFT BLUEBALL SRAID PLAN



Submission request
- - - boundary alignment - draft Plan
- - - Submission request



CE Response:

The submission requests that the development boundary of the Sráid is realigned as shown in the maps above. The realignment would result in the Sráid having less frontage to the R357 heading north from the N52 and more back-land being included within the Sráid boundary. The rationale for the submission is that the landowner could build an internal roadway from the R357 and create a total of 9 no. house sites, an indicative layout of which is indicated on the map above.

In relation to Sráids, Policy SSP-17 contained in Chapter 2 of the draft Plan reads as follows:

‘SSP-17 It is Council policy to encourage the sustainable, balanced development of the Sráids in an incremental manner, with the emphasis on small scale development over a medium to long-term period, in keeping with the character of the settlement’.

The submission request would create a situation in which a complex of 6 no. buildings associated with a former piggery at the front / eastern end of the site would need to be demolished before houses could be constructed in an orderly fashion from the front of the site to the back. There is a risk that the agricultural buildings would not be demolished and / or sites to the rear of the landholding would be sold and houses constructed, creating a haphazard settlement form, not in keeping with the character of the settlement.

Referring to the map in the draft Blueball Sráid Plan and marked-up maps above, the current Sráid development boundary as per the draft Plan would allow the landowner, subject to planning permission, consider creating access off the R357 for a cluster of up to 4 no. house sites within the Sráid boundary, as envisaged by Policy SSP-15 (Chapter 2) of the draft Plan, having regard to indicative layouts provided in the Sample Sráids under the Sráid Plan Guide in Volume 2 of the draft Plan.

‘SSP-15 It is Council policy to support housing taking place within Sráids to act as a viable alternative to one-off housing in the open countryside but with limited scope for small-scale multi-house developments of up to 4 houses only.’

It is considered that the development boundary of Blueball Sráid, as per the draft Plan, is sufficient to allow for a rate of organic growth and development form that is consistent with draft Plan policy SSP-15 and SSP-17 of the draft Plan.

Accordingly, it is advised to retain the development boundary of Blueball Sráid in accordance with the draft Plan.

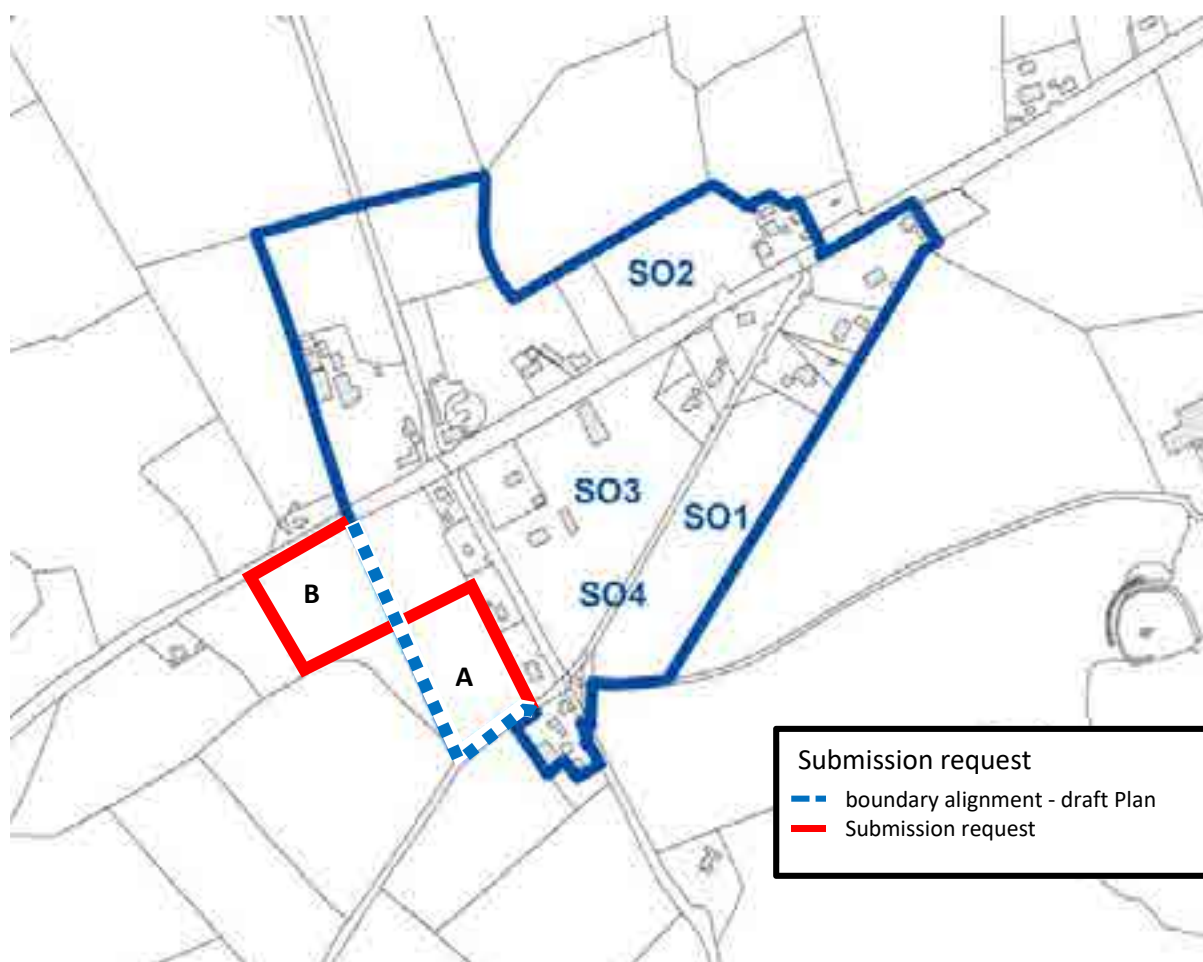
Ref: [CDP/D/137](#)

Person / Body:

Barry Gorman

Summary of submission / observation:

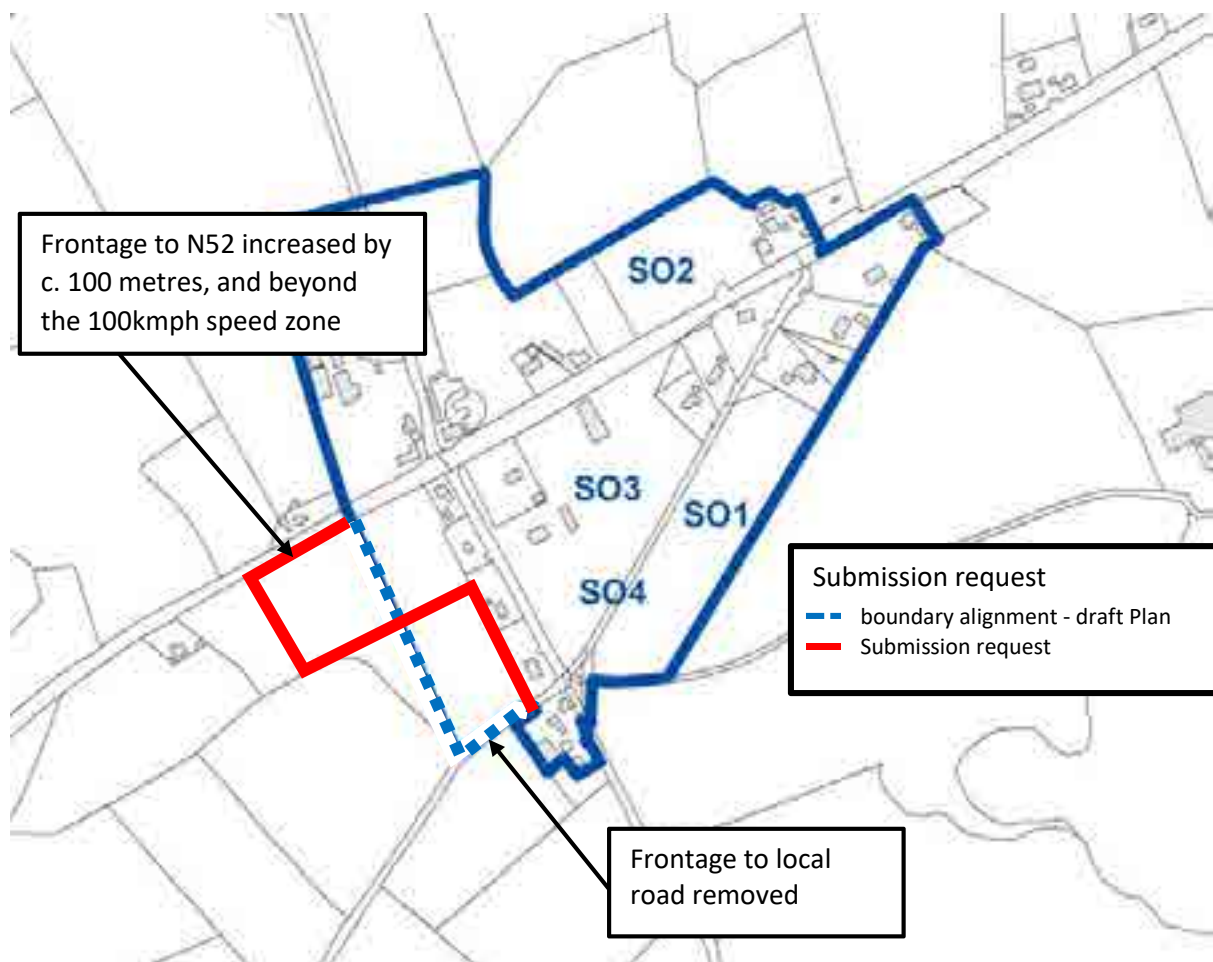
That the of the Blueball Sráid development boundary on the western end, south of the N52, be realigned.



CE Response:

The submission seeks the realignment of the development boundary in the south western end of the Sráid, on land southwest of the junction between the N52 and L2012. The realignment would result

in no change to the actual size of the Sráid in terms of land area, however it would result in the Sráid having an additional 100 metres approximate frontage to the N52 National Secondary Road, and removing all frontage to the local road to the south. See map below.



Chapter 2 of the draft Plan includes the following policy for Sráids:

SSP-17 It is Council policy to encourage the sustainable, balanced development of the Sráids in an incremental manner, with the emphasis on small scale development over a medium to long-term period, in keeping with the character of the settlement.

SSP-19 It is Council policy that any development shall be centred on the focal point of the settlement assisting in creating a 'centre' with a greater sense of place, and shall be subject to the satisfactory provision of infrastructure and services.

The policy approach for Sráids is the promotion of balanced sustainable development, in an incremental and consolidated manner with the emphasis on small scale development over a medium to long term period, in keeping with the character of the settlement.

It is considered that the development boundary of the Blueball Sráid as per the draft Plan allows for a rate of organic growth consistent with draft Plan policy SSP-17, and in a consolidated form consistent with draft Plan policy SSP-19.

In terms of the N52, National Secondary Road, under Chapter 8 ‘Sustainable Transport Strategy’ of the draft Plan Section 8.6.1 reads as follows:

To ensure that past and future public investment in road improvements is not diminished in whole or in part and to ensure the safety and free flow of traffic, future development requiring direct access onto National Secondary routes will be restricted and assessed against the provisions of ~~Table 4.2 of~~ the Spatial Planning and National Roads - Guidance for Planning Authorities issued by the DoECLG in January 2012.

Policy as contained in Chapter 8 ‘Sustainable Transport Strategy’:

SMAP-20 It is Council policy to maintain and protect the safety, strategic transport function, capacity and efficiency of national roads, **motorways** and associated junctions **and in accordance with Strategic Planning and National Roads Guidelines 2012 or any subsequent edition.**

The proposed realignment would create a situation in which the only access available to the land would be via the N52, contrary to Policy SMAP-20 of the draft Plan, whereas the current Sráid alignment has road frontage for this land to the local road further south.

The boundary realignment proposal is considered to be contrary to draft Plan policy SSP-17 and SSP-19, and while it is not an urban area, per se, the proposal is contrary to the spirit of *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) which seeks ‘Compact Growth’ across cities, towns and villages, achieving consolidation rather than sprawl.

Accordingly, it is advised to retain the development boundary of Blueball Sráid in accordance with the draft Plan.

3.2.3.2 Cadamstown

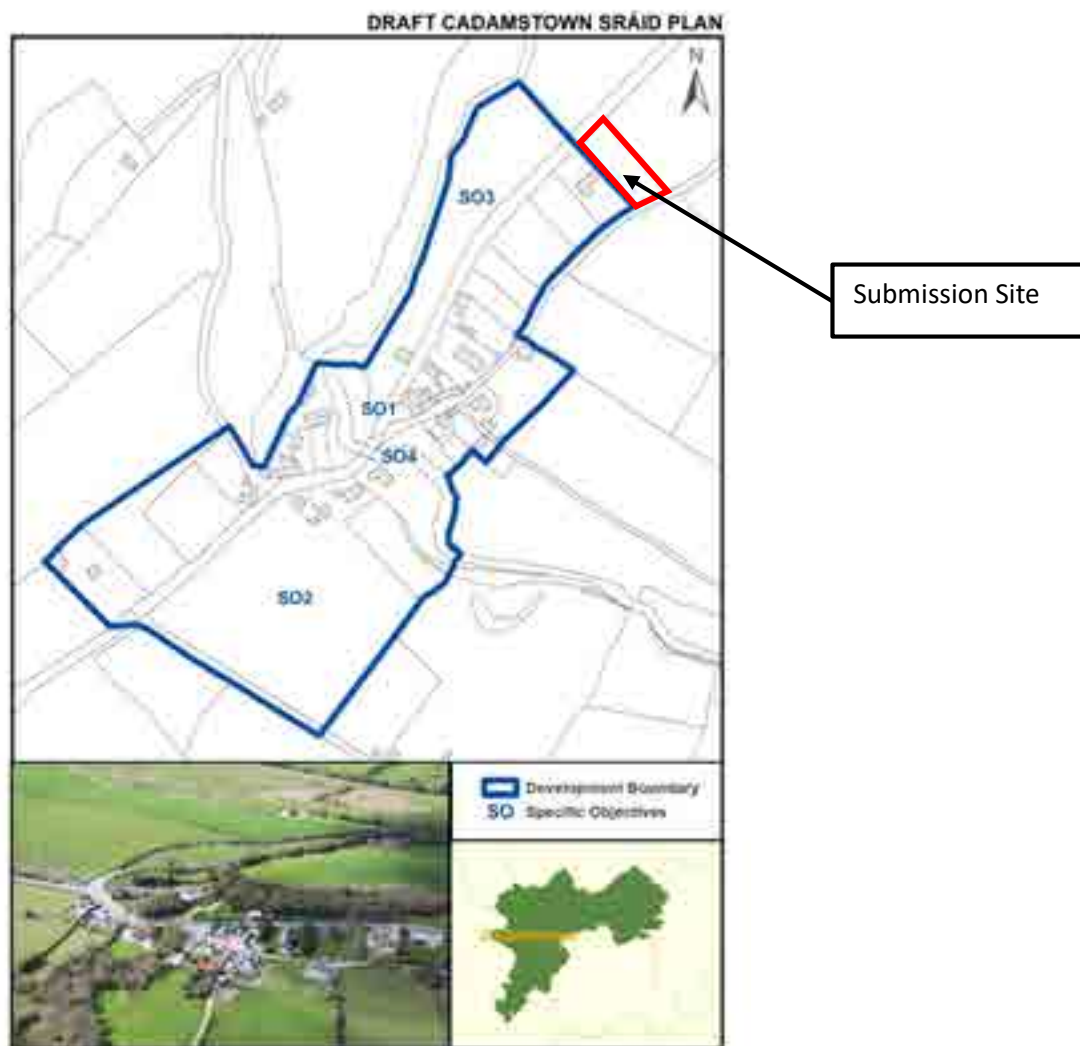
Ref: CDP/D/77

Person / Body:

Sean Nolan

Summary of submission / observation:

That the development boundary of the Cadamstown Sráid plan be extended on the northern end to include a 0.22ha undeveloped site.



CE Response:

The submission site is located on the east side of the R421, north of Cadamstown. Referring to the Cadamstown Sráid Plan in the draft Plan, the submission site is located immediately outside the northern boundary of the Sráid.

Planning permission (Pl. Ref. 08/135) was granted for a house on the site on the 26/05/2008. The house was not built and the permission expired on the 25/05/2013. It is further noted that the permission was subsequent to an outline permission (Pl. Ref. 05/771), granted on the 18/10/2005. That outline permission was for 3 no. dwellings on 3 no. separate sites side-by-side fronting the R421. At the time of the grant of permission, Sráids were not yet introduced to the county development plan, and were subsequently adopted into the 2003-2009 county development plan by way of a variation in 2006. Under the variation to the 2003-2009 county development plan, the submission site was located outside the Cadamstown Sráid boundary, as per all subsequent county development plans and as per the draft 2021-2027 Plan.

The submission requests that the submission site be included within the Sráid boundary.

Chapter 2 of the draft Plan includes the following policy for Sráids:

SSP-17 It is Council policy to encourage the sustainable, balanced development of the Sráids in an incremental manner, with the emphasis on small scale development over a medium to long-term period, in keeping with the character of the settlement.

SSP-19 It is Council policy that any development shall be centred on the focal point of the settlement assisting in creating a 'centre' with a greater sense of place, and shall be subject to the satisfactory provision of infrastructure and services.

The policy approach for Sráids is the promotion of balanced sustainable development, in an incremental and consolidated manner with the emphasis on small scale development over a medium to long term period, in keeping with the character of the settlement.

It is considered that the development boundary of the Cadamstown Sráid as per the draft Plan allows for a rate of organic growth consistent with draft Plan policy SSP-17, and in a consolidated form consistent with draft Plan policy SSP-19. The proposal for an arbitrary extension of the boundary of the Sráid Plan to accommodate 1 no. site is considered to be contrary to draft Plan policy SSP-17 and SSP-19, and while it is not an urban area, per se, the proposal is contrary to the spirit of *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) which seeks 'Compact Growth' across cities, towns and villages, achieving consolidation rather than sprawl.

Accordingly, it is advised to retain the development boundary of Cadamstown Sráid in accordance with the draft Plan.

3.2.3.3 Killina

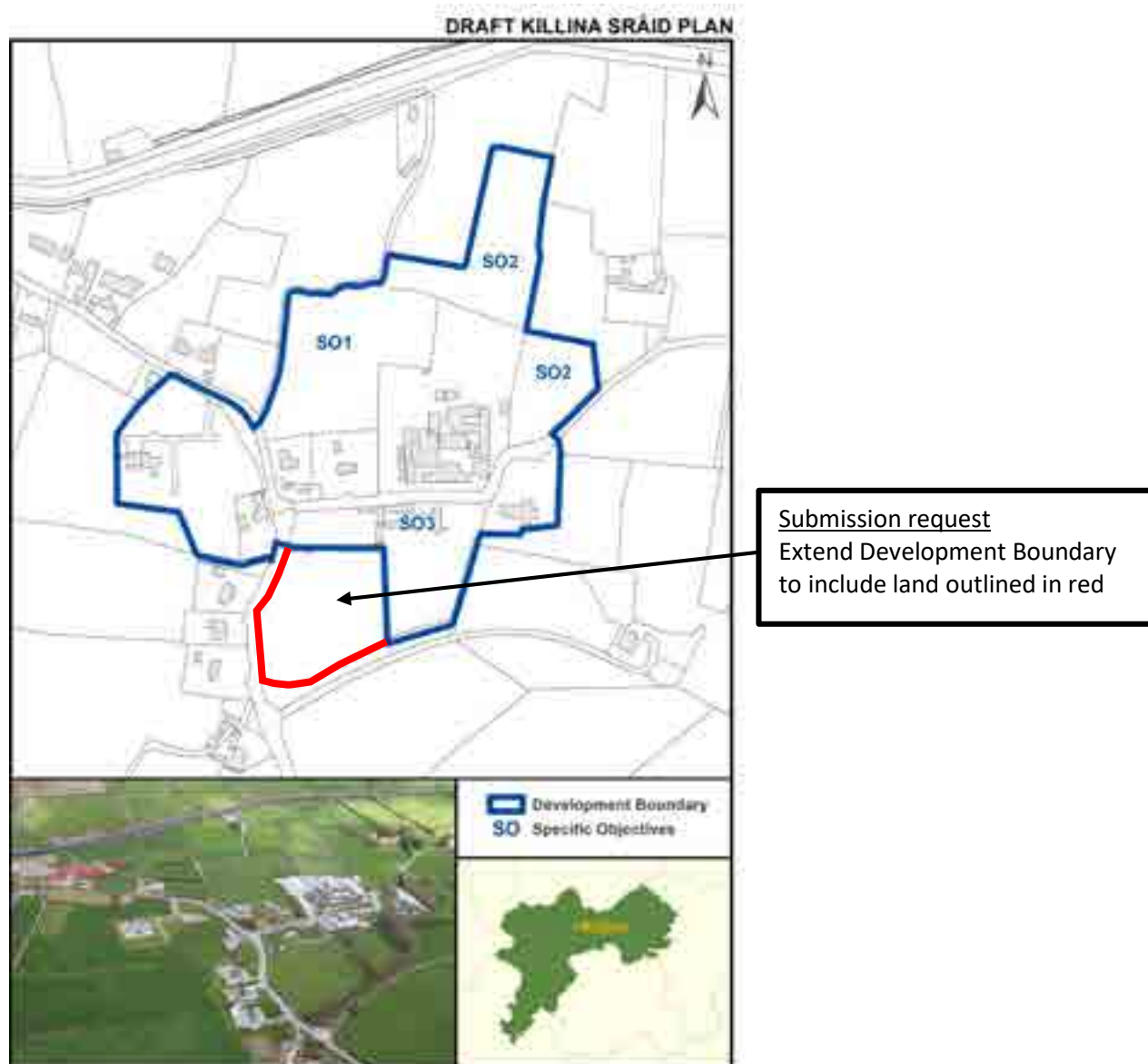
[Ref: CDP/D/62](#)

Person / Body:

Killina Presentation Resource Centre

Summary of submission / observation:

- a) That Specific Objective SO3 be amended to support the establishment of the Killina Presentation Resource Centre in the former Convent building, and include reference to the variety of potential uses of the property.
- b) That General Objective GO5, which supports a link between the Grand Canal Greenway and Secondary School, be amended to also include reference to the Killina Presentation Resource Centre.
- c) That the development boundary on the Killina Sráid Plan be extended to the south east to include additional land associated with the former Convent site; with Specific Objective SO3 be extended to this area. The additional area of land is indicated on the draft Killina Sráid Plan below.



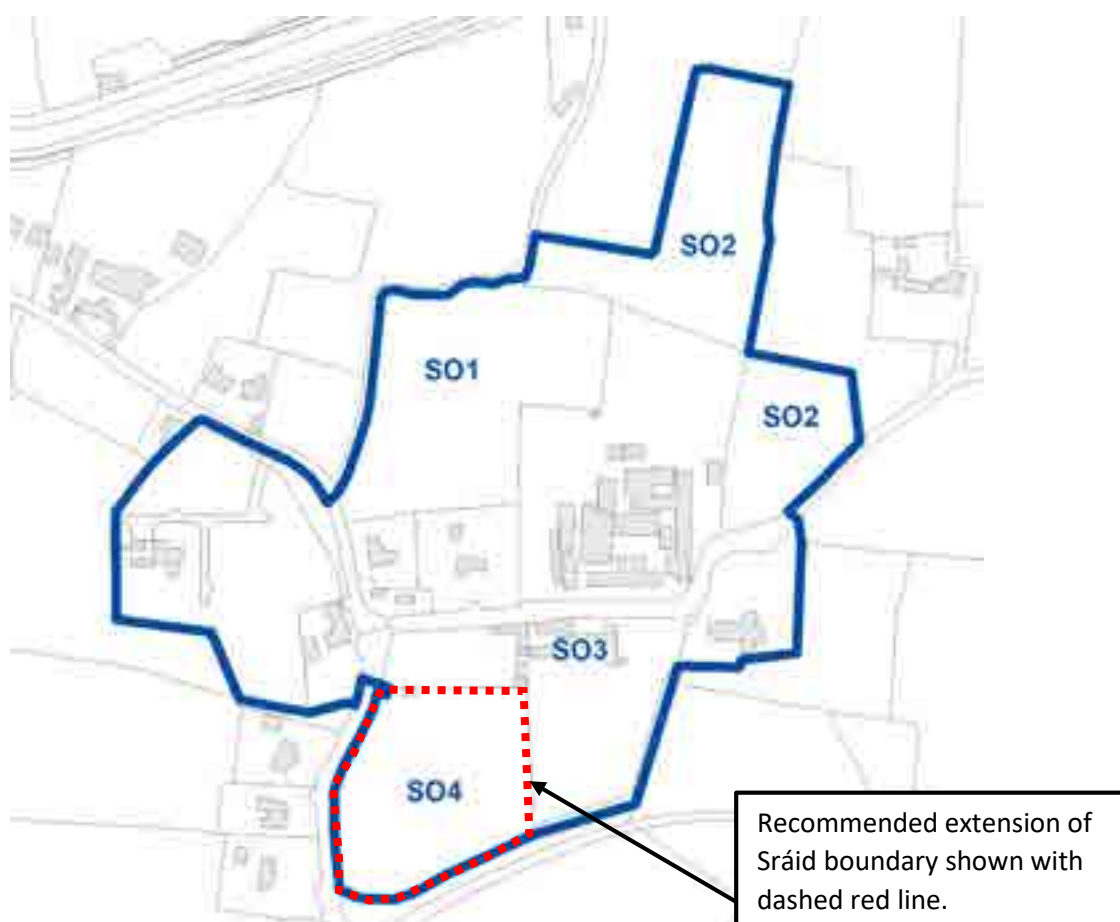
CE Response:

- a) It is recommended that Specific Objective SO3 under the draft Killina Sráid Plan be amended as follows (additional text in red):
 - SO3 Support and encourage the re-purposing and adaptation of the Convent and associated buildings for uses which seek to enhance and strengthen the function of the Sráid; such uses include community services, training and education, pastoral care, tourism, community, cultural, leisure and co-working activities.
- b) It is recommended that General Objective GO5 under the draft Killina Sráid Plan be amended as follows (additional text in red):
 - GO5 Support the provision of a pedestrian / cycleway connection between the Grand Canal Greenway and the Sráid, with particular emphasis on the Secondary School and former Convent site, and support the provision of public facilities and amenities, including cycle parking and picnic facilities within the Sráid.

- c) The Convent buildings and its attendant grounds to the south (open field) and west (walled garden/orchard) are included within the development boundary of the draft Killina Sráid Plan. The area of land subject to this part of the submission is located immediately south of the walled garden/orchard and is enclosed from the roadside by a high stone wall, indicating its historic association with the Convent (a Protected Structure, RPS Ref. 22-11). Given its location within the natural footprint of the Sráid, along with its walled boundary, it is reasonable to include the land within the Sráid plan boundary. It is also considered reasonable to reserve this land for amenity space in accordance with a new Specific Objective, (shown as SO4 on the map below), to read as follows:

Reserve this area for uses relating to public amenity and recreation, which seek to enhance and strengthen the function of the Sráid

Accordingly, it is recommended that the development boundary of the Killina Sráid Plan be extended in accordance with the amended map in Volume 2, extract shown below. It is also recommended that a new Specific Objective, (shown as SO4), be included on the map.



3.2.3.4 Rahan

Ref: CDP/D/28

Person / Body:

Diarmuid Mollin

Summary of submission / observation:

- a) That the Rahan Sráid Plan include an objective to promote the tourism potential of the Rahan Monastic Site.
- b) That the Rahan Sráid Plan include an objective to support pedestrian/cycle linkages between the schools in the locality, via the Grand Canal Greenway.

CE Response:

- a) Chapter 6, Section 6.5.1 of the draft Plan recognises that County Offaly has a rich Early Christian monastic past and the evidence of this occurs on a network of sites across the county. The tourism potential of monastic sites in Offaly is supported through the following policies in the draft Plan:

TRP-13 It is Council policy to promote the monastic sites of County Offaly as tourist attractions in conjunction with Fáilte Ireland, the OPW and relevant stakeholders, in particular Durrow Abbey and Monastic Site and Clonmacnoise Monastic Site with a view to developing proposals to enhance their visitor experience through the provision of signage, improved access in the case of Durrow Monastic Site, and associated infrastructure as appropriate and as resources allow.

TRP-30 It is Council policy to promote and facilitate the role of arts, heritage and culture in recognition of its importance to people's identity and the potential for economic development through a unique cultural tourism offering, including the development of themed trails to showcase Offaly's rich monastic heritage, culture and food offering.

Rahan Monastic Site is located on the south side of the Clodiagh River, and south east of the Rahan Sráid boundary in the draft Plan. Access to the monastic site is from a local road which also connects the Sráid with the Grand Canal approximately 500 metres to the south. Rahan is located on the Grand Canal Greenway and Monastic Sites Greenway, which is part of the Midland Cycling Destination - Offaly Network. Reference is made to Rahan monastic site in section 5.5.1 'Monastic Heritage' in the draft Plan and in Chapter 10 Built Heritage at Figure 10.5, Table 10.1 and section 10.10.4.

It is considered reasonable to include Rahan Monastic Site within the boundary of the Sráid plan and to include further reference to the monastic site in the objectives, supporting tourism related infrastructure, consistent with draft Plan policy TRP-13 and TRP-30.

- b) Rahan National School is located within the Rahan Sráid boundary. The submission also refers to the local secondary school, Killina Presentation Secondary School, which is located within the Killina Sráid, approximately 2km to the east.

With both schools located so close to the Grand Canal Greenway, it is reasonable to encourage walking and cycling as a sustainable means of transport to and from school in line with the Government's Green Schools Initiative, and consistent with draft Plan policy SMAP-08.

SMAP-08 It is Council policy to prioritise the need for people to be physically active in their daily lives; to improve permeability and to promote walking and cycling in the design of streets and public spaces as an alternative and sustainable mode of transport; and to support safer walking and cycling routes to schools under the Green Schools Initiative subject to appropriate environmental assessments, including Habitats Directive Assessment.

As such, it is recommended that General Objective GO2 be amended to strengthen the support for pedestrian and cycle links between the Sráid and the Grand Canal Greenway. A similar approach has been taken for the Killina Sráid Plan.

Accordingly, in respect of parts 1 and 2 of the submission, it is recommended that the Rahan Sráid Plan be amended as follows:

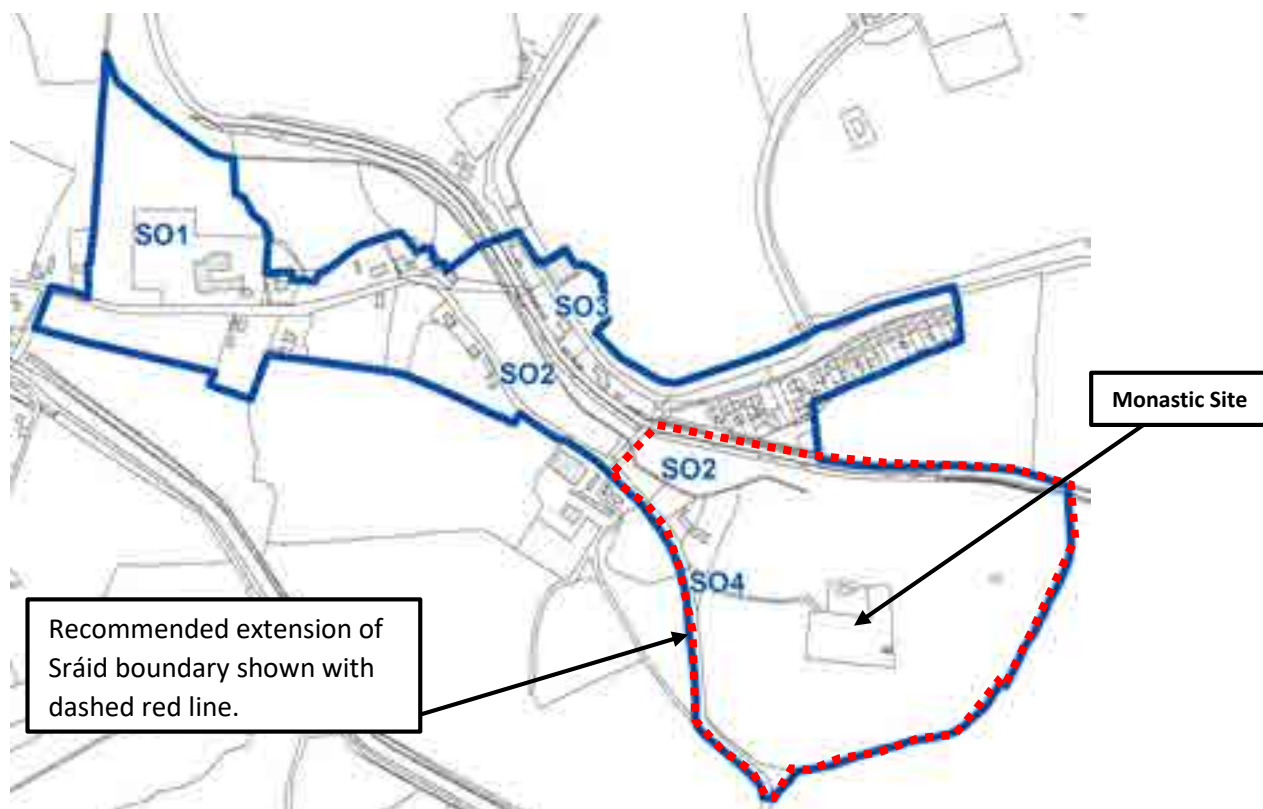
- General Objective GO2 be amended as follows (changes in red):

GO2 To improve pedestrian **and cycle** facilities including links to the GAA grounds, community hall, national school, **Rahan Monastic Site** and Grand Canal Greenway.

- A new Specific Objective (shown as SO4 on the map be included), with wording set out below.

Provision of public facilities and amenities, including cycle parking and picnic facilities, to promote the Sráid / Monastic Site as a point of interest on the Grand Canal Greenway / Shannon Monastic Greenway; and consult with the Office of Public Works to investigate the potential for tourism opportunities at the Monastic Site.

- As shown in the map extract below, extend the development boundary of the Sráid Plan to include the Rahan Monastic Site; show Specific Objective SO4 on the Sráid Plan map and show an additional Specific Objective SO2 (amenity use) on land between the bridge and the monastic site.



[Ref: CDP/D/61](#)

Person / Body:

John Mollin

Summary of submission / observation:

That the designation of Rahan as a Village under the existing county settlement hierarchy be retained.

CE Response:

For the purpose of the county development plan settlement hierarchy, the distinction made between Villages and Sráids is that Villages are serviced by mains wastewater treatment, whereas Sráids are not. Without mains wastewater treatment, a settlement is dependent on individual on-site effluent treatment systems and therefore cannot develop at a sustainable rate. Rahan has no mains wastewater treatment plant. College View housing estate is served by a shared septic tank system and the remainder of the properties in the Sráid have individual effluent treatment systems.

The policy approach for Sráids is the promotion of balanced sustainable development, in an incremental and consolidated manner with the emphasis on small scale development over a medium to long term period, in keeping with the character of the settlement. The Rahan Sráid Plan includes a variety of objectives to support local facilities and amenities, including the development of facilities to improve tourism potential (see also response to Submissions Ref. CDP/D/28).

It is recommended that Rahan is designated as a Sráid under the county settlement hierarchy, thus no change to the draft Plan.

3.2.3.5 Roscomroe

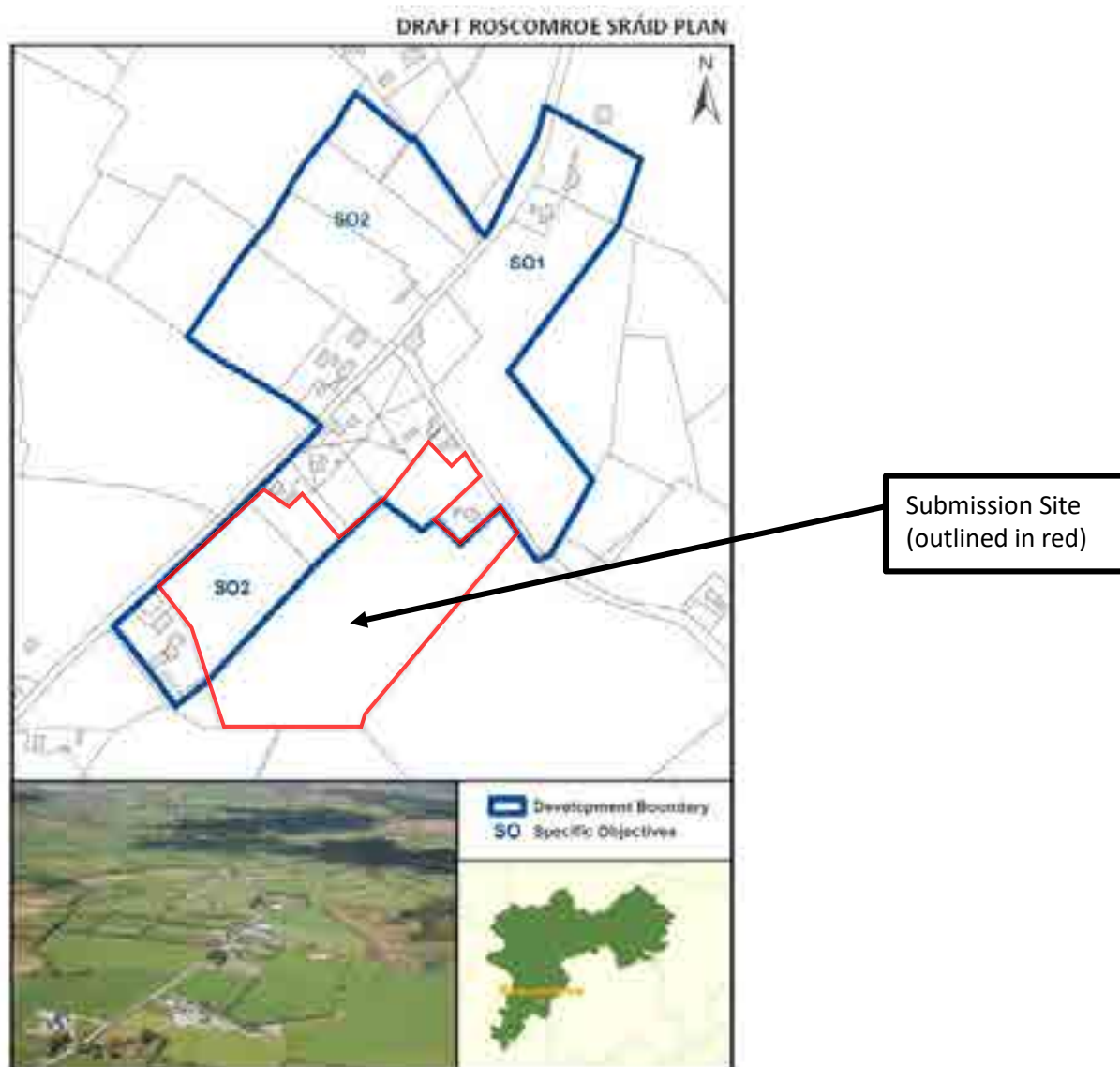
Ref: CDP/D/06

Person / Body:

Kathleen Flanagan

Summary of submission / observation:

That the development boundary of Roscomroe Sráid be extended to include additional land to the south east.



CE Response:

Referring to the map in the draft Roscomroe Sráid Plan, part of the submission site is already contained within the development boundary for the Sráid, which signifies no change from the Sráid Plan in the current County Development Plan (2014-2020). The part of the submission site that is included in the

Sráid boundary has road frontage of c. 135 metres to the northwest and c. 35 metres to the northeast, potentially lending itself to 3 or 4 dwelling sites in total. In effect the submission is requesting that the development boundary be extended to include the backland within the landownership.

In relation to Sráids, Policy SSP-17 contained in Chapter 2 of the draft Plan reads as follows:

SSP-17 It is Council policy to encourage the sustainable, balanced development of the Sráids in an incremental manner, with the emphasis on small scale development over a medium to long-term period, in keeping with the character of the settlement.

It is considered that the development boundary of the Sráid as per the draft Plan allows for a rate of organic growth consistent with draft plan policy SSP-17. In addition, the draft Sráid Plan includes Specific Objective SO2 '*Preserve links to backlands for possible future development*', relating specifically to the submission site and other lands to the north. It is envisaged that the backland of the submission site has potential for some form of development that would benefit the function of the Sráid, albeit in the future and subject to review in the next or subsequent development plan.

Accordingly, it is advised to retain the development boundary of Roscomroe Sráid in accordance with the draft Plan.

3.2.4 Local / Central Government

[Ref: CDP/D/145](#)

Person / Body:

Dept. of Education

Summary of submissions / observations:

- a) The Department anticipates that some requirements for additional educational accommodation may emerge over the lifetime of the Plan, should the projected population increases materialise. Given the National Planning Framework's objectives around compact growth, the facility to expand existing schools and/or to otherwise maximise the use of existing school sites will be critical for the Department in the future, to meet emerging requirements in Offaly and nationally. In that context, the inclusion of a specific objective in the Plan explicitly supporting the intensification of development on existing school sites would be welcomed.
- b) In relation to the settlement of Tullamore and the projected population growth in the settlement, the Department has identified a potential future requirement for additional primary and post primary school accommodation in Tullamore, subject to the projected population materialising, the age profile of that future population and other factors which influence school accommodation needs. Explicit support in the Plan for additional school accommodation in the settlement would be welcomed, in particular the reservation of a suitable site or sites for one new primary school and one new post primary school, in order to meet potential requirements which may emerge over the lifetime of the Plan.

- c) In relation to the settlement of Birr the Department notes the zoning of a circa 6-acre site, to the rear of the Lidl supermarket on the Tullamore Road, as Public/Community/Educational in the Birr Town & Environs Development Plan 2010-2016 (extended until 2020) and it is requested that this zoning (or an equivalent) be retained in the new County Development Plan in order to support potential future educational provision in the settlement.
- d) The Department welcomes the ongoing engagement with Offaly County Council and will continue to work closely with the Council in relation to the provision of new schools and the development of existing schools. It also wishes to emphasise the critical importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for this purpose.

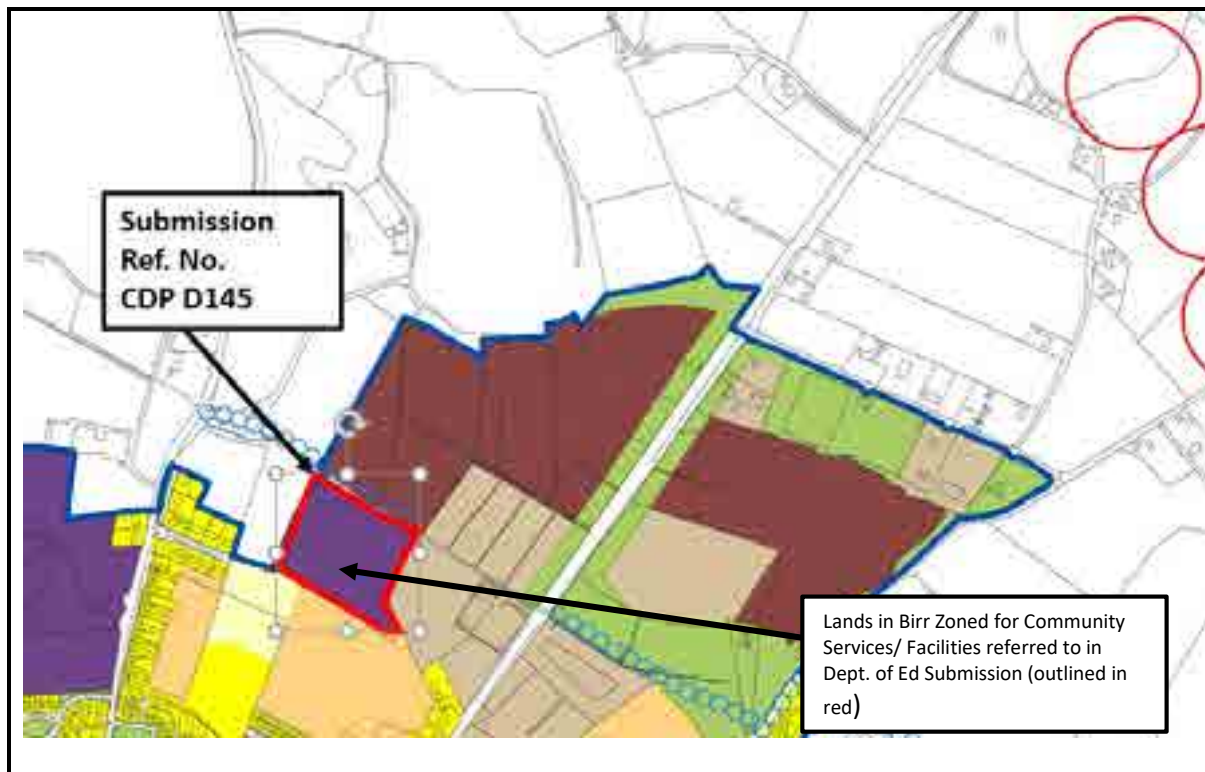
CE Response:

- a) While there is no specific objective supporting the explicit intensification of development on existing school sites, SICCDP-01 supports the extension of social and community facilities in a low climate resilient and environmentally sustainable manner.
SICCDP-01; *It is Council policy to assist, where feasible, in the provision and extension of social, community and cultural facilities and amenities within the county in a low carbon climate resilient and environmentally sustainable manner to serve individual communities throughout the county.*
- b) In relation to the settlement of Tullamore, there is 27ha. of Community Services/ Facilities of 'greenfield' site provision in the Tullamore Town Plan area, which includes 13.5ha on 4 no. sites zoned for Strategic Community Services/Facilities Reserve, in the southern and eastern section of the town plan area. During the making of the forthcoming LAP for Tullamore the Council will consult with the Department of Education and other relevant stakeholders.

Policy SICCDP-02 in the draft Plan provides for the identification of sites for community facilities:

SICCDP-02 It is Council policy to identify and facilitate the development of suitable sites for community facilities within the county, particularly in newly developing areas. These sites should be easily accessible (walking and cycling) and promote the use of public transport.

- c) In relation to the settlement of Birr the request by the Department for suitably zoned lands for potential school provision to the west of Lidl is accommodated in the block of Site Community Services / Facilities of circa 2.3ha. under the Draft Plan.
Please see map below.



d) Statutory consultation will be continued with the Dept. of Education, in progressing the review of the County Development Plan and the forthcoming Local Area Plans (LAPs) for Tullamore, Birr, Portarlinton and Edenderry to ensure that sufficient and appropriate land is zoned for the provision of new schools and the development of existing schools, across the county.

[Ref: CDP/D/152](#)

Person / Body:

Development Applications Unit

Summary of submission / observation:

Archaeological Heritage

This submission states that;

- a) The recently published Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) should be referenced
- b) The proposed development plan should as part of its Cultural Heritage Section have definitive sections/policies on the protection of Offaly's terrestrial and underwater cultural heritage, both known and potential terrestrial and underwater archaeology. The submission details a number of items that should be included in specific policies or objectives;
- c) It is essential that climate change adaptation is built into all policies and planning procedures, in particular development plans which should detail recommended climate change policies and objectives for archaeological heritage;

Nature Conservation

This submission states that;

- d) Biodiversity funding mechanisms such as EU Life Programme and under the Common Agricultural Policy (CAP) post 2020 in addition to funding provided by the Department under the National Biodiversity Action Plan 2017-2021 should be mentioned in Chapter 1 of the Plan;
- e) Emerging Science indicates that the optimum way to change cut away bog from a carbon source to a carbon sink is through rewetting by drain blocking, subject to certain conditions, rather than afforestation. The phrase "with consideration of afforestation on cut away peatlands" in Policy CAEP-12 should be changed to "with consideration of re-wetting and restoration of cut away peatlands, where appropriate."
- f) The Department notes that where industrial developments such as renewable energy, bioenergy and energy storage projects are encouraged on or close to peatlands, the Council should be mindful that such developments do not negatively impact on any rehabilitation measures including enhanced rehabilitation measures (i.e. drain blocking and rewetting).
- g) The Department recommends that planning applications immediately adjacent to peatlands be accompanied by Ecological Impact assessment (EclA) where relevant, due to the high biodiversity value of peatlands, including remnant uncut peatlands in peripheral areas and while the need for hydrological assessments will be considered where groundwater abstraction is to take place;
- h) The introduction to the Biodiversity and Landscape chapter in the Plan should outline the urgency in tackling the current national and global biodiversity crisis. Many of the policies in the Chapter on Biodiversity and Landscape are not directly relevant to biodiversity and ecosystem conservation and restoration in order to realise the Co. Development Plan's Strategic objective to protect and enhance Offalys natural assets and biodiversity. These policies and objectives should be clearly separated from other policies to allow effective monitoring.

- i) The Department urges the Council to include a policy to look for an overall vision/strategy for the Shannon Callows to be developed in co-operation with all stakeholders to ensure that the area is appropriately managed at a landscape scale as suggested in the recently published book *Farming for Nature, The Role of Results Based Payments* and which provide a framework for a linear park from Banagher to Meelick outlined in BLP-19 whilst also helping achieve the Plan's strategic objective to reverse the decline/stagnation of towns and villages.
- j) The Council could include an objective to encourage, support and promote High Nature Value (HNV) farming projects and schemes and to provide support to communities in applying for future locally led conservation scheme funding opportunities;
- k) The Council should include a policy that takes full account of the objective and management practices proposed in any management or related plans for European Sites (SACs and SPAs) in and adjacent to the county published by the Department including the National Raised Bog Special Areas of Conservation (SACs) Management Plan 2017-2022;
- l) The Council should include an objective requiring surveys carried out for preparation of EIARs, NIS, EclA or other assessments be submitted to the National Biodiversity Centre (NDBC);
- m) Where it is proposed to renovate an old building in Opportunity Sites in Settlement Plans, such proposals should be subject to Bat Surveys;
- n) It is recommended that where amenity provision (the development of outdoor pursuits, walking and cycle routes) as outlined in the Draft Plan are likely to result in significant adverse effects to biodiversity, such as those within Riparian zones, floodplains and peatlands, these are subject to Ecological Impact Assessment;
- o) It is recommended that settlement plans include an objective to require new development to avoid adverse impacts on the integrity of the Natura 2000 network and also to avoid impacts to mobile species such as Otter and bird species outside of European sites where this would have negative impacts on the conservation objectives of such sites;
- p) Policy BLP20 be amended so that at least 10 metres of riparian area from the top of the river bank is protected from development including walking and cycling routes and associated artificial lighting. In addition, any development proposal requiring culverting should also document stream habitat lost and provide compensatory habitat where possible. Realignment of water courses should incorporate stream enhancement measures, as outlined in OPW Environmental Guidance: Drainage Maintenance and Construction. The Plan should also promote the removal of historic culverts and infilling along watercourses;
- q) It is recommended that policy BLP-30 to plant pollinator friendly trees and plants and management options to improve pollinator populations within areas of semi natural habitats excludes Natura 2000 sites and designated sites, peatlands, river, canals and hedgerow instead confining this measure to highly modified, intensively managed public amenity grasslands, public open spaces, public parks, roundabouts, grass verges in urban areas and similar.
- r) Objective BLO-04 should be amended to include that proposed developments that are likely to result in significant adverse effects and are within or close to proposed Natural Heritage Areas (pNHAs) and undesignated peatlands which form part of the counties GI strategy would require Ecological Impact Assessment;
- s) The joint Policy Statement referred to in Section 4.13.2 Areas of High Amenity – Upland Areas is now 25 years old and was made prior to the designation of the Slieve Bloom Mountains as an SAC and SPA, it may require to be reviewed and updated. The Department considers that further details about the mountains designation should be provided, including its historical, regulatory and legislative background. More emphasis could be put on outlining the biodiversity and conservation importance of Areas of High Amenity included in this chapter, such as the Slieve Bloom Mountains;

- t) An objective to prepare Green Infrastructure Plans for settlements within the lifetime of this Plan and to map existing and proposed green infrastructure and connections at a suitable scale should be included;
- u) Objective BLO-17 should specify that links to be provided to GI are ecological links such as hedgerows, streams and treelines, and not cycleways or greenways;
- v) A policy should be included promoting re-wetting (i.e. water level is raised and kept near the soil surface), as the general rehabilitation strategy for peatlands, while carefully avoiding any impacts to adjacent land and subject to Ecological Impact Assessment;
- w) A strong and clear policy or objective regarding peat extraction is required to ensure clarity in relation to the requirements for planning permission provided for in the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations, 2001 (as amended) and environmental assessment in this regard;
- x) Table 4.4 entitled 'Occurrence in County Offaly of birds protected under Annex 1 of the EU Birds Directive' is incomplete and should be removed. The Council should consider including an objective to in accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas;
- y) LED luminaries with warmer colours (i.e. CCT values at or below 2700K) be specified by way of objective for future installations to avoid environmental impacts associated with blue rich LED light.
- z) The Strategic Environmental assessment advises that biodiversity, flora and fauna monitoring should include the following;
 - Monitoring of nitrogen deposition due to bioenergy products;
 - Monitoring of one off rural houses;
 - Monitoring of the development of walking and cycling routes (including artificial lighting and disturbance).

CE Response:

Archaeological Heritage

- a) Noted. It is proposed to reference the **Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019)** in Section 10.2 Legislative and Policy Context;
- b) Noted. I am satisfied that many of the items referred to relating to archaeology are addressed in the Draft Plan, notwithstanding this, it is proposed to
 - Amend Policy BHP-39 as follows; **"To support, as appropriate To ensure the protection and preservation of underwater and terrestrial archaeological sites, both known and potential, in riverine or lacustrine locations including wrecks such as the remains of bridges.;**
 - Add in additional policy to **"Require archaeological assessment, including underwater archaeological assessment where relevant, for such developments that due to their location, size or nature may have implications for archaeological heritage. Such developments include those that are located at or close to an archaeological monument or site, those that are extensive in terms of area (0.5 hectare or more) or length (1 kilometre or more and developments that require an Environmental Impact Statement"**;
 - Make the following amendments to the first paragraph of Section 10.10 Archaeological Heritage;

~~Our archaeological heritage includes structures, constructions, groups of buildings, developed sites, underwater sites, moveable objects and monuments of other kinds, as well as their context, whether situated on land or under water.~~ **Our Archaeological Heritage can include:**

 - **National Monuments in the ownership/guardianship of the State or Local Authority**
 - **Archaeological and Architectural monuments/sites in the Record of Monuments and Places (RMP)**

- Monuments in the Register of Historic Monuments
 - Zones of Archaeological Potential in Historic Towns
 - Underwater Archaeological Heritage, including Historic Wrecks
 - Previously unknown and unrecorded archaeological sites (including subsurface elements with no visible surface remains, both terrestrial and underwater)
 - Potential sites located in the vicinity of large complexes of site or monuments
 - Existing or former wetlands, unenclosed land, rivers or lakes
 - Objects or artefacts of known or potential archaeological significance, including into the modern period and recent past (e.g. post-medieval archaeology)
- c) Noted. It is proposed to include the following policies under the heading **Climate Change and Archaeological Heritage**;
- “To promote awareness and the appropriate adaptation of Ireland’s built and archaeological heritage to deal with the effects of climate change;
 - To identify the built and archaeological heritage in local authority ownership and areas at risk from climate change including, but not necessarily restricted to, the Record of Monuments and Places, protected structures and Architectural Conservation Areas designated in the development plan;
 - To undertake climate change vulnerability assessments for the historic structures and sites in Offaly;
 - To develop disaster risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in Offaly; and
 - To develop resilience and adaptation strategies for the built and archaeological heritage in Offaly, in line with Department Guidance and an associated methodology. “
- d) Noted. It is proposed to make reference to the following sources of funding in the Implementation and Monitoring section of the Plan;
- EU LIFE Programme funding
 - Draft Prioritised Action Framework for Ireland 2021-2027 funding
 - Common Agricultural Policy (CAP) post 2020
 - National Biodiversity Action Plan 2017-2021 funding
- e) Noted. It is proposed to amend policy CAEP-12 as follows; “It is Council policy to support the enhancement of carbon sinks such as peatlands, forestry, and permanent grasslands, with consideration of ~~afforestation on cut-away peatlands~~ **re-wetting and restoration of cut away peatlands, where appropriate.**”
- f) Noted. It is proposed to add the following Objective to Chapter 3 of the Draft Plan; “**It is an objective of the Council to ensure that renewable energy projects located on peatlands or in close proximity to peatlands do not negatively impact on any rehabilitation measures including enhanced rehabilitation measures (i.e. drain blocking and rewetting)**” while also adding an extra criteria to DMS 108 “**consideration of existing and future rehabilitation measures including enhanced rehabilitation measures (i.e. drain blocking and rewetting)**”
- g) Noted. It is proposed in this regard to add the requirement for an ecological assessment onto policy **CAEP-16** from Chapter 3 of the Draft Plan as follows (additional text in red); “It is Council policy that planning applications for development on or immediately adjacent to peatlands shall be accompanied by assessments considering the following issues where relevant; peatland stability, hydrology, ~~and/or~~ **carbon emissions balance and ecological impact assessment.**”

- h) Noted. It is proposed to add the following paragraphs (as per Department submission) to Section 4.1 Introduction within Chapter 4: Biodiversity and Landscape;
- “Current negative trends in biodiversity and ecosystems will undermine progress towards 80% of the assessed targets of the UN Sustainable Development Goals, related to poverty, hunger, health, water, cities, climate, oceans and land. A Strategic Objective of this Co. Development Plan is to contribute, as practicable, towards achievement of these goals. Loss of biodiversity is therefore shown to be not only an environmental issue, but also a developmental, economic, security, social and moral issue as well.”
- “Halting and reversing the loss of biodiversity ensures that we are supplied with the ‘ecosystem services’ it provides, that are essential to our well-being. In agriculture, these services include the maintenance of soil structure and the supply of nutrients, pollination and pest control which will guarantee our food security. Outdoor recreation and tourism also relies heavily on ecosystem services and biodiversity to provide the experience of being ‘in nature’ that both local people and visitors to County Offaly increasingly seek out.”
- i) Noted. It is proposed to make the following addition to objective **BLO-11** in Chapter 4 (additional text in red); “It is an objective of the Council to (a) investigate the feasibility of and cooperate with relevant agencies in providing a Linear Park based on the River Shannon from Banagher to Meelick, which takes account of the sensitive ecological nature of the Callows area and (b) to support the development of an overall vision/ strategy for the Shannon Callows in co-operation with all stakeholders to ensure that the area is appropriately managed at a landscape scale.”
- j) Noted. It is proposed to add a policy in Chapter 4 of the Draft Plan for the council to “Support and promote High Nature Value (HNV) farming projects and schemes.”
- k) Noted. It is proposed to add an objective in Chapter 4 of the Draft Plan for the council to “take account of the objective and management practices proposed in any management or related plans for European Sites (SACs and SPAs) in and adjacent to the county published by the Department including the National Raised Bog Special Areas of Conservation (SACs) Management Plan 2017-2022 and any subsequent editions”.
- l) Noted. No further action required. This is not within the remit of the Development Plan. This is an operational issue for the National Biodiversity Centre (NDBC) to monitor planning registers of all local authorities for EIARs, NIS, EclA or other assessments submitted with planning applications.
- m) Noted. It is proposed to amend DMS-26 in Chapter 13 as follows (additions in red text);
- “DMS 26 **Bat and** Swift Surveys/Mitigation
- Planning applications for renovations, redevelopment or demolition of old buildings in town, village centres and opportunity sites shall include a survey of existing numbers of swifts/**bats**. **Where the nests of swifts/bats are shown to be present, location and details of proposed swift** ~~boxes~~ **specific mitigation measures during and after construction shall be proposed.”**
- n) It is proposed to amend Policy TRP-18 in Chapter 6 Tourism and Recreational Development as follows (additional text in red); “It is Council policy to support in conjunction with relevant landowners and recreational / tourism agencies, the maintenance of and enhanced access to the countryside, waterways, monuments, historic properties, for recreational and tourism purposes. Access should be planned and managed in a manner that protects environmental sensitivities, ecological corridors and the ability of local infrastructure to support increased tourism. **Where significant effects cannot be ruled out to biodiversity, such as those within**

riparian zones, floodplains and peatlands, the subject development shall be subject to Ecological Impact Assessment.”

- o) Noted. No further action required. The Chief Executive considers that Objectives BLO-02 and BLO-03 in Chapter 4 are satisfactory in this regard, namely;

BLO-02 It is an objective of the Council that no plans, programmes or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects¹).

BLO-03 It is an objective of the Council that all projects and plans arising from this Plan² will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive. A plan or project will only be authorised after the competent authority has ascertained, based on scientific evidence, Screening for Appropriate Assessment, and subsequent Appropriate Assessment where necessary, that:

1. The plan or project will not give rise to significant adverse direct, indirect or secondary effects on the integrity of any European site (either individually or in combination with other plans or projects); or
 2. The plan or project will have significant adverse effects on the integrity of any European site (that does not host a priority natural habitat type/and or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000; or
 3. The plan or project will have a significant adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons for overriding public interest, restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000.
- p) It is proposed to amend policy BLP-20 in Chapter 4 as follows; “It is Council policy to ~~protect~~ **preserve riparian corridors buffer strips free from development** by reserving ~~land~~ **a minimum of 10 metres either side of all watercourses (measured from top of bank) with the full extent of the protection determined on a case by case basis by the Council, based on site specific characteristics and sensitivities.** ~~along their banks for ecological corridors and maintain them free from inappropriate development”~~

The above policy change is in keeping with the amended standard DMS-25 in response to the submission made by Inland Fisheries Ireland (submission no. 43).

¹ Except as provided for in Article 6(4) of the Habitats Directive, viz. there must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed, and c) Adequate compensatory measures in place.

² Such projects include but are not limited to those relating to: agriculture; amenity and recreation; contaminated sites; electricity transmission; flood alleviation and prevention; forestry; mineral extraction; renewable energy projects; roads; telecommunications; tourism; wastewater and discharges; and water supply and abstraction.

It is proposed to have two separate policies in relation to culverts. The separate culvert policy shall read as follows;

- ~~Where appropriate clear span structures will be promoted where fisheries exist~~ “It is Council policy to promote clear span bridging structures as the preferred option for culverts and culverting and/or realignment of streams will be discouraged. Any development proposal requiring culverting should also document stream habitat lost and provide compensatory habitat where possible. Realignment of water courses should incorporate stream enhancement measures, as outlined in Office of Public Works Environmental Guidance. The Council will consult with Inland Fisheries Ireland in relation to riparian and instream works as appropriate.”
- “It is Council policy to promote the removal of historic culverts and infilling of watercourses”.

- q) Noted. It is proposed to replace policy BLP-30 as follows; ‘It is Council policy to support the aims and objectives of the All Ireland Pollinator Plan 2015-2020 and any subsequent editions by delivering appropriate management actions as set out in their guidance documents’
It is the Council policy to support the aims and objectives of the All Ireland Pollinator Plan 2015-2020 and any subsequent editions by delivering appropriate management actions as set out in their guidance documents.’
- r) Noted. It is proposed to amend Objective BLO-04 from Chapter 4 as follows (additions in red text); “It is an objective of the Council to ensure that the impact of development within or adjacent to national designated sites, Natural Heritage Areas, ~~proposed Natural Heritage Areas~~, Ramsar Sites and Nature Reserves likely to result in significant adverse effects on the designated site is assessed by requiring the submission of an Ecological Impact Assessment prepared by a suitably qualified professional, which should accompany planning applications. The issue of ecological impact assessments and peatlands is addressed in the new policy proposed in response n) above.
- s) Noted. It is proposed to remove reference the Joint Policy Statement prepared by Offaly and Laois County Council referred to in Section 4.13.2 Areas of High Amenity as follows;
“The overall policy of the Council towards the mountains will be to co-operate with other bodies in encouraging development of the amenity and recreational potential of the area while at the same time, preserving the quality and character of the environment. The Council accepts that there is need to devise an overall strategy for the integrated development of the Slieve Bloom Mountains area and to secure an appropriate balance between competing land use, for example, farming, forestry, recreation, conservation and residential. ~~Offaly County Council along with Laois County Council prepared a joint policy statement for the Slieve Bloom Mountains in May 1995.”~~
- t) Noted. No further action required. It is not considered necessary to include a specific objective regarding the preparation of Green Infrastructure Plans for settlements within the lifetime of this Plan and to map existing and proposed green infrastructure and connections at a suitable scale having regard to the range of GI policies and objectives in Chapter 4 and the requirements of DMS 22 and 72 for the preparation of a GI masterplan for residential developments of 20 units and new Business and Technology Parks.
- u) Noted. It is proposed to amend Objective BLO-17 as follows (additional text in red); “It is an objective of the Council to require all new developments to identify, protect and enhance ecological features by making provision for local biodiversity (for example, through provision

of swift boxes or towers, bat roost sites, green roofs, etc.) and provide **ecological** links to the wider Green Infrastructure network as an essential part of the design process.”

- v) Noted. See response to e) above.
- w) Noted. No further action required. Table 3.1 in Section 3.13 Decarbonisation Actions and Projects refers to the cessation of peat fired electricity regeneration and support for the restoration of peat bogs when turf cutting has ceased. It is a policy of the Draft Plan “to support the implementation and provision of the decarbonisation projects listed in Table 3.1 of the County Development Plan.”
- x) Noted. It is proposed to omit Table 4.4 entitled ‘Occurrence in County Offaly of birds protected under Annex 1 of the EU Birds Directive’ from Chapter 4 as requested and to include an objective “**In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas.**”
- y) Noted. It is proposed to include an objective in each settlement plan in Volume 2 of the Draft Plan that it is an objective of the Council to “**Ensure LED luminaires display warmer colours (i.e., CCT values at or below 2700K) in future installations to avoid environmental impacts associated with blue-rich LED light in keeping with Dark Sky Ireland Lighting Recommendations**”.
- z) Noted. It is proposed that the Strategic Environmental Assessment in relation to biodiversity, flora and fauna monitoring shall include the following;
 - **Monitoring of one off rural houses;**
 - **Monitoring of the development of walking and cycling routes (including artificial lighting and disturbance).**

Ref: CDP/D/63

Person / Body:

Meath County Council

Summary of submissions / observations:

Meath County Council support the rural housing policy in the draft Offaly Plan regarding the distinction between ‘rural areas under strong urban influence’, ‘strong rural areas’ and ‘structurally weak rural areas, which is aligned with the Rural Development Pressure Map in the draft Meath County Development Plan 2020-2026. The submission acknowledges rural sráids as alternatives to one-off housing in the open countryside which is similar to the ‘rural node’ concept in the draft Meath Plan. Meath County Council welcome Offaly’s focus on rural towns and villages to combat their decline. The submission supports the policies and objectives in the draft Offaly Plan. Meath County Council state their willingness to engage with Offaly County Council on cross-boundary projects / issues.

CE Response:

The submission is welcome. No recommendations arising from it.

[Ref: CDP/D/02](#)

Person / Body:

Department of Communications, Climate Action & Environment - Waste Policy & Resource Efficiency

Summary of submissions / observations:

The Department would like if the Council would consult directly with the Eastern – Midlands Waste Management Regional Office regarding the development of the final plan.

CE Response:

The Eastern – Midlands Waste Management Regional Office is not a prescribed authority under section 12(1)(a) of the Planning and Development Act 2000 (as amended). Notification of the draft plan was published in newspapers and made available on-line for all bodies / persons to make a submission if desired. The Minister for Climate Action, Communication Networks and Transport was consulted as a prescribed authority on the draft Plan. The following objective in the draft Plan addresses waste management:

ENVO-05 It is an objective of the Council to implement the Eastern-Midlands Regional Waste Management Plan 2015-2021; the Council's Litter Management Plan and Waste Bye-Laws.

3.2.5 Environmental

[Ref: CDP/D/43](#)

Person / Body:

Inland Fisheries Ireland

Summary of submission / observation:

Aquatic Environment

- a) That the draft Plan needs to recognise that protection of the aquatic environment / habitat not only requires the protection of water quality but also necessitates the protection and maintenance of physical habitat and hydrological processes/regimes.
- b) That the draft Plan does not go far enough in protecting the freshwater resources with the emphasis on protecting only those waters already of high status such as in Policy ENVP-04. And that while these high-value waters deserve additional protections, the Water Framework Directive requires that all waters achieve good status and therefore any development that may impact on surface waters should be subject to similar assessment.

Waste Water

- c) Regarding waste water treatment systems, sufficient treatment capacity must be available both within the receiving sewerage systems locally and downstream of waste water treatment plants over the full duration of the plan in order that the ecological integrity of the ultimate receiving waters are protected.
- d) The policy of granting planning permissions for developments with associated increased loading on inadequate or already overloaded municipal sewerage treatment plans is not a sustainable practice.

Flood Risk

- e) That the draft Plan include reference to river morphology and floodplain restoration measures aimed at increasing the natural flood storage of river systems and reducing the speed at which floods arrive at vulnerable sites downstream, including urban areas.
- f) That consideration is given to works which remove/replace manmade structures, such as weirs/culverts/bridges, to mitigate against future flooding events associated with global warming, where such structures, due to design, have inadequate conveyance capacity during high flow events.

Renewable/ Green Energy

- g) That the draft Plan stresses that environmental sustainability will be the deciding criteria with regards to any proposed renewable energy scheme, including hydro-electric schemes, and in this regard, that the draft Plan recognise the difference between “green”/renewable energy and energy that can be described as environmentally sustainable.

Aquatic Habitat Protection (including protection of Riparian Habitat)

- h) That the draft Plan includes policy on the requirement for riparian buffer zones to ensure that impacts from development do not interfere with the aquatic environment.

Invasive Species

- i) That the draft Plan includes policies to ensure that developments do not lead to the spread of invasive species.

River/Stream Crossing Structures

- j) That the draft Plan includes a policy on the use of clear span structures where possible on fisheries waters.

Water Conservation

- k) That the draft Plan is an opportunity to promote policies and awareness of water conservation and water use efficiency, which are central elements of any strategy to enhance water supply reliability, restore ecosystems, and respond to climate change and changing demographics.

Sustainable Urban Drainage Systems (SUDS)

- l) That the draft Plan includes policy on the requirement of SUDS in management of surface water disposal.

Management Policies

- m) That the draft Plan provides for the maintenance and preservation of all watercourses and associated riparian habitats.

CE Response:

- a) The draft Plan, under Chapter 4 - Biodiversity and Landscape, recognises the need to protect the physical environment of waterways through the following policy:

BLP-01 It is Council policy to protect, conserve, and seek to enhance the county's biodiversity and ecological connectivity.

BLP-20 It is Council policy to protect riparian corridors by reserving land along their banks for ecological corridors and maintain them free from inappropriate development. Where appropriate clear span structures will be promoted where fisheries exist, and culverting and/or realignment of streams will be discouraged. The Council will consult with Inland Fisheries Ireland in relation to riparian and instream works as appropriate.

BLO-10 It is an objective of the Council to maintain a riparian zone for larger and smaller river channels based on the The Shannon Regional Fisheries Board Guidance Document, 'Planning for Watercourses in the Urban Environment, a Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation and Recreational Planning'.

- b) The submission refers to Policy ENVP-04 (Chapter 11 – Water Services and Environment), which relates to the impact of proposed new development on a high status water quality site. The submission asks that the assessment of such potential impact is extended to all waterways, regardless of status in this respect, in line with the Water Framework Directive.

Chapter 11 of the draft Plan contains a suite of policy and objectives which seek to protect, maintain and enhance water quality, with Policies ENVP-01, ENVP-02 and ENVP-03 referring specifically to the Water Framework Directive, while Objective ENVO-02 refers to protection of waterbodies ranging from poor status to high status. It is, however, considered reasonable to broaden the policy framework to include reference to all waterbodies in terms of impact from new development.

Accordingly, it is recommended that (a) Policy ENVP-03 be amended (new text in red) and that that a new policy be introduced;

ENVP-03 It is Council policy to support the implementation of the Water Framework Directive, the River Basin Management Plan and the Local Authority Waters Programme in achieving and maintaining at least good environmental status for all water bodies in the county. **Development proposals shall not have an unacceptable impact on the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands.**

Proposed new policy:

It is Council policy that in assessing applications for developments, that consideration is had to the impact on the quality of surface waters having regard to targets and measures set out in the River Basin Management Plan, and any subsequent local or regional plans.

- c) Policy WSP-02 and WSP-03 (Chapter 11 – Water Services and Environment) of the draft Plan relate to water services capacity.

WSP-02 It is Council policy to liaise and co-operate with Irish Water in the implementation and delivery of the 'Water Services Strategic Plan' (2015, under review in 2020), the 'Irish Water Business Plan 2015-2021', the 'Irish Water National Water Resources Plan' (expected in 2021) and the 'Irish Water Investment Plan 2020-2024' (or any amendment thereof) and other relevant investment works programmes of Irish Water, to provide infrastructure to service settlements in accordance with the Council's Core Strategy and Settlement Strategy.

WSP-03 It is Council policy to work in conjunction with Irish Water to protect existing water supply and wastewater infrastructure, to maximise the potential of existing capacity and to facilitate the timely delivery of new water supply and wastewater infrastructure to facilitate future growth in accordance with the Council's Core Strategy and Settlement Strategy.

- d) Policy WSP-06 (Chapter 11 – Water Services and Environment) of the draft Plan relates to new development and water services capacity.

WSP-06 *It is Council policy to ensure that development is permitted in tandem with available water supply and wastewater treatment and to manage development, so that new schemes are permitted only where adequate capacity or resources exists or will become available within the life of a planning permission. Prior to applying for planning permission, applicants shall consult with Irish Water regarding feasibility and capacity for water services connection. Applicants shall submit proof of documentation that connection to a group water scheme has been granted, where applicable.*

- e) Policy BLP-20 (Chapter 4 – Biodiversity and Landscape) of the draft Plan seeks to protect riparian corridors and discourages realignment of streams. The River Basin Management Plan 2018-2021 refers to measures to protect and improve physical condition of surface water, with reference to evidence based restoration programmes, including in terms of hydro-morphology and physical barriers. Policy ENV-03 of the draft Plan supports the implementation of the Water Framework Directive, the River Basin Management Plan and the Local Authority Waters Programme.

BLP-20 It is Council policy to protect riparian corridors by reserving land along their banks for ecological corridors and maintain them free from inappropriate development. Where appropriate clear span structures will be promoted where fisheries exist, and culverting and/or realignment of streams will be discouraged. The Council will consult with Inland Fisheries Ireland in relation to riparian and instream works as appropriate.

ENVP-03 It is Council policy to support the implementation of the Water Framework Directive, the River Basin Management Plan and the Local Authority Waters Programme in achieving and maintaining at least good environmental status for all water bodies in the county. Development proposals shall not have an unacceptable impact on the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands.

- f) The current River Basin Management Plans 2018-2021 refers to measures to protect and improve the physical condition of the water environment, including identification of physical structures which can impede the movement of water and sediment, and can also prevent the migration of

certain protected fish species. Policy ENV-03 of the draft Plan supports the implementation of the Water Framework Directive, the River Basin Management Plan and the Local Authority Waters Programme.

ENVP-03 It is Council policy to support the implementation of the Water Framework Directive, the River Basin Management Plan and the Local Authority Waters Programme in achieving and maintaining at least good environmental status for all water bodies in the county. Development proposals shall not have an unacceptable impact on the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands.

- g) Policy CAEP-22 under the Climate Action and Energy chapter (Chapter 3) of the draft Plan encourages production of renewable energy, including hydro-electric, subject to proper planning and environmental considerations. Policies CAEP-29 and CAEP-30 under the same chapter are specific to hydro-electric schemes.

CAEP-22 It is Council policy to encourage and facilitate the production of energy from renewable sources, such as from bioenergy, waste material, solar, hydro, geothermal and wind energy, subject to proper planning and environmental considerations.

Hydro Energy

CAEP-29 It is Council policy to facilitate the development of new river based hydroelectricity plans subject to due consideration of the free passage of fish, any protected structures, maintenance of biodiversity corridors, protected species and any designated nature conservation area such as Special Areas of Conservation, Special Protection Areas and National Heritage Areas etc.

CAEP-30 It is Council policy to ensure that any proposed projects do not conflict with the requirements of the Water Framework Directive.

- h) Under Section 4.8 (Chapter 4 – Biodiversity and Landscape) of the draft Plan, the Council recognises the function and importance of riparian buffer zones, being strips of vegetated land bordering a river or stream, which can protect a watercourse from the impact of human activity or development in an area, and can also provide amenity. Policy BLP-20, Objective BLO-10 (Chapter 4 – Biodiversity and Landscape) and Development Management Standard DMS-25 (Chapter 13) of the draft Plan seeks to provide for and protect riparian corridors.

BLP-20 It is Council policy to protect riparian corridors by reserving land along their banks for ecological corridors and maintain them free from inappropriate development. Where appropriate clear span structures will be promoted where fisheries exist, and culverting and/or realignment of streams will be discouraged. The Council will consult with Inland Fisheries Ireland in relation to riparian and instream works as appropriate.

BLO-10 It is an objective of the Council to maintain a riparian zone for larger and smaller river channels based on the The Shannon Regional Fisheries Board Guidance-Documents 'Planning for Watercourses in the Urban Environment, a Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation and Recreational Planning'.

DMS-25 – Riparian Zones A 10 metre riparian buffer strip either side of all watercourses (measured from top of bank) shall be preserved free of development and of adequate width to permit access for river maintenance.

Objective BLO-10 refers to the Shannon Regional Fisheries Board Guidance Document, *‘Planning for Watercourses in the Urban Environment, a Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation and Recreational Planning’*. It is noted that November 2020, after the draft Plan was placed on public display, Inland Fisheries Ireland (which replaced all former regional fisheries boards on foot of the Inland Fisheries Act 2010) published an updated guideline document, *‘Planning for Watercourses in the Urban Environment, a Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate / Flood Risk and Recreational Planning’*. This guideline document is broadly similar to its predecessor but introduces the issues around climate change and flood risk as factors influencing the importance of riparian / buffer zones along rivers in urban areas.

Accordingly, it is recommended that text under Section 4.8 and Objective BLO-10 be amended, as shown below. It is also recommended that Development Standard DMS-25 (Chapter 13) be amended to align with the intent of Objective BLO-10 and the guidance provided in the Inland Fisheries Ireland guideline document.

*‘The Council recognises the importance of riparian buffer zones, which are strips of vegetated land bordering a river or stream, which can protect a watercourse from the impact of human activity or development in an area, filtering out pollutants and sediment from overland surface runoff, enhancing flood alleviation and providing a habitat for animals with close affinity to rivers (for example, otters, kingfishers, dippers and dragonflies), and can also provide space for amenity uses, particularly in urban areas. The ~~Shannon Regional Fisheries Board Guidance Document~~, ~~Inland Fisheries Ireland updated guideline document~~ *‘Planning for Watercourses in the Urban Environment, a Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate / Flood Risk and Recreational Planning’* should be followed in this regard.’*

BLO-10 *It is an objective of the Council to maintain a riparian zone for larger and smaller river channels based on the ~~The Shannon Regional Fisheries Board Guidance Document~~ ~~Inland Fisheries Ireland updated guideline document~~, *‘Planning for Watercourses in the Urban Environment, a Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate / Flood Risk and Recreational Planning’*.*

DMS-25 *A **minimum** 10 metre riparian buffer strip either side of all watercourses (measured from top of bank) shall be preserved free of development, with the full extent of the protection zone to be determined on a case by case basis by the Council, based on site specific characteristics and sensitivities. In all cases, adequate width to permit access for river maintenance shall be provided.*

- i) Policy BLP-31 and Objectives BLO-18 and BLO-19 (Chapter 4 – Biodiversity and Landscape) of the draft Plan seek to prevent, control and/or eradicate invasive species.

BLP-31 It is Council policy to continue to deliver and support measures for the prevention, control and/or eradication of invasive species within the county, and to seek details of how these species will be managed and controlled where their presence is identified.

BLO-18 It is an objective of the Council to require, as part of the planning application process, the appropriate eradication/control of invasive species when identified on site or in the vicinity of a site, in accordance with Regulation 49 of the European Communities (Birds and Natural Habitats) Regulations 2011 to 2015.

BLO-19 It is an objective of the Council to continue to maintain mapping identifying the location of invasive species in the county in conjunction with the National Biodiversity Data Centre.

- j) Policy BLP-20 (Chapter 4 – Biodiversity and Landscape) of the draft Plan promotes the use of clear span structures where appropriate.

BLP-20 It is Council policy to protect riparian corridors by reserving land along their banks for ecological corridors and maintain them free from inappropriate development. Where appropriate clear span structures will be promoted where fisheries exist, and culverting and/or realignment of streams will be discouraged. The Council will consult with Inland Fisheries Ireland in relation to riparian and instream works as appropriate.

- k) Policies WSP-01 and WSP-11 (Chapter 11 – Water Services and Environment) of the draft Plan seeks to ensure the efficient and sustainable use and development of water resources and water services infrastructure. Policy ENVP-03 (Chapter 11 – Water Services and Environment) of the draft Plan supports the implementation of the Water Framework Directive, a core objective of which is to promote the efficient use of water.

WSP-01 It is Council policy to ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements, a cleaner environment and climate change mitigation.

WSP-11 It is Council policy to promote the conservation and sustainable use of water in existing and new development within the county and to encourage demand management measures among all water users including rain water harvesting and grey water recycling.

ENVP-03 It is Council policy to support the implementation of the Water Framework Directive, the River Basin Management Plan and the Local Authority Waters Programme in achieving and maintaining at least good environmental status for all water bodies in the county. Development proposals shall not have an unacceptable impact on the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands.

- l) Chapter 11 (Water Services and Environment) of the draft Plan contains suitable policy to require sustainable urban drainage systems. In addition, Chapter 13 (Development Management Standards) includes requirements for SuDS measures for residential, industrial and business/technology development, namely DMS-2, DMS-71 and DMS-72, respectively.

WSP-24 It is Council policy to require new development to provide a separate foul and surface water drainage system and to incorporate Sustainable urban Drainage Systems (SuDS).

WSP-25 It is Council policy to promote the use of green infrastructure, for example green roofs, green walls, planting and green spaces for surface water run-off retention purposes, in the interests of flood mitigation and climate change adaptation.

- m) Policy BLP-20 and Objective BLO-10 (Chapter 4 – Biodiversity and Landscape) of the draft Plan seeks to provide, protect and maintain riparian corridors. The River Basin Management Plan 2018-2021 refers to measures to protect and improve physical condition of surface water, with reference to evidence based restoration programmes. Policy ENV-03 of the draft Plan supports the implementation of the Water Framework Directive, the River Basin Management Plan and the Local Authority Waters Programme.

BLP-20 It is Council policy to protect riparian corridors by reserving land along their banks for ecological corridors and maintain them free from inappropriate development. Where appropriate clear span structures will be promoted where fisheries exist, and culverting and/or realignment of streams will be discouraged. The Council will consult with Inland Fisheries Ireland in relation to riparian and instream works as appropriate.

BLO-10 It is an objective of the Council to maintain a riparian zone for larger and smaller river channels based on the ~~The Shannon Regional Fisheries Board Guidance Document~~ **Inland Fisheries Ireland updated guideline document**, 'Planning for Watercourses in the Urban Environment, a Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, **Climate / Flood Risk** and Recreational Planning'.

ENVP-03 It is Council policy to support the implementation of the Water Framework Directive, the River Basin Management Plan and the Local Authority Waters Programme in achieving and maintaining at least good environmental status for all water bodies in the county. Development proposals shall not have an unacceptable impact on the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands.

Ref: CDP/D/58

Person / Body:

Office of Public Works

Summary of submission / observation:

This submission makes the following comments;

- a) Welcomes that the flood zones have been represented in settlements with the zoning type 'Constrained Land Use' and with a specific Objective LUZO-14;
- b) Planning Authorities need to consider the impacts of climate change in the preparation of plans, such as avoiding development in areas prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives.
- c) The Justification Test as set out in the Guidelines does not appear to have been applied or reported in the preparation of the Plan.

- d) Applications for development on land identified as benefitting land may be prone to flooding, and as such site specific flood risk assessments may be required in these areas. Examples in the Draft Plan of such instances are a 'New Residential' site in Ballinagar, a 'New Residential and Community Services/Facilities' site in Bracknagh and a 'Strategic Residential Reserve' site in Clonbulloge.
- e) Flood event records for December 2015 to January 2016 for floods in Banagher, Pollagh, Shannonbridge and Shannon Harbour are not currently available on the OPW flood portal and have not been included in the Historical Indicators maps as part of the SFRA.
- f)
- (i) Birr – OPW welcomes inclusion of Objective CAEO-09 for the delivery of the flood relief scheme in Birr;
- (ii) Clara – Proposed 'New Residential' zoning (at Kilcoursey) overlaps the potential Future Scenario flood extent maps prepared under the national CFRAM Programme
- (iii) Ferbane – There is a Strategic Residential Reserve site and an undeveloped Town Centre/Mixed Use site located within Flood Zone A.
- (iv) Killeigh – An undeveloped 'Employment Services/Facilities' site is located within Flood Zone A
- (v) Moneygall – The PFRA appears to be the only information used to identify a small section of Flood Zone A, which overlaps with an undeveloped Enterprise and Employment site, which has not been designated as 'Constrained Land Use'.
- (vi) Rahan - OPW welcomes inclusion of Objective CAEO-09 for the delivery of the flood relief scheme in Rahan;
- (vii) Shannonbridge – Proposed 'New Residential', 'Strategic Residential Reserve' and 'Enterprise and Employment' sites overlap with the potential future scenarios flood extents maps prepared under the National CFRAM Programme;
- (viii) Tullamore – Proposed 'Strategic Residential Reserve', undeveloped 'Town Centre/Mixed Use' and 'Enterprise and Employment' sites located within Flood Zone A.

CE Response:

- a) Noted. No further action required.
- b) Noted. No further action required. The Council has avoided incompatible zoning in areas at risk of flooding and integrated various provisions into the Plan that will contribute towards climate mitigation and adaptation, including provisions requiring that climate change is taken into account in flood risk management, for example:
- Chapter 3 "Climate Action & Energy", Policy CAEP-51 *"...The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) and available information from the CFRAM Studies shall be consulted with to this effect."*
 - Chapter 13 "Development Management Standards", DMO-106 "Flood Risk assessments", *"...The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations...."*
- Furthermore, Policy CAEP-52 from Chapter 3 "Climate Action & Energy" states that:
- "It is Council policy to ensure that applications to existing developments in flood vulnerable zones provide details of structural and non-structural risk management measures to include, but not be limited to specifications of the following - floor levels, internal layout, flood resilient construction, flood resistant construction, emergency response planning, access and egress during flood events."

c) Noted.

Please refer to Section 4.4 of the Strategic Flood Risk Assessment (SFRA) Report:

'The Justification Test is required to be passed whereby highly vulnerable land uses are being proposed on undeveloped lands in Flood Zone A or whereby highly and/or less vulnerable land uses are being proposed on undeveloped lands in Flood Zone B.

This requirement did not arise as the levels of flood risk identified by the SFRA were a key informant of land uses in undeveloped areas in Flood Zones A and B. Only appropriate land uses are being proposed for previously undeveloped lands within Flood Zones A and B.

With respect to lands which have already been developed, the potential conflict between zonings and highly and less vulnerable development will be avoided by applying the constrained land use approach, with blue hatched shaded zone, 'Constrained Land Use', applied on the land use zone mapping in order to differentiate that there is a flood risk issue. This approach is established and tested and consistent with the requirements of the Flood Risk Management Guidelines and associated Circular PL 2/2014.

Although Stage 3 detailed flood risk assessment has not been required for the Plan-preparation process thus far, it may be required for individual projects following adoption of the Plan'.

Under the Plan, no highly or less vulnerable land uses are being proposed on undeveloped lands in Flood Zone A (high flood risk) and no highly vulnerable land uses are being proposed on undeveloped lands in Flood Zone B (moderate flood risk). This is because the above Constrained Land Uses (CLU) designation is being applied as part of the Plan across all undeveloped lands within Flood Zones A and B. For more details, please refer to the SFRA that accompanies the Plan.

It is also proposed to amend the section 3.11.3 of the draft plan "Strategic Flood Risk Assessment" as follows:

'In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities, a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the Plan area, and it forms part of this Plan as a separate document. A number of approaches to managing flood risk in the county have been employed in helping to make the Plan and are recommended particularly for dealing with planning applications. These include:

1. Areas at risk of flooding have been identified and there is a greater understanding of why flooding occurs in the general area.
2. A precautionary approach has largely been employed to landuse zoning to avoid directing development towards areas at risk of flooding. ~~Areas at risk of flooding as identified which are being put forward for landuse zoning have been subject to assessment through the justification test.~~ **Under the Plan, no highly or less vulnerable land uses are being proposed on undeveloped lands in Flood Zone A (high flood risk) and no highly vulnerable land uses are being proposed on undeveloped lands in Flood Zone B (moderate flood risk). This is because a Constrained Land Uses designation (see Section 12.6.1 and the SFRA that accompanies the Plan) is being applied through the Plan across all undeveloped lands within Flood Zones A and B.**
3. ~~Where particular areas identified as being liable to flood were examined as being strategically important for the consolidated and coherent growth of the county's settlements and zoned~~

accordingly, a A site-specific flood risk assessment will be required to accompany development proposals for these areas at risk of flooding (fluvial, pluvial or groundwater), even for developments deemed appropriate in principle to the particular Flood Zone and mitigation measures for site and building works will be required to be integrated.

4. Policies and objectives have been devised in the SFRA for incorporation into this plan’.

It is proposed to insert the following table into SFRA Section 4.4 “Justification Test” after the sentence; “This approach is established and tested and consistent with the requirements of the Flood Risk Guidelines and associated Circular PI 2/2014”

Table 6 provides a justification of the Constrained Land Use Approach for Previously Developed Lands.

Settlements	Are lands that have been already developed within Flood Zone A and/or B?	Is the settlement targeted for growth under the RSES, existing Co. Development Plan (CDP) and Draft CDP?	Is the zoning of the lands required to achieve the proper planning and sustainable development of the settlement?	Is the SFRA recommendation integrated into the Plan for management of risk?
Tullamore	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and balanced regional development	Yes, including LUZO-14 Constrained Land Use and DMO-106 Flood Risk Assessments
Birr, including Crinkill	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and balanced regional development	Yes, including LUZO-14 Constrained Land Use and DMO-106 Flood Risk Assessments
Edenderry	Not applicable – take into account when LAP is being varied	Not applicable – take into account when LAP is being varied	Not applicable – take into account when LAP is being varied / reviewed	Not applicable – take into account when LAP is being varied / reviewed
Portarlington	Not applicable – take into account when LAP is being varied	Not applicable – take into account when LAP is being varied	Not applicable – take into account when LAP is being varied / reviewed	Not applicable – take into account when LAP is being varied / reviewed
Banagher	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and balanced regional development	Yes, including LUZO-14 Constrained Land Use and DMO-106 Flood Risk Assessments
Clara	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and	Yes, including LUZO-14 Constrained Land Use and DMO-

			balanced regional development	106 Flood Risk Assessments
Daingean	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and balanced regional development	Yes, including LUZO-14 Constrained Land Use and DMO-106 Flood Risk Assessments
Ferbane	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and balanced regional development	Yes, including LUZO-14 Constrained Land Use and DMO-106 Flood Risk Assessments
Kilcormac	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and balanced regional development	Yes, including LUZO-14 Constrained Land Use and DMO-106 Flood Risk Assessments
Ballinagar	No	Not applicable	Not applicable	Not applicable
Ballycumber	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and balanced regional development	Yes, including LUZO-14 Constrained Land Use and DMO-106 Flood Risk Assessments
Belmont	No	Not applicable	Not applicable	Not applicable
Bracknagh	No	Not applicable	Not applicable	Not applicable
Cloghan	No	Not applicable	Not applicable	Not applicable
Clonbullogue	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and balanced regional development	Yes, including LUZO-14 Constrained Land Use and DMO-106 Flood Risk Assessments
Cloneygowan	No	Not applicable	Not applicable	Not applicable
Coolderry	No	Not applicable	Not applicable	Not applicable
Geashill	No	Not applicable	Not applicable	Not applicable
Killeigh	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and balanced regional development	Yes, including LUZO-14 Constrained Land Use and DMO-106 Flood Risk Assessments
Kinnitty	No	Not applicable	Not applicable	Not applicable
Moneygall	No	Not applicable	Not applicable	Not applicable
Mountbolus	No	Not applicable	Not applicable	Yes, including LUZO-14 Constrained Land Use and DMO-

				106 Flood Risk Assessments
Mucklagh	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and balanced regional development	Yes, including LUZO-14 Constrained Land Use and DMO-106 Flood Risk Assessments
Pollagh/ Lemanaghan	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and balanced regional development	Yes, including LUZO-14 Constrained Land Use and DMO-106 Flood Risk Assessments
Rhode	No	Not applicable	Not applicable	Not applicable
Riverstown	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and balanced regional development	Yes, including LUZO-14 Constrained Land Use and DMO-106 Flood Risk Assessments
Shannon Harbour	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and balanced regional development	Yes, including LUZO-14 Constrained Land Use and DMO-106 Flood Risk Assessments
Shannonbridge	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and balanced regional development	Yes, including LUZO-14 Constrained Land Use and DMO-106 Flood Risk Assessments
Shinrone	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable, compact and balanced regional development	Yes, including LUZO-14 Constrained Land Use and DMO-106 Flood Risk Assessments
Walsh Island	No	Not applicable	Not applicable	Not applicable

d) Noted. No further action required. Sites within these settlements were considered as part of the County Development Plan SFRA and determined not to be within Flood Zones A or B.

Two types of benefitting lands were amongst the historical indicators of flood risk that were mapped and taken into account and mapped as part of the SFRA. There are strategic limitations associated with these datasets (one based on drainage from 1925 and one based on drainage from 1945) which are identified in the SFRA and on the table below. Amendment to the Flood Zones is not warranted.

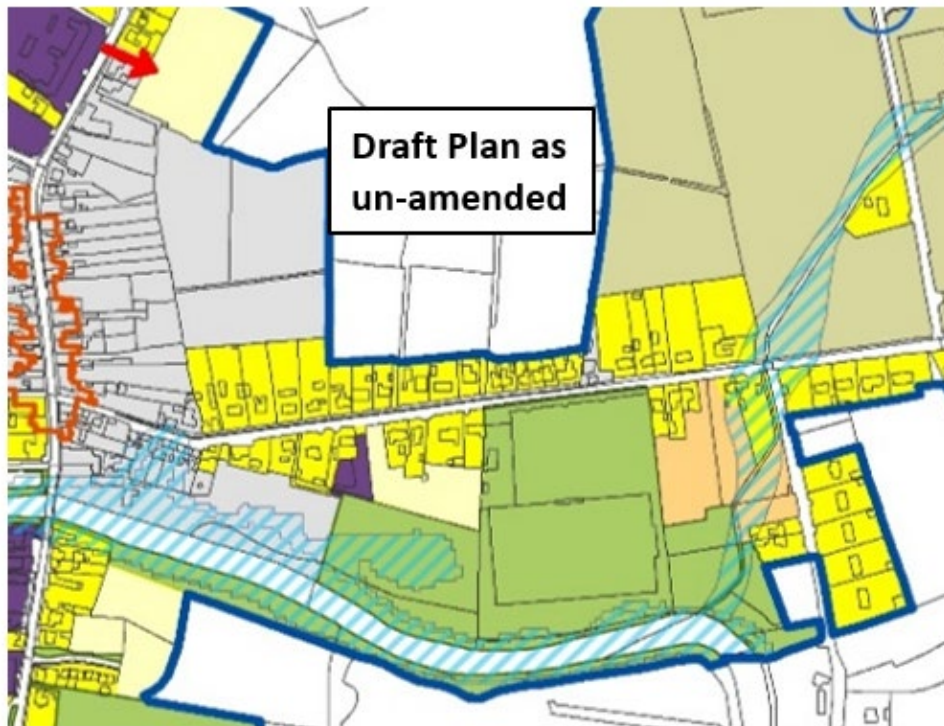
Information Source	Description	Strategic Limitations
Benefitting lands (OPW)	Benefitting lands mapping is a dataset identifying land that might benefit from the implementation of Arterial (Major) Drainage Schemes (under the Arterial Drainage Act 1945) and indicating areas of land estimated or reported to be subject to flooding or poor drainage.	Identifies broad areas - low resolution for flood risk management
Drainage Districts (OPW)	This drainage scheme mapping dataset was prepared on behalf of the Drainage Districts (Local Authorities with statutory responsibility for maintenance under the Arterial Drainage Act, 1925). These maps identify land that might benefit from the implementation of Arterial (Major) Drainage Schemes and indicate areas of land subject to flooding or poor drainage.	Identifies large broad areas - very low resolution for flood risk management

As provided for by the Plan (see for example Policy CAEP-49), it is Council policy to support the implementation of the 'The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and Department Circular PL2/2014. The Council will engage with the OPW when considering any proposals for development on lands identified as being benefitting lands.

- e) Noted. It is proposed to update the SFRA to identify that **“Flood event records for December 2015 to January 2016 for floods in Banagher, Pollagh, Shannonbridge and Shannon Harbour have been taken into account by the assessment and are available on the GSI’s Groundwater Flooding Data Viewer. The 2015-2016 data shows surface water flooding and does not distinguish between fluvial and pluvial flooding”**.
- f)
- (i) **Birr** – Noted.
- (ii) **Clara** – No further action required. Part of the Proposed 'New Residential' zoning (at Kilcoursey) overlaps one of the potential Future Scenario flood extent maps prepared under the national CFRAM Programme. The CFRAM Programme include maps for two potential future scenarios taking account of different degrees of climate impact. Under the Mid-Range Future Scenario (more likely to occur) there is relatively little overlap and under High-Range Future Scenario (less likely to occur) there is significantly more overlap. In compliance with the Guidelines, the Flood Zones identified by the SFRA are defined on the basis of current flood risk. The potential impacts of climate change include increased rainfall intensities and increased fluvial flood flows have been taken into account by the assessment as detailed in the SFRA report and as provided for by various Plan Policies (see response under No. 2 above).
- (iii) **Ferbane** – It is proposed to make the following changes to the Ferbane Zoning Map;
- **change the zoning of the 'Site A' in the below Map from 'Town Centre/Mixed' to 'Open Space, Amenity and Recreation';**
 - **change the zoning of 'Site B' in the below Map from 'Strategic Residential Reserve' to 'Open Space, Amenity and Recreation'.**

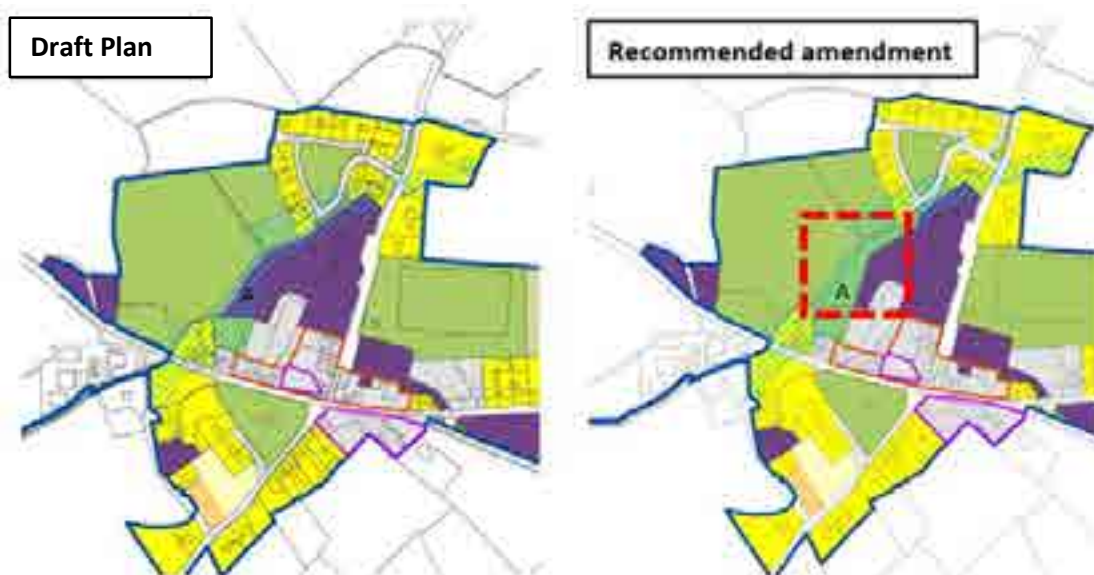
In addition, in reviewing these zonings, it was noted that an additional parcel of land, shown in the below map as 'Site C' was zoned 'Enterprise and Employment' despite being located on

lands designated Constrained Land Use and has not been previously developed. It is accordingly proposed to **change the zoning of this parcel of 'Site C' from 'Enterprise and Employment' to 'Open Space, Amenity and Recreation'** by way of a miscellaneous amendment.



- (iv) **Killeigh** – The OPW submission refers to the ‘Employment Services / Facilities’ zone as being affected by the CLU. This would appear to be, in error, a reference to a zoning objective in the current County Development Plan, 2014-2020, and should refer to the ‘Community Services / Facilities’ zone. It is assumed this is the case and that the Office of Public Works is referring to is the undeveloped land west of the national school and graveyard, which is identified as being within the flood risk area.

Recommended change – change the zoning of the land identified as site ‘A’ in the maps below from ‘Community Services / Facilities’ to ‘Open Space, Amenity, Recreation’ in the Killeigh Village Plan.



Moneygall – The OPW submission relates to 0.718 ha of land located on the western side of the R490 to the northwest of Moneygall Village (Site A on the maps below). In the draft Plan the site is zoned ‘Enterprise and Employment’. The south-eastern corner of the site is affected by the CLU zone. This was not shown in the zoning map in the draft plan but has been updated in the map below for information.

Note that the submission received from the Office of the Planning Regulator to the draft Plan (see section 4 of this CE Report) seeks the removal of this ‘Enterprise and Employment’ zoning from this site for the reasons that it extends the development boundary of Moneygall and would militate against compact growth of the village. In addition, the OPW raises concerns with regards to flood risk across the front/eastern end of the site.

In response to the **OPR** submission (Submissoin CDP/D172 in Section 4 of this CE Report), it has been recommended that this zoning be removed and the boundary amended accordingly. The two maps below put this in context, the first showing the zoning map for Moneygall as per the draft Plan, and the second shows the amended zoning map in response to the OPR submission. Note that the reduction in area of the ‘Enterprise and Employment’ zoning to the northeast of the village was also in response to a separate point in the OPR submission.

Recommended change – as per response to OPR submission, remove the zoning of land identified as site ‘A’ on the maps below and remove the subject land and realign the development boundary of the Moneygall Village Plan.

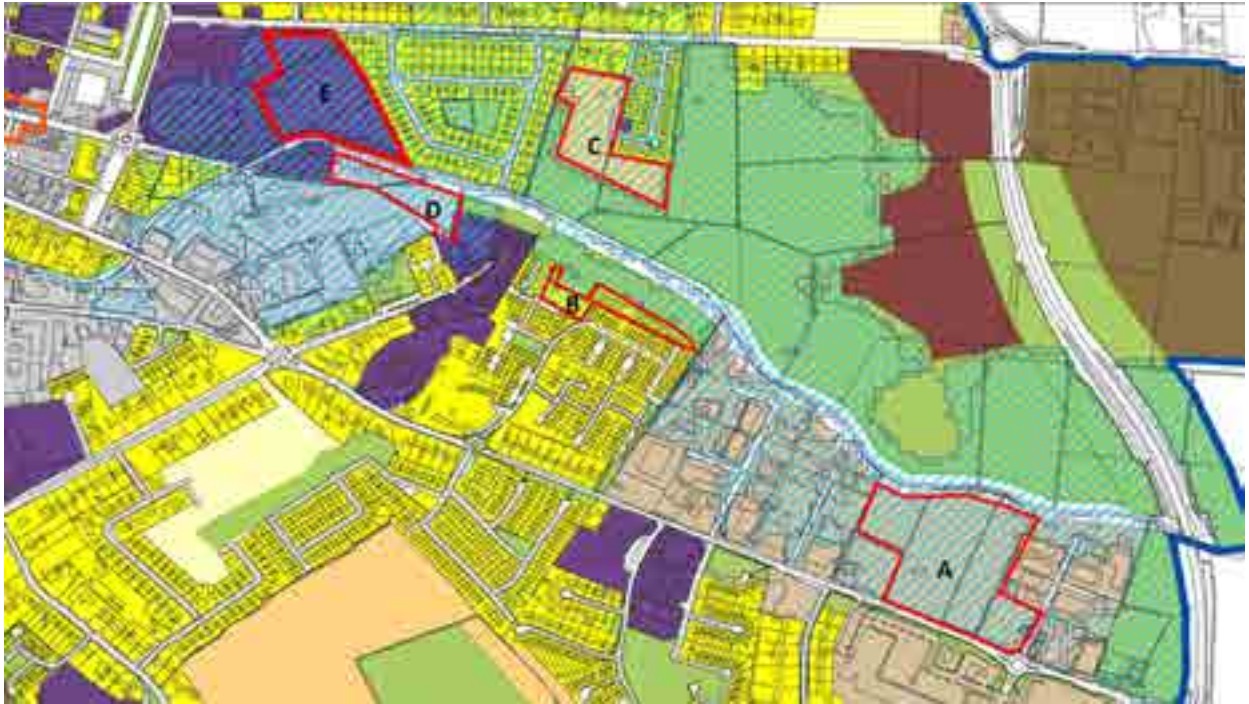


- (i) **Rahan** – Noted.
- (ii) **Shannonbridge** – Noted. Part of the Proposed ‘New Residential’, ‘Strategic Residential Reserve’ and ‘Enterprise and Employment’ sites overlaps with one of the potential future scenarios flood extents maps prepared under the National CFRAM Programme. The CFRAM Programme include maps for two potential future scenarios taking account of different degrees of climate impact. Under the Mid-Range Future Scenario (more likely to occur) there appears to be no overlap and under High-Range Future Scenario (less likely to occur) there is significant overlap. In compliance with the Guidelines, the Flood Zones identified by the SFRA are defined on the basis of current flood risk. The potential impacts of climate change include increased rainfall intensities and increased fluvial flood flows have been taken into account by the assessment as detailed in the SFRA report and as provided for by various Plan Policies (see response under (ii) above).
- (iii) **Tullamore**: The OPW submission refers to the Proposed ‘Strategic Residential Reserve’, undeveloped ‘Town Centre/Mixed Use’ and ‘Enterprise and Employment’ sites located within Flood Zone A.

It is proposed to make the following changes to the Tullamore Zoning Map;

- Site A: Enterprise and Employment (E&E) to Open Space Amenity and Recreation
- Site B: Existing Residential to Open Space Amenity and Recreation
- Site C: Strategic Residential Reserve (SRR) to Open Space Amenity and Recreation
- Site D: Town Centre / Mixed Use to Open Space Amenity and Recreation
- Site E: Community Services/Facilities to Open Space Amenity and Recreation

Tullamore Draft Zoning Plan Excerpt Map with Sites identified in Cloncollig, Whitehall and Riverside areas



Tullamore Draft Zoning Plan Excerpt Map with Sites identified in Cloncollig, Whitehall and Riverside areas and proposed amendments shown



[Ref: CDP/D/75](#)**Person / Body:****Geological Survey Ireland****Summary of submission / observation:**

This submission;

- a) Requests that either of the following wordings be included in relation to a County Geological Sites objective; “to protect from inappropriate development the scheduled list of geological heritage sites (Appendix X)” or “to protect from inappropriate development the following list of County Geological Sites”;
- b) Requests that Geoheritage be developed as a tourism policy in addition to the Tourism Policies set out in Chapter 6 ‘Tourism and Recreational Development’;
- c) Welcomes in Section 4.6.2 reference to a Clonmacnoise Esker Study which recommended that the Clonmacnoise esker system, as well as adjacent esker systems in Offaly, as landscapes to host a potential Geopark spanning the Westmeath Offaly region;
- d) Welcomes the inclusion of the Eiscir Riada as a landscape with high conservation value and promoting this esker landscapes unique geological heritage;
- e) States that the GSI, TCD and OPW have recently signed a research collaboration to develop a building and decorative stone inventory to inform government agencies, building owners and conservationists of the sources for suitable replacement stone in restoration work and to develop a great awareness among the general public which will assist both public and local authorities with Section 4 and 57 of the Planning and Development Act. The project could be considered in Chapter 10 ‘Built Heritage’; and
- f) Refers to specific GSI mapping tools and recommends that the GSI geological mapping, groundwater vulnerability mapping, geohazard mapping, geothermal suitability mapping, aggregates and mineral mapping be used in the Draft Plan.

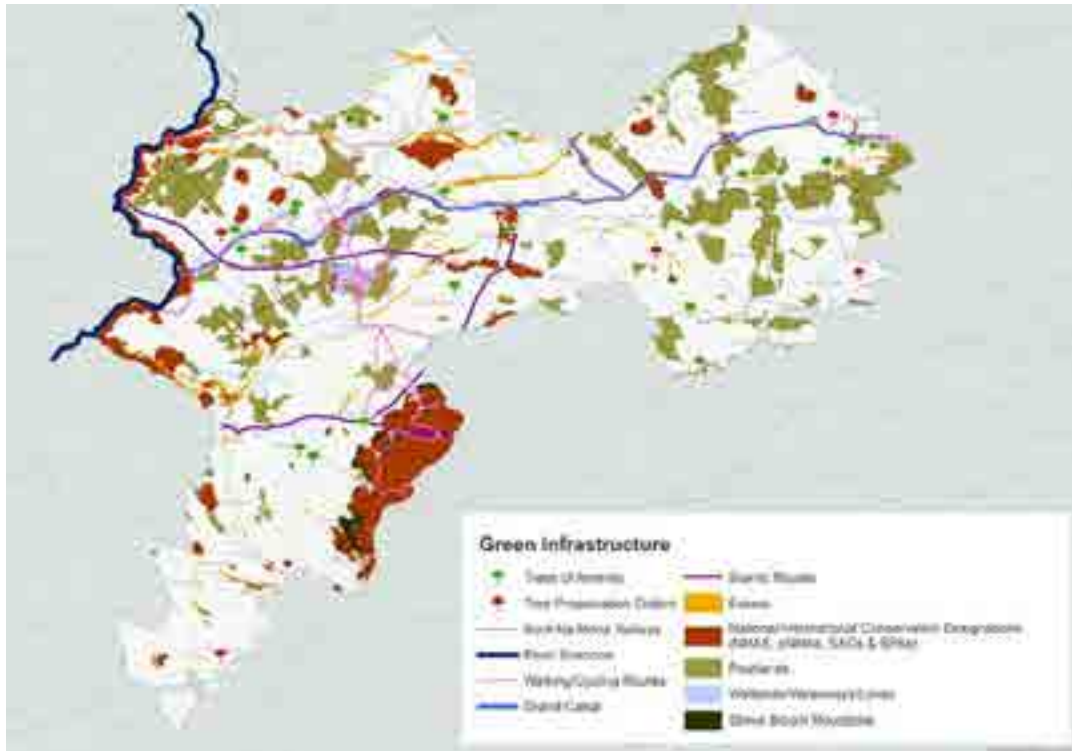
CE Response:

- a) No further action proposed. It is considered that Objective BLO-05 in Chapter 4 which states that “It is an objective of the Council to protect county geological sites and mushroom stones identified in Table 4.12 Schedule of County Geological Sites identified by the Irish Geological Heritage Programme for Protection in County Offaly” addresses this issue adequately.
- b) No further action proposed. Objective BLO-06 within Chapter 4 makes provision for encouraging appreciation of the county’s heritage assets. which states that; “It is an objective of the Council to increase pedestrian and cycling access to esker and geological sites in turn increasing appreciation of esker and geological heritage, where possible, subject to Article 6 of the Habitats Directive”.
- c) Noted. No further action proposed.
- d) Noted. No further action proposed.
- e) Noted, no further action proposed. It is not deemed necessary to refer to this collaboration project in Chapter 10: Built Heritage.
- f) Noted. It is proposed to **amend the below maps** as follows into relevant chapters in Volume 1 and the Wind Energy Strategy in the Draft Plan to incorporate updated GSI Esker Mapping and incorporation of same as Areas of High Amenity which are separately recommended to be included by Miscellaneous Amendment (q).

Revised Open Countryside Housing Policy Map from Chapter 2: Core Strategy, Settlement Strategy and Housing Strategy which takes account of new esker locations as Areas of High Amenity designations



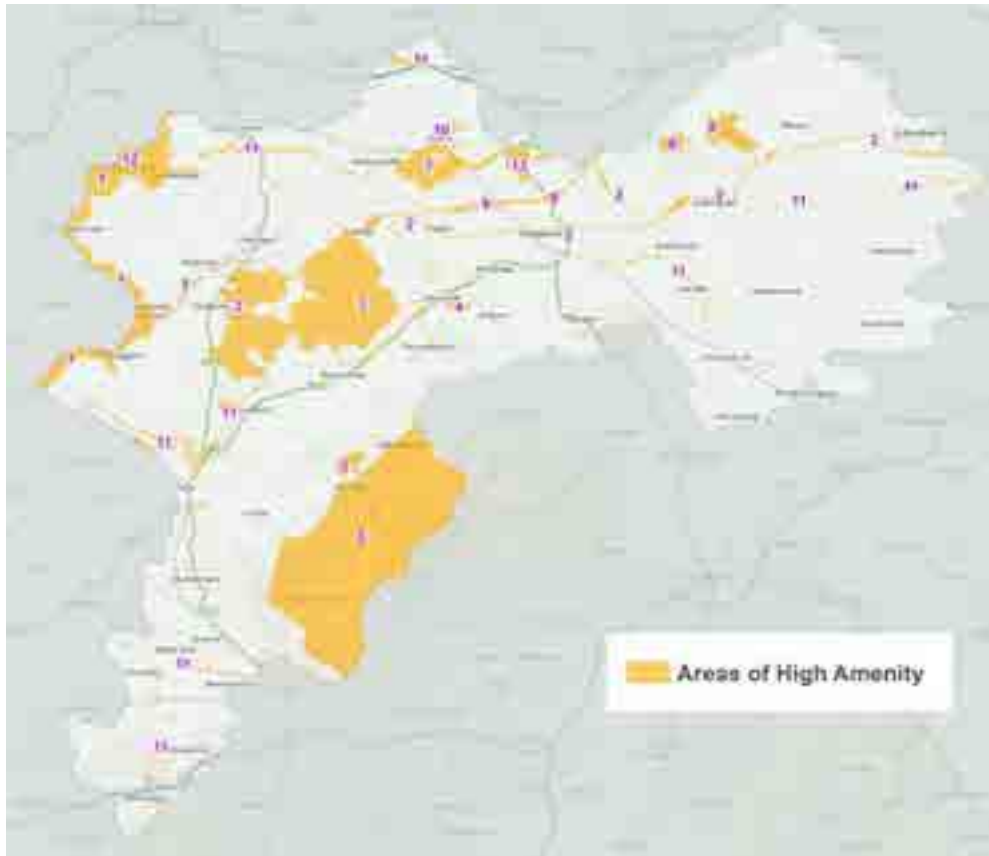
Revised Green Infrastructure Map from Chapter 4: Biodiversity and Landscape which takes account of new esker locations



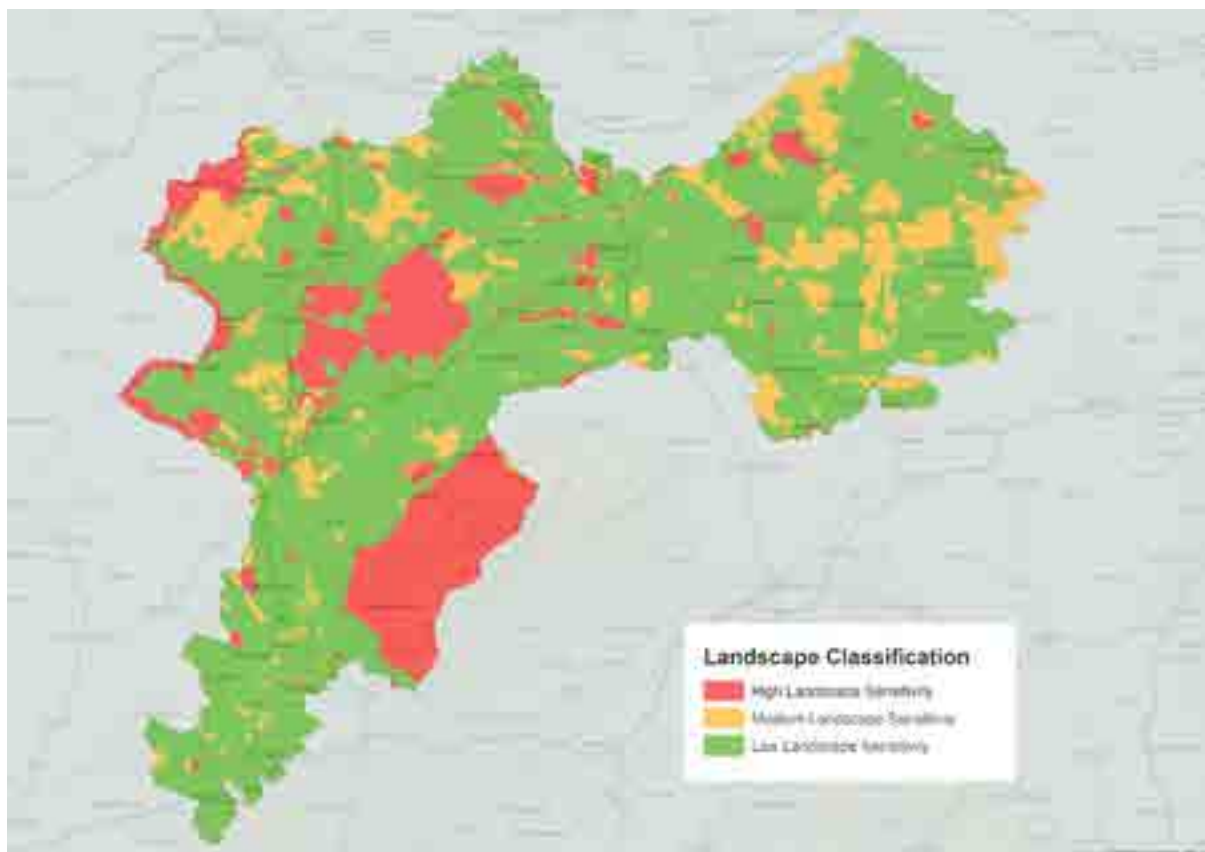
Revised Esker Map from Chapter 4: Biodiversity and Landscape which takes account of new esker locations



Revised Areas of High Amenity in Co. Offaly Map from Chapter 4: Biodiversity and Landscape which takes account of new esker locations



Revised Landscape Classification Map from Chapter 4: Biodiversity and Landscape which takes account of new esker locations



[Ref: CDP/D/133](#)

Person / Body:

EPA

Summary of submission / observation:

The submission received by the EPA refers to both the draft Plan itself and to the Strategic Environmental Assessment (SEA) Report, which accompanies the draft Plan. The SEA is the formal, systematic evaluation of the likely significant effects on the environment of implementing a plan or programme before a decision is made to adopt it, in this case the County Development Plan. SEA is required by the EU SEA Directive as transposed into Irish law through the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) as amended.

Strategic Environmental Assessment (SEA) Report

- a) The submission notes that as a priority, the EPA focus their efforts on reviewing and commenting on key sector plans. For land use plans at county and local level, the EPA provide a 'self-service approach' via the guidance document 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources'. The submission noted that this document is updated regularly and sets out the EPA's key recommendations for integrating environmental considerations into Local Authority Land Use Plans. The EPA suggests that Offaly County Council take this guidance document into account and incorporate the relevant recommendations, in finalising and implementing the Plan.
- b) That Offaly County Council ensures that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.
- c) The EPA acknowledges the inclusion of the various environmental commitments in the Plan, including those related to the protection of water quality, biodiversity and climate adaptation / mitigation. It is clear that the findings of the SEA have been incorporated to a large degree into the Plan.
- d) Referring to Section 8.4 of the SEA (Members' Amendments and Environmental Consequences), the EPA recommends that any motions implemented in the Plan must conform with the principles of proper planning and sustainable development and remain aligned with national policy commitments, such as the National Planning Framework and Regional Spatial and Economic Strategies and the Climate Action Plan 2019.
- e) EPA welcomes the use of environmental sensitivity mapping to help inform the areas needing greater levels of protection to help avoid potential cumulative adverse environmental effects.
- f) EPA acknowledges the approach taken in the consideration of alternatives for the development of the Plan area

g) That where the potential for likely significant effects are identified, appropriate mitigation measures should be provided to avoid or minimise these; and that the Plan includes clear commitments to implement the mitigation measures.

h) That the Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities. If the monitoring identifies adverse impacts during the implementation of the Plan, Offaly County Council should ensure that suitable and effective remedial action is taken. EPA suggests that Council consider publishing monitoring reports alongside the interim review of the Plan over its lifetime.

i) State of the Environment Report – Ireland’s Environment 2016 / 2020

That in finalising the Plan and integrating the findings of the SEA into the Plan, the recommendations, key issues and challenges described in State of the Environment Report Ireland’s Environment – An Assessment 2016 (EPA, 2016) should be considered, as relevant and appropriate.

That Council be aware that the EPA will be finalising and publishing the next iteration of this four year reporting series before the end of the year. Once published, the EPA recommend that Council review the key findings and recommendations and integrate these into the draft Plan, as relevant and where appropriate.

j) Future Amendments to the Plan

That any future amendments to the Plan should be screened for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan.

k) SEA Statement – “Information on the Decision”

That once the Plan is adopted, an SEA Statement should be prepared that summarises:

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

That a copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

l) Environmental Authorities

That under the SEA Regulations, Council should also consult with:

- The Minister for Housing, Planning and Local Government,
- The Minister for Agriculture, Food and the Marine, and the Minister for the Environment, Climate and Communications, where it appears to Council as the competent authority that the plan or programme, or modification to a plan or programme, might have significant effects on fisheries or the marine environment,

- The Minister for Culture, Heritage and the Gaeltacht where it appears to Council as the competent authority that the plan or programme, or modification to a plan or programme, might have significant effects in relation to the architectural or archaeological heritage or to nature conservation, and
 - any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.
- m) That objective (ii) under *Section 2.4 ‘Strategic Objectives’* of the SEA Environment Statement (EPA mistakenly refers to *Section 2.3 Strategic Vision*) be amended as follows “*Consolidate settlements ~~by avoiding to avoid~~ undesirable and inefficient sprawl...*”
- n) That the second last paragraph under *Section 2.7 – ‘Relationship with other relevant Plans and Programmes’* of the SEA Environment Statement, could strengthen the role of the Plan in informing lower level plans and programmes by amending it as follows “The County Development Plan ~~may will~~, in turn, guide lower level strategic actions...”
- o) Section 4 – Environmental Baseline
- Referring to Section 4.18 - Overlay of Environmental Sensitivity Mapping, that there is also merit in referring to the EPA-funded Environmental Sensitivity Mapping Web Tool www.enviromap.ie, which could also assist in this regard.
- p) Section 5-Strategic Environmental Objectives
- That for Table 5.1 – Strategic Environmental Objectives (SEOs), Indicators and Targets, consider the following aspects:
- The second bullet point target associated with the Water SEO should also refer to subsequent iterations of the River Basin Management Plan.
 - The third bullet point target associated with the Water SEO, related to flooding, should also look to avoid inappropriate zoning or development of lands in areas at risk of significant flooding. Development of lands should be consistent with the flood risk management guidelines.
- q) Section 8 – Evaluation of Plan Provisions
- That EPA guidance note ‘Good Practice Guidance note on cumulative effects assessment in SEA’ could be referred to in Section 8.2 Cumulative Effects.
- That for Table 8.5 Presence of Interrelationships between Environmental Components, given the amount of peatlands within the plan area, there is merit in recognizing the interrelationship between Soil and Air and Climatic Factors. Where peat rich soils are allowed to dry out, they can release CO₂ and act as carbon sources, while wet peat soils act as carbon sinks.

Draft Plan (Volume 1)

- r) Chapter 3 – Climate Action and Energy
- In Section 3.7 *Peatlands*, EPA note the intention of Offaly County Council to support the preparation of a “*comprehensive after use framework plan for the industrial peatlands*”. (Policy CAEP-13). The requirements of the SEA and Habitats Directives should be taken into consideration also, as appropriate.
- s) Chapter 4 – Biodiversity and Landscape

EPA acknowledge the intention for Offaly County Council (in Policy BLP-15) to work with adjoining local authorities and relevant stakeholders, including the NPWS, to promoting a National Park designation for peatlands in the midlands. We also note the proposed 'Regional Peatway', connecting natural and cultural attractions. The requirements of the SEA and Habitats directives should be taken into account for both of these proposals as appropriate and where relevant.

t) Chapter 4 – Biodiversity and Landscape

In relation to Policy BLP-21, EPA note the intention of the policy to have regard to a '*Waterways Corridor Study 2002*'. Given that this strategy predates more recent environmental legislation (including the SEA Directive) and environmental policy commitments, any recommendations or findings within this study should be carefully considered. EPA also suggest the merit in reviewing this strategy in the context of ensuring that any recommendations contained within this strategy conform with national and international commitments with regards environmental protection.

u) Chapter 8 – Sustainable Mobility and Accessibility

In relation to *Section 8.6 – Air Transport*, while EPA note the intention of Offaly County Council to support the location of an airport within the county or within the midlands. This should be considered in the context of existing national airport infrastructure and continued improvements to transport and road infrastructure servicing those airports. No information is provided regarding the type of airport considered, or how potential significant environmental affects would be considered in this regard. Any proposal should be subject to the relevant environmental assessments.

v) Chapter 8 – Sustainable Mobility and Accessibility

In *Section 8.8 – Sustainable Mobility and Accessibility Objectives*, the objective to prepare a local transport plan for Tullamore (SMA-O-02), should take into account the requirements of the SEA and Habitats Directives.

w) Chapter 11 – Water Services and Environment

We welcome the range of policies and objectives contained in this chapter related to environmental protection and supporting sustainable development. In Section 11.5.2 Waste Management, there is merit in referring to the Draft National Hazardous Waste Management Plan 2021-2027, which is currently being prepared by the EPA.

CE Response:

- a) The EPA's 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' document has been taken into account in undertaking the SEA and preparing the Plan.

No change to the draft Plan.

- b) The Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy, as required by Section 10(1A) of the Planning and Development Act 2000 (as amended).

No change to the draft Plan.

- c) Noted. No change to the draft Plan.

- d) The three motions passed by the elected members are referred to in Table 8.3 of the SEA as follows:

Table 8.3 Motions advised against and subsequently agreed upon as amendments

Motion adopted as amendment	Potential for Likely Significant Negative Environmental Effects
Enterprise and Employment zoning, Moneygall	There is no established planning justification for zoning at this settlement above that which was already included in the pre-Draft Plan at this settlement. By not consolidating land use zoning and including unnecessary land use zoning beyond Moneygall's existing development envelope, this amendment would provide for a less compact form of development that would fail to maximise benefits from infrastructural investment. By facilitating the unnecessary sprawl of the settlement and failing to consolidate zoning, this amendment would decrease the likelihood of brownfield development and conflict with efforts to improve sustainable mobility (with associated effects on energy, air, noise and human health). Providing for unnecessary zoning would be likely to result in higher levels of sprawl and associated avoidable potential adverse environmental effects.
New Residential Zoning, Rhode	New Residential zoning in the south east of the Plan area included in the pre-Draft Plan was removed; New Residential Zoning was added in the north east for the Draft Plan. This change is not consistent with the Section 28 Ministerial Guidelines on Sustainable Residential Development in Urban Areas (page 49: "The scale of new residential schemes for development should be in proportion to the pattern and grain of existing development. Because of the scale of smaller towns and villages, it is generally preferable that overall expansion proceeds on the basis of a number of well integrated sites within and around the town/village centre in question rather than focusing on rapid growth driven by one very large site," and page 50 "...no one proposal for residential development should increase the existing housing stock" by more than 10-15% within the lifetime of the development plan or local area plan.). Development of the land to the south would also allow for a more compact village.
Boundary change at Dunkerrin Sráid	There is no established planning justification for extending the boundary southwards at this Sráid to encompass previously undeveloped lands, this amendment would provide for a less compact form of development that would fail to maximise benefits from infrastructural investment. By facilitating the unnecessary sprawl of the Sráid this amendment would be likely to result in higher levels of avoidable potential adverse environmental effects.

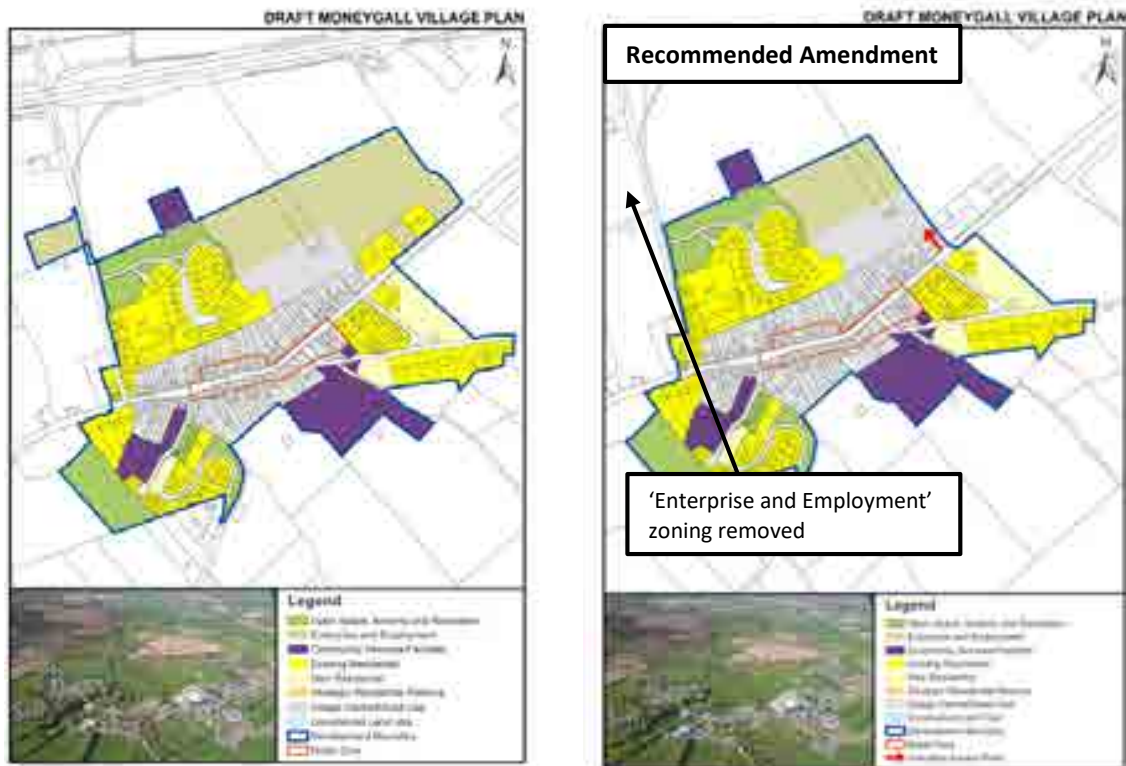
The three motions are described in further details as follows:

Enterprise and Employment zoning, Moneygall

The amendment related to 0.718ha of land located on the western side of the R490 to the northwest of Moneygall Village. The amendment comprised the zoning of the site 'Enterprise and Employment', and by association, the extension of the development boundary of Moneygall Village.

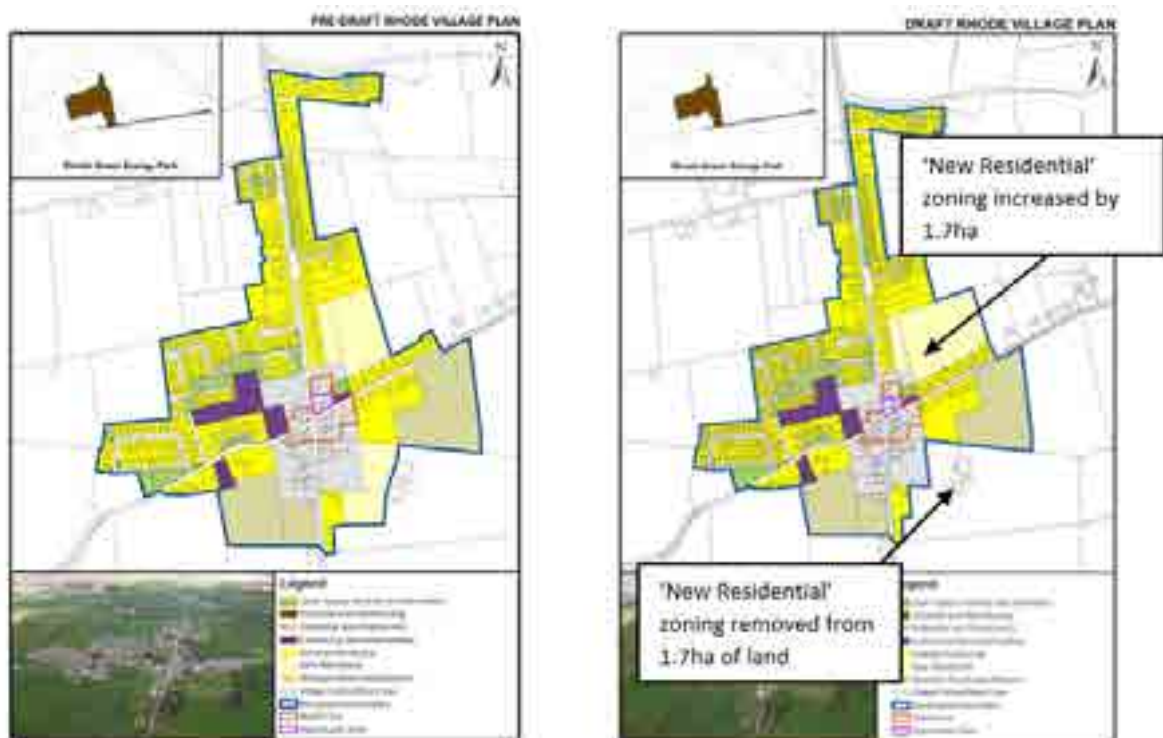
Note however that the submission received from the OPR to the draft Plan seeks the removal of this 'Enterprise and Employment' zoning from this site for the reasons that it extends the development boundary of Moneygall and would militate against compact growth of the village. In addition, the OPW raises concerns with regards to flood risk across the front/eastern end of the site.

In response to the OPR submission, it has been recommended that this zoning be removed and the boundary amended accordingly. The two maps below put this in context, the first showing the zoning map for Moneygall as per the draft Plan, and the second shows the amended zoning map in response to the OPR submission. Note that the reduction in area of the 'Enterprise and Employment' zoning to the northeast of the village was also in response to a separate point in the OPR submission.



'New Residential' zoning, Rhode

The amendment related to the location of 'New Residential' zoned land in Rhode, and comprised an increase by 1.7ha of 'New Residential' zoning on land north-east of the village centre and removal of 1.7ha of 'New Residential' zoning on land south-east of the village centre.



In respect of national policy commitments, such as the National Planning Framework and Regional Spatial and Economic Strategies and the Climate Action Plan 2019, the following is noted:

- The amendment results in the quantum of ‘New Residential’ zoned land in village remaining consistent with the Core Strategy for the county (Chapter 2 of the draft Plan).
- The ‘New Residential’ zoned land on the northeast side of the village centre, as per the draft Plan, comprises infill development directly adjacent to the village centre, noting that the entire site, zoned ‘New Residential’ is within 400m of the village centre. The site is also within the development boundary of the current Rhode Village Plan under the Offaly County Development Plan 2014-2020.

As such, the amendment remains consistent with *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF), which seeks ‘Compact Growth’ across cities, towns and villages; and *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES), stating that ‘*Residential development 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.*’

- Services are readily available.
- The ‘New Residential’ zoned land on the northeast side of the village centre has no environmental constraints, such as flooding or designated sites (SAC, SPA, NHA).
- The Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities, 2009. Provides the following guidance in terms of sustainable growth of towns and villages:

The scale of new residential schemes for development should be in proportion to the pattern and grain of existing development. Because of the scale of smaller towns and villages, it is generally preferable that overall expansion proceeds on the basis of a number of well integrated sites within and around the town/village centre in question rather than focusing on rapid growth driven by one very large site.

...that no one proposal for residential development should increase the existing housing stock by more than 10-15% within the lifetime of the development plan.

Notwithstanding the above, it is considered that development of the land can be suitably controlled through the application of the same aforementioned Section 28 guidelines and development management standards contained in Chapter 13 of the draft Plan, noting specifically DMS-33;

DMS-33 Villages

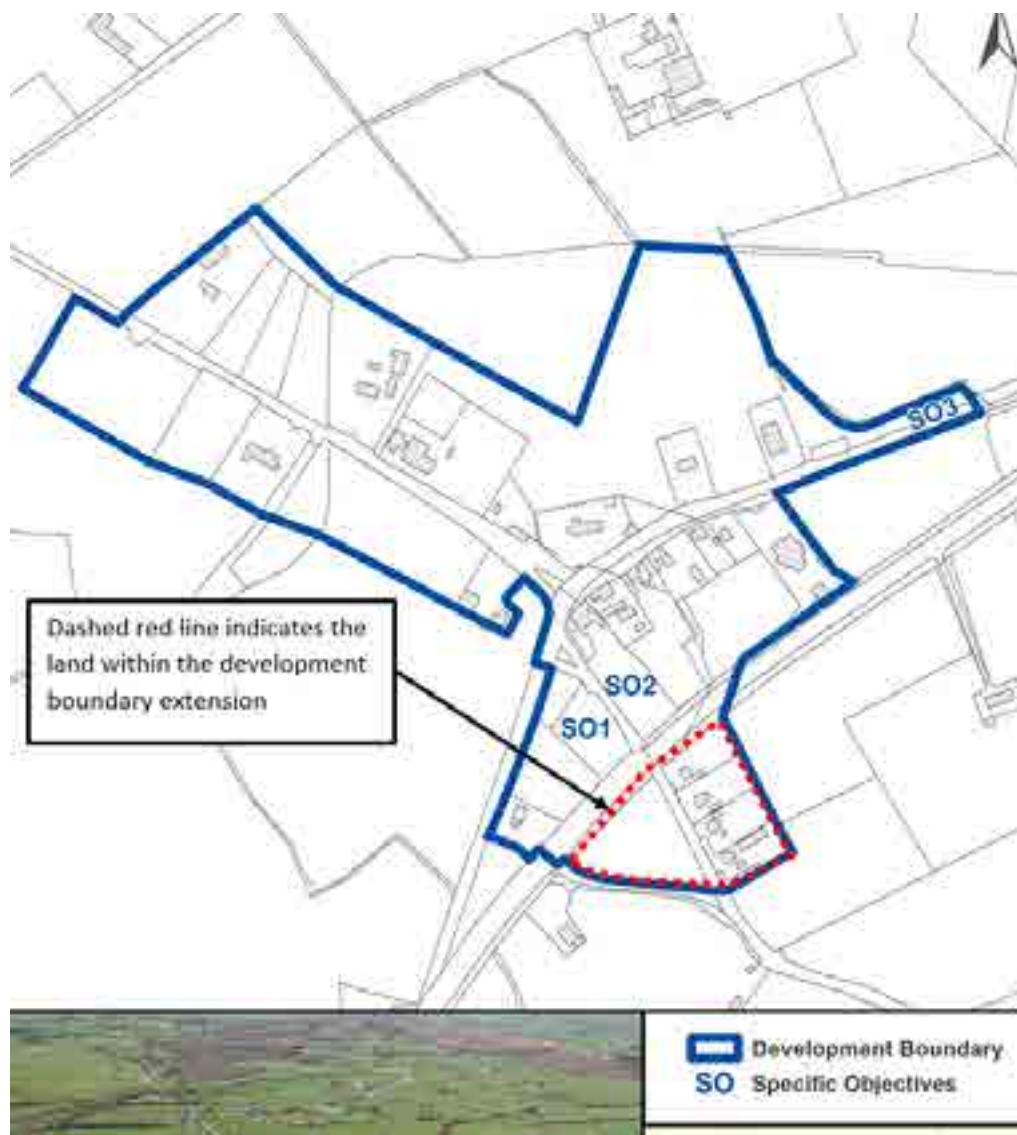
While the Residential developments shall have regard to and help to maintain and reinforce the form and character of the village concerned in terms of design, layout, finishing details, boundary makeup, landscaping etc. The resulting development shall be high in quality, with a differing scale and character more appropriate to its location and context rather than larger more homogenous urban scaled housing estates.

In particular, roads which open up significant tracts of land relative to the existing size of the settlement should be assessed to ensure significant environmental effects

to the environment are avoided and should be designed by suitably qualified professionals with strong Landscape Architecture and design input. Boundary treatments, footpaths and lighting should reflect the village's rural character.

Boundary change at Dunkerrin Sráid

The amendment related to a motion to include 4 no. existing one-off dwellings and a 0.4ha undeveloped site within the development boundary of the Dunkerrin Sráid.



In respect of national policy commitments, such as the National Planning Framework and Regional Spatial and Economic Strategies and the Climate Action Plan 2019, the following is noted:

- The extension to the development boundary possibly creates two new dwelling sites, each 0.2ha. Chapter 2 of the draft Plan includes the following policy for Sráids:

SSP-15 It is Council policy to support housing taking place within Sráids to act as a viable alternative to one-off housing in the open countryside but with limited scope for small-scale multi-house developments of up to 4 houses only.

SSP-17 It is Council policy to encourage the sustainable, balanced development of the Sráids in an incremental manner, with the emphasis on small scale development over a medium to long-term period, in keeping with the character of the settlement.

SSP-19 It is Council policy that any development shall be centred on the focal point of the settlement assisting in creating a 'centre' with a greater sense of place, and shall be subject to the satisfactory provision of infrastructure and services.

The policy approach for Sráids is the promotion of balanced sustainable development, in an incremental and consolidated manner with the emphasis on small scale development over a medium to long term period, in keeping with the character of the settlement.

Due to the limited size of the undeveloped site, development is limited to 1 or 2 houses, which, if occurred over the lifetime of the Plan, would not offend the policy approach for the Sráids in terms of seeking incremental growth, noting that there was just 1 house built within the Sráid since 2009.

- The extension to the boundary possibly creates two new dwelling sites, each requiring an on-site wastewater treatment system. In this regard, any application for a dwelling would need to comply with development management standard DMS-51 which relates to the EPA requirements for on-site wastewater treatment.

DMS-51 On-site Wastewater Treatment

For individual on-site wastewater treatment systems, the standards and guidance on design, operation and maintenance of on-site wastewater treatment systems as set out in the Environmental Protection Agency (EPA) 'Code of Practice on Wastewater Treatment and Disposal Systems serving Single Houses' (October, 2009) or any later version that may be issued by the EPA, shall be complied with.

- e) Noted. No change to the draft Plan.
- f) Noted. No change to the draft Plan.
- g) Noted. The required information on mitigation measures is provided in Section 9 of the SEA Environmental Report. Mitigation has been integrated into the Policies and Objectives of the Plan.
No change to the draft Plan.
- h) Noted. The required information on monitoring measures is provided in Section 10 of the SEA Environmental Report - this will inform the final Programme to be included in the SEA Statement.
No change to the draft Plan at this time – to take account of the cited guidance when finalising the Monitoring Programme for inclusion in SEA Statement.
- i) Noted. The recommendations, key issues and challenges described in the 2016 State of the Environment Report have been taken into account by the Plan and SEA – please refer to the SEA Environmental Report, including Section 4.2. The next iteration of this report will be taken into account during the Plan-preparation/SEA process as relevant.

No change to the draft Plan at this time – to take account of any new information as it emerges and as relevant.

- j) Noted. The any proposed material alterations will be screened for likely significant environmental effects.

No change to the draft Plan.

- k) Noted. An SEA Statement containing the required information will be prepared at the end of the process.

No change to the draft Plan.

- l) Noted. These environmental authorities are being consulted with as part of the SEA/Plan preparation process.

No change to the draft Plan.

- m) The Strategic Objectives set out under Section 2.4 of the SEA Environmental Report are a repeat of the Strategic Objectives under Section 1.5, Chapter 1 of the draft Plan written statement. It is recommended that Objective (ii) in both Chapter 1 of the written statement and Section 2.4 of the SEA Environmental Report be amended as follows:

- (ii) Consolidate settlements ~~by avoiding to avoid~~ undesirable and inefficient sprawl. This will be achieved through targeting a significant proportion of future development on infill/ brownfield/ underutilised sites within the existing built-up footprint of all settlements in accordance with the principle of Compact Growth set out in the National Planning Framework.

- n) It is recommended that the second last paragraph under Section 2.7 of the SEA Environmental Report be amended as follows:

As required by the Planning and Development Act 2000, as amended, the Draft County Development Plan is consistent with and conforms with national and regional policies, plans and programmes, including the NPF and RSES for the Eastern & Midlands Region. The County Development Plan ~~may will~~, in turn, guide lower level strategic actions, such as the Tullamore, Birr, Edenderry and Portarlinton Local Area Plans that will be subject to their own lower-tier environmental assessments.

- o) Noted. In Section 4.18 of the SEA Environmental Report, EPA-funded Environmental Sensitivity Mapping Web Tool www.enviromap.ie will be referenced, which could also assist in lower tier consideration of plans and projects.

- p) Noted. In Table 5.1 of the SEA Environmental Report, the second and third bullet points for 'Targets' in respect of the Environmental Component 'Water' will be updated as follows:

Implementation of the objectives of the second cycle of the River Basin Management Plan by 2021 (and subsequent ~~objectives iterations~~ as relevant).

Avoid inappropriate ~~zoning and~~ development in areas at risk of flooding and areas that are vulnerable to current and future erosion.

- q) Noted. In Section 8.2 of the SEA Environmental Report, EPA's guidance note 'Good Practice Guidance note on cumulative effects assessment in SEA' will be referenced, which has been considered in the assessment.
- r) Noted, SEA and AA requirements will be taken into account as relevant, as required by the legislation.
- s) Noted, SEA and AA requirements will be taken into account as relevant, as required by the legislation.
- t) Noted. While having regard to this Strategy, the Council do not necessarily commit to its full implementation and will carefully consider any recommendations or findings within this study, taking into account more recent environmental legislation (including the SEA Directive) and environmental policy commitments.

It is therefore proposed to amend text under Section 4.13.1 and Policy BLP-21 of the draft Plan (Chapter 4 'Biodiversity and Landscape') as follows:

The Heritage Council published Waterway Corridor Studies pertaining to Offaly in 2002 and in 2004. ~~Council will consider~~ ~~Regard will be had to~~ these studies in relation to funding and planning applications (See Policy BLP-21 in this chapter).

BLP-21 It is Council policy ~~have regard~~ to ~~consider~~ the Waterways Corridor Study 2002 and protect the recreational, educational and amenity potential of navigational and non-navigational waterways within the county, such as the Grand Canal Corridor, towpaths and adjacent wetland landscapes, ~~taking into account more recent heritage and environmental legislation (including the SEA Directive) and environmental policy commitments.~~

- u) Noted. Policy SMAP-26 reads as follows:

SMAP-26 It is Council policy to support the provision of an airport within the county or the midlands where it would contribute towards the proper planning and sustainable development of the county and comply with all environmental legislation and policies and objectives contained within this Plan and higher level planning documents, including the National Planning Framework and the Eastern and Midland Regional Spatial and Economic Strategy.

It is recommended elsewhere in the CE Report that Policy SMAP-26 is amended as follows:

SMAP-26 It is Council policy to support the provision of ~~a green international trade and distribution zone based on international air connectivity~~ ~~an airport~~ within the county or the midlands where it would contribute towards the proper planning and sustainable development of the county, ~~and~~ ~~and~~ comply with all environmental legislation, ~~and~~ policies and objectives contained within this Plan and would be consistent with higher level planning documents, including the National Planning Framework and the Eastern and Midland Regional Spatial and Economic Strategy.

In relation to Policy SMAP-26, the table under Section 8.8.8 of the SEA Environmental Report states the following:

Policy SMAP-26 supports the provision of an airport within the County or the midlands subject to certain requirements being met. The development of an airport would have to be accompanied by significant amounts of infrastructure - including supporting public and private transport infrastructure and services and water services. Significant amounts of greenfield lands, away from existing settlements would be required with significant residual impacts likely on the landscape. Potential conflicts would be likely to arise between the project and ecology. The operation of an airport would be likely to generate significant amounts of greenhouse gas emissions and energy usage and would be likely to result in significant noise emissions that would have the potential to conflict with human health. The need for any airport and alternatives regarding location would have to be thoroughly examined at project-level environmental assessment. Consideration would have to be given to flight paths utilised by flights to and from existing airports. Notwithstanding these potential issues, mitigation has been integrated into Policy SMAP-26 requiring such an airport to: contribute towards the proper planning and sustainable development of the county; and comply with all environmental legislation and policies and objectives contained within the Plan and higher level planning documents, including the National Planning Framework and the Eastern and Midland Regional Spatial and Economic Strategy.

In addition to complying with the various Plan provisions relating to environmental protection and management and sustainable development, any project that may emerge relating to Policy SMAP-26 would have to be subject to environmental assessment requirements as relevant, as required by the legislation.

- v) Noted, SEA and AA requirements will be taken into account as relevant, as required by the legislation.
- w) It is recommended that the following paragraph of text and policy are added to the Environment Section of Chapter 11 'Water Services and Environment'.

Hazardous Waste

Hazardous waste is generated by every sector of society and is for the most part managed by authorised operators. The Council will have regard to the Environmental Protection Agency's National Hazardous Waste Management Plan 2014-2020, and subsequent plans, which takes into account progress that has been made since the previous plan and the waste policy and legislative changes that have also occurred and includes an objective regarding self-sufficiency in managing hazardous waste.

Proposed new policy:

To ensure that hazardous waste is addressed through an integrated approach of prevention, collection, and recycling and encourage the development of industry-led producer responsibility schemes for key waste streams.

[Ref: CDP/D/149](#)

Person / Body:

Councillor Eamon Dooley

Summary of submissions / observations:

Requests that any Government funded programmes for the after use of cutaway bogs on state owned lands must include provision for greenways and any other appropriate amenities that would benefit the local economy.

CE Response:

The after-use of cut away bogs and the provision of peatways (i.e. Greenways on peat) and other amenities and reference to Government funding are also addressed in Chapters 5 and 6 of the draft Plan in the policies / objectives hereunder.

RDO-05 It is an objective of the Council to support the longer-term strategic planning for industrial peatland areas, which should include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure including workshops, office buildings and industrial sites, which addresses environmental, economic and social issues including employment and replacement enterprise reflecting the current transition from employment based around peat extraction. Examples of after use and re-purposing of workshops and production facilities could include outreach training centres, gravel extraction, bike-hire facilities, enterprise space / co-working facilities, aquaculture, **birch water harvesting**, herb growing, resource management / recycling centre, climate change mitigation (such as through renewable energy, carbon sink, data centres, battery energy storage, afforestation including native woodland, a Green Energy Hub, flood management), and tourism (such as through peatways, recreational forestry, wilderness, eco-tourism based on biodiversity, and a designation of a National Peatlands Heritage Park).

RDO-06 It is an objective of the Council to support the Midlands Regional Transition Team in developing a 'Holistic Plan for Just Transition in the Midland Region' including an inventory of project proposals and actions to support just transition in the Midlands and to assist the region in identifying potential investment needs for inclusion in a programme of support under the new EU Just Transition Fund.

TRO-17 It is an objective of the Council to protect potential greenway, blueway and peatway routes (i) along and in proximity to abandoned rail lines and (ii) routes identified in Figure 6.14 'Midlands Cycling Destination, Offaly Network Map' from inappropriate development that could compromise the delivery of a cycling or walking route in the future.

TRO-09 It is an objective of the Council to facilitate the development of a tourism resource using cutaway peatlands in conjunction with Bord na Móna and Fáilte Ireland, subject to environmental considerations and nature designations for example, recreational forestry, outdoor pursuits, peatways on the network of bogs and industrial railways and a designation of a National Peatlands Heritage Park.

TRP-16 It is Council policy to support the extension of greenways, blueways, peatways and trails within the county and the integration and linkage of them with other existing / proposed greenways, blueways, peatways and trails both within and outside County Offaly.

RDO-02 It is an objective of the Council to support the progression and delivery of projects in the context of available National and European funding, that support:

- Community structural development;
- Local business and enterprise development;
- Infrastructure and capital development,
- Agricultural development; and
- Tourism and heritage development.

An announcement was recently made of the Government’s Bord Na Móna Bog Rehabilitation Scheme with c.30 bogs in Offaly to be restored. The scheme benefits states *“The enhanced improvements will also enrich the State’s natural capital, increase eco-system services, strengthen biodiversity, improve water quality and storage attenuation, develop the amenity potential of the peatlands as well as providing employment opportunities as part of a Just Transition in the Midlands”*. In response to this, it is recommended to;

- amend Section 4.1 Peatlands as follows (additional text in red);

Notwithstanding the extensive peat production which has taken place at various sites within the county, peatlands act as important amenity areas for locals and visitors while also contributing significantly to climate change mitigation and adaptation, providing important carbon sinks, water attenuation and flooding protection. Peatlands are considered to be very important ecosystems and many of the county’s bogs are listed designated sites under Annex I (habitats) of the EU Directive and are listed in Table 4.2 of this chapter.

National environmental policies are dictating that domestic turf cutting on these designated raised bogs will be phased out over the coming years. The future rehabilitation of peatlands offers great potential to enhance and restore natural systems (natural assets) and increase the flow of ecosystem goods and services like flood regulation, water purification, habitat and species biodiversity as well as amenity and recreational activity. It is necessary for the Council to continue to liaise with various government and non-government organisations in an effort to secure the conservation of the peatlands in the county.

The National Peatland Strategy produced by the Department of Arts, Heritage and the Gaeltacht and the NPWS aims to provide a long-term management framework to optimise the social, environmental and economic contribution of all peatlands within the State, setting out supports, structures, funding mechanisms and regulatory frameworks to promote a partnership approach to their sustainable development.

The Council recognises that the development of peatways offer a unique alternative means for tourists and visitors to access and enjoy rural parts of the county while supporting the development of rural communities and job creation in the rural economy, as well as the protection and promotion of natural assets and biodiversity.

The development of Lough Boora Discovery Park in Offaly, voted ‘Ireland’s Favourite Place’ in a nationwide Royal Town Planning Institute competition in 2018, is an example of a suitable after use for a cutaway bog, providing important habitats for a wide range of animals, birds and plants along with amenity facilities such as a Sculpture Park, visitor centre, angling area, bird watching facilities and walking and cycling routes.

The Council recognises ~~the potential to develop~~ other potential long term opportunities on rehabilitated peatlands such as the development of;

- a 'Regional Peatway' connecting natural and cultural attractions and the development of a National Park for the raised bog peatlands in the midlands; and
- Wilderness³ corridors at the following locations;
 - Cavemount, Esker, Ballycon, Derrycricket, Clonsast North, Clonsast and Derrycastle in East Offaly; and
 - Blackwater, Ballaghurt and Belmont Bogs in West Offaly, from Clonmacnoise in the direction of Belmont village, all of which can be linked to routes identified in Figure 6.14 'Midlands Cycling Destination, Offaly Network Map.'
- Add in the following objective to Chapter 4 Biodiversity and Landscape;

"It is an objective of the Council to work with stakeholders such as Bord Na Móna, Coillte, National Parks and Wildlife Service, Waterways Ireland and Just Transition related groups to examine the feasibility of developing a Wilderness Corridor on rehabilitated peatlands linked to routes identified in Figure 6.14 'Midlands Cycling Destination, Offaly Network Map at;

- (i) Cavemount, Esker, Ballycon, Derrycricket, Clonsast North, Clonsast and Derrycastle Bogs in East Offaly; and
- (ii) Blackwater, Ballaghurt and Belmont Bogs in West Offaly, from Clonmacnoise in the direction of Belmont village in West Offaly.

- Add in the following policy to Chapter 5 Economic Development;

'It is Council policy to proactively encourage the Bord na Móna Peatlands Rehabilitation Scheme (which is to be administered by the Department of the Environment, Climate and Communications (DECC) and regulated by the National Parks and Wildlife Service (NPWS) of the Department of Housing, Local Government and Heritage) to deliver on potential amenity and tourism benefits for example complimenting the delivery of the *Midlands Cycling Destination – Offaly*, where routes pass through the rehabilitated bogs, subject to environmental, biodiversity and hydrological requirements'.

In order to support the new objective relating to examining the feasibility of Wilderness Corridors, the following additions are necessary in the following sections in the Draft Plan;

Chapter 3 Climate Action and Energy

The additional text shown in red below is proposed to be inserted to policy CAEP-35 from the Draft Plan;

"It is Council policy that in assessing planning applications for wind farms, the Council shall:

- (a) have regard to the provisions of the Wind Energy Development Guidelines 2006, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change

³ The consensus definition of wilderness in a European context as contained in Guidelines on Wilderness in Natura 2000 European Commission Technical Report, 2013-069 is: "A wilderness is an area governed by natural processes. It is composed of native habitats and species, and large enough for the effective ecological functioning of natural processes. It is unmodified or only slightly modified and without intrusive or extractive human activity, settlements, infrastructure or visual disturbance."

- 2017, the Draft revised Wind Energy Guidelines 2019 which are expected to be finalised in the near future;
- (b) have regard to ‘Areas Open for Consideration for Wind Energy Developments’ in the Wind Energy Strategy Designations Map from the County Wind Energy Strategy;
 - (c) require a 2 km separation distance from turbines to town and village settlement boundaries in the county;
 - (d) the impact of the proposed wind farm development on proposed Wilderness Corridors as detailed in Objective XX (Ref. Number to be determined) of Chapter 4;
 - (e) have regard to Development Management Standard 109 on wind farms contained in Chapter 13 of this Plan; and
 - (f) have regard to existing and future international, European, national and regional policy, directives and legislation.”

Chapter 13 Development Management Standards

The additional text shown in red below is proposed to be inserted into DMS-109 from the Draft Plan;

<p>DMS-109 Wind Farms</p>	<p>When assessing planning applications for wind energy developments the Council will have regard to;</p> <ul style="list-style-type: none"> • the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made; and • the Wind Energy Strategy Designations Map from the County Wind Energy Strategy showing areas identified as ‘Areas Open for Consideration for Wind Energy Developments’ and ‘Areas not deemed suitable for Wind Energy Developments’, and specific policy for wind development in these areas as outlined in Section 8 of the County Wind Energy Strategy; • 2 km separation distance from turbines to town and village boundaries in the county as required by policy CAEP-35 of this Plan. <p>In addition to the above, the following local considerations will be taken into account by the Council in relation to any planning application;</p> <ul style="list-style-type: none"> • Impact on the visual amenities of the area; • Impact on the residential amenities of the area; • Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape;
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	<ul style="list-style-type: none"> • Visual impact of the proposal with respect to protected views, scenic routes, designated scenic landscapes and proposed Wilderness Areas as detailed in Chapter 4 of this Plan; • Impact on nature conservation, ecology, soil, hydrology, groundwater, archaeology, built heritage and public rights of way; • Impact on ground conditions and geology; • Consideration of falling distance plus an additional flashover distance from wind turbines to overhead transmission lines; • Impact of development on the road network in the area; and • Impact on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region), shadow flicker and air quality. <p>This list is not exhaustive and the Council may consider other requirements contained in the chapter on a case by case basis with planning applications should the need arise.</p>
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Draft County Wind Energy Strategy

The additional text shown in red below is proposed to be inserted into Table 3: Assessment of Wind Energy Potential Areas in Section 6 Field Analysis and Desk Top Survey of Potential Wind Energy Areas of the Draft Plan;

Ref No.	Area	Recommendation
2	<p>Area generally from Cloneygowan to Clonbullogue</p> <p>This area is characterised by a predominantly flat and in places slightly undulating landscape with a number of significant tracts of peatlands and transitional woodlands and coniferous forestry, in particular in areas around Walsh Island, Bracknagh and Clonbulloge, along with improved agricultural land, large landholdings and a dispersed pattern of rural housing. The extensive tracts of flat peatlands in this area offer potential to accommodate a wind farm layout with depth, comprising a grid formation giving a better sense of balance and visual cohesion. In addition, there exists a precedent of windfarm and renewable energy projects developed in the area such as Mount Lucas windfarm while other projects have been deemed suitable and are awaiting commencement of development. There exists both good wind speeds and electricity infrastructure in the area.</p> <p>A potential constraint in this area is the objective in Chapter 4 to examine the feasibility of developing Wilderness Corridors at bogs at Cavemount,</p>	<p>Area deemed ‘Open for consideration for Wind Energy development’ in principle *</p>

	Esker, Ballycon, Derrycricket, Clonsast North, Clonsast and Derrycastle. The Council will not be in favour of any developments proposed on these bogs with the potential to impact upon the character, uniqueness and wilderness potential of these areas. The impact on a potential Wilderness Corridor from any wind farm development will be assessed at project level by the Council.	
6	<p>Area generally east of Shannonbridge and south of Clonmacnoise</p> <p>The landscape in this area is extremely varied with;</p> <ul style="list-style-type: none"> • The monastic site of Clonmacnoise together with Mongans Bog, Fin Lough and Clonmacnoise Callows located to the north west of this area; • Esker ridge running from Shannonbridge towards Clonmacnoise; • The River Shannon and its callows, comprising river flood plains, grassland, meadows and semi natural woodland, along the west of this area; • Extensive tracts of peatlands, transitional woodlands and coniferous forestry at Tullaghbeg, Derrylahan and Clorahane. <p>Whilst viable wind speeds are available in this area, the presence of the Clonmacnoise monastic site, the River Shannon Callows, eskers and protected views of Clonmacnoise and the River Shannon, as identified in Chapter 4 of this Plan, severely limits the capacity of this area to accommodate the visual change associated with windfarm developments.</p> <p>A potential constraint in this area is the objective in Chapter 4 to examine the feasibility of developing Wilderness Corridors at bogs at Blackwater, Ballaghurt and Belmont Bog. The Council will not be in favour of any developments proposed on these bogs with the potential to impact upon the character, uniqueness and wilderness potential of these areas. The impact on a potential Wilderness Corridor from any wind farm development will be assessed at project level by the Council.</p>	Area deemed 'Open for consideration for Wind Energy development' in principle *

[Ref: CDP/D/174](#)

Person / Body:

Keep Ireland Open

Summary of submission / observation:

This submission is very detailed and difficult to follow in parts. Notwithstanding this, following examination of this submission, the main points of the submission can be summarised as follows;

Format

1. The Plan should provide an Index as recommended in Section 5.15 of the Development Plan Guidelines;
2. Development Management Standards should be dealt with at the end of each chapter to make the plan more user-friendly;

3. The layout of the Draft Plan could be improved by sub-numbering or sub-lettering lists of points and paragraphs.

Chapter 3 Climate Action & Energy

4. Policy CAEP-02 should be replaced by following a policy stating; “Recognising that large-scale overhead power lines can have a significant impact on the visual character of an area, ensure that energy corridors do not impact on the natural environment and minimise their visual impact and obtrusiveness by avoiding areas of high amenity, high landscape value, scenic importance, sensitivity or sites and areas of nature conservation and areas of archaeological interest, NHAs, SPAs, SACs and National Monuments and mountains areas, by integrating with their surroundings and by preserving the natural environment. Where impacts are inevitable mitigation measures to minimise their visual obtrusiveness must be provided for. In respect of Natura Sites, networks must comply with Art 6 of the Habitats Directive.”
5. Propose additional policy – “In rural areas the undergrounding or re-routing of transmission lines (including telephone and TV cables) shall be considered first as part of a detailed consideration and evaluation of all available options. Where technically feasible and environmentally appropriate, HV and other power lines (including existing power lines) and associated equipment should be placed underground to reduce the visual impact on the natural environment especially in sensitive areas or areas of high visual amenity to preserve significant landscape, impact on Euro sites and significant views from the visual intrusion of energy infrastructure and cooperate with other agencies as appropriate. Protect areas of recognised landscape importance and significant views from visually intrusive large scale energy transmission infrastructure by using alternative routing. Development must be consistent with international best practice. Integrate with surface treatment schemes where possible. Demonstrate that where impacts are identified mitigation features have been provided/included where impacts are inevitable.”
6. Propose an additional Policy relating to Hydro Energy: “*In assessing hydro energy schemes proposals the Council will take into account the impact on public rights of way and walking routes.*”
7. Propose that policy CAEP-31 be replaced by; “Development must safeguard and protect the natural heritage and have no significant adverse impact on surrounding natural or built heritage features, biodiversity, views and prospects and scenic routes or on the visual character of the landscape and amenities. There is a presumption against their being located in sensitive areas such as Natura 2000 sites and must take into account possible cumulative effect and the potential for mitigation through screening with hedges.”
8. Propose an additional policy in relation to solar farms “Make representations to the appropriate government department to make Planning Guidelines for ground mounted solar farms.”
9. Proposes in relation to Wind Energy that the Draft Plan include maps showing the degree of acceptability from prohibition to preferred areas including areas in adjoining counties considered unsuitable.
10. Proposes that the Plan undertake an analysis of suitable areas for wind energy and prepare a map showing the Landscape Suitability for Wind Energy Development in accordance with national guidelines including section 3.5 of the Wind Energy Guidelines (2006) and any subsequent revisions and as recommended in the LCA.
11. Include a policy requiring existing public rights of way and established walking routes to be identified, maintained and preserved free from development

12. Include a policy to “Restrict large scale wind energy structures in the rural hinterland and mountain areas to protect their overriding visual and environmental values”
13. All applicants should include a LIA dealing with possible impacts on any existing rights of way or established walking routes
14. Include an objective stating that “wind energy developments must be appropriately located”.
15. Include an objective stating “The development including any ancillary facilities or buildings, considered individually or taking into account their scale and layout, their incremental/cumulative effect due to other proposals, the degree to which impacts are highly visible over a vast area, their visual impact on scenic landscape as well as local visual impacts, impacts on archaeology, should not create a hazard or nuisance, including the risk of land instability and take into account the character and appearance of the surrounding area, the openness and visual amenity of the countryside, landscapes, designated sites and sites of historic or archaeological interest or in proximity to National Monuments. Development will be subject to suitable locations and will only be permitted where they will not have an adverse impact on the environment including natural heritage and the protection of amenities and landscapes. Where impacts are inevitable what mitigation features have been taken into account.”
16. Include an objective stating “In assessing development proposals the Council will take into account public access to the countryside and the impact on public rights of way and walking routes.”

Chapter 4 Biodiversity and Landscape

17. Submit that this should be entitled *Natural Heritage* to better reflect its contents.
18. Submit that the Policy related to Designated and non- Designated sites in Section 4.16 requires a complete re-write as many topics are totally unrelated.
19. Delete Quarries from the Title and include BLP 13 & 14 in Chapter 5 Economic Development Policies: Aggregates and Mining
20. Replace BLP-09 by “Work with stakeholders, to protect sites or features in areas of geological or geomorphological interest or importance from inappropriate development by prohibiting development at, or in their vicinity, or which threaten their existence, integrity or conservation value. Identify, protect, enhance, maintain, manage, conserve, and where appropriate, restore their character and promote their preservation (including sites that may become designated during the lifetime of the Plan, in the interest of protecting our geological heritage.”
21. Replace BLP-10 by “Promote, encourage, facilitate and support access and public rights of way to geological and geo-morphological features of interest inter in consultation with landowners (where appropriate).”
22. Propose additional policy: “Co-ordinate the continuing development of strategic walking routes, trails and other countryside recreational opportunities”
23. Propose additional policy; “Plan and prepare for the future use of large industrial bog sites when peat harvesting finishes as there is potential for the development of amenities in conjunction with NPWS, Coillte and ESB/Bord na Móna.”
24. Propose additional policy; “Explore the potential for the development of and work in partnership with relevant stakeholders towards achieving a National Peatlands Park.”
25. Submit that a Table of existing or potential riverside and lakeside walks/cycle routes should be included;
26. Propose additional policy/objective; “In partnership with the NPWS, WI, Councils, community groups and other relevant stakeholders, provide, protect, promote, encourage, develop,

- maintain, facilitate, increase and improve public access to the inland waterways including riparian/waterway corridors. In partnership with NPWS WI and other relevant stakeholders”
27. Propose additional policy/objective; “Recognising the importance of rivers and riparian corridors and buffer zones for their natural amenity and scenic values, provide promote, develop and facilitate/accommodate access for walking, cycling tracks and other compatible activities along inland waterways including rivers and canals to facilitate the creation of linear parks, in co-operation with landowners, WI, NPWS, Government Departments, community groups and other councils”
 28. Propose additional policy/objective; “Support and facilitate the development of Greenways and Trails along (named) rivers”
 29. Propose additional policy/objective; “Identify existing accesses to lake shores and riverbanks within the life time of the Plan”
 30. Propose additional policy/objective; “Require that land adjacent to river and canal banks and lakeshores be reserved/preserved for public access as an undisturbed buffer zone between new development and river corridors and other water bodies to encourage increased public access and recreational opportunities.”
 31. Propose additional policy/objective; “Seek to enhance public access to inland waterways as a condition of any development granted.”
 32. Propose additional policy/objective; “Recognising the importance of inland waterways, both navigable and non-navigable, work with State Agencies, landowners, local communities and other relevant groups/stakeholders to protect, manage, maintain, preserve, conserve, improve and enhance waterbodies and watercourses, rivers(named),streams river valleys, lakes, springs and associated undeveloped riparian strips/zones, buffer zones, distinctive linear sections of water corridors, canals (including towpaths) and river banks and adjacent wetlands river and stream valleys and riverine wetland areas from degradation and damage and the visual impact of dispersed and highly visible development that could adversely affect them by compromising their visual integrity, recreational, amenity, natural heritage, geological or landscape character values and the natural characteristics and features and recognise and promote them as natural environmental assets, and maintain them free from inappropriate development. Keep them in an open state and in a natural condition by discouraging land filing culverting or realignment and in certain instances by uncovering existing culverts.”
 33. Propose additional policy/objective; “Protect and maintain the amenity and recreational value of walking and cycling routes by prohibiting the intrusion of development along these routes. Seek to ensure that new development will not have a negative impact on established walking routes and public rights of way along inland waterways.”
 34. Propose additional policy/objective; “Normally only permit proposals for development associated with water sports adjacent to waterways (including inland lakes) where the proposed facilities are compatible with existing use of water including non-recreational uses, which will not result in damage to important features of archaeological heritage or Natura Sites, can be satisfactorily integrated into the landscape or will not have an unacceptable impact on visual or environmental amenities especially in areas of high amenity or scenic importance.”
 35. Propose additional policy/objective; “As water sports cover a wide range of activities from tranquil uses such as sailing, canoeing, rowing and sail boarding to powered activities such as water-skiing and powerboat uses, the Council may require management plans for particular areas to address the compatibility of such varying demands.”

36. Propose additional policy/objective; “Adopt bye laws prohibiting or restricting jet-skiing, water skiing and any other noise generating activities within one year of the adoption of the Plan.”
37. Propose additional policy/objective; “When considering development applications relating to activities such as the use of jet-skis and power boats have regard to the recommendations of any national guidelines which may come into force with respect their potential impacts on nature conservation.”
38. Propose additional policy/objective; “In areas adjacent to inland waterways, lakes, canals, rivers, where planning permission is sought, the applicant must ensure that full public access to waterways is retained or conditions may be attached requiring retention of this access to facilitate creation or extension of walking/cycle routes.”
39. Propose additional policy/objective; “Adopt a regional approach to the protection of watercourses in co-operation with neighbouring counties.”
40. Propose additional policy/objective; “Require that development along rivers set aside land for pedestrian routes that could be linked to established settlements.”
41. Propose additional policy/objective; “Protect, enhance and improve existing public rights of way and, where possible, provide additional access to inland waterways including lake shores, river banks, through the acquisition of land for public rights of way and parking and lay-by facilities, through agreement with existing landowners.”
42. Propose additional policy/objective; “Reserve land adjacent to canal and river banks and other waterbodies to promote and facilitate the creation of waterside linear parks to link with existing parks and open spaces and to facilitate the provision of walking/cycling routes along canals and watercourses.”
43. Propose additional policy/objective; “Promote the natural, historic and amenity value of watercourses to address the long term management and protection and strengthen regional links.”

Canals

44. Propose additional policy/objective; “Provide public access to canal corridor, where feasible, in co-operation with WI, NPWS and community groups, encourage, promote and use the potential of canal towpaths for designated walking and cycle routes, both as recreational amenities and the promotion of links with any designated walking cycling routes, existing or proposed.”
45. Propose additional policy/objective; “Ensure the conservation of canal corridors and require that developments abutting the canal relate to the context of the adjacent environment and contribute to its overall amenity.”
46. Propose additional policy/objective; “Support and facilitate the development of an integrated network of Greenways and Trails (including blue water trails long the Grand Canal for cycling, walking and nature study.”
47. Propose additional policy/objective; “Ensure that development along or adjacent to the Grand Canal contributes to the creation of an open and integrated network of walking and cycling routes that integrates into the Grand Canal Way Green Route.”
48. Propose additional policy/objective; “Protect, preserve, maintain, improve and enhance the national heritage, recreational and amenity value (including walking and cycling) of the Grand Canal corridor and its towpaths by ensuring that development along and adjacent to the canal protects and incorporates high value natural heritage features including watercourses, wetlands, woodlands and includes a buffer area to facilitate a fully functioning Green Infrastructure network.”

49. Propose additional policy/objective; “Promote and develop the towpaths along the Grand Canal, Barrow Line and Corbally Line Canal to expand recreation in co-operation with WI and adjoining councils.”
50. Propose additional policy/objective; “Investigate the possibility of developing long distance walking routes, within the lifetime of the Plan, along disused canals.”

Lakes

51. Propose additional policy/objective; “Promote, extend, develop and facilitate the provision of increased access to lakes and lakeshores to extend public walking and cycling routes.”
52. Propose additional policy/objective; “Support the provision of walking and cycling links between lakes and nearby villages.”

Trees, Forestry and Hedgerow

53. Suggest that coniferous forestry should be regarded primarily as commercial forestry and deciduous forestry as amenity.
54. Propose additional policy/objective; “*Recognising the contribution that forestry makes to well-being, develop, promote, provide, protect, improve and encourage the provision of greater public access to new and existing forestry, both state and private, for recreational activities such as walking, hiking, cycling, and other non-noise generating activities and the provision of nature trails, as part of connected network of walking and cycle routes in cooperation/consultation with Coillte, the Forest Service, private landowners, local interest groups and other relevant stakeholders and agencies.*”
55. Propose additional policy/objective; “Retain existing rights of way and identify them and established walking routes before planting commences and maintain them as rights of way/walking routes.”
56. Propose additional policy/objective; “Ensure that existing public rights of way, traditional walking routes are not obstructed.”
57. Propose additional policy/objective; “*Forestry must not be visually obtrusive in the landscape so as to ensure that development is appropriate in its character, nature and scale and that it is carefully managed so that it doesn’t detract substantially or result in damage to visual amenity or have a negative visual effect on the rural environment and character of the countryside or cause pollution to or degradation of wildlife habitats, natural waters or areas of geological importance. It must enhance and be in harmony with the landscape. Protect and safeguard scenic and exposed/elevated landscapes, nature conservation areas (including Natura Sites and NHA’s), monuments, archaeological or other historical or heritage features.*”
58. Propose additional policy/objective; “No new or replacement coniferous forests will be allowed on summits generally above 250 metres. “
59. Propose additional policy/objective; “Protect woodlands and groups of trees from inappropriate development that would impact adversely on them and affect their amenity value. Manage and promote the preservation and enhancement of the existing network of woodlands as they contribute to the environment including landscape character and landscape conservation. Where appropriate, protect mature groups of trees that are not protected under TPOs.”
60. Propose additional policy/objective; “Recognising the recreational potential of forestry, including Coillte’s “open forest” policy, protect and encourage access to forestry and woodlands, in co-operation with Coillte, private landowners and other stakeholders for walking routes (including long distance and looped walks) mountain and nature trails and hiking.”

Geology, Eskers and Quarries

61. Propose additional objective; "Increase cycling and pedestrian access and maintain esker heritage."
62. Propose additional policy/objective; "Protect, preserve and conserve the landscape and natural heritage and geo-diversity values of esker systems from inappropriate development."
63. Propose additional policy/objective; "Ensure that any plan or project affecting eskers is adequately addressed with regard to their potential impact on the landscape and the environment and that applications for quarrying activity in proximity to eskers having regard to their potential to impact on the landscape, the environment and amenity value designated status of the eskers and conserve them from inappropriate development."

Landscape

64. Propose additional policy/objective; "Provide and increase managed public access to interesting and attractive landscapes or to semi-natural and landscape amenity areas for recreational."
65. Propose additional policy/objective; "Preserve, maintain, enhance important landscapes and protect the amenity value, visual integrity of upland areas. Discourage inappropriate development in open countryside and prohibit developments which are likely to have material adverse visual impacts, either individually or cumulatively, on the character of the uplands. Ensure that development will not materially interfere or detract from scenic uplands and that particular regard is had to potential impacts of new developments and require that proposed developments demonstrate that every effort has been made to reduce visual impacts (including excessive bulk and inappropriate siting) and that visually prominent sites have been avoided to minimise visibility from scenic routes, walking trails, public amenities, settlements and roads. Have particular regard to the potential impacts of development on sensitive upland areas and consider the difficulty of establishing and maintaining screening vegetation."
66. Propose additional policy/objective; "Preserve the status of traditionally open/unfenced landscapes including commonages and other hill land."
67. Propose additional policy/objective; "Protect, conserve, preserve, maintain, safeguard, identify and enhance the visual integrity, scenic quality, general amenity and the visual quality of areas of intrinsically important and outstanding, highly sensitive, designated, natural, unspoiled and open landscapes (named), scenic areas, high amenity areas and the environs of archaeological or historic sites (named) from intrusive, inappropriate, injurious or unsympathetic new, or additions to, existing developments and reinforce their character and promote their distinctiveness by prohibiting development where it could unduly impinge or impact on or be detrimental to such landscapes or would be injurious to, or detract from natural amenities or introduce incongruous landscape elements."

Designated Sites

68. Propose additional policy/objective; "Actively promote the conservation and protection of proposed or designated SACs and protect their integrity. Development in, near or which could adversely affect a site should avoid any significant impact on features for which the site is designated or proposed and only consider development proposals within or affect a site if it can clearly demonstrate that the development will not have a significant adverse effect on it. Identify and afford appropriate protection to new sites."
69. Propose additional policy/objective; "Protect those sites identified as candidate SACs as well as other sites that may be identified during the lifetime of the Plan."

70. Propose additional policy/objective; “Development in, near or which could adversely affect a SPA should avoid any significant adverse impact on the features for which the site has been designated or which could affect its integrity. Council will take appropriate steps to avoid the deterioration or disturbance of habitats or species contrary to the Habitats Directive and in particular will protect plant and animal species.”
71. Propose additional policy/objective; “Assess proposed developments in order to determine if they are likely to impact directly, /indirectly or cumulatively on designated sites in accordance with relevant legislation.”
72. Propose additional policy/objective; “All developments, plans and projects that have the potential to have a negative/adverse impact on the integrity or coherence of a Natura Site will be subject to Habitats Directive Assessment and should be in accordance with best practice and guidance. Comply fully with Art 6(3) & (4) of the Habitats Directive (as transposed into Irish law by the EU Habitats Regulations 1997 and subsequent amendments) and S.177A of the Planning and Development Act (2000 – 2010) or any superseding legislation to ensure the protection, management, enhancement and improvement of the network of Euro Sites, including any additional sites that may be proposed during the lifetime of the Plan, by assessing and screening and, where warranted, by prohibiting developments or projects within, near or immediately adjacent, which could have significant adverse direct, indirect or secondary impacts,(either individually, cumulatively or in combination with other plans) on the conservation objectives and qualifying interest of a site, due to their size, scale or land take unless there are imperative reasons such as overriding public interest of a social economic nature and adequate compensatory measures have been identified and put in place to ensure and that it can be established that there is no feasible alternative or less damaging solutions. Sites should be afforded the highest level of protection in accordance with the relevant Directives and legislation. Promote the favourable conservation status of habitats and protective species including those listed under the Birds Directive, the Wildlife Acts and the Habitats Directive.”
73. Propose additional policy/objective; “Recognising their importance, and in accordance with relevant legislation, protect, enhance and conserve the character and integrity of designated or proposed NHAs including those that may be designated during the lifetime of the Plan and maintain their conservation value, by avoiding/resisting proposed development in, near or adjacent to Sites which could result in their deterioration or which are likely to have a significant adverse effect (direct, indirect or cumulative) on features for which the sites were designated or proposed for designation. Ensure the protection of the ecological, visual, recreational, environmental and amenity values. Ensure that any development is designed and sited as to minimise its impact on landscape values. Maintain the conservation value of Council owned land within designated or proposed Sites and promote the conservation value of adjoining council-owned land.”
74. Propose additional policy/objective; “Assess all proposed developments in order to determine if they are likely to impact directly, indirectly or cumulatively on designated natural heritage sites in accordance with relevant legislation.”
75. Propose additional policy/objective; “Protect, conserve, preserve, enhance, maintain and, where necessary restore the integrity of all sites, including areas adjacent thereto, designated or proposed, under National and European legislation and in other relevant International Conventions and Agreements and Processes by prohibiting development which might damage or be harmful to or result in serious dereliction or disturbance or which could have a significant adverse effect on the integrity of a site and maintain and develop linkages between them. Support in co-operation with statutory authorities the management of proposed or

designated sites to achieve conservation objectives. Protect and maintain the favourable conservation status/value and where necessary the restoration of designated or proposed sites. When assessing development proposals ensure the protection and conservation and enhancement of wildlife habitats.”

76. Propose additional policy/objective; “Maintain or restore the favourable conservation condition of designated or proposed sites under the control of the Council.”
77. Propose additional policy/objective; “Protect, conserve, protect the integrity of and maintain the favourable conservation status and conservation value of Ramsar Sites, Statutory Nature Reserves, Biogenetic Reserves, and Wildfowl Sanctuaries under National and European legislation and International Agreements and maintain and /develop linkages between them. Prohibit development which would damage or threaten their integrity.”
78. Propose additional policy/objective; “Recognising the role played by natural amenities and landscapes as major resources as part of our heritage, identify, provide, support, maintain, actively promote, encourage, protect, preserve, improve, safeguard and enhance public access to heritage sites and features, natural heritage and amenity areas, including Natura 2000 sites, nature reserves, mountains, uplands, moorlands, forests, rivers, lakes, valleys, scenic areas, areas of natural beauty and other natural amenities for active recreational activities such as mountaineering and hill-walking, which have been traditionally used for outdoor recreation, and to the countryside generally, by creating a meaningful network of access routes as the opportunity or need arises. This will be done in co-operation, consultation and consensus with state agencies, landowners, community groups other interested bodies.”
79. Propose additional policy/objective; “Designate traditional walking routes to the uplands as public rights of way.”
80. Propose additional policy/objective; “Recognising the important role of the environment through diversity, quality, integrity and quality of life by promoting the protection, conservation and enhancement of the natural environment by prohibiting intrusive development that would detrimentally impact on natural heritage which could or might have a negative impact on natural amenity and recreational assets, natural heritage features or might unduly damage or take away from its character and by implementing the provisions of the Planning and Development Act 2000(as amended). Promote appropriate enhancement of the natural environment as an integral part of development. Engage with stakeholders, including local communities and statutory authorities to identify, protect, conserve, preserve, manage, enhance, safeguard, facilitate, maintain and, where appropriate, restore, visual and scenic amenities, the quality and character of the natural heritage features and the natural environment including rivers, streams, wetlands and woodlands, scenic areas and the general amenity of the countryside and in recognition of its importance as a non-renewable resource, from intrusive development that would detrimentally impact on it, while maximising the recreational amenity and quality of life by the provision of visual relief from the built environment. Avoid unnecessary harm and reduce its effect where it cannot be avoided by replacing like with like.”
81. Impose “Precautionary Principles” which are an integral component of planning policies on environmental and heritage matters. Where uncertainty exists regarding the potential impact of a proposed development on natural heritage, full account shall be taken of these Principles.
82. Propose additional policy/objective; “Adopt a regional approach to the protection, conservation and management of the environment in co-operation with neighbouring counties.”

83. Propose additional policy/objective; “Preserve the open character of commonages, land and other hill land and secure access over paths and tracks through consensus with landowners, particularly in mountain areas.”
84. Propose additional policy/objective; “In partnership with the NPWS, WI and other stakeholders facilitate public access to wetlands and support and protect the amenity potential of wetlands.”
85. Propose additional policy/objective; “Protect, conserve, preserve, manage and enhance wetlands (including fens) from infilling, fragmentation, degradation and protect and conserve their quality, character and features. Resist development (including land reclamation) which would destroy, fragment and degrade wetlands, coastal wetlands, estuarine marshland and control adjacent development by the use of buffer zones.”

Chapter 5 Economic Development

Communications Infrastructure

86. Protect and conserve rural amenities, archaeological and natural heritage, visual amenities, landscape and the environment generally, from adverse impacts from agricultural practices and development particularly in high amenity areas and ensure that it is appropriate in nature and scale, ensure that they do not have an undue negative impact on the visual/scenic amenity of the countryside and its appearance and character and integrate into the landscape. Developments and practices must be necessary for the efficient use of the farm and must ensure that they are conducted in a manner consistent with the protection of the environment and in line with national legislations and relevant guidelines. Identify mitigating measures where required “Require the identification of Public Rights of Way and established walking routes 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 or on the natural environment.”
87. Propose additional policy: “The Council shall, in assessing an application, take into account the impact on established walking routes.”

Agriculture

88. Propose additional policy: “Recognise and support the role of farmers as custodians of the natural resources of the countryside and of rural landscapes.”
89. Propose additional policy: “Promote, at national level, the adoption of a Land Use Strategy.”
90. Propose additional policy: “Protect and conserve rural amenities, archaeological and natural heritage, visual amenities, landscape and the environment generally, from adverse impacts of agricultural practices and development particularly in high amenity areas and ensure that it is appropriate in nature and scale, ensure that they do not have an undue negative impact on the visual/scenic amenity of the countryside and its appearance and character and integrate into the landscape. Developments and practices must be necessary for the efficient use of the farm and must ensure that they are conducted in a manner consistent with the protection of the environment and in line with national legislations and relevant guidelines. Identify mitigating measures where required.”
91. Propose additional policy: “Protect and conserve rural amenities, archaeological and natural heritage, visual amenities, landscape and the environment generally, from adverse impacts of agricultural practices and development particularly in high amenity areas and ensure that it is appropriate in nature and scale, ensure that they do not have an undue negative impact on

the visual/scenic amenity of the countryside and its appearance and character and integrate into the landscape. Developments and practices must be necessary for the efficient use of the farm and must ensure that they are conducted in a manner consistent with the protection of the environment and in line with national legislations and relevant guidelines. Identify mitigating measures where required.”

Aggregates and Mining

92. Propose additional policy: “Applications for new development for aggregate extraction, processing and associated processes, shall identify existing public rights of way and walking routes which may be impacted on or are adjacent to the development site. They shall be kept free from development as a Rights of Way/Walking Route.”
93. Propose additional policy: “Restrict development of aggregate extraction, processing and associated concrete production which could impinge or impact on matters of public importance, public rights of way or walking routes and satisfactorily address the potential impact on recreational activities”
94. Propose additional policy: “Recognising that the development for aggregates/mineral extraction, processing and associated developments can impose adverse impacts on amenities, ensure the protection, conservation, preservation and safeguarding of recorded monuments and areas in their vicinity, World Heritage Sites (including Tentative Sites), existing and proposed NHA’s, Euro Sites, Nature Reserves archaeological sites and features, natural heritage, natural environment, features of natural beauty or interest, designated and prescribed sites, geological sites and areas of geological/geomorphological or historic interest and areas of high scenic amenity from inappropriate development that might be detrimental to them. Applicants must recognise that the aggregates (stone and sand/gravel deposits and mines) concrete products industry have a particularly sensitive role. Development must be carried out so that it minimises adverse effect on the environment and visual and natural amenities to the greatest possible extent must be carried out during all life cycle stages, whether in respect of new quarries or extensions to existing ones and development will be prohibited if the quality of the environment or landscape, particularly sensitive landscape, is adversely affected or compromised or there is a reduction of the visual quality of areas of high amenity. All working should be landscaped either by the retention of existing vegetation or by screening.”
95. Propose additional policy: “Require that development proposals on or in proximity to a quarry site should investigate the nature and extent of the risks associated with the development together with appropriate mitigation”

Chapter 6 Tourism and Recreational Development

Public Rights of Way

96. Propose to replace existing text in Section 6.6 with following;

“Public Rights of Way have existed over the centuries constitute an important recreational amenity. They enable the enjoyment of high quality landscape, natural and archaeological heritage and provide links to valuable amenities and natural beauty such as rivers, lakes, bogs, forests and places of natural beauty. A PROW or highway is a physically defined route over which the public have a right of passage even if the route is not in public ownership. It is described as “a user as of right” and confers an unrestricted right of the general public to pass and repass at all times of the day or night and at all seasons without notice to, or permission

from the landowner. The most common characteristic of a PROW is that it follows a defined route which may be sub-divided amongst different branches. The listing and mapping of public rights of way will preserve Public Rights of Ways for recreational purposes. The listing of public rights of way is an urgent matter as the lack of certainty on access has not only affected the rights of local people but has been the major cause of the failure of walking tourism to reach its full potential in this country.”

97. Suggests that the Council should begin the formal process for designating rights of way under Section 14 of the Planning and Development Act 2000 (as amended)
98. Replace policy TRP31 with following: “Recognizing the importance of maintaining established public rights of way preserve, protect, promote, enhance, maintain and improve them, for the common good, all public rights of way particularly those giving access to mountains, lakes, river banks, geomorphological features of heritage value and other places of natural beauty or recreational utility by ensuring that development doesn’t impinge thereon.”
99. Replace policy TRP31 with following: “Prohibit development and keep free from obstruction public walking routes and public rights of way, particularly those at mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity and take legal action if necessary, to prevent any attempt to close them off.”
100. Propose additional policy: “Identify and map, on an ongoing basis, public rights of way and incorporate them in the Plan by way of a Variation. Where appropriate links to established public rights of way in adjoining counties will be identified.”
101. Propose additional policy: “In accordance with the provisions of either Sections 206 or 207 of the Planning and Development Act 2000 encourage and facilitate the creation of additional rights of way and extend existing ones for pedestrian or amenity reasons, by investigating named areas to facilitate the development of waymarked ways and looped walks, by undertaking a review/survey of green links and cycling routes and by bringing forward proposals within two years of the adoption of the Plan, either by agreement or by the use of compulsory powers, for the creation of public rights of way, particularly in areas of high amenity and recreational importance and to uplands, lakeshores, river banks, forests, heritage and scientific sites, areas of historic, archaeological and recreational importance and National Monuments, to create a meaningful network. Promote their greater use. Provide linkages from built up areas to the countryside and the coast and link with public rights of way in adjoining counties.”
102. Propose additional policy: “Ensure the provision of, and where necessary, improve signposting and way marking on all public rights of way.”
103. Propose additional policy: “Designate Pilgrim Paths such as Clonmacnoise as public rights of way.”
104. Propose additional policy: “Identify mass paths and routes to holy wells, mass rocks and penal mass stations and consider designating them as public rights of way.”
105. Propose additional policy: “Encourage the provision, for the common good, of a network of Public Rights of Way to traditional outdoor amenities, including heritage sites and features of archaeological interest, national monuments, mountains, hills, rivers, forests, lakes, geological and geomorphic systems, water corridors, places of natural beauty and other natural amenities.”
106. Propose additional policy: “Look favourably on planning applications which include proposals to improve the condition and appearance of existing rights of way.”
107. Propose additional policy: “Development will not be permitted where a public right of way might be prejudiced, unless specific arrangements are made for suitable alternative linkages and that the developer can demonstrate that the level of amenity is maintained by:

- (i) the footpath/bridleway being diverted by the minimal practical distance and the route continues to be segregated from vehicular traffic;
 - (ii) Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it.
 - (iii) the diverted route is of at least equal character and convenience.”
108. Propose additional policy: “Where, in the interests of proper planning and development, the extinguishment of an existing right of way becomes expedient, the Council may require the provision of a suitable alternative.”
109. Propose additional policy: “The Council will utilise its relevant statutory powers to preserve as practicable the character of listed public rights of way for amenity purposes.”
110. Propose additional policy: “Protect and promote Greenways and consider designating them as public rights of way.
111. Propose additional policy: “Seek to identify and protect over the lifetime of the Plan further existing public rights of way which give access to the mountains, lakeshores, riverbanks or other place of natural beauty or recreation utility (accompanied by mapping).”
112. Propose additional policy: “Where appropriate, links to established Public Rights of Way in adjoining counties will be identified”
113. Propose additional policy: “Protect the landscape from inappropriate development by ensuring that developments and other activities associated with tourism or recreational activity do not cause damage, be detrimental to or detract from the traditional character or appearance of areas of scenic or visual amenities and ensure that the layout, design and associated infrastructure are of highest quality. Developments must be sensitively located, and be sympathetic in manner with the environment, heritage and amenities. They must ensure the protection, maintenance and conservation of amenities, be compatible with their intensity, scale, and balance and ensure that they are not located where they would be detrimental to environmentally sensitive landscapes. Ensure the highest quality standards of design and materials so that there is no significant adverse impact on the coastal areas, Natura 2000 sites, historic or archaeological sites, maritime heritage or the countryside generally. They must be integrated, assimilated and absorbed into the landscape to take advantage of natural screening and topography.”
114. Propose additional policy: “Tourism and recreational development shall be assessed against the nature and scale appropriate to the character of the area and shall be located to be visually sympathetic to its surroundings.”
115. Propose additional policy: “Support development, in co-operation with various stakeholders to promote, preserve, improve, encourage public access to lakes, riversides, uplands and other areas that have been traditionally used for outdoor recreation and extend recreational amenities including riverside and canal walks and walking and cycling routes.”
116. Propose additional policy: “Promote and encourage the recreational use of rivers and the development of blueways which provide opportunities for walkers, cyclists and canoers.”
117. Propose additional policy: “Protect and preserve recreational attractions such as scenic beauty, woodlands and waterways, natural heritage, the character and distinctiveness of scenic landscape and the environmental quality. It will normally only permit development where it won’t result in damage to sites of nature conservation or important features of archaeological heritage, will not cause harm to the appearance and character of the landscape and can be readily absorbed into its surroundings by taking advantage of existing vegetation and/or topography, where the enjoyment of the countryside isn’t adversely affected by the nature, scale, extent, frequency or timing of the proposed activities including any noise likely

- to be generated and any ancillary development shall be small in scale, designed to a high standard and sympathetic to environment in its setting, layout and landscaping.”
118. Propose additional policy: “Ensure that golf course development does not impinge on existing public rights of way and walking routes by identifying them prior to development.”
119. Propose additional policy: “Development proposals for Noise Generating Sports will not normally be permitted unless there is no conflict with the enjoyment of areas used for informal recreation.”
120. Propose additional policy: “Adopt Bye-laws banning the use of motor bikes and quads (except for bona fide agricultural purposes) in privately- owned areas of rough grazing (including commonages) and motorised para gliders.”
121. Propose additional policy: “Support the maintenance of and enhanced access to state lands such as National Parks, Forest Parks, Woodlands etc. for recreation.”

Chapter 8: Sustainable Mobility and Accessibility

122. Submit that a Table with maps of Way-marked Ways of medium/long-long distance walking routes, Greenways, Sli na Slainte, heritage/historic walking trails, pilgrim paths, paths to mass rocks and holy wells, looped walks, hill walks, forest walks and other defined walking trails with accompanying maps be added and a data base should be set-up and up-dated as new trails emerge.”
123. Propose additional policy: “Promote and facilitate the continuing development of a regional and local network of Ways and Permissive Access Routes that provide a network of long distance walking, running and hiking trails and routes. Encourage the re-routing of existing trails off public roads.”
124. Propose additional policy: “In view of the obesity and diabetes crisis, support, improve, develop, upgrade and facilitate Slí na Sláinte routes. These should be waymarked/signposted, where feasible.”
125. Propose additional policy: “Promote walking through the development and expansion of a network of safe walking trails within towns and villages and their environs. Such routes can link with existing waymarked trails, Sli na Slainte and the Green Infrastructure Network and existing or new public rights of way.”
126. Propose additional policy: “Support the provision of proposed long distance walking trails that provide access to scenic uplands and riverine features.”
127. Propose additional policy: “Research and map an existing network of traditional paths used for leisure purposes to determine their legal status.”
128. Propose additional policy: “Employ a full time Walks Officer at an appropriate senior level.”
129. Propose additional policy: “The Council will co-operate with relevant agencies, both public and private, including the National Trails Office, NWMWAC, Coillte, the Heritage Council, adjoining councils and local landowners, to support the development, maintenance, facilitation and enhancement of medium and long distance hiking/walking routes, community walks and off-road trails particularly in the uplands. This will include consultation with adjoining councils with a view to promoting routes extending beyond the county boundary.”
130. Propose additional policy: “Lobby the appropriate Government Department to agree and implement a scheme to indemnify private landowners with regard to recreational users of their land.”
131. Propose additional policy: “Ensure the protection of and co-ordinate the continuation of strategic walking routes and trails.”

132. Propose additional policy: "Preserve and protect the integrity of existing public walking and access routes (including long distance walking routes) which contribute to the general amenity by prohibiting the intrusion of development along these routes particularly those in scenic and high amenity areas and along inland waterways."
133. Propose additional policy: "Protect listed walks from development that creates or has the potential to create dis-amenities."
134. Propose additional policy: "Take the potential impact of proposed development into account when considering/assessing applications for permission in the vicinity of established walking routes that might impinge on walking routes (including long distance) or potential walking routes."
135. Propose additional policy: "Protect access routes to upland walks and public rights of way."

Cycling

136. Submit that a Table of Cycle routes with maps should be included.
137. Propose additional policy: "Promote, facilitate, support and encourage the development, enhancement and expansion of safe cycle routes by facilitating the construction of cycleways. Support the development of the National Cycle Network and The National Cycle Network Scoping Study (2010) and enhance and maintain these routes with better signposting, lighting and road surfaces separated from vehicular traffic. Encourage the development of off-road cycling. Ensure that the upgrading of roads will not impact negatively on the safety and perceived safety of cyclists. Ensure that any dedicated cycle routes which are developed away from the main public carriageway are well lit. Routes should, where possible, follow off-road tracks and quiet country roads."
138. Propose additional policy: "Cycle routes should be designed using current thinking and best practice from experience in other locations, lower speed limits and priority over motorised transport to ensure road safety for pedestrians and cyclists."
139. Propose additional policy: "Assign an officer at appropriate senior level as a "Cycling Officer".
140. Propose additional policy: "Promote and facilitate the development of cycle routes in accordance with the National Cycle Network Scoping Study 2010."
141. Propose additional policy: "Support the development, maintenance and enhancement of trails and routes in co-operation with Sports Council, NTA, NTO, NWMWAC, Heritage Council and other bodies to develop cycle touring routes including those linking with adjoining counties particularly in areas of high amenity."
142. Propose additional policy: "Produce cycle maps."
143. Propose additional policy: "Support community, authority or agency led projects that would deliver identified strategic cycling links."
144. Propose additional policy: "Develop a Cycling Strategy during the lifetime of the Plan."
145. Propose additional policy: "Support the policies of the National Cycle Framework 2009."

Walking and Cycling

146. Propose additional policy: "Support, promote, establish and actively encourage the provision, development, extension and design of off road interlinked cycleways and walkways, (mention routes), including medium and long distance walkways and particularly those with

historic associations, in conjunction with the Irish Sports Council, IW and other stakeholders to link with a strategic network of trails from residential areas, open spaces and existing or new public rights of way to facilitate the creation of a secure and safe greenways network to provide access to scenic, mountain, lakeshore and river features and to link with adjoining counties, including cross border counties in partnership with their councils, the state, private and voluntary sectors.”

147. Propose additional policy: “Encourage and support the enhancement and extension of existing walking and cycle routes by utilising links from residential areas, parks and open spaces and existing and new public rights of way to facilitate the creation of a secure green network to provide access to scenic mountain, lakeshore and river features.”
148. Propose additional policy: “Support, promote, facilitate and continue to develop a comprehensive, integrated and connected network of greenways, within the County and adjoining counties in accordance with the “Strategy for the future Development of National and Regional Greenways”, in parks and public open spaces and work with the NTA, adjoining councils and all stakeholders to develop a co-ordinated approach to the selection, delivering and servicing of future greenway, in order to achieve improve external linkages, to achieve maximum impact and connectivity and to provide alternative routes for pedestrians and cyclists.”
149. Propose additional policy: “Engage in the CPO process, when required, to facilitate the timely delivery of the Greenway programme.”
150. Propose additional policy: “Walking and Cycling will be promoted, developed, facilitated and encouraged in accordance with initiatives contained in “Smarter Travel 2009” by improving existing cycleways and by developing a network of safe, maintained, comfortable, convenient and guarded cycle routes and footpaths on existing roads. Ensure, where possible, that cycleways and footpaths are effectively separated from major vehicular carriageways. Provide, promote, improve and extend the network of off road cycle and walking routes on all new road improvement schemes, including regional, local distributor and local collector roads and on roads being up-graded, to ensure personal safety, particularly at night and a more convenient, pleasant, attractive environment. Support the installation of infrastructure measures e.g new/wider pavements, road crossings, retrofitted, if necessary, which would facilitate and encourage safe walking and cycling.”
151. Propose additional policy: “Signpost and waymark walking and cycle routes with appropriately designed quality signage and information boards.”
152. Propose additional policy: “Provide, create, promote, plan, support, maintain, enhance, encourage, extend, facilitate and support the development and improvement of walking, rambling and cycling in conjunction/co-operation the Irish Sports Council, walking and cycling groups, landowners, farmers, local groups and communities by identifying/defining more dedicated walking and cycling routes(named) to enable the creation of a high quality, coherent, pleasant, integrated and comprehensive dedicated off road countrywide joined up network of local and regional cycling/walking routes, footpaths, greenways, particularly in rural areas between settlements, that link communities to key destinations and amenities, including looped walks, local walks, community walks medium/long distance walks and established rights of way, through open spaces, strategic green corridors(including river corridors) and other off-road routes), particularly those with historic associations or other areas of interest and maximise their potential. Expand and extend existing routes by utilising links from residential areas to provide access to mountains, lakeshores, rivers and scenic areas. Bring mountain amenities closer to residential communities by promoting the establishment of a network of formal footpaths, off road paths

- and cycleways that are attractive and facilitate casual walkers and cyclists. Investigate the provision of dedicated cycle and pedestrian routes along routes of high amenity.”
153. Propose additional policy: “Encourage and support sensitive development which provides for the provision of access to natural habitats and heritage features.
 154. Propose additional policy: “Seek opportunities for the development of suitable walking routes, cycle tracks and bridle paths along historic access routes. Explore the potential of inter-county trails (named). Augment existing networks and trails at key heritage sites.”
 155. Propose additional policy: “Support the policies of DoTT’s Smarter Travel.”
 156. Propose additional policy: “Develop and promote a Walking and Cycling Policy/Strategy within two years of the adoption of the Plan, working in partnership with statutory bodies, private and voluntary sectors, landowners and other stakeholders. The Strategy should list trails, evaluate these routes and make recommendations for their promotion and would address, inter alia, the possibility of cycle-ways in recreational areas and along river banks, car parking for walkers and cyclists and improved signage and maps.”
 157. Propose additional policy: “Provide adequate car parking and/or lay-bys for walkers and cyclists, (from your local knowledge name important locations) and other appropriate points to facilitate access to amenity/scenic areas from 9am until dark.”
 158. Propose additional policy: “Establish new Walkways and cycle routes on a legal and permanent basis.”
 159. Propose additional policy: “Develop a strategy to underpin the funding for the development and extension and enhancement of walking/cycling trails, greenways, including off-road trails, inter-county waymarked walking and cycle routes and the Tain Trail, through the Action Plan for Rural Development 2017, DoTTS, NTA, Heritage Council and associated transport agencies and LEADER. “
 160. Propose additional policy: “Ensure that walking and cycling routes and the public footpaths network are maintained and where feasible improved.”
 161. Propose additional policy: “Protect the integrity, extent, scenic quality, visual setting and functionality of Greenways and walking and cycle routes.”
 162. Propose additional policy: “Protect the routes of, and prohibit development which would hinder the creation and development of future Greenways, walking and cycling routes including those identified in the Plan.”
 163. Propose additional policy: “Ensure that development proposals protect the routes of potential linkages such as linear paths footpaths trails, greenways and cycleways through a site where the Council considers that an opportunity to provide a linkage to or between adjoining areas.”
 164. Propose additional policy: “Protect established walking and cycling routes and keep them free from development which would adversely impact upon them.”

Disused Railways

165. Propose additional policy: “Actively encourage, support, promote and facilitate the development of disused railways (named) for greenways, walkways and cycleways and other recreational activity to develop a network including medium and long-distance walking and cycling routes and bridle paths to improve access to rural tourist attractions, with related signage and waymarking.”
166. Propose additional policy: “Protect and preserve routes of former railway lines(named) for recreational development free from development by protecting, enhancing, conserving, safeguarding and preserving potential greenway routes as long distance walking

and cycling routes along or near these rail lines which could compromise their development as walking/cycle routes in the future. Along these corridors other uses shall not be considered. Where these corridors have been compromised by development, adjacent land which could provide opportunities to bypass such an impediment and reconnect these routes for walking/cycling shall be protected for this purpose.”

167. Propose text for Draft Plan: “While it should be possible to provide most routes along the existing track alignment, there may be a need for diversions and deviations following detailed survey and design work and consultation with landowners. The aim is to include these routes in a map in the Plan. Meanwhile adequate protection needs to be given to abandoned rail lines so as to avoid inappropriate development that could compromise their viability.”
168. Propose additional policy: “Where feasible, provide separate trails for walkers and cyclists in the interests of safety and convenience with appropriate surfaces for each type of user.”

Chapter 9 Social Inclusion, Community and Cultural Development

169. Replace Policy SICCOOP 36 by “Protect, preserve, enhance, conserve and maintain archaeological/historic graveyards and their settings and historic burial grounds (including those identified in the RPM) and those in the guardianship of the Council through improved access and preserve their heritage value. Encourage and promote local involvement and community stewardship in the care, upkeep, maintenance, management rehabilitation and conservation of these graveyards in accordance with legislation, best conservation and heritage principals and best practice guidelines. Maintain all burial grounds in the Council’s charge in good condition.”

Chapter 10 Built Heritage

170. Submit that this chapter should be titled Heritage to better reflect its proposed contents.
171. Propose additional policy: “Publish a list with maps of heritage sites which are open to the public.”
172. Propose additional policy: “Prepare and implement a strategy for access to heritage routes by identifying, promoting and supporting the development of a network of heritage trails, with a focus on publicly accessible heritage sites and attractions in co-operation with community groups, landowners and other stakeholders incorporating features of heritage interest.”
173. Propose additional policy: “Appoint a Heritage Forum on a permanent basis to assist the heritage officer in implementing the actions and objectives of the heritage plan.”
174. Propose additional policy: “Support the objectives and actions of the County Heritage Plan.”
175. Replace Policy BHP-33 with “Council recognises the importance of promoting, encouraging and securing/ensuring the protection, conservation, preservation, enhancement, safeguarding and appropriate management of sites, settings and features of archaeological/historic interest including the protection of their intrinsic value, character, integrity, context and settings of National/Recorded Monuments, caves or newly-discovered archaeological sites and/or sub-surface archaeological remains, known and unknown, including those identified in the RMP, RHM & SMR and sites and features of historic interest and National Monuments that are the subject to Preservation Orders, in the ownership or

guardianship of the State or the Council and by Implementing the provisions of the Planning and Development Act 2000 (as amended) and other statutory and other relevant policy decisions. Development, either above or below ground, taking place within or adjacent to sites should be designed to ensure that it will not seriously detract from, impact upon or damage features of historic or archaeological interest, shall respect their character and settings. Proposed developments which would be seriously injurious to the settings, character of sites or RPMs, including in particular, those within a 20m radius of National Monuments, will not be permitted and those within 75m will be discouraged. Ensure that development, within adjacent to or in the vicinity of an archaeological monument shall not be detrimental to its character be or setting by reason of its bulk or detailing and shall be sited and designed in a manner which minimises its impact settings, is resisted. Extend this protection to cover additions or alterations that may arise during the adoption of this Plan and to newly discovered remains and features. Protect and preserve all archaeological sites and monuments included in the RMP, any sites of and features of historic or archaeological interest and any subsurface e arch features that may be discovered during the development. Protect, where appropriate, the character and setting of any unrecorded archaeological site from inappropriate development.”

176. Replace Policy BHP-33 with “Recognising the importance of archaeology and National Monuments as part of our heritage, promote, enhance, facilitate, encourage, support, improve and protect public access to National Monuments, Archaeological Sites, castles, sites of historic interest and to archaeological landscapes, in the direct ownership, guardianship or control of the Council, and/or the State or private ownership, including those listed in the RMP, in co-operation with landowners.”
177. Propose additional policy: “Protect and preserve in situ all archaeological sites and features of historic interest discovered/identified subsequent to the publication of the RMP.”
178. Propose additional policy: “Preserve, protect and, where necessary, enhance mass rocks and holy wells.”

Chapter 13 Development Management Standards

179. Proposed additions to DMS-62 Commercial Developments in the Open Countryside
 “Only grant planning permission for a building in the countryside where the location is suitable and that the proposal would not be viable at an alternative location and where the development would not cause a detrimental impact or erode rural character and is compatible with neighbouring land use and ensures that development in visual sensitive areas addresses the surrounding countryside. Any new building will not be acceptable where it is unduly prominent in the landscape, where it results in build-up of development when viewed with existing and/or approved buildings or where the impact of the ancillary works, including the creation of visibility splays would damage rural character or impact negatively on the environment or which fails to protect Natura Sites, conservation areas, natural heritage or the environment or fails to protect and improve or is injurious to amenities (including visual amenities). Buildings should be kept simple and finished with material appropriate to rural settings and should reflect the size, scale and pattern of development in the area. Buildings of excessive height will not be permitted and should be sited to make use of existing hedgerows and topography to provide natural screening.”

“Economic development that is urban in nature should be in the first instance located in urban areas.”

180. Fencing of Hitherto Open Land

“It is a requirement of the Planning Regulations 2001 Art 9(l)(a)(x) that the fencing or enclosure of land open to or used by the public during the ten years preceding such fencing or enclosure for recreational purposes or as a means of access to any seashore, mountain or other place of natural beauty or recreational utility, requires planning permission. Taken from Kilkenny 6.2 Fencing 1st sentence.”

“Wire fencing constitutes visual pollution and destroys the “away from it all” feeling which makes upland areas such an attraction.”

“There has been a large increase in the amount of new fencing in upland areas. Barbed wire has been used in most of this new fencing, which, in the absence of stiles or gates, makes access for recreational users of our countryside almost impossible. Traditional hill-sheep farming rarely required fencing, but since the introduction of AEOS, sheep-farmers must, in certain circumstances, stock-proof their land. The challenge is to ensure that such fencing will be done in a manner that will meet the requirements of AEOS without impinging on access for walkers and other recreational users.”

“As new fencing of land open to be used by the public during the ten years preceding is not exempt development in accordance with Art 9(l)(a)(x) of the Planning and Development Regulations the following criteria will be used when considering planning applications for new fencing of hitherto open land: Fencing, particularly in upland, highly scenic or amenity areas, will not normally be permitted unless such fencing is essential to the viability of the farm. The nature of the material to be used, the height of the fence, and in the case of a wire fence the type of wire to be used will be taken into account. Stiles or gates at appropriate places will be required. Barbed-wire will not be used for the top line of wire.”

CE Response:

The members are advised that the Plan addresses mandatory objectives as set out in Section 10(2) of the Planning and Development Act 2000 (as amended) and relevant discretionary objectives as listed in the First Schedule of the Act. It is also considered that the structure of the Draft Plan is in line with advice relating to the structure and presentation of development plans contained in Section 3.1 of the Development Plan Guidelines 2006 complying the following criteria;

- Be internally consistent and meet the requirements of planning legislation.
- Comprehensively and coherently address the relevant planning issues in order to promote the proper planning and sustainable development of the area.
- Be easy to read and should follow a natural and logical progression from strategic issues to more detailed matters such as development objectives and requirements, which provide the basis for development management decision making.
- Be laid out clearly with the use of colour, illustrations and maps to enhance understanding and interpretation. Acronyms should be explained and where appropriate, terms used should be clearly defined.

This submission is extensive and refers to many existing policies and objectives from other county development plans and strategies which it suggests should be incorporated into the plan by either replacing or adding to existing policies and objectives relating to access to the countryside and related issues. Following examination of the submissions recommendations and the policies and objectives contained in the Draft Plan, it is considered that the vast majority of suggestions in this regard are addressed satisfactorily in the draft plan. For instance, the submission proposes that a number of policies and objectives in Chapters in the Draft Plan should explicitly refer to public rights of way and designated sites yet they are covered by the inclusion of overarching objectives and policies in the Draft Plan;

TRP-31 “It is Council policy to support the preservation, protection, promotion and improvement, for the common good, existing public rights of way for recreation and tourism purposes, particularly those which provide access to state and semi-state lands such as archaeological sites, National Monuments and amenities, including upland areas and water corridors, and to create new ones or extend existing ones where appropriate either by agreement with landowners or through the use of compulsory purchase powers, whereby access is planned and managed in a sustainable manner that protects environmental sensitivities, ecological corridors and the ability of local infrastructure to support increased tourism.”

BLO-02 “It is an objective of the Council that no plans, programmes or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects⁴).”

BLO-03 “It is an objective of the Council that all projects and plans arising from this Plan⁵ will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive. A plan or project will only be authorised after the competent authority has ascertained, based on scientific evidence, Screening for Appropriate Assessment, and subsequent Appropriate Assessment where necessary, that:

- (i) The plan or project will not give rise to significant adverse direct, indirect or secondary effects on the integrity of any European site (either individually or in combination with other plans or projects); or
- (ii) The plan or project will have significant adverse effects on the integrity of any European site (that does not host a priority natural habitat type/and or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000; or
- (iii) The plan or project will have a significant adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons for overriding public interest, restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000.”

BLO-04 “It is an objective of the Council to ensure that the impact of development within or adjacent to national designated sites, Natural Heritage Areas, Ramsar Sites and Nature Reserves likely to result in significant adverse effects on the designated site is assessed by requiring the submission of an Ecological Impact Assessment prepared by a suitably qualified professional, which should accompany planning applications.”

⁴ Except as provided for in Article 6(4) of the Habitats Directive, viz. there must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed, and c) Adequate compensatory measures in place.

⁵ Such projects include but are not limited to those relating to: agriculture; amenity and recreation; contaminated sites; electricity transmission; flood alleviation and prevention; forestry; mineral extraction; renewable energy projects; roads; telecommunications; tourism; wastewater and discharges; and water supply and abstraction.

I am satisfied with the scope and comprehensiveness of policies and objectives in the Draft Plan relating to walking and cycling and the development of greenways/blueways/peatways and trails and the Members will note that the council has committed significant resources to the development of cycling and walking routes over the lifetime of the current plan, in particular the Grand Canal Greenway and intends to continue this investment subject to funding.

In relation to public right of ways, in recognition of Section 10(2)(o) of the Act, which outlines a mandatory objective to identify, map, listing and preserving public rights of way which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility, it is noted that public rights of way are addressed in section 6.6 of Chapter 6 Tourism and Recreational Development with supporting policies. It is proposed to insert an objective in response to this submission: **“It is an objective of the Council to examine the feasibility of identifying and mapping new Public Rights of Way in the recreational and amenity areas of the county in the context of emerging national guidance.”**

In relation to reusing disused railways for recreational use, this is addressed in the following objectives of the draft Plan:

TRO-09 It is an objective of the Council to facilitate the development of a tourism resource using cutaway peatlands in conjunction with Bord na Móna and Fáilte Ireland, subject to environmental considerations and nature designations for example, recreational forestry, outdoor pursuits, peatways on the network of bogs and industrial railways and a designation of a National Peatlands Heritage Park.

TRO-17 It is an objective of the Council to protect potential greenway, blueway and peatway routes (i) along and in proximity to abandoned rail lines and (ii) routes identified in Figure 6.14 ‘Midlands Cycling Destination, Offaly Network Map’ from inappropriate development that could compromise the delivery of a cycling or walking route in the future.

There are policies in the plan which make provision for signage of ways e.g.:

TRP-17 It is Council policy to promote the provision of appropriate infrastructural requirements to meet the needs of greenways, blueways, and peatways and other pedestrian / cycling trails such as high quality signage, bicycle stands, service facilities, seating and if necessary, car parking (all with regard to Department of Transport, Tourism and Sport’s ‘Greenways and Cycle Routes Ancillary Infrastructure Guidelines’), and the provision of visitor interpretation along these routes such as storyboards, artworks and other media to create a greater sense of place, connecting and immersing visitors in the local heritage and stories.

It is also proposed to incorporate the following suggested policy from the submission in Chapter 10 Built Heritage to; **“Preserve, protect and, where necessary, enhance mass rocks and holy wells.”**

In relation to increased access to waterways for walkers and cyclists as proposed in the submission, it is noted that the Development Applications Unit in their submission have recommended that where amenity provision (the development of outdoor pursuits, walking and cycle routes) as outlined in the Draft Plan are likely to result in significant adverse effects to biodiversity, such as those within Riparian zones, floodplains and peatlands, are subject to Ecological Impact assessment and it is proposed to make the following addition to policy TRP-18 in Chapter 6; Tourism and Recreational Development;

TRP-18 “It is Council policy to support in conjunction with relevant landowners and recreational / tourism agencies, the maintenance of and enhanced access to the countryside, waterways, monuments, historic properties, for recreational and tourism purposes. Access should be planned and managed in a manner that protects environmental sensitivities, ecological corridors and the ability of local infrastructure to support increased tourism. **Where significant effects are likely to biodiversity, such as those within riparian zones, floodplains and peatlands, the subject development shall be subject to Ecological Impact Assessment.**”

In relation to the proposed development management standards in the submission, I agree with the point made that the design of structures is important and consider it necessary to amend DMS-62 ‘Commercial Development in Open Countryside and Sraids’ as follows (additional text in red); “In assessing applications for commercial development in the open countryside and Sraids, the Council will have regard to the following:

- The nature of the proposed use to be carried out, the hours of operation and the number of employees;
- The effects on the amenities of adjoining properties;
- The level of traffic generated by the proposed development;
- The generation, storage and collection of waste; and
- **the siting, layout and design should respect and enhance the rural setting and provide for satisfactory measures to assist integration into the landscape.**

This list is not exhaustive and the Council may consider other requirements contained in the chapter on a case by case basis with planning applications should the need arise.”

In relation to the recommended stipulation in the submission that economic development that is urban in nature should be in the first instance located in urban areas, it is considered that the following policies in Chapter 5 Economic Development Strategy address this:

ENTP-09 It is Council policy that future economic and enterprise development in Offaly that is urban in nature should be in the first instance located in urban areas and be largely distributed throughout the county’s settlement hierarchy, having regard to each individual area’s (a) identified role within the region, (b) existing size, (c) existing function (d) capacity for sustainable growth (i.e. growth without detriment to its surroundings, its built or natural assets and/or its character) and (e) available infrastructure capacity. There is, however, a positive presumption in terms of employment creation and therefore it is Council policy to examine such proposals within other locations on a case-by-case basis for example employment related development in a location clearly linked to a rural resource activity.

REDP-11 It is Council policy to favourably consider proposals for the expansion of existing industrial or new business enterprise in the open countryside where the proposal;

- a) is an appropriate size and scale,
- b) does not negatively impact on the character and amenity of the surrounding area,
- c) has regard to and complies with guidelines/standards including traffic, noise and environmental considerations, and
- d) is rural in nature by being rural resource based and not urban in nature.”

It is noted that there are a number of actions and measures proposed in the submission such as by-laws relating to jet skiing, water skiing, use of motor bikes and quads and requesting that the Council lobby appropriate Government Department to agree and implement a scheme to indemnify private landowners with regard to recreational users of their land which do not fall within the remit of a development plan and as such no further action is required.

3.2.6 Renewable Energy

Ref: CDP/D/67

Person / Body:

Cllr N. Feighery

Summary of submission / observation:

This submission requests that the designation of the Killurin, Annaghmore, Gurteen and Killoughey areas as not being suitable for wind energy development not change from the existing County Development Plan and attaches a submission from the Killurin-Annaghmore-Gurteen Wind Turbine Concern Group articulating the reasons that the designation of this area should remain the same in the County Wind Energy Strategy (County Wind Energy Strategy).

The submission from the Killurin-Annaghmore-Gurteen Wind Turbine Concern Group makes the following points;

- a) There should be no wind energy development outside the areas designated as 'not suitable for wind energy development' in the existing Co. Development Plan (2014-20);
- b) In relation to Area 3 'South of Tullamore from Killeigh to Kilcormac' Table 3: Assessment of Wind Energy Potential Areas should state in addition in the interests of clarity a number of specific townlands and protected views where wind energy in Area 3 of the draft Plan is not deemed suitable;
- c) The designation of Area 3 as not being suitable for wind energy development in the County Wind Energy Strategy is correct and should there be a proposal to commence wind energy development in Laois along the border with Area 3, Offaly County Council could object to the progression of such development given the effect such development would have on their protected views, its proximity to the Slieve Bloom Mountains and the impacts on homes and amenities in the area; and
- d) The insertion of a windfarm into the area around Annaghmore House and its original demesne, currently deemed unsuitable for wind energy development in the current plan (2014-20), would interfere with the character of Annaghmore House's historic landscape.

CE Response:

- a) and d) No further action required. As outlined in Objective CAEO-03 in Chapter 3 of the Draft Plan, the Council will implement its County Wind Energy Strategy considering the development of windfarms and smaller wind energy projects in 'Areas Deemed Open for

Consideration for Wind Energy Development’ as identified in Map No. 10 ‘Wind Energy Strategy Designations’. In areas outside ‘Areas Deemed Open for Consideration for Wind Energy Development’, wind energy developments shall not normally be permitted – except as provided for under relevant exemption provisions in the Planning and Development Regulations 2001 (as amended) whilst repowering and extension of existing and permitted wind farms will be assessed on a case by case basis.

- b) No further action required as naming specific townlands within each Wind Potential Area in Table 3 is not necessary nor practical whilst protected views are outlined specifically in 5.3.3 and shown in Map No. 8 Protected Views and Potential Wind Energy Areas.
- c) Noted. The Council has made a submission to the Issues Paper of the Draft Laois County Development regarding the designation of areas within Laois on the border with Offaly and reserves the right to make a submission on any planning application for wind energy in this area.

[Ref: CDP/D/70 and CDP/D/187](#)

Person / Body:

Cllr Fitzpatrick

Summary of submission / observation:

This submission states that the Council has been very proactive over the last two County Development Plans regarding wind energy policy and the Council must consider the cumulative impact of wind energy development in the county.

CE Response:

It should be noted that notwithstanding the ‘Areas Deemed Open for Consideration for Wind Energy Developments’ designation, wind farm developments in these areas will be evaluated on a case by case basis subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of the draft Plan and the Section 28 Wind Energy Development Guidelines, which include local considerations such as;

- Impact on the visual amenities of the area;
- Impact on the residential amenities of the area;
- Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape; and
- Visual impact of the proposal with respect to protected views, scenic routes and designated scenic landscapes.

[Ref: CDP/D/73](#)

Person / Body:

Cllr. Noel Cribben

Summary of submission / observation:

That Bord na Móna lands from Edenderry across to Derrygreenagh be zoned industrial for a Green Energy Hub.

CE Response:

The Climate Action and Energy chapter (Chapter 3) in Volume 1 of the draft Plan recognises the significant potential to develop a Green Energy Hub in County Offaly, which focuses on the higher order aspects of the industry such as research, new technologies, headquarter development, assembly, maintenance and financing, due to its extensive area of peatlands, its long history in power generation and its proactive position in relation to renewable energy developments over the past decade. In this regard, Chapter 3 of the draft Plan includes the following policy:

CAEP-14 It is Council policy to investigate the potential for a Green Energy Hub on peatlands in the county and facilitate it if possible.

The Economic Development chapter (Chapter 5) also makes reference to a Green Energy Hub as an example of a potential after-use for industrial peatland and its associated infrastructure.

RDO-05 It is an objective of the Council to support the longer-term strategic planning for industrial peatland areas, which should include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure including workshops, office buildings and industrial sites, which addresses environmental, economic and social issues including employment and replacement enterprise reflecting the current transition from employment based around peat extraction. Examples of after use and re-purposing of workshops and production facilities could include outreach training centres, gravel extraction, bike-hire facilities, enterprise space / co-working facilities, aquaculture, herb growing, resource management / recycling centre, climate change mitigation (such as through renewable energy, carbon sink, data centres, battery energy storage, afforestation including native woodland, a Green Energy Hub, flood management), and tourism (such as through peatways, recreational forestry, wilderness, eco-tourism based on biodiversity, and a designation of a National Peatlands Heritage Park).

As such, further investigations will be conducted in due course to establish the most appropriate location for a Green Energy Hub for County Offaly.

Accordingly, it is advised that draft Plan policy CAEP-14 and objective RDO-05 are sufficient to underpin this ambition for establishment of a Green Energy Hub, and that zoning large areas of land in the rural area is not necessary. No change to the draft Plan.

[Ref: CDP/D/106](#)

Person / Body:

Pierre Greijmans

Summary of submission / observation:

This submission makes the following comments relating to the County Wind Energy Strategy and renewable energy in the Draft Plan;

- a) Queries where the Strategic Energy Zones referred to in EMRA RSES are to be located and why if they are to be located within Offaly, are alternative sites indicated as suitable for wind energy in the Plan;
- b) States that the Climate Action Plan places an overreliance on wind power over solar power and allows the possibility of corporate entities to profit, while the negatives are borne by the public;
- c) States that it is not clear why the area south of Cloghan has been included as 'Open for Consideration for Wind Energy Developments' and which observations through field study, desk top study or otherwise have informed same. The information involved in these studies should be laid out and be able to be studied by the public. The inclusion of this area within this designation will impact significantly upon the views of several houses on local road L30061 of the Slieve Bloom Mountains while if the area to the east is developed for wind energy also residents will be 'living in an industrial environment';
- d) States that the number of turbines constructed at Meewaun as referred in page 7 of the Wind Strategy is wrong; the number of turbines constructed is 4 not 5;
- e) Requests to be supplied with a noise assessment report for planning application 15/44 at Meenwaun;
- f) Refers to a 2007 ECJ ruling against Ireland (ECJ c.418-04) which stated that outside Special Protection Areas (SPAs), member states shall also strive to avoid pollution or deterioration of habitats;
- g) Queries if the main impacts of wind energy developments on birds such as collision, disturbance, displacement, habitat loss or damage and barrier effects have been taken into account in the proposed 'light blue area', if there are any reports available to the Planning Authority on the loss of habitats (birds and bats) due to existing wind turbine installations; Meenwaun, Leabeg and Mount Lucas and if the additional area in light blue has been screened for bats and in particular the Common Pipistrelle;
- h) States that he is opposed to public private partnerships in terms of wind development as the landowners that actually put wind turbines on their land do not live in the area;
- i) States that Agenda 21 is not a treaty and is therefore not law that the pseudo-science that believes that man is mainly responsible for Climate Change and that CO2 is the main driver should not be entertained;
- j) Better alternatives like Thorium or the newest safe generation nuclear plants, as being built at the moment are way better for the environment and climate;
- k) Concludes by referring to the negatives of wind turbines, the absence of localised data in relation to a number of areas and that the Council withdraw the area in light blue and restrict the development of wind energy to areas operated by Bord na Móna as in the existing County Development Plan and Eastern and Midland Regional Spatial and Economic Strategy.

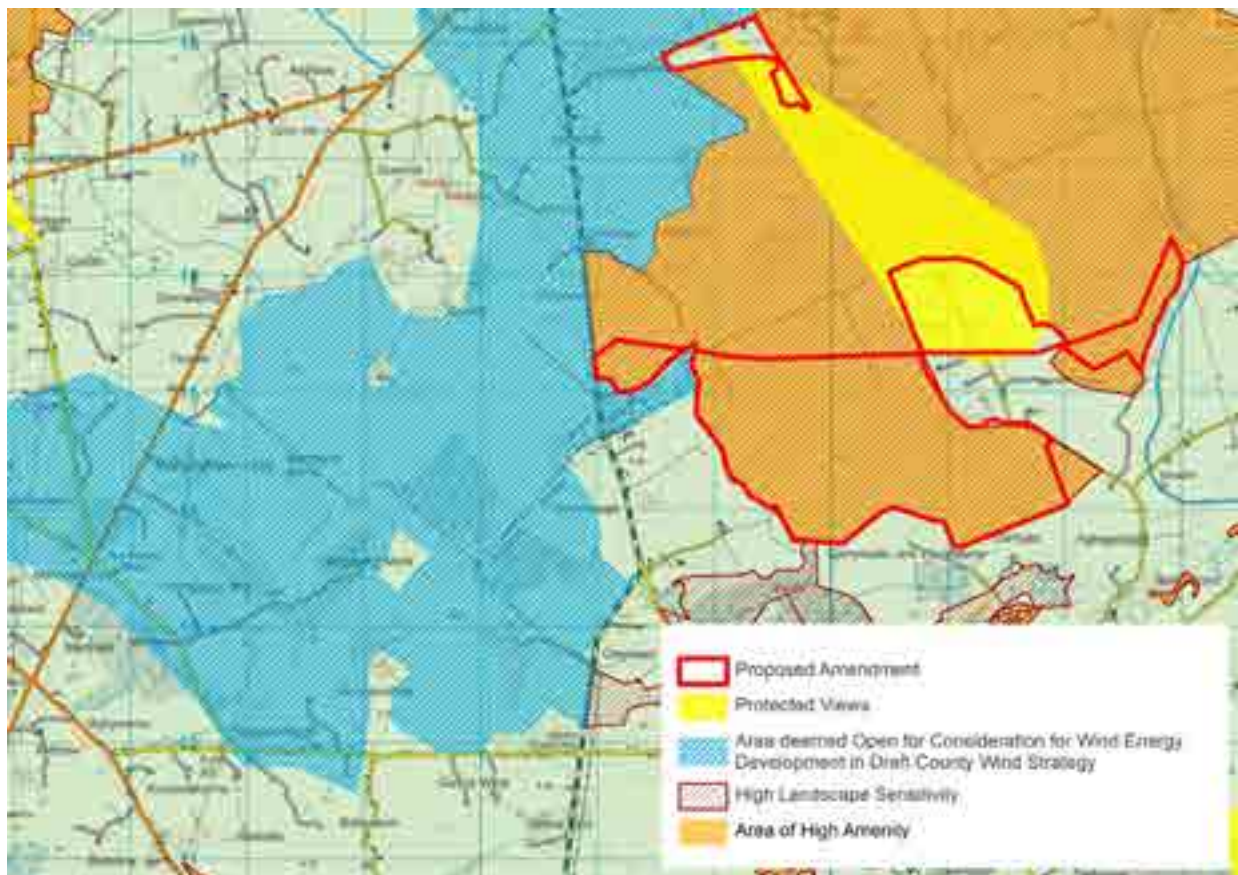
CE Response:

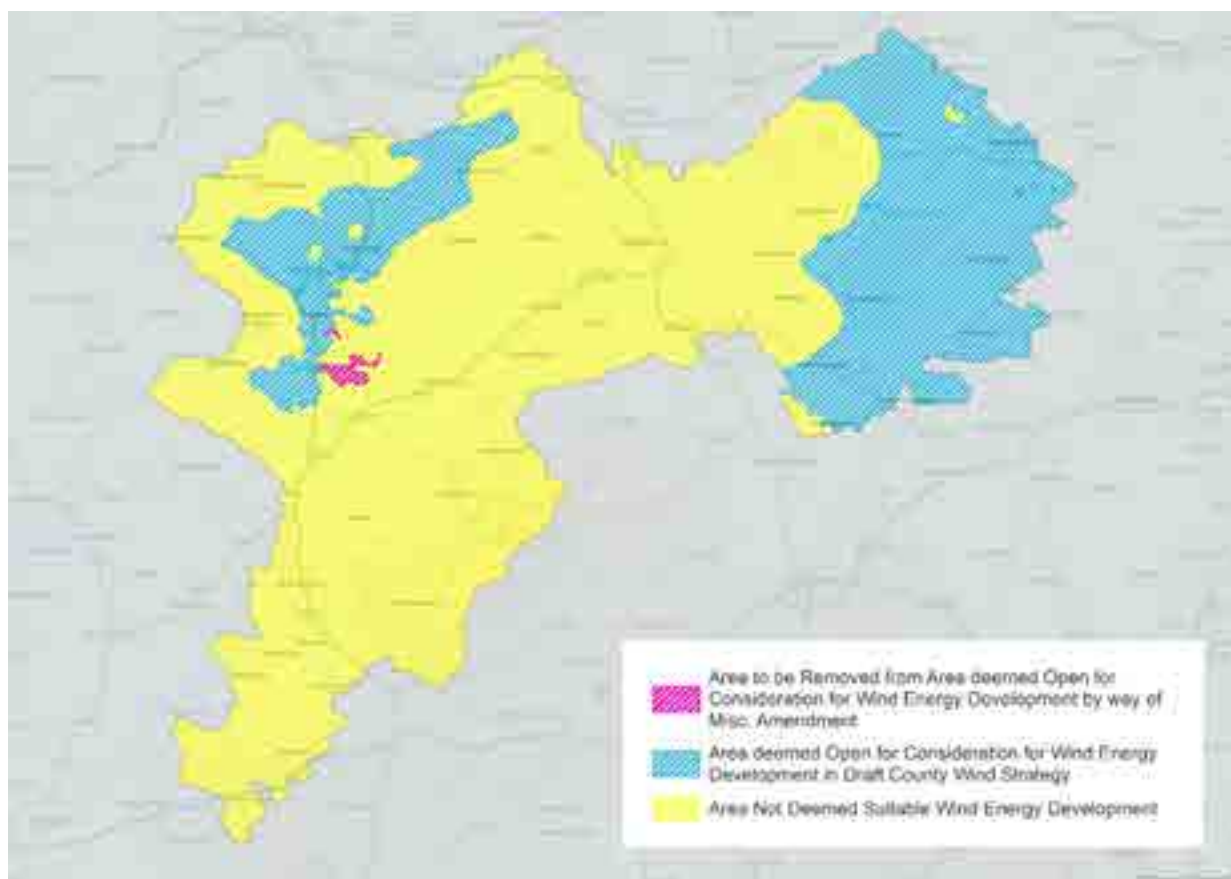
- a) RPO 7.35 of the EMRA RSES states that “EMRA shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones.” No locations or types of energy generating projects have been identified by EMRA to date but it is Council Policy as per Policy CAEP-25 in Chapter 3 Climate Action and Energy of the Draft Plan to cooperate with EMRA in this regard. The EMRA RSES does not state that the provision of these Strategic Energy Zones in the region requires a parallel moratorium on the development of renewable energy developments and to do anything along these lines would mitigate against the Plan supporting the achieving of national targets in relation to reductions in fossil fuel dependency and greenhouse gas emissions.
- b) The Climate Action Plan sets out over 180 actions, together with hundreds of sub-actions, that can help Ireland achieve its 2030 targets for carbon emissions, and put the country on a trajectory to achieve net zero carbon emissions by 2050. Every relevant sector is addressed: electricity, enterprise, housing, heating, transport, agriculture, waste, and the public sector. Amongst the objectives relating to electricity are to increase reliance on renewables from 30% to 70% adding up to 8.2 GW of renewable onshore wind energy capacity with some of this delivered by private contracts via corporate power purchase agreements. In accordance with Section 28(1C) of the Planning and Development Act, Section 3.4 of the County Wind Energy Strategy of the Draft Plan implements the Specific Planning Policy Requirement (SPPR) from the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change from July 2017 (by way of amendment) acknowledging and document national policy on renewable energy, indicating how the plan will contribute to realising overall national targets on renewable energy and if a new or varied mandatory setback distance proposal would create a significant limitation or constraint on renewable energy projects, including wind turbines, in the authority’s administrative area, it shall be a material consideration in the strategic environmental assessment of the plan (not applicable in relation to the Draft Plan).
- c) This Wind Energy Strategy uses a ‘step by step’ sieve mapping analysis of the key environmental, landscape and technical criteria which must be balanced in order to identify the most suitable location for wind energy development as advised by the Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6). Table 3: Assessment of Wind Energy Potential Areas in Section 6 Field Analysis and Desktop Survey of Potential Wind Energy Areas recommends following an examination of the significance of and relevance of protected views and patterns of residential developments along with prevailing land form and uses that this area is deemed ‘Open for consideration for Wind Energy development’ in principle. It states that; “This area is characterised by a predominantly flat and in places slightly undulating landscape with a number of significant tracts of peatlands and transitional woodlands, and coniferous forestry in places. There also exists good wind speeds and reasonable access to the grid. The extensive tracts of flat peatlands in this area offer potential to accommodate a wind farm layout with depth, comprising a grid formation giving a better sense of balance and visual cohesion. In addition, there exists a precedent of windfarm and renewable energy projects developed in the area such as Meewau windfarm while other projects have been deemed suitable and are awaiting commencement of development. There exists both good wind speeds and electricity infrastructure in the area.”

It should be noted in this regard that a significant proportion of this area has changed in its designation to “Not Deemed Suitable for Wind Energy Development” by way of Miscellaneous Amendment r) on account of Map No. 10 Wind Energy Strategy Designation in the Draft Plan erroneously not excluding from the lands designated ‘Areas Deemed Open for Consideration for Wind Energy Development’ in Map No. 10;

- part of the Lough Boora Area of High Amenity;
- an area within the vicinity of a Protected View over the boglands towards the Slieve Bloom Mountains, Ref. No. V12, from Road No. L-07009 in the townland of Stonestown.

These areas are shown in the below maps.





- d) Noted. Table 1 and figures used in relation to Offaly's installed wind capacity have accordingly been amended in Section 4 of the County Wind Energy Strategy to take account of the correct number of turbines in Meenwaun wind farm.
- e) This is a compliance issue relating to the planning application 15/44 and is a different process to the preparation of the Draft Plan.
- f) The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy. It should be noted in this regard that;
- All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from 'Areas Open for Consideration for Wind Energy Developments' in the County Wind Energy Strategy;
 - DMS 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments have to detail the impacts on of the proposed development on nature conservation, including birds;
 - Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site.

Notwithstanding these provisions, I consider it appropriate to propose the following additional objective for the protection of birds in Chapter 4 Biodiversity and Landscape; **"In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas."**

- g) The County Wind Energy Strategy forms part of the Draft Plan which has been subject to Stage 1 AA Screening and Stage 2 AA, which having incorporated mitigation measures, concludes that the Draft Plan is not foreseen to give rise to any significant effects on designated European sites, alone or in combination with other plans or projects. This evaluation is made in view of the conservation objectives of the habitats or species, for which these sites have been designated. In addition, it should be noted that Development Management Standard 109 contained in Chapter 13 of Volume 1 of this County Development Plan states that the Council will consider the Impact of proposed windfarm development on nature conservation and ecology.
- h) Planning applications for wind energy are examined on their own merits, irrespective of landowners, with regard to policy CAEP-35 of the draft Plan.
- i) In view of the importance attributed to climate action under national policy, including in the Climate Action Plan 2019 and the National Planning Framework, the Draft Plan includes a standalone chapter on Climate Action and Energy and a County Wind Energy Strategy that ensures Offaly will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.
- j) Whilst the Draft Plan does not refer to energy alternatives such as those referred to in this submission it does contain a specific policy, CAEP-22, to encourage and facilitate the production of energy from a range of renewable sources, such as from bioenergy, waste material, solar, hydro, geothermal and wind energy, subject to proper planning and environmental considerations.
- k) I am satisfied that in preparing the County Wind Energy Strategy that it has had sufficient regard to all relevant Ministerial planning guidelines and guidance notes, national plans, policies and strategies whilst the 'step by step' sieve mapping analysis of the key environmental, landscape and technical criteria used to identify the most suitable location for wind energy development is in line with advice contained in the Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6).

Ref: CDP/D/107

Person / Body:

Andrew Lally

Summary of submission / observation:

- a) This submission objects to the extension of lands being added to the wind development plan in his area and queries if the area was not open for consideration for wind development in the Offaly County Development Plan 2014-20, why should it change now. The submission further states that wind development will adversely affect the amenities of the local population making reference to unobstructed views of the Slieve Bloom Mountains being destroyed.
- b) The submission further states that wildlife such as bats, red barn owls, buzzards and hares will also be affected.

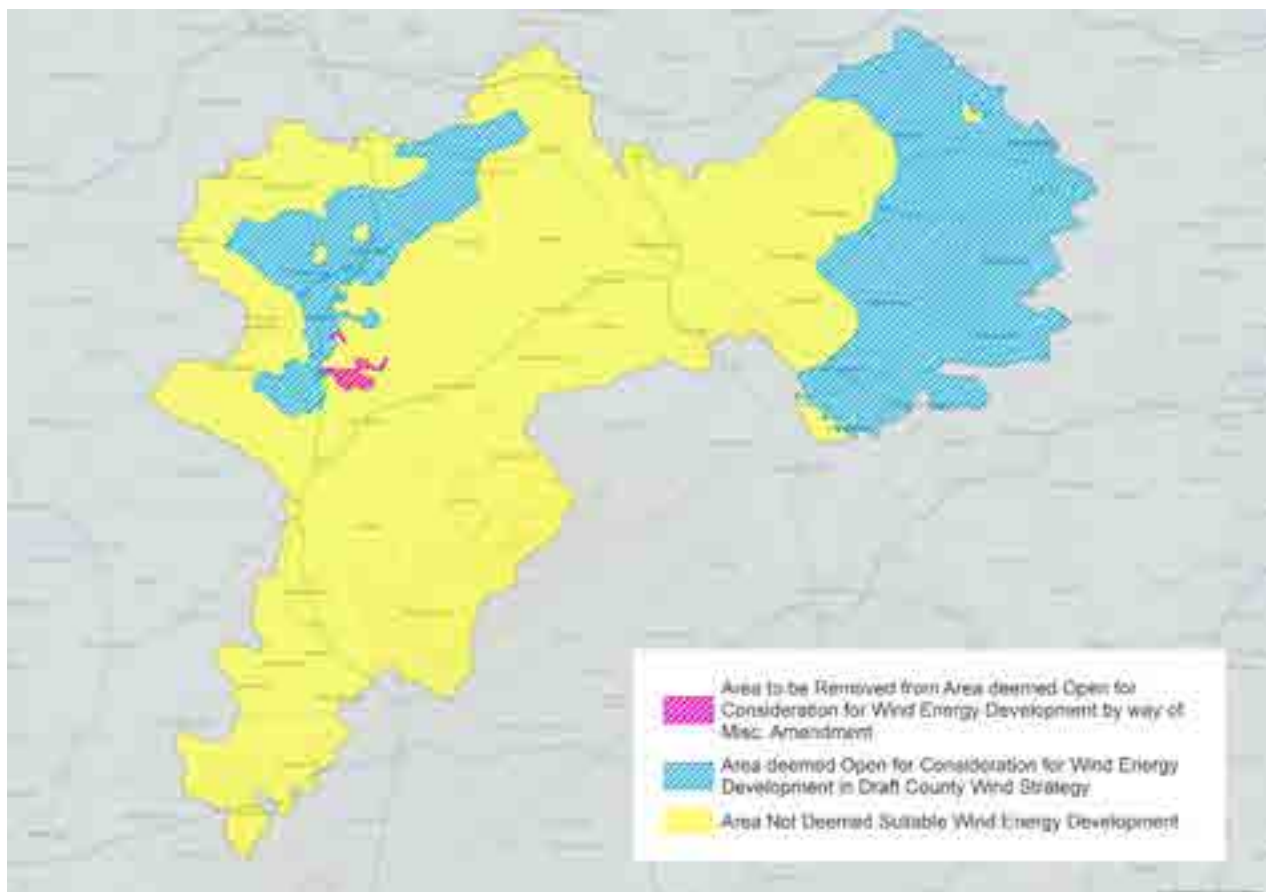
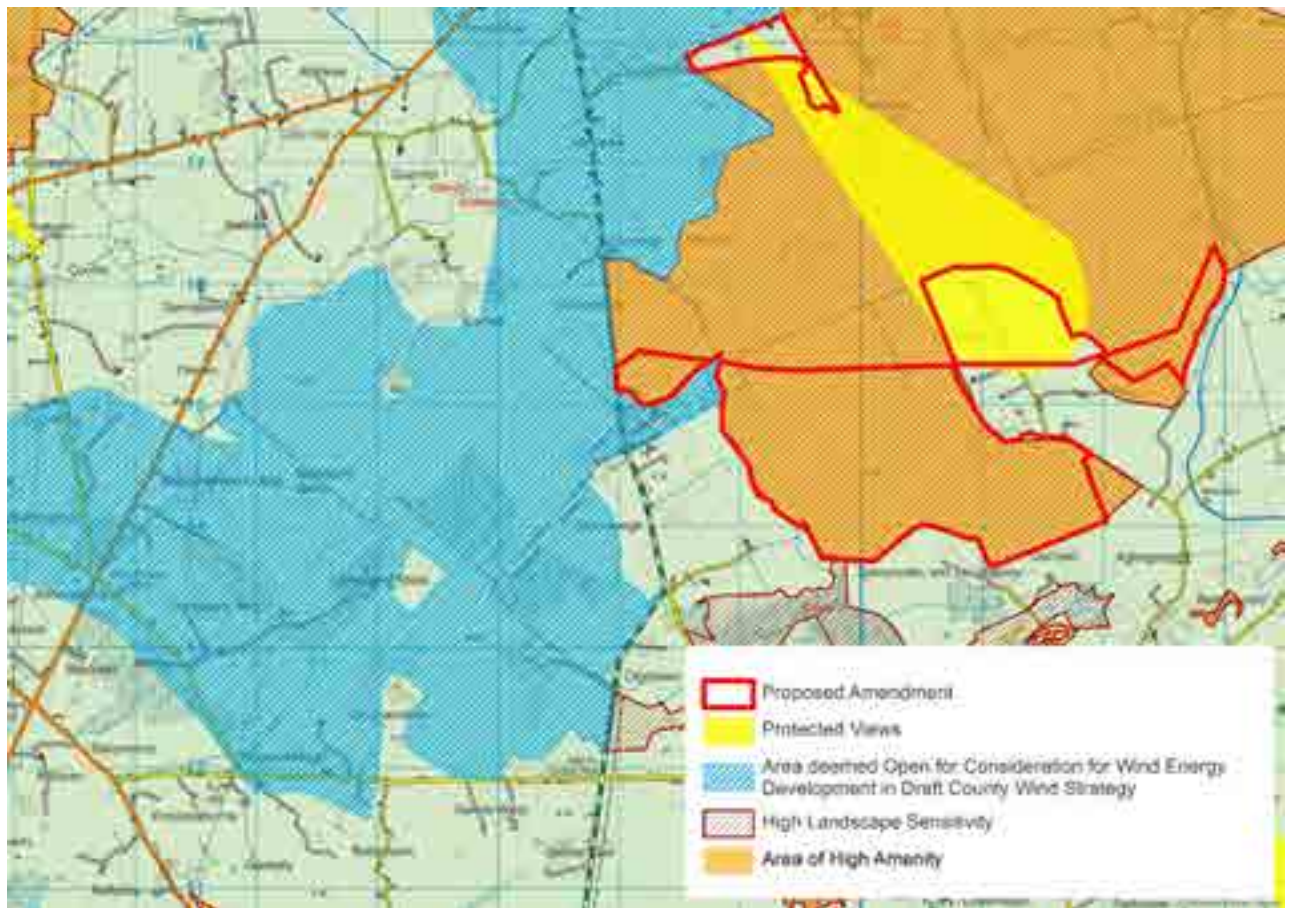
CE Response:

- a) This Wind Energy Strategy uses a ‘step by step’ sieve mapping analysis of the key environmental, landscape and technical criteria which must be balanced in order to identify the most suitable location for wind energy development as advised by the Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6). Table 3: Assessment of Wind Energy Potential Areas in Section 6 Field Analysis and Desktop Survey of Potential Wind Energy Areas recommends following an examination of the significance of and relevance of protected views and patterns of residential developments along with prevailing land form and uses that this area is deemed ‘Open for consideration for Wind Energy development’ in principle. It states that; “This area is characterised by a predominantly flat and in places slightly undulating landscape with a number of significant tracts of peatlands and transitional woodlands, and coniferous forestry in places. There also exists good wind speeds and reasonable access to the grid. The extensive tracts of flat peatlands in this area offer potential to accommodate a wind farm layout with depth, comprising a grid formation giving a better sense of balance and visual cohesion. In addition, there exists a precedent of windfarm and renewable energy projects developed in the area such as Meewaun windfarm while other projects have been deemed suitable and are awaiting commencement of development. There exists both good wind speeds and electricity infrastructure in the area.”

It should be noted in this regard that a significant proportion of this area has changed in its designation to “Not Deemed Suitable for Wind Energy Development” by way of Miscellaneous Amendment r) on account of Map No. 10 Wind Energy Strategy Designation in the Draft Plan erroneously not excluding from the lands designated ‘Areas Deemed Open for Consideration for Wind Energy Development’ in Map No. 10;

- part of the Lough Boora Area of High Amenity;
- an area within the vicinity of a Protected View over the boglands towards the Slieve Bloom Mountains, Ref. No. V12, from Road No. L-07009 in the townland of Stonestown.

These areas are shown in the below maps.



- b) The County Wind Energy Strategy forms part of the Draft Plan which has been subject to Stage 1 AA Screening and Stage 2 AA, which having incorporated mitigation measures, concludes that the Draft Plan is not foreseen to give rise to any significant effects on designated European sites, alone or in combination with other plans or projects. This evaluation is made in view of the conservation objectives of the habitats or species, for which these sites have been designated. In addition, it should be noted that Development Management Standard 109 contained in Chapter 13 of Volume 1 of the draft Plan states that the Council will consider the Impact of proposed windfarm development on nature conservation and ecology.

Ref: CDP/D/117

Person / Body:

Cronan Kennedy

Summary of submission / observation:

This submission states in relation to the proposal in the County Wind Energy Strategy to include the area south of Galross Cross into the 'Area deemed Open for Consideration' that;

- a) There exists four turbines in the area with permission for an additional one turbine as well as a Bord na Móna planning application for 21 turbines at a height of 185 metres each;
- b) Wind turbines have an adverse effect on humans through noise and shadow flicker. The submission expresses concern about the consolidated noise and ill health impact of the additional 21 turbines proposed in Derrinlough;
- c) The Irish Wildlife Trust in 2019 objected to Bord na Móna's plans for a 24 turbine windfarm in Longford as the Trust was concerned that turbines were being inappropriately located especially on peatland habitats;
- d) Birds such as cuckoos and pine martens are very active in the area and asks can the Council confirm that an Appropriate Assessment under the Habitats Directive has been followed in considering to extend zone 7 for windfarm development;
- e) His property value has decreased as a result of being located close to a turbine;
- f) He has a right to his views and amenities towards the Slieve Bloom Mountains along with the right to no industrial noise at night.

CE Response:

No further action proposed.

- a) It should be noted that notwithstanding the 'Areas Deemed Open for Consideration for Wind Energy Developments' designation, wind farm developments in these areas will be evaluated on a case by case basis subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of the draft Plan and the Section 28 Wind Energy Development Guidelines, which include local considerations such as;
 - Impact on the visual amenities of the area;
 - Impact on the residential amenities of the area;
 - Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape; and

- Visual impact of the proposal with respect to protected views, scenic routes and designated scenic landscapes.
- b) DMS 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments have to detail the impacts on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region) and shadow flicker. In assessing planning applications for windfarms, the Council will have regard to the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made.

It should be noted in this regard that the noise and shadow flicker limits in the draft Wind Energy Guidelines (WEG) are more onerous than the 2006 WEGs and afford a higher level of protection to people who live in the vicinity of any future wind farm developments. The draft guidelines propose a noise limit, referred to as a *“Relative Rated Noise Limit (RRNL) in the range of 35 – 43 dB(A), while not exceeding the background noise level by more than 5dB(A) with an upper limit of 43 dB(A).”* The Draft Guidelines indicate that they are based on best international practice on wind turbine noise control including the Institute of Acoustics Good Practice Guides, WHO Guidelines and a procedure for the assessment of low frequency noise complaints. The Draft Guidelines confirm a policy of zero shadow flicker. The Draft Guidelines recommend planning authorities or An Bord Pleanála to impose condition(s) to ensure that no existing dwelling or other affected property will experience shadow flicker as a result of the wind energy development subject of the planning application and the wind energy development shall be installed and operated in accordance with the shadow flicker study submitted to accompany the planning application, including any mitigation measures required.

- c) This Wind Energy Strategy uses a ‘step by step’ sieve mapping analysis of the key environmental, landscape and technical criteria which must be balanced in order to identify the most suitable location for wind energy development as advised by the Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6). It should be noted that due to their specific characteristics as much of the areas contained in the ‘Areas Open for Consideration’ are peatland areas. It should also be noted that notwithstanding the ‘Areas Deemed Open for Consideration for Wind Energy Developments’ designation, wind farm developments in these areas will be evaluated on a case by case basis subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of the draft Plan and the Section 28 Wind Energy Development Guidelines.
- d) The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy. It should be noted in this regard that;
- All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from ‘Areas Open for Consideration for Wind Energy Developments’ in the County Wind Energy Strategy;
 - DMS 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments have to detail the impacts on of the proposed development on nature conservation, including birds;

- Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site.

Notwithstanding these provisions, I consider it appropriate to propose the following additional objective for the protection of birds in Chapter 4 Biodiversity and Landscape; **“In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas.”**

- e) Noted. No further action proposed. The Members are advised that fluctuations in property values are not a material consideration for planning matters. The location and siting of wind turbines must take into account the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) (or the Draft Wind Energy Guidelines 2019 when adopted) and the impact on the amenities of nearby properties is a material consideration in this regard.
- f) Noted. No further action required. It should be noted that notwithstanding the ‘Areas Deemed Open for Consideration for Wind Energy Developments’ designation, wind farm developments in these areas will be evaluated on a case by case basis subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of the draft Plan and the Section 28 Wind Energy Development Guidelines, which include local considerations such as;
- Impact on the visual amenities of the area;
 - Visual impact of the proposal with respect to protected views, scenic routes and designated scenic landscapes.

[Ref: CDP/D/124](#)

Person / Body:

Coillte

Summary of submission / observation:

The submission supports the;

- inclusion of policies and objectives regarding supporting sustainable rural based enterprises such as forestry and tourism;
- inclusion of policies and objectivities regarding accessible recreational, community and sporting facilities;
- identification of Tullamore as key town in the Core Strategy and inclusion of an objective to investigate the feasibility of a Western By Pass/Relief Road around Tullamore;
- numerous supportive policies relating to climate action and renewable energy, including the Council’s policy to co-operate with EMRA in identifying Strategic Energy Zones as areas suitable for larger energy generating projects, community and micro energy production;

The submission mentions that Coillte has an open forest policy and welcome all visitors to their forests according to the principles of ‘Leave No Trace’, referring to Forest Recreation Areas in Glenafally and

Glenregan; recreational trails at Durrow Abbey, Garryhinch, Glasderry, Golden Grove and Knockbarron Wood; and mountain bike trails in the Slieve Bloom Mountains.

This submission requests that the Council in the final Plan;

- a) removes references to a 2 km setback from towns and villages in Policy CAEP-35 and Development Management Standard 109 and references to WHO Noise Guidelines 2018 and that instead all policies rely on and refer to standards in the DHPLG WEGs 2006 and any future amendment thereof;
- b) ensures a proportionate contribution by County Offaly to the achievement of on-shore wind energy targets in the Climate Action Plan and use the SEA tool to demonstrate this has been achieved;
- c) reconsiders the attachment of conditions limiting the duration of planning permissions relating to windfarms; and
- d) promotes the use of sustainable timber products.

CE Response:

- a) It is proposed to remove the requirement for a setback distance of 2 km between turbines and settlement boundaries of towns & villages from Policy CAEP-35 in Chapter 3 & DMS 109 in Chapter 13 as the inclusion of such mandatory separation distances would restrict the potential for wind farm development in the county, would undermine other policy objectives supporting wind farm development and be contrary to national policy and Ministerial guidance on wind farm development.
- b) In the absence of national guidance on how local authorities can set a target for wind energy generation within their functional area or targets set down in this regard in the EMRA RSES, it is proposed to include an objective (Ref. CAEO-03) in Chapter 3 of the Draft Plan to **“Work with key stakeholders to carry out an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.”** To support this objective, an additional paragraph should be included in Section 3.2.6 Wind Energy of the Draft Plan stating that **“Whilst due to the absence of national guidance on how local authorities can set a target for wind energy generation within their functional area it is not possible to set a specific target for renewable energy generation in the county during the plan period, the Council is committed to working with key stakeholders in the carrying out of an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.”**
- c) This is an issue for development management. It should be noted in this regard that Offaly County Council generally does not specify a shorter duration of planning permissions below that detailed by the applicants in their planning application and EIS. It is noted that the Wind Energy Guidelines 2006 and the Draft Revised Wind Energy Guidelines 2019 both state *‘Planning authorities may grant permission for a duration longer than 5 years if it is considered appropriate, for example, to ensure that the permission does not expire before a grid connection is granted. It is, however, the responsibility of the applicants in the first instance to request such longer durations in appropriate circumstances’*. It is noted also the Draft Wind Energy Guidelines state in Section 7.22 Time Limits that *“current technology would suggest that a time limit of approximately 30 years is reasonable.”*
- d) It should be noted that the Draft Plan recognises that the design, construction and operation of new buildings, have a significant role to play in reducing energy demand and increasing energy efficiency into the future and in this regard contains a specific policy, CAEP-43, *“to*

support and promote structural materials in the construction industry that have low to zero embodied energy and carbon dioxide emissions”.

Ref: CDP/D/128

Person / Body:

SSE

Summary of submission / observation:

The submission states that SSE welcomes;

- the recognition given in the Draft Plan to climate action and Just Transition is also critical as emphasised by policy CAEP-21;
- policies CAEP-04 to CAEP-12 which seek to support European and National climate objectives; raise awareness of issues associated with climate action and; support the transition to a low carbon economy by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency;
- policies CAEP-23 and CAEP-24 which seek to ensure renewable energy projects are subject to appropriate community consultation and that community benefits are derived; and
- CAEP-36 which outlines the Council policy to consider the repowering of existing windfarm developments on a case by case basis where the proposal does not result in a net increase in the number of turbines and it is demonstrated that there is no adverse impact on the receiving environment, landscape, designated sites or residences in the area.

The submission requests that the Council in the Draft Plan;

- a) Reflect targets contained in the Climate Action Plan relating to renewable energy;
- b) Ensures that the Wind Energy Strategy is consistent with the Wind Energy Development Guidelines and not go beyond what’s required in the Guidelines;
- c) Not use the SEAI Wind Atlas or any similar general wind resource data as a constraint when identifying suitable areas for onshore wind in Offaly’s Wind Energy Strategy as turbine technologies have advanced significantly in the past decade;
- d) Provide for new consents which allow for 30-35 years’ operation at a minimum;
- e) Engages closely with neighbouring local authorities in the region relating to the Wind Strategy and that a regional steering group comprising planners from each local authority and potentially led by Offaly planners, would be optimum with input from DHLGH;
- f) Recognise the importance of security of supply in the County Development Plan and the continued need for flexible, low carbon generation capacity on the Irish grid;
- g) Recognise the importance of ensuring the continued use, reuse or repowering of existing infrastructure where appropriate to allow Ireland to meet its energy needs;
- h) Reflect Action 64 in the Climate Action Plan which seeks to increase the energy efficiency of Local Authority social housing stock;
- i) Should go further than the policies currently outlined to identify areas where EV charge points could be installed and competitively tendered for these assets; and
- j) Strive to achieve 100% conversion to LED lighting to reduce energy consumption and that the Council implement similar Smart Technologies and innovations as Fingal County Council have previously done.

CE Response:

- a) In the absence of national guidance on how local authorities can set a target for wind energy generation within their functional area or targets set down in this regard in the EMRA RSES, it is proposed to include an objective in the Plan to “Work with key stakeholders to carry out an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.” To support this objective, an additional paragraph should be included in the Plan stating that “Whilst due to the absence of national guidance on how local authorities can set a target for wind energy generation within their functional area it is not possible to set a specific target for renewable energy generation in the county during the plan period, the Council is committed to working with key stakeholders in the carrying out of an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.”
- b) It is proposed to remove the requirement for a setback distance of 2 km between turbines and settlement boundaries of towns & villages from Policy CAEP-35 in Chapter 3 & DMS 109 in Chapter 13 as the inclusion of such mandatory separation distances would restrict the potential for wind farm development in the county, would undermine other policy objectives supporting wind farm development and be contrary to national policy and Ministerial guidance on wind farm development. Notwithstanding this proposed amendment, in addition it is proposed to expand Section 3 ‘Wind Energy Policy Context’ in the Draft County Wind Energy Strategy to include a paragraph summarising what is in the 2006 Guidelines and reaffirm that it conforms with the Guidelines. “It is a specific planning policy requirement under Section 28(1C) of the Act that, in making, reviewing, varying or amending a development plan, or a local area plan, with policies or objectives that relate to wind energy developments, the relevant planning authority shall carry out the following:
- (1) Ensure that overall national policy on renewable energy as contained in documents such as the Government’s ‘White Paper on Energy Policy - Ireland’s Transition to a Low Carbon Future’, as well as the ‘National Renewable Energy Action Plan’, the ‘Strategy for Renewable Energy’ and the ‘National Mitigation Plan’, is acknowledged and documented in the relevant development plan or local area plan;
 - (2) Indicate how the implementation of the relevant development plan or local area plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts); and
 - (3) Demonstrate detailed compliance with item number (2) above in any proposal to introduce or vary a mandatory setback distance or distances for wind turbines from specified land uses or classes of land use into a development plan or local area plan. Such a proposal shall be subject to environmental assessment requirements, for example under the SEA and Habitats Directives. It shall also be a material consideration in SEA, when taking into account likely significant effects on climatic factors, in addition to other factors such as landscape and air, if a mandatory setback or variation to a mandatory setback proposed by a planning authority in a development plan or local area plan would create a significant limitation or constraint on renewable energy projects, including wind turbines, within the administrative area of the plan.”
- c) No further action proposed. Section 2.1 of Draft Guidelines state that; “The Sustainable Energy Authority of Ireland provides an online ‘wind mapping system’, which identifies wind speeds and directions across the country: <http://maps.seai.ie/wind/>. This information should be used by local authorities in identifying areas suitable for wind energy development in the

formulation of their development plans and wind energy strategies (see Chapter 3).”It is therefore considered good practice to retain consideration of this data in Section 5 ‘Identifying Suitable Areas in County Offaly for Wind Energy Development’.

- d) This is an issue for development management. It should be noted in this regard that Offaly County Council generally does not specify a shorter duration of planning permissions below that detailed by the applicants in their planning application and EIS. It is noted also the Draft Wind Energy Guidelines state in Section 7.22 Time Limits that “current technology would suggest that a time limit of approximately 30 years is reasonable.”
- e) This issue has been addressed in Section 9 of the Draft County Wind Energy Strategy which details other Local Authorities Wind Strategies and the level of consistencies with the Draft County Wind Energy Strategy for Offaly. The Planning Authority is satisfied subject to material amendments that the Draft County Wind Energy Strategy complies with National policy and guidelines. Whilst not an issue for the Draft Plan, the Council would be open to the forming of a regional steering group comprising planners from each local authority with input from DHLGH.
- f) In order to demonstrate the Council’s recognition of the importance of wind energy in achieving national targets relating to climate change, it is proposed to include an Objective in Chapter 3 to “ensure the security of energy supply by supporting the potential of the wind energy resources of the County in a manner that is consistent with proper planning and sustainable development of the area.”
- g) The issue of repowering is already addressed in the Draft Plan by the inclusion of CAEP-36 which states that; “It is Council policy to consider the repowering of existing windfarm development on a case by case basis where the proposal does not result in a net increase in the number of turbines and it is demonstrated that there is no adverse impact on the receiving environment, landscape, designated sites or residences in the area.”
- h) It is proposed to include the following objective in Chapter 2 of the Draft Plan in accordance with Action 64 of the Climate Action Plan; “Introduce minimum BER standards in the Local Authority social housing stock as part of retrofit works being carried out on older stock or refurbishment of vacant dwellings” and include reference to same in Table 3.1 Decarbonisation Actions and Projects in Chapter 3.
- i) No further action required, the inclusion of Policy CAEP-48 within Chapter 3 of the Draft Plan “to support the growth of Electric Vehicles, E-Bikes, Fuel Cell Vehicles and Autonomous Vehicles with support facilities, through a roll-out of additional electric charging points and refuelling infrastructure in collaboration with relevant agencies and in accordance with the siting criteria set out in the National Policy Framework Alternative Fuels Infrastructure for Transport in Ireland 2017-2030” is sufficient.
- j) It is proposed to include a policy in Chapter 3 stating that “the Council supports the use of smart city technologies in Offaly’s settlements to assist in energy reduction through integrating public lighting infrastructure with EV charging points and also providing real time data on street lighting energy usage, atmospheric pressure, CO2 emissions and average noise pollution levels.”

[Ref: CDP/D/130](#)**Person / Body:****Declan Lally****Summary of submission / observation:**

This submission refers to the inclusion of Wind Energy Potential Area 7 (Area South of Galcross Cross) within 'Areas Open for Consideration for Wind Energy Development';

- a) Stating that there exist four turbines in the area with permission for an additional one turbine as well as a Bord na Móna planning application for 21 turbines at a height of 185 metres each;
- b) Stating that wind turbines have an adverse effect on humans through noise and shadow flicker. The submission expresses concern about the consolidated noise and ill health impact of the additional 21 turbines proposed in Derrinlough. The submission refers to a number of legal cases and articles in this regard;
- c) Stating that any submission to expand 'Zone 7' south of Galcross Cross will have a potentially negative impact on I-LOFAR at Birr Castle and it is unknown what the consolidated impact of the Derrinlough and Meewaun turbines will have on the facility.
- d) Referring to the Irish Wildlife Trust in 2019 objecting to Bord na Móna's plans for a 24 turbine windfarm in Longford as the Trust was concerned that turbines were being inappropriately located especially on peatland habitats;
- e) Querying can the Council confirm that an Appropriate Assessment under the Habitats Directive has been followed in considering to extend zone 7 for windfarm development;
- f) Stating that his family are entitled to enjoy their views of the Slieve Bloom Mountains, not wind turbine blades, shadow flicker and industrial noise in a country area;
- g) Stating that extending the Draft Area will impact hugely on the potential tourism market for Offaly and the midlands;
- h) Stating that the Council should apply similar occupancy condition to wind farms as they do to one off rural areas (no sale for 7 -10 years) rather than allow developers sell windfarms on making a huge profit;
- i) Stating that values of properties decrease if they located close to turbines;
- j) Attaches a number of research documents and reports to the submission relating to noise and the effects of wind turbines on health and the impact on bats. The submission queries if the Council has considered the scientific evidence of the impacts of wind turbines in residential areas.

CE Response:

- a) Noted. It should be noted that notwithstanding the 'Areas Deemed Open for Consideration for Wind Energy Developments' designation, wind farm developments in these areas will be evaluated on a case by case basis subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of the draft Plan and the Section 28 Wind Energy Development Guidelines, which include local considerations such as;
 - Impact on the visual amenities of the area;
 - Impact on the residential amenities of the area;
 - Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape; and

- Visual impact of the proposal with respect to protected views, scenic routes and designated scenic landscapes.
- b) Noted. No further action required. DMS 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments have to detail the impacts on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region) and shadow flicker. In assessing planning applications for windfarms, the Council will have regard to the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made. It should be noted in this regard that the noise and shadow flicker limits in the draft Wind Energy Guidelines (WEG) are more onerous than the 2006 WEGs and afford a higher level of protection to people who live in the vicinity of any future wind farm developments. The draft guidelines propose a noise limit, referred to as a *“Relative Rated Noise Limit (RRNL) in the range of 35 – 43 dB(A), while not exceeding the background noise level by more than 5dB(A) with an upper limit of 43 dB(A).”* The Draft Guidelines indicate that they are based on best international practice on wind turbine noise control including the Institute of Acoustics Good Practice Guides, WHO Guidelines and a procedure for the assessment of low frequency noise complaints. The Draft Guidelines confirm a policy of zero shadow flicker. The Draft Guidelines recommend planning authorities or An Bord Pleanála to impose condition(s) to ensure that no existing dwelling or other affected property will experience shadow flicker as a result of the wind energy development subject of the planning application and the wind energy development shall be installed and operated in accordance with the shadow flicker study submitted to accompany the planning application, including any mitigation measures required.
- c) Noted. No further action proposed. As neither the Section 28 Wind Energy Guidelines 2006 or the Draft Wind Energy Guidelines make provision for exclusion zones around Radio Observatories and broadcast communication, it is not considered appropriate to include a condition requiring an exclusion zone around the I-LOFAR station for wind energy developments as a specific policy or objective in the Plan. Instead developers will be required in Chapter 13 of the Draft Plan under Development Management Standard 105 for Windfarms to take account of any impacts of the proposed development on Radio Observatories and broadcast communication and to include proposed mitigation measures in this regard.
- d) Noted. In the Draft Plan, DMS 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments have to detail the impacts on of the proposed development on nature conservation, which includes birds, while Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site.

In addition to these provisions, I consider it appropriate to propose the following additional objectives for the protection of birds and the rehabilitation of peatlands in Chapter 4 Biodiversity and Landscape;

- *“In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas.”*

- “It is an objective of the Council to ensure that renewable energy projects located on peatlands or in close proximity to peatlands do not negatively impact on any rehabilitation measures including enhanced rehabilitation measures (i.e. drain blocking and rewetting)”
- e) The County Wind Energy Strategy forms part of the Draft Plan which has been subject to Stage 1 AA Screening and Stage 2 AA, which having incorporated mitigation measures, concludes that the Draft Plan is not foreseen to give rise to any significant effects on designated European sites, alone or in combination with other plans or projects. This evaluation is made in view of the conservation objectives of the habitats or species, for which these sites have been designated. In addition, it should be noted that Development Management Standard 109 contained in Chapter 13 of Volume 1 of the draft Plan states that the Council will consider the impact of proposed windfarm development on nature conservation and ecology.
- f) Noted. No further action required. It should be noted that notwithstanding the ‘Areas Deemed Open for Consideration for Wind Energy Developments’ designation, wind farm developments in these areas will be evaluated on a case by case basis subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of the draft Plan and the Section 28 Wind Energy Development Guidelines, which include local considerations such as;
- Impact on the visual amenities of the area;
 - Visual impact of the proposal with respect to protected views, scenic routes and designated scenic landscapes.
- g) I am satisfied that the County Wind Strategy and the policies and objectives contained in Chapter 3 strike a reasonable balance between responding to overall positive Government policy on renewable energy and enabling the wind energy resources of the Planning Authority’s area to be harnessed in a manner that is consistent with proper planning and sustainable development. The Draft Plan recognises the importance of tourism in rural areas as part of a range of diversified uses and includes a policy in Chapter 5, REDP-07 to “facilitate the development of the rural economy through supporting sustainability and economic efficiency in agriculture and diversification into alternative on-farm and off-farm activities such as the food and drinks sector, forestry, horticulture, crafts, agri-business, fishing, aquaculture, waste management, rural tourism, renewable energy and the bio-economy, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.”
- h) Noted. No further action proposed. There is no provision in planning legislation or Section 28 Planning Guidelines to propose such a condition prohibiting a wind farm developer from selling their development for a period of time as suggested in this submission.
- i) Noted. No further action proposed. The Members are advised that fluctuations in property values are not a material consideration for planning matters. The location and siting of wind turbines must take into account the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) (or the Draft Wind Energy Guidelines 2019 when adopted) and the impact on the amenities of nearby properties is a material consideration in this regard.
- j) Noted. No further action proposed. As detailed in response b) above, DMS 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments have to detail the impacts on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region) and shadow flicker. In assessing planning applications for windfarms, the Council will have regard to the Wind Energy Development Guidelines for Planning Authorities, DoEHLG,

(2006) and any amendments to the Guidelines which may be made. In relation to impacts on bats, DMS 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments have to detail the impacts on of the proposed development on nature conservation, which includes birds and bats.

Ref: CDP/D/141

Person / Body:

Statkraft

Summary of submission / observation:

This submission states that;

- a) wind speeds and nature conservation areas should not be used as a constraint or excluded from areas considered suitable for wind energy development;
- b) there is a significant disparity between maps 7 and 8 (Potential Wind Energy Areas showing scenic views) and Map 10 (Wind Energy Strategy Designations) of the wind energy strategy where maps 7 and 8 show a significant area of land which has “wind energy potential” however the areas “open to consideration” in Map 10 is considerably less;
- c) six of the twelve potential wind energy areas considered in the County Wind Energy Strategy are deemed unsuitable for wind energy based on scenic views or as a result of the location one off housing and settlements which appears to be overly onerous and Statkraft would request that OCC make it clearer how this was defined. These areas should not be ruled out in the County Wind Energy Strategy but assessed on a case by case basis;
- d) the 2 km setback separation distance from turbines to the boundaries of towns and villages as required in CAEP-35 is in conflict with current and Draft Wind Energy Guidelines. There is precedence for the Department to issue Ministerial Directions where proposals are not in compliance with issued guidance, National policies and objectives, as previously happened with Westmeath County Council.
- e) the Council are trying to renege on any material participation with national targets by using an unfairly justified population metric. Population is not a justified measure of the % share of the wind energy required that a County should be using and has not been cited in any guidelines to date.
- f) Departmental Circular PL5/2017 (August 2017) and the Circular ‘Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (July 2017) set out statutory obligations and administrative procedures for Local Authorities to follow in relation to development plans;
- g) Offaly has an opportunity to embrace the transition to a low carbon society and renewable electricity can play a leading role in the sustainable development of the county for years to come.

CE Response:

- a) No further action proposed. Section 2.1 of Draft Guidelines state that; “The Sustainable Energy Authority of Ireland provides an online ‘wind mapping system’, which identifies wind speeds and directions across the country: <http://maps.seai.ie/wind/>. This information should be used by local authorities in identifying areas suitable for wind energy development in the formulation of their development plans and wind energy strategies (see Chapter 3).” It is

therefore considered good practice to retain consideration of this data in Section 5 'Identifying Suitable Areas in County Offaly for Wind Energy Development'. In relation to nature conservation areas, I am mindful of the Councils responsibilities as set out in European and national legislation and in relevant policies and objectives in the Draft Plan to protect those parts of the county that are most sensitive from inappropriate development.

- b) Section 6 of the County Wind Energy Strategy involved a field analysis and desk top survey of 12 identified potential wind energy areas assessing these areas against the significance of and relevance of protected views as shown in Map No. 8, patterns of residential development as shown in Map No. 9, along with prevailing land form and uses in these areas in order to produce a Wind Energy Strategy that can accommodate commercial wind turbines, which tend to require larger landbanks with fewer constraints with the potential to accommodate a higher number of or larger turbines. This approach is consistent with Section 2,3 of the Draft Wind Energy Guidelines 2019 which state (p.17) that *"These Guidelines focus mainly on commercial wind turbines, given the significant contribution they can make to meeting renewable energy targets and the potential wider impacts on the given the significant contribution they can make to meeting renewable energy targets and the potential wider impacts on the local environment and community, however microgeneration can also help to tackle climate change."*

There will in all likelihood be instances the existences of small pockets of land outside the Areas Deemed Open for Consideration which may not have the environmental and technical constraints as listed in Section 5 of the County Wind Energy Strategy. Rather than including all these smaller, fragmented and piece-meal areas in a patch-work type Wind Strategy map in the County Wind Energy Strategy, the Planning Authority considers it more appropriate to have a coherent wind strategy map that provides clarity for developers, the planning authority and the public clearly outlining the parts of the county that have significant wind energy potential (in line with Section 3.4 Development Plan – Strategic Aims and Objectives from the Draft Wind Energy Guidelines 2019).

This overall approach is consistent with the Wind Strategies from previous County Development Plans which as Section 4 Review of Wind Energy Development and Future Energy Requirements in Offaly demonstrates (98.5 MW of wind energy installed with another 287.3 MW committed in undeveloped but permitted wind energy developments), Offaly has been extremely productive in the generation of wind energy.

- c) Noted. No further action proposed. The Wind Energy Strategy in the Draft Plan focuses mainly on commercial wind turbines, which tend to require larger landbanks with fewer constraints, such as including scenic areas, heritage areas and rural housing, with the potential to accommodate a higher number of or larger turbines, which is consistent with the approach of the Draft Wind Energy Guidelines 2019 which state in Section 2.3 (p.17) that *"These Guidelines focus mainly on commercial wind turbines, given the significant contribution they can make to meeting renewable energy targets and the potential wider impacts on the given the significant contribution they can make to meeting renewable energy targets and the potential wider impacts on the local environment and community, however microgeneration can also help to tackle climate change."* It should be noted in this regard that approximately 28% of Co. Offalys landform is proposed to be designated 'Areas Open for Consideration' in the county Wind Energy Strategy.
- d) It is proposed to remove the requirement for a setback distance of 2 km between turbines and settlement boundaries of towns & villages from Policy CAEP-35 in Chapter 3 & DMS 109 in Chapter 13 as the inclusion of such mandatory separation distances would restrict the potential for wind farm development in the county, would undermine other policy objectives

supporting wind farm development and be contrary to national policy and Ministerial guidance on wind farm development.

- e) Noted. I do not agree with this specific point included in this submission. Table 1: Installed Wind Capacity in Co. Offaly and Table 2: Permitted and undeveloped Wind Farms in Co. Offaly contained in Section 4 of the Draft County Wind Energy Strategy show how proactive that the Council continues to be in promoting wind energy in appropriate locations in the county. To remove any doubt, it is proposed to remove the following sentences in Section 4; “Based on the national installed wind capacity of 3,748 MW from Quarter 2 of 2019, the installed wind capacity in County Offaly represents 2.63% of the total installed wind capacity in the Republic of Ireland to date.” (p.7)

“Using Offaly share of the national population from Census 2016, 1.63% as a proxy, as a minimum County Offaly is required to generate 133.66 MW of renewable energy by 2030” (p.8) and their replacement with the following paragraph;

“Whilst due to the absence of national guidance on how local authorities can set a target for wind energy generation within their functional area it is not possible to set a specific target for renewable energy generation in the county during the plan period, the Council is committed to working with key stakeholders in the carrying out of an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.

It should be noted that;

- based on the national installed wind capacity of 4,235 MW from Quarter 2 of 2020, the installed wind capacity in County Offaly as shown in Table 1 represents 2.33% of the total installed wind capacity in the Republic of Ireland to date; and
- as Table 2 shows, there are permissions in place for an additional 80 turbines, which if constructed, will bring the total output in Offaly to 385.8MW, which show how proactive and supportive of wind energy development in appropriate locations.”

In the absence of national guidance on how local authorities can set a target for wind energy generation within their functional area or targets set down in this regard in the EMRA RSES, it is proposed to include an objective in Chapter 3 Climate Action and Energy in the Plan to “Work with key stakeholders to carry out an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.”

- f) Noted. In addressing OPR Recommendation 13 in their submission, both Section 3.1.7 Legislative and Policy Context in Chapter 3 Climate Action and Energy and Section 3.4 Wind Energy Policy Context in the County Wind Energy Strategy in the Draft Plan are to be amended as follows to include specific reference to the Specific Planning Policy Requirement contained in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change:

“It is a specific planning policy requirement under Section 28(1C) of the Act that, in making, reviewing, varying or amending a development plan, or a local area plan, with policies or objectives that relate to wind energy developments, the relevant planning authority shall carry out the following: (1) Ensure that overall national policy on renewable energy as contained in documents such as the Government’s ‘White Paper on Energy Policy - Ireland’s Transition to a Low Carbon Future’, as well as the ‘National Renewable Energy Action Plan’,

the 'Strategy for Renewable Energy' and the 'National Mitigation Plan', is acknowledged and documented in the relevant development plan or local area plan;

(2) Indicate how the implementation of the relevant development plan or local area plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts); and

(3) Demonstrate detailed compliance with item number (2) above in any proposal to introduce or vary a mandatory setback distance or distances for wind turbines from specified land uses or classes of land use into a development plan or local area plan. Such a proposal shall be subject to environmental assessment requirements, for example under the SEA and Habitats Directives. It shall also be a material consideration in SEA, when taking into account likely significant effects on climatic factors, in addition to other factors such as landscape and air, if a mandatory setback or variation to a mandatory setback proposed by a planning authority in a development plan or local area plan would create a significant limitation or constraint on renewable energy projects, including wind turbines, within the administrative area of the plan."

- g) Noted. No further action required as a positive and supportive statement of this nature is already contained in Section 1 of the County Wind Energy Strategy which contains 5 objectives, one of which, no. 2, is to "Support wind energy as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and greenhouse gas emissions."

[Ref: CDP/D/142](#)

Person / Body:

ESB Group Property

Summary of submission / observation:

This submission states that ESB supports the following from the Draft Plan;

- a) CAEP-01 in Chapter 3 Climate Action and Energy to support the development, reinforcement, renewal and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required;
- b) CAEP-07 and CAEP-08 in Chapter 3 Climate Action and Energy in relation to climate adaptation, mitigation and transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050;
- c) CAEP-03 which promotes the use of efficient energy storage systems;
- d) CAEP-32 which seeks to ensure appropriate site selection for large solar farms by focusing in the first instance on developing solar farms on previously developed and non-agriculture land, provided that it is not of high environmental value;
- e) The Wind Energy Development Policy set out in Section 8 of the County Wind Energy Strategy, including the policy of the Council to assess proposals for new wind energy developments in accordance with Map No. 10 'Wind Energy Strategy Designations', Climate Action Energy Objective 03 and subject to the Development Management Standard 109 contained in Chapter 13 of the Written Statement along with Section 28 Wind Energy Development Guidelines or any update made thereto;
- f) The view that there is significant potential to develop a Green Energy Hub in Co. Offaly;

- g) CAEP-13 that calls for the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the midlands;
- h) ENTP-32 allowing for the improved development of telecommunications infrastructure and Development Management Standard 111 in Chapter 13;
- i) Section 3.6 'Electric Vehicles, Fuel Cell Vehicles and Autonomous Vehicles' in the Draft Plan, its associated supportive policy CAEP-48 and DMS-104 which provides guidance relating to charging points requirements for development.

The submission also wishes to highlight that;

- j) the technology in relation to energy storage is evolving. Technologies such as liquid air storage, that provide more scalable storage systems than batteries and synchronous condensers for additional grid support may form future developments in this area and would be suitably located on the site of former generation stations.

CE Response:

The Planning Authority notes the comments a) to i) above and considers that no further actions are required in this regard.

Relating to comment j) whilst it is not considered necessary to amend CAEP-03 as it is sufficiently broad to cater for new battery storage technologies, it is recommended that reference be made to liquid air storage in Section 3.5 'Energy Storage' as follows (new additions in red text);

“Whilst renewable energy sources have vast potential to reduce dependency on fossil fuels and GHG emissions, many of the resources have intermittent or variable output, therefore if they are not harnessed, the energy goes to waste. As a result, there is an increased need for energy storage when energy demand is low so it can be used when energy demand is high. There are a number of storage systems which provide this function including pumped hydroelectric energy storage (PHES), battery storage and thermal storage in addition to newer technologies **such as liquid air storage**. Two battery storage facilities of this nature have been developed at Shannonbridge and Lumcloon in the west of the county while another has been granted permission at Coolcur, Rhode.”

[Ref: CDP/D/156](#)

Person / Body:

RWE Renewables Ireland Ltd.

Summary of submission / observation:

This submission;

- a) states that the lands designated in the draft Wind Energy Strategy (WES) do not vary hugely from the current WES 2014 and encourages Offaly County Council to review these designations excluding physical constraints used in the current draft analysis, including access to grid and adequate wind speeds; and
- b) recommends that Offaly County Council do not impose additional restrictions in the area near I-LOFAR and allow any potential developer to engage with I-LOFAR to ascertain whether a potential project is viable.

CE Response:

- a) Noted. No further action required. This Wind Energy Strategy uses a ‘step by step’ sieve mapping analysis of the key environmental, landscape and technical criteria which must be balanced in order to identify the most suitable location for wind energy development as advised by the Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6).
- b) Noted. No further action proposed. As neither the Section 28 Wind Energy Guidelines 2006 or the Draft Wind Energy Guidelines make provision for exclusion zones around Radio Observatories and broadcast communication, it is not considered appropriate to include a condition requiring an exclusion zone around the I-LOFAR station for wind energy developments as a specific policy or objective in the Plan. Instead developers will be required in Chapter 13 of the Draft Plan under Development Management Standard 109 for Windfarms to take account of any impacts of the proposed development on Radio Observatories and broadcast communication and to include proposed mitigation measures in this regard.

The additional text shown in red below is accordingly proposed to be inserted to DMS 109 from the Draft Plan;

<p>DMS-109 Farms</p> <p style="color: green;">Wind</p>	<p>When assessing planning applications for wind energy developments the Council will have regard to;</p> <ul style="list-style-type: none"> the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made; and the Wind Energy Strategy Designations Map from the County Wind Energy Strategy showing areas identified as ‘Areas Open for Consideration for Wind Energy Developments’ and ‘Areas not deemed suitable for Wind Energy Developments’, and specific policy for wind development in these areas as outlined in Section 8 of the County Wind Energy Strategy; 2 km separation distance from turbines to town and village boundaries in the county as required by policy CAEP-35 of this Plan. <p>In addition to the above, the following local considerations will be taken into account by the Council in relation to any planning application;</p> <ul style="list-style-type: none"> Impact on the visual amenities of the area; Impact on the residential amenities of the area; Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape; Visual impact of the proposal with respect to protected views, scenic routes and designated scenic landscapes;
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	<ul style="list-style-type: none"> • Impact on nature conservation, ecology, soil, hydrology, groundwater, archaeology, built heritage and public rights of way; • Impact on ground conditions and geology; • Consideration of falling distance plus an additional flashover distance from wind turbines to overhead transmission lines; • Impact of development on the road network in the area; • Impact of the development on radio observatories and broadcast communication in the area; and • Impact on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region), shadow flicker and air quality. <p>This list is not exhaustive and the Council may consider other requirements contained in the chapter on a case by case basis with planning applications should the need arise. Where impacts are predicted to arise as a result of the development proposed, suitably detailed mitigation measures shall be proposed.</p>
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It is also proposed to **remove the reference to ‘the internationally important Irish Low Frequency array (I-LOFAR) in Birr Castle which is particularly sensitive to wind turbines in its vicinity due to the Doppler effect which masks the radar signal and produces backscatter’** from Wind Potential Area 7 ‘Area generally south of Cloghan and Birr Environs’ in Table 3: Assessment of Wind Energy Potential Areas in the County Wind Energy Strategy in the Draft Plan.

It should be noted that Miscellaneous Amendment s) refers to Wind Potential Area 7 adding in the following section;

“There are a number of constraints in this area relating to the proximity of the subject site to the following Special Protection Areas;

- **The Dovegrove Callows Special Protection Area (SPA), a feeding site for an internationally important flock of Greenland White-fronted Goose, a species that is listed on Annex I of the E.U. Birds Directive;**
- **The River Little Brosna Callows (SPA) of special conservation interest for the following species: Whooper Swan, Greenland White-fronted Goose, Wigeon, Teal, Pintail, Shoveler, Golden Plover, Lapwing, BlackTailed Godwit and Black-Headed Gull. The site is also of special conservation interest for holding an assemblage of over 20,000 wintering waterbirds; and**
- **All Saints Bog SPA, 3.5 km from the site, as it was known to be utilised in the past by part of an internationally important population of Greenland White-fronted Goose (It should be noted that NPWS site synopsis states that the last record of Greenland White-fronted Goose within the site was 75 individuals in 1993/94). Merlin has been seen on the bog during the breeding season and may breed there.”**

[Ref: CDP/D/157](#)

Person / Body:

Bord na Móna

Summary of submission / observation:

This submission states that;

- a) Bord na Móna has engaged in the review of the 2011 Strategic Framework for the Future Use of Peatlands and expect to publish the review in coming months.
- b) Bord na Móna is concerned that the synergy between renewable energy developments and the after use of cutaway peatland is not recognised in Chapter 3 of the draft Plan. Chapter 3 of the Draft Plan should be consistent with references to the potential of cutaway bogs as locations for renewable energy in accordance with Section 3.2 of the National Planning Framework and Section 7.9 of the EMRA RSES. It is stated that in addition to wind and solar energy, cutaway bogs are prime sites for energy storage, electrical transmission/distribution infrastructure, potential onsite large volume off-takers (e.g data centres) and associated developments.
- c) The 2km separation distance from proposed turbines to town and settlement boundaries as proposed in Policy CAEP-35 and Development Management Standard 109 should be removed as the existing and Draft Wind Energy Development Guidelines do not differentiate between rural and urban dwellings.
- d) In relation to Table 3.1 Decarbonisation Actions and Projects in Section 3.13 that Bord na Móna as part of their peatland rehabilitation programme will look to re-wet residual peat and reduce carbon emissions in these landbanks. In this regard, Bord na Móna are developing an Enhanced Rehabilitation Scheme with Government support developing suitable hydrological conditions for rewetting and working towards these areas becoming functioning peatland ecosystems.
- e) Careful consideration needs to be given to zoning of areas as being suitable or not suitable for wind energy development going forward, so as not to constrain any areas which may have renewable energy potential, particularly for wind generation.
- f) Given advances in turbine technologies over recent years, the SEAI Wind Atlas or any similar general wind resource data should not be used as a constraint for zoning areas for renewable energy development.
- g) Bord na Móna lands support a wide range of protected species that are under pressure in the wider landscape.
- h) Bord na Móna welcomes reference to the development of a regional peatway connecting natural and cultural attractions in Chapter 4 of the Draft Plan and the development of a National Park and Objective TRO-12 that states that any development of renewable energy on cutaway bog will be required to provide increased opportunities for amenity access and education facilities.
- i) Bord na Móna is committed to harnessing its industrial potential to support its mission statement of job creation and to support Government objectives across the region. The submission states that Bord na Móna's properties meet the needs of a variety of industries including waste recovery, SEVESO uses, logistics, storage, mineral extraction and manufacturing.
- j) In relation to Chapter 6: Tourism and Recreation, the submission states that Bord na Móna's Brown to Green Strategy provides connectivity and access to a rehabilitated landscape potentially making the region a hub for cycle tourism, biodiversity and outdoor recreation. The submission refers to Failte Ireland recognising the opportunity for Lough Boora Discovery

Park to becoming a 'brand home' for Bord na Móna and to become the central tourism attraction in the Midlands and Irelands Ancient East.

- k) Given the geographic location, nature and physical characteristics of Bord na Móna's estate, there remains significant potential for Bord na Móna to support further resource recovery operations and enable the transition to a more sustainable future and support the circular economy.
- l) The submission requests that policy ENVO-06 be amended to include 'collection of waste' so the policy would read as follows:
 "It is an objective of the Council to use statutory powers to prohibit the illegal deposit, disposal and **collection of waste** materials, refuse and litter, and to authorise and regulate, waste disposal within the county in an environmentally sustainable manner".

CE Response:

- a) The Council notes that Bord na Móna is to publish a review of its Strategic Framework for the Future Use of Peatlands in the coming months and requests that Bord na Móna have regard to relevant policies and objectives in the Draft Plan regarding Climate Action and Energy (including renewable energy), Biodiversity and Landscape, Economic Development and the Wind Energy Strategy Designations mapping contained in the County Wind Energy Strategy. The Chief Executives refers to Policy CAEP-13 in Chapter 3 of the Draft Plan, supports the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the midlands and adjacent parts of the north west and southern regions, which meets the environmental, economic and social needs of communities in these areas, and also demonstrating leadership in climate change mitigation and land stewardship. The Council recognises that the industrial peatlands in the midlands are a significant resource will transition to after uses ranging from amenity, tourism, biodiversity services, 'wild areas', flood management, climate mitigation, energy development, industry, education, conservation and many more.
- b) Whilst the Draft Plan does not contain a specific policy promoting peatlands as preferred areas for renewable energy, it does recognise the great potential that peatlands offer in relation to a range of uses in addition to renewable energies; such as amenity, tourism, biodiversity services, 'wild areas', flood management, climate mitigation, industry, education, conservation and many more. As referred to in a) of this response, policy CAEP-13 of the Draft Plan recognises that the peatlands are a significant resource and supports the preparation of a comprehensive after use framework plan for the peatlands in line with RPO 4.84 of EMRA RSES. In relation to wind energy, the County Wind Energy Strategy constitutes a plan led approach to wind energy development in County Offaly using a sieve mapping analysis and field analysis in identifying 'Areas Open for Consideration'. It should be noted that due to their specific characteristics much of the areas contained in the 'Areas Open for Consideration' are peatland areas.
- c) It is proposed to remove the requirement for a setback distance of 2 km between turbines and settlement boundaries of towns & villages from Policy CAEP-35 in Chapter 3 & DMS 109 in Chapter 13 as the inclusion of such mandatory separation distances would restrict the potential for wind farm development in the county, would undermine other policy objectives supporting wind farm development and be contrary to national policy and Ministerial guidance on wind farm development.
- d) No further action required. Policy BLP-18 in Chapter 3 of the Draft Plan supports the re-wetting of residual peat and reduction of carbon emissions on Bord na Móna lands in stating that; *" It is Council policy to support collaboration between Offaly County Council, 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 in conjunction with appropriate developed after uses.”

- e) No further action proposed. The Wind Energy Strategy uses a ‘step by step’ sieve mapping analysis of the key environmental, landscape and technical criteria which must be balanced in order to identify the most suitable location for wind energy development as advised by the Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6).

It should be noted that notwithstanding the ‘Areas Deemed Open for Consideration for Wind Energy Developments’ designation, wind farm developments in these areas will be evaluated on a case by case basis subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of this County Development Plan and the Section 28 Wind Energy Development Guidelines, which include local considerations such as;

- Impact on the visual amenities of the area;
 - Impact on the residential amenities of the area;
 - Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape; and
 - Visual impact of the proposal with respect to protected views, scenic routes and designated scenic landscapes.
- f) No further action proposed. Section 2.1 of Draft Guidelines state that; “The Sustainable Energy Authority of Ireland provides an online ‘wind mapping system’, which identifies wind speeds and directions across the country: <http://maps.seai.ie/wind/>. This information should be used by local authorities in identifying areas suitable for wind energy development in the formulation of their development plans and wind energy strategies (see Chapter 3).” It is therefore considered good practice to retain consideration of this data in Section 5 ‘Identifying Suitable Areas in County Offaly for Wind Energy Development’.
- g) Noted. The Draft Plan makes reference in Section 4.7 to peatlands being considered a very important ecosystem and that many of the county’s bogs are designated sites under Annex 1 (Habitats) of the EU Directive. In addition, Chapter 4 of the Draft Plan contains a policy, BLP-14 “to protect the county’s designated peatland areas and landscapes, including any historical walkways through bogs and to conserve their ecological, archaeological and cultural heritage and to develop educational heritage.”
- h) Noted. It is an objective of the Draft Plan Ref.TRO-15 to implement the ‘Feasibility Study on the Development of a Major Cycling Destination in the Midlands of Ireland’ (2016) in conjunction with Bord na Móna, Coillte, Waterways Ireland, the Office of Public Works and the Product Development Group, in accordance with the Offaly Tourism Statement of Strategy 2017-2022’.
- i) Noted. The Draft Plan recognises the great potential that peatlands offer in relation to a range of uses in addition to renewable energies; such as amenity, tourism, biodiversity services, ‘wild areas’, flood management, climate mitigation, industry, education, conservation and many more and includes in this regard a specific policy, CAEP-13, which recognises that the peatlands are a significant resource and supports the preparation of a comprehensive after use framework plan for the peatlands in line with RPO 4.84 of EMRA RSES.
- j) Noted. Chapter 5 of the Draft Plan contains a specific objective, RDO-07, “to support the development of Lough Boora Discovery Park as a National Peatlands Centre and to support the development of further strategic linkages with the local and regional green infrastructure network.”

- k) Noted. Chapter 5 of the Draft Plan contains a specific objective, ENTP-35 “to support enterprise development of industries, agencies and communities that create and employ green technologies in the provision of their goods and services, while taking measures to accelerate the transition towards a sustainable, low carbon and circular economy”.
- l) Noted. It is proposed to amend policy ENVO-06 as suggested by Bord na Móna as follows “It is an objective of the Council to use statutory powers to prohibit the illegal deposit, disposal and collection of waste materials, refuse and litter, and to authorise and regulate, waste disposal within the county in an environmentally sustainable manner”.

[Ref: CDP/D/164](#)

Person / Body:

Irish Wind Energy Association

Summary of submission / observation:

This submission states;

- a) In relation to policy CAEP-02 in Chapter 3 that while in general grid connections to wind farms are underground there may be circumstances where sections of overhead line may be appropriate;
- b) The basis for a 2 km separation distance from turbines to town and village settlement boundaries in the county as required by policy CAEP-35 is not evidence based and would be contrary to national and regional policies. This provision should be removed and all associated policies should rely on the Wind Energy Guidelines 2006 and any further amendments of same;
- c) That reference to the World Health Organisations (WHO) 2018 Environmental Noise Guidelines for the European Region should be deleted pending adoption of the Draft Wind Energy Guidelines;
- d) In the case of repowering projects, it is unlikely that new turbines would be available to match those of the original windfarm and that replacement with larger turbines, spaced further apart is a likely scenario;
- e) That a policy dealing with ‘Renewal Projects’ should be included that affords those projects that have a specified time limit for operation as a condition of permission be afforded every opportunity to maintain their contributions rather than cease production;
- f) That shape files of Areas of High Amenity and Landscape Classification Areas be made available to the public;
- g) States that if the next Development Plan provided through its policies for a further 350 MW of wind energy development in the county over the next decade, it would result in an annual investment of over €8.75 million in the Offaly economy or €252.5 million over a typical 30-year operational lifespan of projects (using €2/MWh as prescribed for Community Benefit under the Renewable Energy Support Scheme).
- h) It is noted that the step by step process undertaken in the Draft County Wind Strategy has yielded just two designations:
- Areas Open for Consideration for Wind Energy Development
 - Areas Not Deemed Suitable for Wind Energy Development, which is in contrast to the General Zoning Matrix as set out in Section 12.3 of the Draft Plan which has three zonings; permitted in principle, open for consideration and not normally permitted. It is queried if Section 12.3 covers wind energy also.

- i) Whilst acknowledging the absence of any Central Government or Regional Assembly guidance on how many MW or GW of new wind energy that local authorities should be providing for, Offaly County Council should seize the opportunity and seek to identify enough land to accommodate as much as possible of the additional 4.2 GW of additional onshore wind energy required by the Climate Action Plan by 2030. IWEA strongly suggests that Offaly in the County Development Plan and WES must detail a sufficient quantum of land as being suitable for wind energy to ensure national renewable energy targets can be achieved, and demonstrate how the quantum of land classified as suitable is sufficient for this purpose.
- j) Grid capacity, prevailing wind speeds and nature conservation areas should not be used as a constraint or excluded from areas considered suitable for wind energy development;
- k) That as decarbonisation and renewable energy ambitions increase, wind energy developments will have to extend from the least sensitive landscape areas with the most capacity into areas of slightly more sensitive landscape;
- l) It is noted that the more irregular form of lands deemed 'Open for Consideration' in the north west of the county will result in a less efficient layout for wind farms (No map submitted showing the subject lands);
- m) That the IWEA acknowledge that in Section 9 of the Draft County Wind Energy Strategy, the Council has assessed the County Development Plans and Wind Energy Strategies of adjoining counties and apart from Co. Laois, there is a high consistency with others Co. Development Plans and County Wind Energy Strategies.
- n) That the IWEA has been advocating for a regional approach to the spatial planning of wind farm developments for some time, to compliment the Local Authority level approach that has been the case to date.

CE Response:

- a) Noted. No further action proposed. I am satisfied with the wording of CAEP-02 in the Plan as stands;
CAEP-02 It is Council policy to require that, in all new developments, local services such as electricity shall be undergrounded, multiple services are accommodated in shared strips underground and that access covers are shared, whenever possible.
- b) It is proposed to remove the requirement for a setback distance of 2 km between turbines and settlement boundaries of towns & villages from Policy CAEP-35 in Chapter 3 & DMS 109 in Chapter 13 as the inclusion of such mandatory separation distances would restrict the potential for wind farm development in the county, would undermine other policy objectives supporting wind farm development and be contrary to national policy and Ministerial guidance on wind farm development.
- c) Noted. No further action proposed. I am satisfied to retain reference to "Impact on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region)" as contained in DMS-109 Wind Farms. It is noted in this regard that amongst the best international practice that the Draft Revised Wind Energy Development Guidelines are based on are the World Health Organisations (WHO) 2018 Environmental Noise Guidelines.
- d) Noted. No further action required. The issue of repowering is already addressed in the Draft Plan by the inclusion of CAEP-36 which states that; *"It is Council policy to consider the repowering of existing windfarm development on a case by case basis where the proposal does not result in a net increase in the number of turbines and it is demonstrated that there is no adverse impact on the receiving environment, landscape, designated sites or residences in the area."*

- e) Noted. It is proposed to expand the wording of CAEP-36 to include reference to 'renewal' as follows (additional text in red); "It is Council policy to consider the repowering **and renewal** of existing windfarm development on a case by case basis where the proposal does not result in a net increase in the number of turbines and it is demonstrated that there is no adverse impact on the receiving environment, landscape, designated sites or residences in the area."
- f) Noted. No further action proposed. The Council will endeavour to load all mapping onto its online G-Plan system post the making of the County Development Plan.
- g) Noted. No further action required.
- h) Noted. No further action proposed. Designations are not zonings. The zoning classifications set out in Section 12.3 only apply in Towns and Villages where lands are zoned for classifications of land use whereas the designations used in the County Wind Energy Strategy signify the areas where wind energy is open for consideration or not permitted.
- i) In the absence of national guidance on how local authorities can set a target for wind energy generation within their functional area or targets set down in this regard in the EMRA RSES, it is proposed to include an objective in the Plan to **"Work with key stakeholders to carry out an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource."** To support this objective, an additional paragraph should be included in the Plan stating that **"Whilst due to the absence of national guidance on how local authorities can set a target for wind energy generation within their functional area it is not possible to set a specific target for renewable energy generation in the county during the plan period, the Council is committed to working with key stakeholders in the carrying out of an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource."**
- j) Noted. No further action proposed. The 'step by step' sieve mapping analysis of the key environmental, landscape and technical criteria which must be balanced in order to identify the most suitable location for wind energy development used in the Draft County Wind Energy Strategy is based on advice contained in the Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6) in relation to identifying suitable locations for wind energy development. It is therefore considered good practice to retain consideration of this data in Section 5 'Identifying Suitable Areas in County Offaly for Wind Energy Development'
- k) Noted. No further action proposed. I am mindful of the Council's responsibilities as set out in European and national legislation and in relevant policies and objectives in the Draft Plan to protect those parts of the county that are most sensitive from inappropriate development.
- l) Noted. The onus is on wind energy developers to plan and design their developments around the County Wind Energy Strategy. The Wind Energy Strategy uses a 'step by step' sieve mapping analysis of the key environmental, landscape and technical criteria which must be balanced in order to identify the most suitable location for wind energy development as advised by the Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6). The approach followed by the Council provides two large Areas designated as 'Open for Consideration areas for Wind Energy Development' in Map 10 County Wind Energy Designations which generally have fewer constraints and contain large landbanks of suitable land which are potentially more conducive to wind energy generation rather than including smaller, fragmented and piece-meal areas in a patch-work type Wind Strategy map.
- m) Noted. No further action proposed. I am satisfied subject to recommended amendments that the Draft County Wind Energy Strategy complies with National policy and guidelines
- n) Noted. No further action proposed. I am satisfied subject to recommended amendments that the Draft County Wind Energy Strategy complies with National policy and guidelines. Whilst

not an issue for the Draft Plan, the Council would be open to the forming of a regional steering group comprising planners from each local authority with input from DHLGH.

[Ref: CDP/D/166](#)

Person / Body:

Mark Mahon on behalf of RPS Group Ltd

Summary of submission / observation:

a) Strategic Opportunities for Rhode Green Energy Park (GEP)

The submission states that the RPS 'Opportunity Assessment Report' for Rhode GEP which is currently nearing completion outlines three strategic opportunities at a regional or national scale for the Rhode GEP;

- Strand 1: Energy decarbonisation/ innovation hub built around renewable energy, energy storage, hydrogen and electricity system integration.
- Strand 2: Eco-Industrial Park model whereby large-scale energy intensive employment – for example in data centres, agri-food, horticulture, bio-economy – develops around the electricity and heat resources available.
- Strand 3: Educational/ Innovation/ Centre of Learning for renewables and electricity grid: to improve awareness within the community of how the energy transition is happening, for collaboration with stakeholders across the Midlands Region and to create partnerships with University and Third Level Institutions.

b) Scope to develop beyond the existing Green Energy Park boundary

The submission states that while the core area of the Rhode GEP (circa 5 hectares) provides several opportunities and already has operational energy facilities, some future proposals such as large scale renewable energy projects, data centres, or industrial companies may require larger land banks adjacent to the site. It would be useful for the Co. Development Plan to provide for the location of complimentary developments such as these land uses so long as the design ethos and coherence of the park is respected.

c) Zoning / Suitability of future land uses within the Park

The submission states that Industrial and Warehousing and Business/ Technology Zonings would be compatible with the forms of development emerging from the Opportunity Assessment Report prepared by the consultants. The Stage 2 Draft CDP includes reference to 'logistics' among the uses that might be potentially suitable for the Rhode GEP. This should be re-examined. The energy/ innovation and enterprise theme that is emerging for the GEP might not be compatible with (for example) a busy logistics/warehouse depot, which would have a large footprint, but might not have any synergies or relationship with other occupants.

d) Community Integration – Recreation, Connections

The footpath network which links the Rhode GEP with the village is a popular informal walking loop which has the potential to be strengthened and expanded, for example with planned cycleway networks and connections to Croghan Hill. Integration of proposed renewable energy facilities with amenity walkways/ cycleways would also be beneficial and can lead to a better integration of the energy proposals with the community.

e) Sustainable Design Approach

The concept for the Rhode GEP will include a high standard of design and landscaping, and implementation of sustainable design principles (e.g. in relation to sustainable drainage, lighting, connectivity, biodiversity, etc.). The vision for the physical development of the GEP is in some ways more closely related to the 'Business/ Technology Park' model described in the Stage 2 draft Plan.

f) Data Centre Potential

The Opportunity Assessment report will identify potential for Data Centre development at the Rhode GEP, albeit further feasibility work is required to identify all of the enabling infrastructure requirements. Within the GEP itself, land is available for a small-medium sized Data Centre(s), whereas land adjacent to the park would be required for large scale development.

g) Infrastructure improvements

It is likely that some or all of the following measures some will be required to realise the potential of the Rhode GEP;

- Upgrading physical environment of the existing Business Park (roads, footpaths, landscaping)
- R400 road improvements
- Footpaths/ cycleways
- Improved telecommunications (fibre) infrastructure
- Wastewater treatment facility capacity expansion
- Water supply improvements
- Electricity grid connections and potential expansion of existing substation.
- Gas grid connection to the site
- Interconnecting services (heat networks, electricity, gas, water, etc.) between companies operating in and around the Park

CE Response:

Noted.

Points a) - e) and g)

Points a) to e) and g) are proposed to be addressed by the inclusion of new subsections in Section 5.5.6 Rhode Green Energy Park along with additional objectives in Chapter 5 Economic Development and amendments to a number of titles of Development Management Standards in Chapter 13.

It is proposed to insert **the development of Rhode Green Energy Park as a standalone Key Initiative** in Table 5.1 Key Initiatives in County Offaly in Chapter 5 Economic Development and omitting reference to the Green Energy Park from point 7 of the same table.

It is proposed to make the following changes to Section 5.5.6 Rhode Green Energy Park in Chapter 5 Economic Development;

The Rhode Green Energy Park (GEP) is strategically located on the outskirts of Rhode, just 7 km from the M6 Dublin to Galway motorway. The business park has been established on the site of a former ESB Power Station and occupies approximately 5.3 ha with 13 serviced sites. The area has a strong heritage in energy production and coupled with the strategic location, the park is considered suitable for Green Energy as well as other complementary green uses such as Green Enterprise, Food Processing, Manufacturing, Logistics, Engineering and Research and Development **and is already home**

to a number of consented renewable energy generation proposals and facilities in the shape of wind, solar and flywheel battery storage. With the significant development of the business park infrastructure(s) in place and various energy related infrastructure and prospective developments nearby, Offaly County Council has identified the potential for a Green Energy Park at this location which can be a national exemplar of the transition from a historical dependency on fossil fuels to sustainable energy and energy innovation.



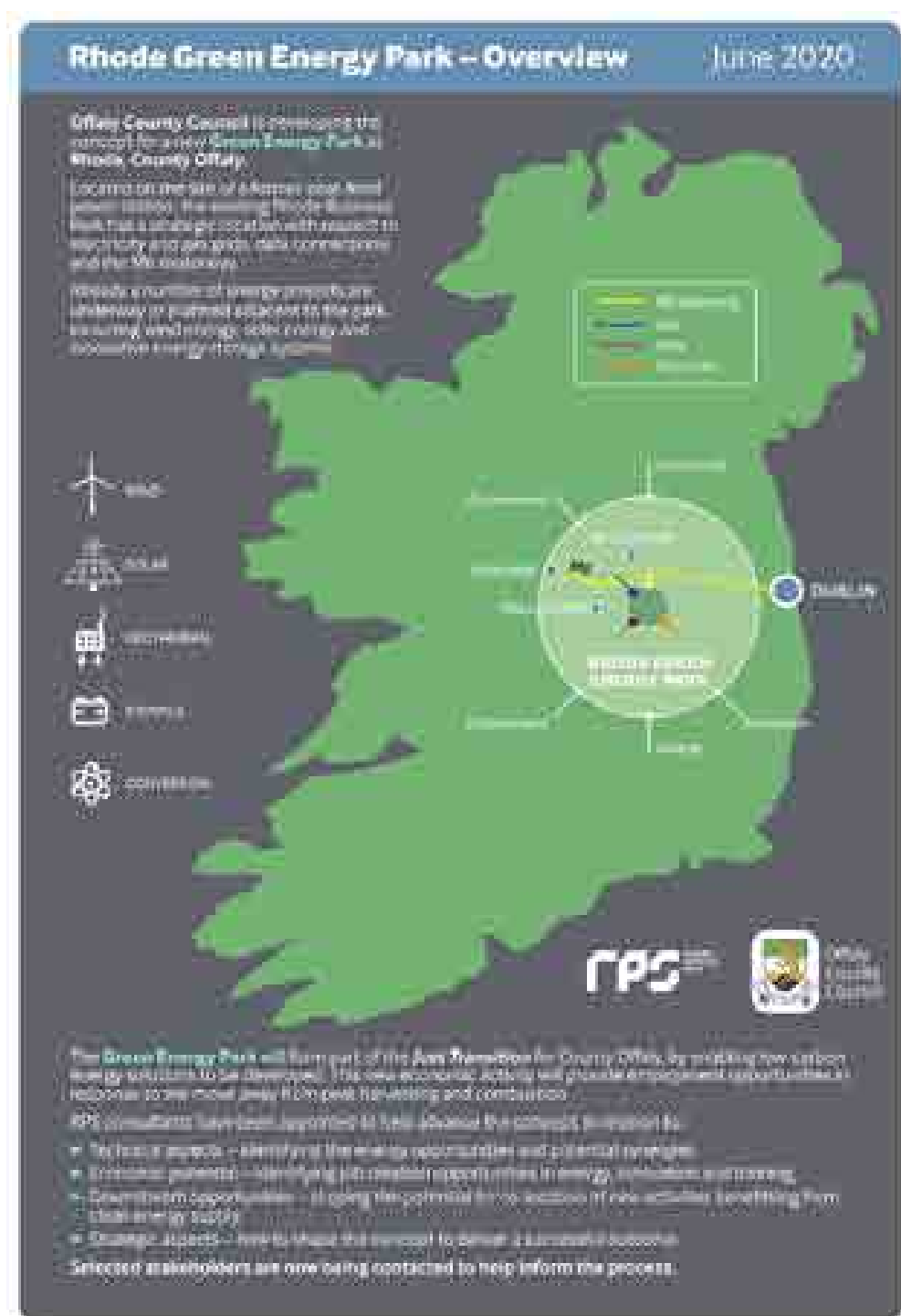
Offaly County Council has commissioned RPS Consultants to prepare an 'Opportunity Assessment Report' for Rhode GEP which has identified three strategic opportunity areas;

1. Energy decarbonisation/ innovation hub built around renewable energy, energy storage, hydrogen gas and electricity system integration.
2. Eco-Industrial Park model whereby large-scale energy intensive employment – for example in data centres, agri-food, horticulture, bio-economy – develops around the electricity and heat resources available.
3. Educational/ Innovation/ Centre of Learning for renewables and electricity grid: to improve awareness within the community of how the energy transition is happening, for collaboration with stakeholders across the Midlands Region and to create partnerships with University and Third Level Institutions.

These strategic opportunities offer considerable potential to;

- develop hybrid renewable energy facilities in co-location with industries and enterprise within the Business Park and renewable energy developments in the surrounding rural area; and

- provide mutual benefits and efficiencies for both energy producers and users by sharing outputs and by-products of their processes in a reliable, sustainable and cost competitive fashion and at the same time export renewable energy to the national grid to help transition to a low-carbon and climate resilient society.



Guiding Future Development of the Rhode Green Energy Park

In order to maximise the potential of the Rhode GEP, the following principles should apply to the future planning of the Rhode Green Energy Park, in order to realise its potential.

Table 5.2: Guiding Principles for the Rhode GEP**1. Integration/ Interconnectivity of units/ enterprises**

Rather than conceiving each proposal as a stand-alone unit, developers should plan for future integration with other facilities in the park, following an eco-park model. This means interconnection of electricity, a local heat network, and physical connections for transfer of other materials (circular economy co-operation). This translates as a services corridor concept within the park. This can take into account potential for future connection of external services and utilities.

2. Shared Approach – Wastewater, SUDS, offices/meeting room

A more coherent and efficient park will develop if some aspects are shared; for example, a central sustainable drainage pond will avoid each plot needing its own system, a central wastewater treatment plant is preferable to several smaller units. A shared hub for office space and meeting rooms will help create co-operation and synergy between tenant companies. Offaly County Council can take a lead in this regard.

3. Design Approach/ Coherence

The attractiveness and coherence of the park will benefit from a specific design guide to inform the approach on individual plots. Accordingly, it is an objective of this Plan to prepare a Design Statement for the Rhode Green Energy Park showing the developers the preferred approach to materials, colours, boundary treatment, signage etc. for individual units and sites in the Park. Until this Design Statement is prepared, developers shall as a minimum comply with the requirements of DMS-73. Individual developments will still have freedom meet their own design requirements but following overarching guidance.

4. Community Integration – Recreation, Connections and Green Infrastructure Provision

The Park forms part of an informal walking loop popular with the local community. This can be strengthened and expanded, for example with connections to Midland Cycling Destination - Offaly routes in the vicinity, connections to Croghan Hill and connections with potential walking and cycling routes in nearby bogs post rehabilitation. Access to the existing walking loops in the Park should be protected during construction work where possible. It is an objective of this Plan to prepare a Green Infrastructure Masterplan for the Rhode Green Energy Park to advise developers on how to retain and enhance existing green infrastructure and to provide new green infrastructure within and around the Rhode Green Energy Park. Until this Statement is prepared, developers shall as a minimum comply with the requirements contained in DMS-72.

5. Sustainable Design Approach

As part of the energy transition, the park should be developed as an exemplar of sustainability, using for instance low-carbon materials, encouraging sustainable transport, incorporating biodiversity gain, reducing impacts from lighting, and so on. It is an objective of this Plan for the Council to prepare an Energy Efficiency and Climate Change Adaptation Design Statement for the Park. Until this Statement is prepared, developers shall as a minimum comply with the requirements contained DMS-74 in Chapter 13 of this Plan in this regard. One avenue for developers to consider in this regard is to implement a sustainability standard such as CEEQUAL (for park infrastructure) or a community approach under BREEAM or LEED.

6. Technology/ WiFi zone

As a landmark, pioneering energy efficient, low carbon centre of industry, the Rhode Green Energy Park would benefit from a Wi-Fi zone to facilitate collaboration spaces in the park and any academic / research ties that the park will develop.

7. Future Expansion/ Phased Growth

The Council recognises that while the core area of the Rhode GEP provides several opportunities and already has operational energy facilities, some future proposals such as large scale renewable energy projects or data centres may require larger land banks adjacent to the site or in the general area. In this regard, there exists large tracts of flat peatland and transitional marginal land within the general area of the GEP which may be capable of accommodating such complimentary

developments subject to proper planning and environmental considerations and the design ethos and coherence of the park being respected. The layout should be planned to enable future connections to adjacent land. The possible need to expand infrastructure such as the electricity substation and wastewater treatment installation should also be borne in mind.

Appropriate and Inappropriate Uses within the Rhode Green Energy Park

Table 5.3 below which is referred to in ENTO-13 outlines appropriate uses that will be considered and inappropriate uses that will not be considered by the Planning Authority within the Rhode GEP. It should be noted that the uses identified appropriate and inappropriate in Objective ENTO-13 relating to the Rhode GEP take precedence over the acceptability or otherwise of uses which apply to ‘Industrial and Warehousing’ as contained in Table 12.1 Land Use Zoning Matrix in Chapter 12 Land Use Zoning Objectives.

Table 5.3: Appropriate and Inappropriate Uses within the Rhode Green Energy Park

Uses considered appropriate for the Rhode Green Energy Park	Uses not considered appropriate for the Rhode Green Energy Park
<ol style="list-style-type: none"> 1. Low Carbon Peaking Plant 2. Hydrogen Electrolyser and Storage 3. Data Centre 4. Geothermal Heat Pumps 5. Steam Reformation Plant 6. Anerobic Digestor (Biogas) 7. Biofuel Production 8. Horticulture/Agrifood (Greenhouses) 9. Research and Development 10. Other uses which in the opinion of the Planning Authority are in keeping with and complementary to the strategic opportunities outlined in Section 5.5.6.2. 	<ol style="list-style-type: none"> 1. Batching plants 2. Fuel Depots 3. Heavy Vehicle Depots 4. Light or heavy industry not related to Green Energy or Green Innovation 5. Warehousing not related to Green Energy or Green Innovation 6. Logistics 7. Abattoir 8. Retail wholesale outlets 9. Boarding Kennels 10. Mart/Co-operatives 11. Scrap yards 12. Service Stations 13. Veterinary surgeries 14. Other uses which in the opinion of the Planning Authority are in not in keeping with and complementary to the strategic opportunities outlined in Section 5.5.6.3.

Necessary Infrastructure

Realising the potential of Rhode GEP will require further development of enabling infrastructure provided directly from developers and from national and European funding programs. Table 5.4 below lists a range of new infrastructure and upgrades to existing infrastructure that will be required in this regard.

Table 5.4: Future infrastructure requirements to facilitate development of Rhode Green Energy Park

- Upgrading physical environment of the existing Business Park (roads, footpaths, landscaping)
- R400 road improvements
- Footpaths/ cycleways
- Improved telecommunications (fibre) infrastructure
- Upgrade of capacity at Rhode Wastewater Treatment Plant
- Water supply improvements
- Electricity grid connections and potential expansion of existing substation
- Gas grid connection to the site
- Interconnecting services (heat networks, electricity, gas, water, etc.) between companies operating in and around the Park
- Modern Interface (MI) Wholesale High Quality Access (WHQA) to fibre-optic communication

It is proposed to change Policy ENTP-27 to an objective in Section 5.9 as follows (additional text in red);

It is an objective of the Council policy to support and promote the development of Rhode Green Energy Park for Green Energy as well as other complementary green uses such as Green Enterprise, Food Processing, Manufacturing, Logistics, Engineering and Research and Development as outlined as 'Uses Considered Appropriate for the Rhode Green Energy Park in Table 5.3. 'Uses not considered appropriate for the Rhode Green Energy Park' in Table 5.3 will not be encouraged in the Rhode Green Energy Park.

It is also proposed to add the following objectives to Section 5;

It is an objective of the Council to ensure that proposed developments within the Rhode Green Energy Park adhere to the principles set out in Table 5.2: Guiding Principles for the Rhode Green Energy Park.

It is an objective of the Council to support and facilitate the infrastructural upgrades and works outlined in Table 5.4 in conjunction with the development of the Rhode Business Park.

It is an objective of this Plan for the Council to prepare the following;

- a Design Statement showing the developers the preferred approach to materials, colours, boundary treatment, signage etc. in the Rhode Green Energy Park;
- a Green Infrastructure Masterplan for the Rhode Green Energy Park to advise developers of how to retain and enhance existing green infrastructure and to provide new green infrastructure within and around the Rhode Green Energy Park; and
- an Energy Efficiency and Climate Change Adaptation Design Statement for the Rhode Green Energy Park.

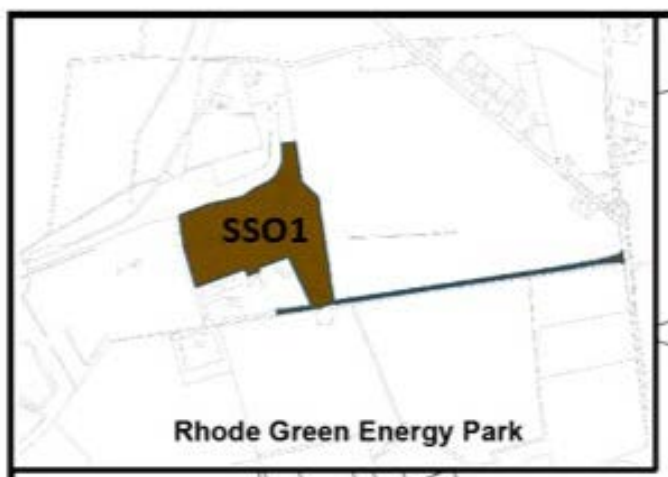
In addition, it is proposed to amend the title of the following Development Management Standards in Chapter 13;

- DMS-72 - New Business and Technology Parks, Strategic Employment Zones and Green Energy Parks

- DMS-73 - Individual units in Business and Technology Parks, Strategic Employment Zones and Green Energy Parks
- DMS-74 - Energy Efficiency and Climate Change Adaptation Design Statement (Industrial, Warehousing, Business and Technology Park and Green Energy Parks >1,000 m²).

It is proposed to make the following insertions / amendments into the Rhode Village Plan in Volume 2 of the Plan:

- The area has a strong heritage in energy production, and coupled with the strategic location, the park is considered suitable for Green Energy as well as other complementary uses. ~~such as Green Enterprise, Food Processing, Manufacturing, Logistics, Engineering and Research and Development (R&D).~~
- SO6 To support and promote the development of Rhode Green Energy Park for Green Energy as well as other complementary uses in accordance with Objectives ENTO- 13, ENTO-14, ENTO-15 and ENTO-16, and Tables 5.2, 5.3 and 5.4, contained in the Chapter 5 'Economic Development Strategy'.
- **Site Specific Objectives (refer to map)**
SSO1 Rhode Green Energy Park is zoned 'Industrial and Warehousing'. Table 5.3 of Chapter 5 'Economic Development Strategy' outlines appropriate uses that will be considered and inappropriate uses that will not be considered by the Planning Authority within the Rhode Green Energy Park. It should be noted that the uses identified appropriate and inappropriate in Table 5.3 relating to the Rhode Green Energy Park take precedence over the acceptability or otherwise of uses which apply to 'Industrial and Warehousing' as contained in Table 12.1 Land Use Zoning Matrix in Chapter 12 'Land Use Zoning Objectives'.



Point f)

In relation to the point raised in this submission regarding the minimum sizes considered by data centres as listed in Policy CAEP-38. It is proposed to amend CAEP-38 to provide for small and medium data centres by lowering the minimum size for a data centre from 50 to 25 in Policy CAEP-38 in Chapter 3 as follows;

CAEP-38 It is Council policy to consider applications for proposed data centres in County Offaly in line with the following criteria;

- Accessibility/ease of connection to power;

- Availability of renewable energy to power proposed data centre;
- Availability of high powered fibre optic infrastructure;
- Transport/road accessibility;
- Compatibility of surrounding land uses/zoning;
- Avoidance of designated sites; and
- Availability of significant land banks ~~minimum of circa 50 acres in size.~~

Ref: CDP/D/168

Person / Body:

Cllr. Liam Quinn

Summary of submission / observation:

This submission requests that Offaly County Council consider a special status for cutaway peatlands in North Offaly. This designation would favour renewable energy projects on these lands thus reducing the burden on lands more suitable for conventional agriculture.

CE Response:

Whilst the Draft Plan does not contain a specific policy promoting peatlands as preferred areas for renewable energy, it does recognise the great potential that peatlands offer in relation to a range of uses in addition to renewable energies; such as amenity, tourism, biodiversity services, 'wild areas', flood management, climate mitigation, industry, education, conservation and many more. It also includes Policy CAEP-13 of the Draft Plan which recognises that the peatlands are a significant resource and supports the preparation of a comprehensive after use framework plan for the peatlands in line with RPO 4.84 of EMRA RSES. In relation to wind energy, the County Wind Energy Strategy constitutes a plan led approach to wind energy development in County Offaly using a sieve mapping analysis and field analysis in identifying 'Areas Open for Consideration'. It should be noted that due to their specific characteristics much of the areas contained in the 'Areas Open for Consideration' are peatland areas.

Ref: CDP/D/183

Person / Body:

Galetech Energy Services

Summary of submission / observation:

- a) This submission requests that their client's lands located c. 4 km north of Birr and c. 4km south west of Fivalee be designated as an 'Area Open for Consideration for Wind Energy Development' for the following reasons;
 - The subject lands are assessed to have a wind speed in excess of 7.5 m/s and are located within close proximity to Dallow (Clondallow) 38kV substation located approximately 2km to

the south west, Birr 38kV substation (5km away), Banagher 38kV substation (10 km away), Lumcloon 38kV substation (10 km away) and Derrycarney (11 km away);

- The subject lands are located in an area of low and medium landscape sensitivity;
 - The subject lands are not designated for nature conservation, high amenity value and the development of lands would not significantly interfere with any scenic view, prospect or amenity value;
 - The absence of any overwhelming environmental constraints;
 - A high degree of compliance with the Draft Revised Wind Energy Development Guidelines 2019 particularly in terms of available separation distance to dwellings, noise and shadow flicker limits and grid connection availability.
- b) The submission also wishes to express concern regarding the content of Policy CAEP-35 (c) which proposes a 2 km separation distance between wind turbines and the settlement boundaries of towns and villages on which the Planning Authority has not provided a rationale or justification for.
- c) The submission notes that the 'Birr Environs' area assessed as part of 'Wind Energy Potential Area 7' in the Draft County Wind Strategy have been excluded due to the presence of Little Brosna Callows and Dovegrove Callows and the presence of I-LOFAR at Birr Castle which may be affected by wind turbines but is of the opinion that;
- the subject lands are located c. 2km from Dovegrove Callows and c. 5 km from the River Little Brosna Callows this substantially reducing the effect of any future development of the subject lands; and
 - the subject lands are located in excess of 5 km from I-LOFAR and that the Planning Authority has not presented evidence of consultation with the relevant bodies to fully determine whether a wind energy development in this general location would affect the I-LOFAR.

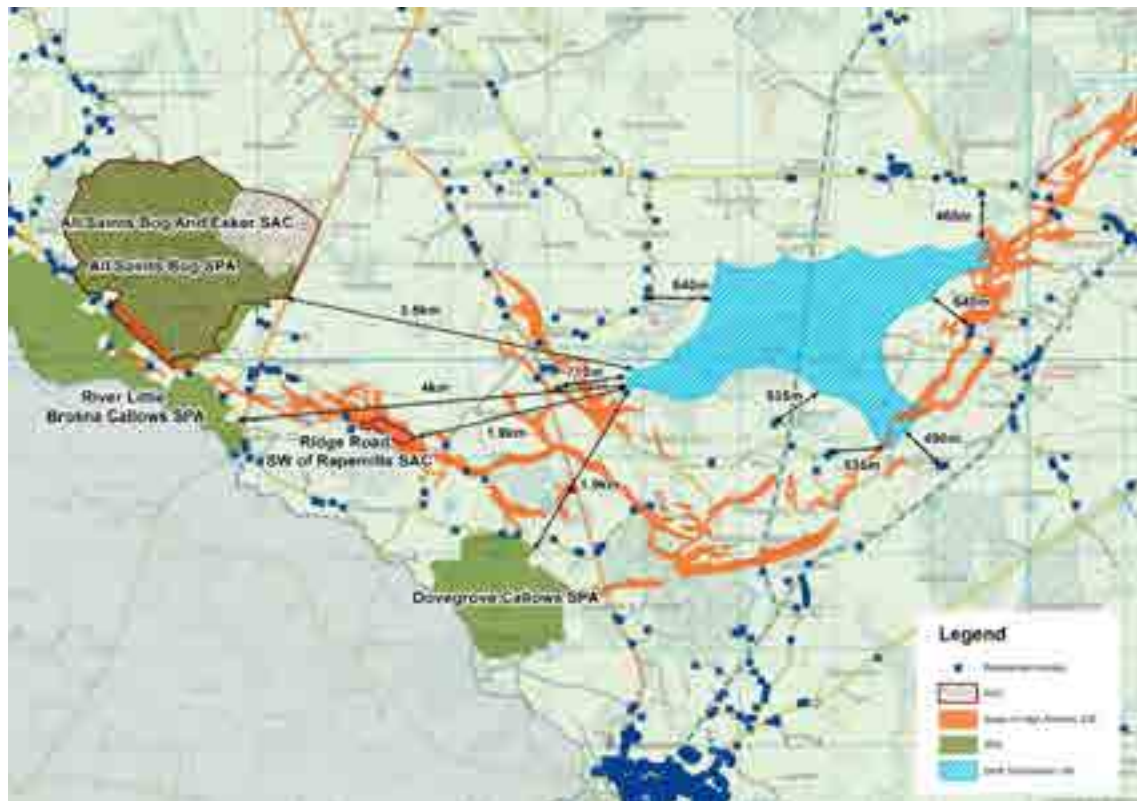
CE Response:

- a) Noted. No further action required.

There are a number of constraints to wind development in this area principally the proximity to the following Special Protection Areas;

- The Dovegrove Callows Special Protection Area (SPA), a feeding site for an internationally important flock of Greenland White-fronted Goose, a species that is listed on Annex I of the E.U. Birds Directive, which is 1.9 km from the site.; and
- The River Little Brosna Callows (SPA) of special conservation interest for the following species: Whooper Swan, Greenland Whitefronted Goose, Wigeon, Teal, Pintail, Shoveler, Golden Plover, Lapwing, BlackTailed Godwit and Black-Headed Gull. The site is also of special conservation interest for holding an assemblage of over 20,000 wintering waterbirds, which is 4 km from the site; and
- All Saints Bog SPA, 3.5 km from the site, as it was known to be utilised in the past by part of an internationally important population of Greenland Whitefronted Goose (should be noted that NPWS site synopsis states that the last record of Greenland White-fronted Goose within the site was 75 individuals in 1993/94). Merlin has been seen on the bog during the breeding season and may breed there.

I am not satisfied that the inclusion of the subject landholding as 'Areas Deemed Open for Consideration for Wind Energy Development' would not give rise to significant adverse direct, indirect or secondary effects on the integrity of these European sites.



In addition, whilst it is noted that the current 500 metres set back as outlined in the Wind Energy Guidelines 2006 would not be a constraining factor in relation to the subject site, the requirement for a setback distance 4 times the tip height of a wind turbine (unless a reduced setback is agreed with relevant landowners) as recommended in SPPR 2 of the Draft Wind Energy Guidelines 2019 recommends under SPPR 2 and as the N62 traverses the landholding, would be significant constraining factors, leaving at best smaller, fragmented and piece-meal areas that could be developed for wind energy.

Accordingly, this area is not considered suitable for inclusion within 'Areas Deemed Open for Consideration for Wind Energy Development' in Map No. 10 in the County Wind Energy Strategy which includes within that designation areas with fewer environmental and landscape constraints; with the potential to accommodate a higher number of or larger turbines, which is consistent with the approach of the Draft Wind Energy Guidelines 2019 which state in Section 2.3 (p.17) that *"These Guidelines focus mainly on commercial wind turbines, given the significant contribution they can make to meeting renewable energy targets and the potential wider impacts on the given the significant contribution they can make to meeting renewable energy targets and the potential wider impacts on the local environment and community, however microgeneration can also help to tackle climate change."*

Rather than including all these smaller, fragmented and piece-meal areas in a patch-work type County Wind Energy Strategy Map, the Planning Authority considers it more appropriate to have a coherent wind strategy map that provides clarity for developers, the planning authority and the public clearly outlining the parts of the county that have significant wind energy potential (in line with Section 3.4 Development Plan – Strategic Aims and Objectives from the Draft Wind Energy Guidelines 2019).

- b) It is proposed to remove the requirement for a setback distance of 2 km between turbines and settlement boundaries of towns & villages from Policy CAEP-35 in Chapter 3 & DMS 109

in Chapter 13 as the inclusion of such mandatory separation distances would restrict the potential for wind farm development in the county, would undermine other policy objectives supporting wind farm development and be contrary to national policy and Ministerial guidance on wind farm development.

- c) Please refer to a).

[Ref: CDP/D/184](#)

Person / Body:

Galetech Energy Services

Summary of submission / observation:

- a) This submission requests that their client's lands 2 km north east of Clara (which were subject to a planning application, PI20/70, refused permission by Offaly County Council and currently appealed by the applicant to An Bord Pleanála) be designated as an 'Area Open for Consideration for Wind Energy Development' for the following reasons;
- The subject lands are assessed to have a wind speed in excess of 7.5 m/s and are located within close proximity to multiple points of connection to the national electricity grid from substations at Srah (8.8 km away), Moate (9.4 km away) and Thornsberry (9.7 km away);
 - The subject lands are located in an area of low landscape sensitivity;
 - The subject lands are not designated for nature conservation, high amenity value and the development of lands would not significantly interfere with any scenic view, prospect or amenity value;
 - The absence of any overwhelming environmental constraints;
 - A high degree of compliance with the Draft Revised Wind Energy Development Guidelines 2019 particularly in terms of available separation distance distances to dwellings, noise and shadow flicker limits and grid connection availability.
- b) The submission also wishes to express concern regarding the content of Policy CAEP-35 (c) which proposes a 2 km separation distance between wind turbines and the settlement boundaries of towns and villages on which the Planning Authority has not provided a rationale or justification for.
- c) The submission considers that the Planning Authority's decision to prepare the Draft Wind Strategy focussing solely on "commercial wind farms" disregards the substantial contribution to the generation of renewable energy which can be made by small scale developments.



CE Response:

- a) Noted. No further action required.

The Wind Energy Strategy in the Draft Plan focuses mainly on commercial wind turbines, which tend to require larger landbanks with fewer constraints with the potential to accommodate a higher number of or larger turbines, which is consistent with the approach of the Draft Wind Energy Guidelines 2019 which state in Section 2.3 (p.17) that *“These Guidelines focus mainly on commercial wind turbines, given the significant contribution they can make to meeting renewable energy targets and the potential wider impacts on the given the significant contribution they can make to meeting renewable energy targets and the potential wider impacts on the local environment and community, however microgeneration can also help to tackle climate change.”*

There will in all likelihood be instances for the existence of small pockets of land outside the Areas Deemed Open for Consideration, such as in this case, which may not have the environmental and technical constraints as listed in Section 5 of the Wind Strategy. Rather than including all these smaller, fragmented and piece-meal areas in a patch-work type Wind Strategy map, it is considered more appropriate to have a coherent wind strategy map that provides clarity for developers, the planning authority and the public clearly outlining the parts of the county that have significant wind energy potential (in line with Section 3.4 Development Plan – Strategic Aims and Objectives from the Draft Wind Energy Guidelines 2019).

The Draft Wind Strategy following a ‘step by step’ sieve mapping analysis has identified broad key areas as ‘Open for Consideration for Wind Energy Developments’ which;

- have a viable wind speed and good access to the electricity grid;

- with fewer environmental and landscape constraints;
 - are characterised by dispersed or sparse patterns of rural housing;
 - are of a sufficient size to accommodate commercial wind farms and associated infrastructure rather than a smaller remote and dispersed area.
- b) It is proposed to remove the requirement for a setback distance of 2 km between turbines and settlement boundaries of towns & villages from Policy CAEP-35 in Chapter 3 & DMS 109 in Chapter 13 as the inclusion of such mandatory separation distances would restrict the potential for wind farm development in the county, would undermine other policy objectives supporting wind farm development and be contrary to national policy and Ministerial guidance on wind farm development.
- c) It should be noted that the Draft Plan does make provision to accommodate micro generation (less than 11kW) in certain instances outside these 'Areas Open for Consideration for Wind Energy Development' incorporating the following policies in the Draft Plan to;
- consider on-site wind energy development by auto producers/micro producers where energy generated is primarily required to meet the needs of the development; community, agricultural or small enterprise. **(CAEP-37)**; and
 - facilitate micro-renewable energy installations and auto-generator installations where it is demonstrated to the satisfaction of the Council that they will not result in a significant adverse impact on residential, visual or environmental amenity **(CAEP-45)**.

Note:

The submission whilst in relation to the subject site refers to the presence of multiple points of connection to the national electricity grid from substations at Srah (8.8 km away), Moate (9.4 km away) and Thornsberry (9.7 km away) negates to refer to the potential technical constraints from a 200 kv line traversing the site. Section 4.9.2 of the Draft Wind Energy Guidelines in this regard states in relation to Eirgrid's current policy on clearance distances required between turbines and overhead lines that *"They advise that the distance between an overhead transmission line (110kV, 220kV or 400kV) and a commercial wind turbine should not be less than three and a half rotor diameters unless EirGrid have agreed a reduction based on a risk assessment. The minimum clearance for all turbines and overhead transmission lines must be falling distance (measured from the edge of the foundation) plus an additional flashover distance for the relevant voltage."*

[Ref: CDP/D/186](#)

Person / Body:

Agnes Doolan

Summary of submission / observation:

This submission asks why is Derrinlough wind farm listed as a Permitted and Undeveloped Wind Farm in Co. Offaly in Table 2, page 8 in the Draft Wind Strategy stating that the application is with An Bord Pleanala, Ref. 306706.

CE Response:

No further action required. The permitted planning permission contained in Table 2 is for 9 turbines under Planning Ref. 14/188 (An Bord Pleanála Ref. No. PL19.244053) referred to in this submission is a separate site from the Strategic Infrastructure Development application for 21 no. wind turbines currently awaiting decision with An Bord Pleanála, Ref. No. PI19.306706.

Ref: CDP/D/189**Person / Body:**

Andrew and Marion Lally

Summary of submission / observation:

- a) This submission objects to the extension of lands being added to the wind development plan in his area and queries if the area was not open for consideration for wind development in the Offaly County Development Plan 2014-2020, why should it change now. The submission further states that wind development will adversely affect the amenities of the local population making reference to unobstructed views of the Slieve Bloom Mountains being destroyed.
- b) The submission further states that wildlife such as bats, red barn owls, buzzards and hares will also be affected.

CE Response:

- a) The draft Wind Energy Strategy uses a 'step by step' sieve mapping analysis of the key environmental, landscape and technical criteria which must be balanced in order to identify the most suitable location for wind energy development as advised by the Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6). It should also be noted that notwithstanding the 'Areas Deemed Open for Consideration for Wind Energy Developments' designation, wind farm developments in these areas will be evaluated on a case by case basis subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of this County Development Plan and the Section 28 Wind Energy Development Guidelines, which include local considerations such as;
 - Impact on the visual amenities of the area;
 - Impact on the residential amenities of the area;
 - Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape; and
 - Visual impact of the proposal with respect to protected views, scenic routes and designated scenic landscapes.
- b) The County Wind Energy Strategy forms part of the Draft Plan which has been subject to Stage 1 AA Screening and Stage 2 AA, which having incorporated mitigation measures, concludes that the Draft Plan is not foreseen to give rise to any significant effects on designated

European sites, alone or in combination with other plans or projects. This evaluation is made in view of the conservation objectives of the habitats or species, for which these sites have been designated. In addition, it should be noted that Development Management Standard 109 contained in Chapter 13 of Volume 1 of the draft Plan states that the Council will consider the impact of proposed windfarm development on nature conservation and ecology.

Ref: CDP/D/190

Person / Body:

Jim Madden

Summary of submission / observation:

This submission states that the Martello Tower Napoleonic fortification near Victoria Locke while one of only two structures of its kind built inland is in a neglected state and is almost inaccessible to visitors. The submission states that the Napoleonic fortifications in the county (Shannonbridge, Banagher and Lusmagh) have tourism potential and should be developed and promoted in this regard.

CE Response:

The subject locks referred to in this submission are protected structures in the Draft Plan and recorded sites and monuments. The draft Plan has a number of policies and objectives relating to the protection of these structures and sites, their character and setting in Chapter 10 'Built Heritage'. One of these policies, Policy BHP-43, supports the progression and delivery of projects that repair and conserve historic structures under the Historic Structures Fund, the Built Heritage Investment Scheme or other funding schemes as applicable.

It should be noted that Fort Eliza, situated on the banks of the River Shannon in Banagher received funding in 2020 under Waterways Ireland's Heritage Plan for conservation works to its battery and entrance.

Notwithstanding this, it is proposed to include an additional policy in Chapter 10, ref no. BHP-43, that "It is Council policy to support and promote the protection and appropriate management of historic military fortifications and castle sites in the county."

Ref: CDP/D/196

Person / Body:

James Moyles

Summary of submission / observation:

The submission from the Killurin-Annaghmore-Gurteen Wind Turbine Concern Group makes the following points;

- a) There should be no wind energy development outside the areas designated as ‘not suitable for wind energy development’ in the existing County Development Plan;
- b) In relation to Area 3 ‘South of Tullamore from Killeigh to Kilcormac’ Table 3: Assessment of Wind Energy Potential Areas should state in addition in the interests of clarity a number of specific townlands and protected views where wind energy in Area 3 is not deemed suitable;
- c) The designation of Area 3 as not being suitable for wind energy development in the County Wind Energy Strategy is correct and should there be a proposal to commence wind energy development in Laois along the border with Area 3, Offaly County Council could object to the progression of such development given the effect such development would have on their protected views, its proximity to the Slieve Bloom Mountains and the impacts on homes and amenities in the area; and
- d) The insertion of a windfarm into the area around Annaghmore House and its original demesne, currently deemed unsuitable for wind energy development in the current plan, would interfere with the character of Annaghmore Houses historic landscape.

CE Response:

- a) No further action required. As outlined in Objective CAEO-03 in Chapter 3 of the draft Plan, the Council will implement its County Wind Energy Strategy considering the development of windfarms and smaller wind energy projects in ‘Areas Deemed Open for Consideration for Wind Energy Development’ as identified in Map No. 10 ‘Wind Energy Strategy Designations’. In areas outside ‘Areas Deemed Open for Consideration for Wind Energy Development’, wind energy developments shall not normally be permitted – except as provided for under relevant exemption provisions in the Planning and Development Regulations 2001 (as amended) whilst repowering and extension of existing and permitted wind farms will be assessed on a case by case basis.
- b) No further action required as naming specific townlands within each Wind Potential Area in Table 3 is not necessary nor practical whilst protected views are outlined specifically in 5.3.3 and shown in Map No. 8 Protected Views and Potential Wind Energy Areas.
- c) Noted. The Council has made a submission to the Issues Paper of the Draft Laois County Development regarding the designation of areas within Laois on the border with Offaly.
- d) No further action required. As outlined in Objective CAEO-03 in Chapter 3 of the Draft Plan, the Council will implement its County Wind Energy Strategy considering the development of windfarms and smaller wind energy projects in ‘Areas Deemed Open for Consideration for Wind Energy Development’ as identified in Map No. 10 ‘Wind Energy Strategy Designations’. In areas outside ‘Areas Deemed Open for Consideration for Wind Energy Development’, wind energy developments shall not normally be permitted – except as provided for under relevant exemption provisions in the Planning and Development Regulations 2001 (as amended) whilst repowering and extension of existing and permitted wind farms will be assessed on a case by case basis.

3.2.7 Utilities

[Ref: CDP/D/88](#)

Person / Body:

Eirgrid

Summary of submission / observation:

This submission states that;

- a) EirGrid notes and welcomes inclusion in Chapter 3 – Climate Action and Energy reference to its policy documents – *Grid Development Strategy – Your Grid, Your Tomorrow; Tomorrows Energy Scenarios 2017 – Planning our Energy Future* and *Tomorrows Energy Scenarios 2019 – System Needs Assessment* – as part of the legislative and policy background to Development Plan Energy policy.
- b) Policy CAEP-01 could be strengthened by inclusion of Regional Policy Objective 10.20 of the RSES as follows (additional words in italics and text underlined); “It is Council policy to support and facilitate the development, reinforcement, renewal 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 Co. Offaly.”
- c) Policy CAEP-02 which states that “It is Council policy to require that, in all new developments, local services such as electricity shall be undergrounded, multiple services are accommodated in shared strips underground and that access covers are shared, whenever possible” should be removed as a policy statement as such a requirement may not always be compatible with electricity infrastructure provision, particularly higher voltage circuits. The Council might consider a more nuanced approach to cables as part of its Development Management Standards.
- d) The following RPOs from RSES should be included in the Draft Plan;
 - (i) Support EirGrid’s Implementation Plan 2017 – 2022 and Transmission Development Plan 2019 and any subsequent plans prepared during the lifetime of the RSES that facilitate the timely delivery of major investment projects subject to appropriate environmental assessment and the outcome of the planning process.
 - (ii) Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/ distribution of a renewable energy focused generation across the major demand centres. This includes:
 - Facilitating trans-boundary networks into and through the County and Region to ensure the RSES can be delivered in a sustainable and timely manner;
 - Facilitate the delivery of the necessary integration of transmission network requirements to allow linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner;
 - support the safeguarding of strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks.
- e) The Climate Action Plan states that increased levels of renewable generation will require very substantial new infrastructure, including grid infrastructure. It is imperative that every Local Authority and County Development Plan supports and facilitates EirGrids strategy of decarbonising the electricity network to meet our Climate Action Plan targets for 2050.

CE Response:

- a) Noted.
- b) In order to fully support Regional Policy Objective 10.20 of the RSES, it is proposed to add in the wording ‘and facilitate’ to Policy CAEP-01 so that it now reads; “It is Council policy to support **and facilitate** the development, reinforcement, renewal 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 Co. Offaly.”
- c) Noted.
- It is proposed to amend Policy CAEP-02 from Chapter 3 Climate Action and Energy as follows; “It is Council policy to require that, in all new developments, local services **such as medium and low voltage** electricity **cables** shall be undergrounded, **with** multiple services **are** accommodated in shared strips underground and that access covers are shared, whenever possible.”
- It is also proposed to add the following extra policy to Chapter 3 Climate Action and Energy in this regard;
- “Proposals for new electricity distribution lines 38 kV or above along with transmission lines 110 kV or above will be considered subject to the protection of Designated and Non Designated Sites as outlined in Objectives BLO-01 to BLO-03 and landscape considerations as outlined in objectives BLO-20 Areas of High Amenity, BLO-22 Landscape and BLO 24-25 Protection of Key Scenic Views, Prospects and Key Amenity Routes.”**
- d) The Planning Authority is satisfied to include the proposed RPOs from the EMRA RSES as detailed in this submission as new policies in Chapter 3;
- ‘It is Council policy to support EirGrid’s Implementation Plan 2017 – 2022 and Transmission Development Plan 2019 and any subsequent plans prepared during the plan period that facilitate the timely delivery of major investment projects subject to appropriate environmental assessment and the outcome of the planning process’.**
- ‘It is Council policy to support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/distribution of a renewable energy focused generation across the major demand centres. This includes:**
- Facilitating trans-boundary networks into and through the County and Region to ensure the Regional Spatial and Economic Strategy can be delivered in a sustainable and timely manner;**
 - Facilitate the delivery of the necessary integration of transmission network requirements to allow linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner; and**
 - Support the safeguarding of strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks’.**
- e) Noted. In view of the importance attributed to climate action under national policy, including in the Climate Action Plan 2019 and the National Planning Framework, the Draft Plan includes a standalone chapter on Climate Action and Energy and a County Wind Energy Strategy that ensures Offaly will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.

[Ref: CDP/D/147](#)

Person / Body:

Irish Water

Summary of submissions / observations:

a) Waste Water:

The submission states that where there are constraints at a waste water treatment plant, planning applications for developments are on a first come, first served basis and that if no IW project is associated with a constrained area, then any infrastructure will be developer-led.

Figures provided in the submission indicate that there are a number of settlements where there are waste water treatment plant capacity problems based on the proposed population increase of the draft Plan, namely:

- Birr: currently only extra headroom for a maximum of 300 houses / 900 persons.
- Edenderry: currently a little headroom however this will be increased on completion of IW project
- Daingean: currently headroom for circa 30 houses / 90 persons
- Rahan – no capacity
- Walsh Island – no capacity

b) Waste Water Networks:

There are some constraints in sewer networks in the county depending on size and scale of proposed developments. Infrastructure will have to be assessed on a case by case basis.

A Drainage Area Plan is currently being prepared by IW for Tullamore which will develop solutions to overcome current constraints in the existing sewer network.

IW is developing an Infrastructure Development Plan which will assess all zoned land in Tullamore and develop a flow profile from each site which will outline any upgrades that are required in the network. This is expected to be completed December 2020.

IW have commenced the design of the proposed Southern Interceptor Sewer for Tullamore which will inform the requirements of trunk infrastructure required to be co-located within new roads and how the flow will be connected to the existing system and to the waste water treatment plant.

c) Water Infrastructure:

Offaly's water supply is serviced by a number of Water Supply Zones. While there are some constraints, the availability of water will be on a first come, first served basis with priority given to domestic customers. In the meantime, leakage control and water conservation will be of utmost importance.

The water supply capacity is very limited / constrained for Tullamore, Edenderry, Portarlinton. It is limited for Birr, Daingean and Kilcormac.

d) Requested changes in red:

WSO-03 It is an objective of the Council to co-operate with Irish Water in the delivery of the Eastern and Midlands Water Supply Project. ~~and to ensure the maximum benefit from this project to County Offaly, in particular with respect to economic development potential and security of supply to Tullamore.~~

The above change is requested as the Water Supply Project(WSP) is for the benefit of the whole region.

~~**WSO-04** It is an objective of the Council to engage with Irish Water to examine significant raw water sources which may be made redundant by the Water Supply Project for the Eastern and Midlands Region with a view to reserving and protecting them for future back up or 'windfall' type economic development opportunities where high water use is required. It is an objective of the Council to work together with Irish Water to ensure that future development and required water infrastructure are aligned, recognising that Irish Water's National Water Resources Plan is a critical component in this.~~

The above change is requested because the WSP will not result in significant redundant water sources nor spare capacity. WSP is required to meet existing and projected water demand for the region and will provide a secure and reliable water source to facilitate domestic and economic development. The servicing of permitted development is an obligation of IW and will be addressed in IW's forthcoming National Water Resources Plan.

e) Water Quality:

The National Water Resources Plan is being used to identify deficiencies and need across all public water supplied and to develop plan level capital and operational solutions.

CE Response:

a)

- The draft Plan provides for 414 residential units in Birr / 1263 persons, however the submissions states that the headroom is only for 300 residential units / 900 persons. Currently after heavy rain the incoming flow to the Birr waste water treatment plan overflows to the river. The proposed wetlands will prevent this occurring and will pump the effluent to the Plant when storm subsides. Also, this wetland will prevent the Plant from washing out. It will not increase the capacity of the Plant. There are no current proposals to expand the plant. In the event of no remaining headroom, any proposed development would require developer investment.
- The draft Plan provides for 235 residential units / 368 persons in Edenderry, however the submission states that the headroom will be increased. The capacity will be increased on completion of upgrade to the treatment plant during the plan period. The expectant plant design capacity is for a population equivalent of 12,500. IW is in the process of appointing a consultant to design the new extension.
- The draft Plan provides for 64 residential units / 172 persons in Daingean, however the submission states that there is currently only headroom for circa 30 residential units / 90 persons. Surface water getting into the network is a problem. Offaly County Council are proposing it under the IW Small Towns and Villages Growth Programme for rectification.
- Rahan is a sráid in the draft Plan so there is no zoning proposed.

- The draft Plan identifies new residential zoning in Walsh Island (for approximately 13 houses) however the submission states that there is no reasonable capacity. An alteration of the treatment plant through improved aeration and improved sludge rates would increase it to 500 PE which is sufficient to cater for the proposed village growth.

Taking account of the deficiencies above, it is noted that section 33(5) of the Water Services (no. 2) Act 2013 as amended by the Planning and Development (Amendment) Act 2018 states that Irish Water shall, when preparing a water services strategic plan have regard to proper planning and sustainable development in line with any development plans within the meaning of the Act 2000, in particular the Core Strategy under section 10 of the Act. Irish Water in their submission states *'If no [Irish Water] project is associated with a constrained area, then any infrastructure will be developer led. Irish Water can work with developers to form the best solution for a particular site'*.

b) Noted.

- c) The water supply capacity is very limited / constrained for Tullamore, Edenderry, Portarlington. It is limited for Birr, Daingean and Kilcormac.

The National Water Resources Plan (which is due to be published for consultation early 2021) will include four Regional Water Resources Plans which will develop a strategic plan for each water supply including short, medium and long term options to address risk across our water supplies. However according to IW although water is constrained in the above areas at critical times such as drought and freeze events, this need not necessarily halt growth.

IW and Offaly County Council are continually progressing leakage reduction activities, mains rehabilitation activities and lead replacement activities. These are priorities based on leakage rates, water quality issues and ongoing disruption to customer's supplies. IW and Offaly County Council will continue to monitor the performance of the network to ensure that the most urgent works are priorities as required.

Taking account of the deficiencies above, it is noted that section 33(5) of the Water Services (no. 2) Act 2013 as amended by the Planning and Development (Amendment) Act 2018 states that Irish Water shall, when preparing a water services strategic plan have regard to proper planning and sustainable development in line with any development plans within the meaning of the Act 2000, in particular the Core Strategy under section 10 of the Act. Irish Water in their submission states *'If no [Irish Water] project is associated with a constrained area, then any infrastructure will be developer led. Irish Water can work with developers to form the best solution for a particular site'*.

- d) The changes requested by IW to the wording of objectives in relation to the WSP is noted. However, it is recommended to retain the wording of both WSO-03 and WSO-04 as per the draft Plan, with the exception of one word-change as identified below in WSO-03 based on its route through County Offaly. The initial 'project needs' report on the WSP (February 2015) had a major focus on the economic development potential for the midlands 'corridor' of this route, which stated: *'The Water Supply Project has the potential to deliver new water supplies and support economic development in other counties, in what could be described as the Benefiting Corridor/Zone, which would enable access by other areas to water infrastructure servicing both a Benefiting Corridor and the Dublin Region'*.

WSO-03 It is an objective of the Council to co-operate with Irish Water in the delivery of the Eastern and Midlands Water Supply Project and to ensure the maximum benefit from this project to County Offaly, in particular with respect to economic development potential and security of supply. ~~to Tullamore~~

WSO-04 It is an objective of the Council to engage with Irish Water to examine significant raw water sources which may be made redundant by the Water Supply Project for the Eastern and Midlands Region with a view to reserving and protecting them for future back up or 'windfall' type economic development opportunities where high water use is required.

e) Noted.

[Ref: CDP/D/111](#)

Person / Body:

An Post

Summary of submissions / observations:

- a) States that An Post, over the coming years, will seek to enhance facilities at existing and new locations and hopes that Offaly County Council can accommodate future engagement with An Post, in the future in relation to this. An Post is currently undertaking detailed assessments of its existing facilities nationwide and considering a programme of works to ensure these facilities are best in class while also seeking new sites capable of accommodating modern delivery operations to serve new and expanding catchment areas.
- b) An Post utilise a road fleet of more than 3,000 vehicles. The number of Electric Vehicles on the fleet is steadily increasing. An Post now delivers 1 million more parcels every week than it did in 2017 and this pattern is set to continue.
- c) Requests that Offaly County Council have due regard to the operational requirements of An Post as part of the consideration and implementation of public realm schemes in the County's primary urban areas, i.e. The removal of loading bays and restrictions on 24-hour vehicular access at post offices or other postal facilities could have significant impacts on the smooth operation of the postal service and have longer term impacts on the commercial viability of postal premises. It is, therefore, requested that the Local Authority engage closely with An Post as part of future public realm schemes.
- d) Given the likely requirement, in response to population growth, to provide additional postal facilities in Offaly over the period of the Offaly Co. Development Plan 2021, it is requested that Offaly County Council provide appropriate policies and zoning objectives that will accommodate same. It is considered that the inclusion of such policies and objectives cannot only accommodate improved public infrastructure but also spur employment growth and increase the vitality and viability of some of the

County's primary settlements. Requests that Offaly County Council include supportive policies to facilitate enhanced postal services in the County over the next 6 years such as:

- (I) "To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in the County"
 - (II) "To facilitate the provision of postal infrastructure at suitable locations in the County."
 - (III) "To promote the integration of appropriate post office facilities within new and existing communities that are appropriate to the size and scale of each settlement."
- e) It is submitted that postal infrastructure should be deemed important public infrastructure and it is requested that flexible land use zonings that accommodate such infrastructure and services at suitable locations are included throughout the County's settlements.
- f) Highlights that Car Parking and vehicular accommodation is a potential area for concern as follows:
- (i) Car spaces required for staff who access town centre earlier than most forms of public transport:
 - (ii) Delivery vehicles / Post Vehicles and associated Electrical Charging points are required; and
 - (iii) Parking for customers is required.
- g) It is noted from the Draft Plan that the car parking standard for 'warehousing' has reduced from 1 space per 100 sq.m (set out as part of the Offaly Co. Development Plan 2014-2020) to 1 space per 200 sq.m. It is requested that the 1 per 100 sq.m. standard is reinstated or that a specific objective is included in the Offaly Co. Development Plan 2021-2027 that provides flexibility to An Post given the service they provide and their relatively unique parking requirement.
- h) Request Offaly County Council to engage with An Post should any future area plan propose to amend delivery hours in town centre locations. An Post is committed to working with the Local Authority and local residents in minimising potential disturbances to adjacent properties and to providing emission free deliveries in town centres.
- i) The Draft Plan highlights the importance of high-quality public realm with regards to place making and the provision of sustainable communities. Whilst An Post welcomes the commitment of the Local Authority to improve town and village centre areas to make them safer and more welcoming places for the public, it is requested that Offaly County Council carefully consider the operational requirements of commercial operators in urban areas.

CE Response:

- a) Noted
- b) Noted

- c) Noted- it is unavoidable in some instances of public realm works in town centre areas that there would be some disturbance during construction works. However, it is hoped that this would be a minimum impact on commercial businesses in the affected areas and the Council will strive to engage with local businesses in future to further minimise this.
- d) There are numerous policies and objectives in Volume I which support the retail and business sectors, including An Post, in the Retail, Town Centre Strategy and Regeneration Chapter and the Economic Development Chapter, and also the various town and village plans contained in Volume II.

SICCDP-41 It is Council policy to support and encourage traditional local services such as small shops, post offices, and licensed premises, acknowledging their important role in communities and smaller settlements, particularly villages and Sráids throughout the county.

- e) It is not considered appropriate to give An Post Infrastructure special status in the Draft County Development Plan. An Post infrastructure could for example fall under Banking / Financial Institutions/ Shop under 200m² or Retail Warehousing depending on the scale of activity and location.
- f) Noted the car parking standards as proposed in the draft Plan are deemed appropriate for An Post facilities.

In relation to Electrical Vehicle Charging Points, the following policies / standards exist in the draft Plan:

CAEP-48 It is Council policy to support the growth of Electric Vehicles, E-Bikes, Fuel Cell Vehicles and Autonomous Vehicles with support facilities, through a roll-out of additional electric charging points and refuelling infrastructure in collaboration with relevant agencies and in accordance with the siting criteria set out in the National Policy Framework Alternative Fuels Infrastructure for Transport in Ireland 2017-2030.

DMS: 104 Electric Vehicle Charging Points A minimum of 10% of the proposed car parking spaces required for the category of development listed in car parking standards contained in DMO-102 shall be provided with electrical connection points, to allow for functional electric vehicle charging. The remaining car parking spaces shall be fitted with ducting for electrical connection points to allow for the future fit out of charging points

SMAP-02 It is Council policy to support the growth in the use of electric vehicles, autonomous vehicles and fuel cell vehicles; prioritise car parking spaces for these vehicles; and facilitate the provision of battery charging infrastructure and refuelling infrastructure for these vehicles where considered appropriate.

- g) Noted the current car parking standards as proposed are deemed appropriate for An Post Facilities.
- h) Noted
- i) Noted

[Ref: CDP/D/155](#)**Person / Body:****Gas Networks Ireland****Summary of submission / observation:**

This submission;

- a) Welcomes the inclusion in Chapter 3 Climate Action and Energy of Section 3.2.5 on Biogas from Landfills and Biomass which has a sub section on anaerobic digestion;
- b) Welcomes the inclusion in Chapter 3 Climate Action and Energy objectives on gas which support the further extension of the gas grid in Co. Offaly and also support and facilitate the production of low carbon gases such as biomethane and hydrogen which can be injected into the national gas network;
- c) Suggests that the Sustainable Mobility and Accessibility section of the Plan includes wording to support Compressed Natural Gas (CNG) Infrastructure as follows;

“The development of CNG Infrastructure will enable fuel switching from diesel to CNG for heavy goods vehicles (HGVs). This will lead to a reduction in carbon emissions along with air quality benefits for vehicles currently using diesel. There will be a presumption in favour of applications for CNG infrastructure provided planning and environmental criteria are satisfied.”

“The Council supports the development of Compressed Natural Gas (CNG) Vehicle usage and refuelling infrastructure on sites owned and occupied by Offaly County Council and private sites through supportive policies and development of control standards in the County Development Plan.”

- d) The development of combined Heat and Power (CHG) is supported by the EMRA RSES 2019-2031 which supports the ‘use of alternative cleaner fuels for home heating and transport including the use of Compressed Natural Gas powered commercial vehicles’ and the ‘National Policy Framework: Alternative Fuels Infrastructure for Transport in Ireland (2017 to 2030)’ which sets out a target network of 70 CNG refuelling stations by 2025.

CE Response:

- a) Noted. No further action proposed.
- b) Noted. No further action proposed.
- c) Noted. It is proposed to amend objective CAEO-07 in Chapter 3 make reference to compressed natural gas as follows (additional text in red);
 - “ It is an objective of the Council to support and facilitate the;
 - (i) production of low carbon renewable biogases such as hydrogen and biomethane, produced largely from agricultural organic matter, that can be exported to the National Grid; **and**
 - (ii) **development of Compressed Natural Gas (CNG) vehicle usage and refuelling infrastructure on appropriate sites.”**

It also proposed to change the title heading of Section 3.2.5 from ‘Biogas from Landfills and Biomass’ to ‘**Renewable Biogas**’ and to include an additional subsection within the section on Compressed Natural Gas as follows;

“Compressed Natural Gas (CNG) is natural gas which has been compressed to fit into a Natural Gas Vehicle’s (NGV) tank and is particularly suitable for buses and heavy goods vehicles (HGVs) as an

alternative to diesel vehicles. The Council recognises that increased Compressed Natural Gas (CNG) vehicle usage and refuelling infrastructure will lead to a reduction in carbon emissions along with improved air quality.”

d) Noted. No further action proposed.

3.2.8 Transportation

3.2.8.1 Airport

Ref: CDP/D/100

Person / Body:

Midlands Airport Developments Ltd.

Summary of submissions / observations:

Seeks to develop an international trade and distribution zone anchored by an international cargo and passenger airport (with a 3.5km runway) in the midlands at Tubber Co. Offaly to act as a reliever of pressure on Dublin airport. It would involve 9 clusters; aviation, education, intelligent green energy infrastructure, logistics, ICT, food and lifesciences, advanced manufacturing, leisure and conferencing and up to 3000 residential units in the form of a smart / super rural city.

CE Response:

Much of the content of the submission refers to outdated / superseded documents, guidelines, statistics and Government departments, for example the National Spatial Strategy and the Midland Regional Planning Guidelines. The concept of a smart / super rural city is contrary to the population targets and locations for growth as set out in the National Planning Framework.

Funding has been sought from Central Government in the past under the Rural Regeneration and Development Fund by Midland Airport Developments Ltd. which was unsuccessful.

The current Co. Development Plan 2014-2020 includes an objective STAP-26 to support the location of an airport in Offaly.

SMAP-26 It is Council policy to support the provision of an airport within the county or the midlands where it would contribute towards the proper planning and sustainable development of the county and comply with all environmental legislation and policies and objectives contained within this Plan and higher level planning documents, including the National Planning Framework and the Eastern and Midland Regional Spatial and Economic Strategy.

I recommend amending the wording of SMAP-26 to reflect the request for a green international trade and distribution zone based on international connectivity, rather than solely an airport, but that compliance with the NPF and RSES would be required. Accordingly, it is recommended to amend the wording of Policy SMAP-26 of the draft Plan as follows:

SMAP-26 It is Council policy to support the provision of a green international trade and distribution zone based on international air connectivity ~~an airport~~ within the county or the midlands where it would contribute towards the proper planning and sustainable development of the county, ~~and~~ comply with all environmental legislation, ~~and~~ policies and objectives contained within this Plan and would be consistent with higher level planning documents, including the National Planning Framework and the Eastern and Midland Regional Spatial and Economic Strategy.

[Ref: CDP/D/31](#)

Person / Body:

Fergal McCabe

Summary of submissions / observations:

Requests the removal of the airport-related policy from the draft Plan:

SMAP-26 It is Council policy to support the provision of an airport within the county or the midlands where it would contribute towards the proper planning and sustainable development of the county and comply with all environmental legislation and policies and objectives contained within this Plan and higher level planning documents, including the National Planning Framework and the Eastern and Midland Regional Spatial and Economic Strategy.

It is stated that an airport within the county / midlands is unmentioned in any of the submissions, assessments, recommendations or considerations received by the Council during the consultation phase. Its inclusion directly conflicts with and undermines other policies of the draft Plan. It is significant and unjustified.

CE Response:

The current Co. Development Plan 2014-2020 includes an objective STAP-26 to support the location of an airport in Offaly. It is considered that the provision of an airport itself could be considered in the new Plan again, but that compliance with the NPF and RSES would be required. However, an amended policy is proposed based on Submission no. 100 by Midlands Airport Developments Ltd. which requests a green international trade and distribution zone based on internal connectivity rather than solely an airport.

SMAP-26 It is Council policy to support the provision of a green international trade and distribution zone based on international air connectivity ~~an airport~~ within the county or the midlands where it would contribute towards the proper planning and sustainable development of the county, ~~and~~ comply with all environmental legislation, ~~and~~ policies and objectives contained within this Plan and would be consistent with higher level planning documents, including the National Planning Framework and the Eastern and Midland Regional Spatial and Economic Strategy.

[Ref: CDP/D/134](#)

Person / Body:

Dublin Airport Authority

Summary of submissions / observations:

The submission notes that the draft Plan contains the following policy,

SMAP-26 It is Council policy to support the provision of an airport within the county or the midlands where it would contribute towards proper planning and sustainable development of the county and comply with all environmental legislation and policies and objectives contained within this Plan and higher level planning documents, including the National Planning Framework and the Eastern and Midland Regional Spatial Economic Strategy.

The framework for the development of aviation in Ireland is set out in the National Aviation Policy, as well as the National Planning Framework. In the context of the long term sustainable development of the region and nation as a whole, Dublin Airport Authority recommends that policy for the provision of aviation services has regard to and is in line with national planning policy. It also notes the absence of regional planning policy to support the provision of aviation services in the RSES or Ireland's Regional Airports Programme.

CE Response:

Although an airport is not proposed in the above policy documents, this does not preclude a private airport from been considered for development purposes. There are national / regional policy outcomes in the NPF and RSES that are relevant for consideration of an airport planning application irrespective of no mention of an airport in such documents. However, an amended policy is proposed based on Submission no. 100 by Midlands Airport Developments Ltd. which requests a green international trade and distribution zone based on internal connectivity rather than solely an airport.

SMAP-26 It is Council policy to support the provision of **a green international trade and distribution zone based on international air connectivity** ~~an airport~~ within the county or the midlands where it would contribute towards the proper planning and sustainable development of the county, ~~and~~ comply with all environmental legislation, ~~and~~ policies and objectives contained within this Plan and would be consistent with higher level planning documents, including the National Planning Framework and the Eastern and Midland Regional Spatial and Economic Strategy.

3.2.8.2 Other Modes of Transport

[Ref: CDP/D/46](#)

Person / Body:

Transport Infrastructure Ireland (TII)

Summary of submissions / observations:

- a) Requests Chapter 2 (titled Core Strategy, Settlement Strategy and Housing Strategy) to acknowledge the strategic function of the road network and include objectives to maintain the strategic function, capacity and safety of the national roads network and to ensure the maintenance of the transport network to ensure quality levels of service, safety, accessibility and connectivity to transport users.
- b) The Local Transport Plan for Tullamore (as referred to in Objective SMAO-02 of the draft Plan) should inform the preparation of Tullamore LAP. **SMAO-02:** It is an objective of the Council to prepare a Local Transport Plan for the Key Town of Tullamore in conjunction with the National Transport Authority.
- c) Remove reference in the draft Plan to Table 4.2 of the Spatial Planning and National Roads Guidelines for Planning Authorities as such a table does not exist in those Guidelines.
- d) Recommends that policy SMAP-21 could be reviewed to more closely align with the relevant text of section 2.5 of the Spatial Planning and National Roads Guidelines (**SPNRG**). **SMAP-21:** It is Council policy that development(s) requiring a new direct access or an intensification of an existing access onto a National Secondary road, or onto a privately owned road leading onto a National Secondary road where a speed limit greater than 50 km/ph applies will be restricted in accordance with the provisions of Spatial Planning and National Roads Guidelines for Planning Authorities, January 2012. Exceptional circumstances may be considered where the development is of national and regional strategic importance and complies with the criteria set out in the Spatial Planning and National Roads Guidelines in this regard.
Section 2.5 of SPNRG states 'The policy of the planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which has speed limits greater than 60 kph apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.
- e) It is noted that policy RTCP-04 and RTCP-07 support the concentration of retail uses in established town centres and the application of the sequential test. In the interests of clarity, it is requested to include a new policy to reference the presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads / motorways reflecting policy outlined in the Retail Planning Guidelines 2012.
- f) Opportunity Site no. 9 at Ardan, Tullamore is in proximity to the N52 national road and associated junctions. It is noted that masterplans are required for Opportunity sites. The submission requests that consultation with statutory stakeholders should be undertaken and clarification of the masterplan making process be outlined, proposals should consider the cumulative impact of development and be subject to Traffic and Transport

Assessment. Proposed works to national roads should incorporate the principles set out in Section 2.7 of the SPNRG.

- g) Requests that any proposal for Durrow Abbey will take full cognisance of and demonstrate adherence to the provision of the SPNRG.
- h) Would like reference be made in the plan that potential applicants for development in rural areas adhere to policy in relation to accessing national roads, and that cross referencing from section 5.6 Rural Economic Strategy in Chapter 5 to policies in Chapter 8 Sustainable Mobility & Accessibility occur.
- i) Requests the following changes (in red) to Objective SMAO-09 in Chapter 8 Sustainable Mobility and Accessibility;

SMAO-09 It is an objective of the Council to facilitate the development of the national secondary road network in Offaly through the continued construction, upgrading and improvement of the national secondary roads in the county, the N62, the N52 and the N80 where on examination it is found to be feasible, including as outlined in the accompanying table:

N52: To support the construction of a road between Tullamore and Kilbeggan (Link Road) **in accordance with National Development Plan investment** objectives taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, **including section 8.5.4 Corridor and Route Selection Process.**

- j) Requests that reference to the National Development Plan status of the N52 Tullamore to Kilbeggan Scheme in Objective SMAO-09 be stated i.e. ‘at pre-appraisal / early planning in Project Ireland 2040 | National Development Plan 2018-2027’.
- k) Include the following objective:
‘It is an objective of the Council to protect the study area, route corridor options and thereafter the preferred route corridor selected for the national road schemes being progressed in the Development Plan in accordance with National Development Plan Objectives and to prohibit development that could prejudice their future delivery.’
- l) Requests that it be clarified in Chapter 8 that section 8.5.4 that relates to ‘Corridor and Route Selection Process’ does not apply to national road schemes.
- m) Makes suggestions to Policy SMAP-17 (which relates to cycle lanes along the N80) to ensure safety standards for all road users, standards comply with TII publications and to safeguard the strategic function of the national road.
- n) Seeks consideration for mobility management / travel planning for trip intensive development.
- o) Requests policy be inserted into the plan relating to Service Areas.
- p) In light of the fact that private development proposals have accessed or sought to access national road drainage regimes to dispose of surface drainage, the TII requests that the following policy be inserted into the plan:

‘It is Council policy that the capacity and efficiency of the national road network drainage regimes in County Offaly will be safeguarded for national road drainage purposes’.

- q) Requests that the Plan state that glint and glare assessments be accompanied with planning applications for solar farms.

- r) Requests that the Plan state that all renewable energy development applications be accompanied by an assessment of all alternative grid connection routing.
- s) Requests that Policy CAEP-13 which states that Offaly County Council will support the preparation of a comprehensive after-use framework plan for the industrialised peatlands should state that such framework plan will have regard to the provisions of the SPNRG.
- t) The NRA Design Manual for Roads and Bridges has been superseded and all relevant standards are now detailed in TII publications.
- u) References to the Design Manual for Urban Roads and Streets should also make reference to the complementary TII publication titled 'The Treatment of Transition Zones to Towns and Villages on National Roads'.
- v) Requests reference to Table 2.3 of the Traffic and Transportation Guidelines (which refers to sub-threshold criteria) in Development Management Standard DM-105.
- w) The reference to 'Road Safety Audit Guidelines (TII, 0217)' in Development Management Standard DMS-105 should remove reference to the year as TII publications are updated regularly. Rather use 'Road Safety Audit Guidelines (TII publication)'.
- x) Requests that DMS-86 is reviewed to incorporate reference to Section 3.8 of SPNRG and to omit reference to TII consent being required for signage on national roads (as TII are not the consenting authority).
- y) Brings attention to section 3.7 of the SPNRG which addresses 'avoiding adverse impacts from existing and future roads'. The following is an extract (Note: The Regulations referred to are the Environmental Noise Regulations 2006):

The Regulations apply to national and non-national roads with traffic volumes above a prescribed level. Accordingly, all proposals in respect to noise sensitive developments within the zone of influence of such existing or of planned new roads should identify and implement, where appropriate, mitigation measures in relation to noise and other effects listed above. The costs of implementing the mitigation measures concerned should be borne by the developer.

TII seek an objective which requires that development proposals in proximity to a noise source, such as an existing or proposed national road, should include noise attenuation measures.

- z) TII recommends consultation in the future on the provision of an on-road footpath link from Ferbane town to the Grand Canal Greenway along the N62 outside reduced speed limit locations and to ensure road safety standards for all road users are adhered to and standards comply with TII Publications. Likewise, they would like to be consulted on any future masterplan design for Opportunity sites along national roads.

CE Response:

- a) The strategic function of the road network is acknowledged in Chapter 8 (titled Sustainable Mobility and Accessibility) and does not need to be repeated in Chapter 2 also. In accordance with the Core Strategy Guidance, Chapter 2 identifies the strategic roads within the Core Strategy Map. The following policies / objectives in Chapter 8 of the draft Plan address the issues raised by TII.

SMAP-20 It is Council policy to maintain and protect the safety, strategic transport function, capacity and efficiency of national roads and associated junctions.

SMAP-01 It is Council policy to support sustainable mobility, enhanced regional accessibility and connectivity within County Offaly in accordance with the National Policy Outcomes of the National Planning Framework 2040 and the National Development Plan.

SMAO-09 It is an objective of the Council to facilitate the development of the national secondary road network in Offaly through the continued construction, upgrading and improvement of the national secondary roads in the county, the N62, the N52 and the N80 where on examination it is found to be feasible, including as outlined in the accompanying table

- b) It is the intention of Offaly County Council to prepare the Local Transport Plan to feed into and inform the Local Area Plan.
- c) Reference to Table 4.2 in section 8.5.1 of Chapter 8 of the draft plan should be removed as follows:
 - ‘To ensure that past and future public investment in road improvements is not diminished in whole or in part and to ensure the safety and free flow of traffic, future development requiring direct access onto National Secondary routes will be restricted and assessed against the provisions of **Table 4.2 of** the Spatial Planning and National Roads - Guidance for Planning Authorities issued by the DoECLG in January 2012’.
- d) In order to be consistent with the SPNRG it is recommended to amend Policy SMAP-01 to reflect the wording of the SPNRG as stated in the submission.

It should be noted that the draft Plan includes the plan-led approach in section 8.5.1 that *‘Offaly County Council considers that there are currently no exceptional circumstances as set out in section 2.6 of the Guidelines on Spatial Planning and National Roads that would require the identification of stretches of national roads where a less restrictive approach to that identified in Table 8.3 below may be applied’.*

The recommended revised wording of SMAP-01 (as proposed by TII) should be:

SMAP-21: It is Council policy that development(s) requiring a new direct access or an intensification of an existing access onto a National Secondary road, or onto a privately owned road leading onto a National Secondary road where a speed limit greater than **50 60** km/ph applies will be ~~restricted~~ **avoided** in accordance with the provisions of Spatial Planning and National Roads Guidelines for Planning Authorities, January 2012. Exceptional circumstances may be considered where the development is of national and regional strategic importance, **is plan-led** and complies with the criteria set out in the Spatial Planning and National Roads Guidelines in this regard.

- e) It is noted that a key message in Chapter 2 of the Retail Planning Guidelines is ‘There should be a general presumption against large out-of-town retail centres in particular those located adjacent or close to existing, new or planned national roads/motorways’.

Section 2.3 of the Retail Planning Guidelines states ‘Similarly there is a presumption against out-of-town retail centres which could impact on the viability and vitality of city and town centres and also generate significant additional traffic with potential to impact on the national road network and the performance of junctions and interchanges. The Guidelines on Spatial Planning and National Roads address retail development in the context of policy on national roads’. It is recommended that a policy be included in Chapter 7 of the Plan (titled Retail & Town Centre Strategy and Regeneration) as follows:

'It is Council policy that there will be a general presumption against large out-of-town retail centres in particular those located adjacent or close to existing, new or planned national roads/motorways'.

- f) It is recommended that the following development principle for Opportunity Sites listed in section 7.2.4 of Chapter 7 of the draft plan be amended to include reference to the SPNRG and Traffic and Transport Guidelines as follows:

'Be consistent with Section 28 Ministerial Guidelines for example Sustainable Development in Urban Area Guidelines, Design Manual for Urban Roads and Streets, Sustainable Urban Housing Design Standards for New Apartments, ~~and~~ Urban Development and Building Heights – Guidelines for Planning Authorities, Spatial Planning and National Roads Guidelines, Traffic and Transport Guidelines and any other future relevant Guidelines, and in particular specific planning policy requirements;'

Referral of planning applications to relevant prescribed authorities takes place during the course of their assessment.

A new policy referring to proposed works to national roads should incorporate the principles set out in Section 2.7 of the SPNRG which should be provided in Chapter 8 Sustainable Mobility and Accessibility as follows;

'It is Council policy that development at national road interchanges or junctions shall be carried out in accordance with the procedure set out in section 2.7 of the Ministerial Guidelines Spatial Planning and National Roads Guidelines 2012 or subsequent edition.'

- g) All planning applications are referred to the relevant prescribed authorities and assessed against the relevant section 28 ministerial guidelines as referred to in section 13.1 of Chapter 13 Development Management Standards below;

'The development management standards contained in this chapter shall be read in conjunction with the policies and objectives of previous chapters. In making a decision on any individual planning application, the Planning Authority is restricted to considering the proper planning and sustainable development of an area, having regard to the matters provided for in Section 34 of the Planning and Development Act, 2000 (as amended). This Chapter sets out the general development management principles and standards that will be applied by the Council to ensure that future development is in accordance with the policies and objectives set out elsewhere in this County Development Plan. Regard should also be had to Guidelines issued by the Minister under Section 28 of the Planning and Development Act, 2000 (as amended). Specific Planning Policy Requirements set out in Section 28 Guidelines apply, notwithstanding the objectives and requirements of this Development Plan, Local Area Plans or future variations. Future planning guidelines or amendments to existing guidelines will be considered in the assessment of planning applications'.

- h) It is considered appropriate that any development that proposes accessing a national road is addressed by consideration of Chapter 8 Sustainable Mobility and Accessibility whether or not it relates to rural areas. It is not considered necessary to cross reference from Section 5.6 Rural Economic Strategy in Chapter 5 to Chapter 8.

- i) It is recommended to make the following changes to objective SMAO-09

N52: To support the construction of a road between Tullamore and Kilbeggan (Link Road) **in accordance with National Development Plan investment** objectives taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, **and subject to compliance with requirements of various TII Planning Guidelines for Assessment of Environmental Impacts under headings such as “Constraints Study”, “Route Corridor Selection” and “Environmental Impact Assessment” including section 8.5.4 Corridor and Route Selection Process.**

- j) It is considered unnecessary to state the current status of the N52 Tullamore to Kilbeggan route as the status is likely to change during the life of the County Development Plan.
- k) It is considered appropriate to include the suggested objective, namely:
‘It is an objective of the Council to protect the study area, route corridor options and thereafter the preferred route corridor selected for the national road schemes being progressed in the Development Plan in accordance with National Development Plan Objectives and to prohibit development that could prejudice their future delivery.’
- l) The following red text should be inserted in section 8.5.4 of the draft Plan which relates to Corridor and Route Selection process.

‘The following Corridor and Route Selection Process will be undertaken for relevant new infrastructure, **however this would not apply to national road schemes which are progressed in accordance with statutory processes and TII publications, including various TII Planning Guidelines for Assessment of Environmental Impacts under headings such as “Constraints Study”, “Route Corridor Selection” and “Environmental Impact Assessment”...**’

- m) The following additional red text is recommended:

SMAP-17 It is Council policy to be supportive of exploring opportunities for the provision of cycle lanes along the N80, preferably off road cycle tracks separated from vehicular traffic where feasible, subject to **meeting adhering to road safety standards and complying with** Transport Infrastructure Ireland’s **Guidelines Publications, safeguarding the strategic function of the N80** and the undertaking of a safety audit.

It is also recommended to relocate this policy from under the sub-heading ‘public transport’ to under the sub-heading ‘walking / cycling’ in Chapter 8.

- n) It is recommended to insert the red text into Policy SMAP-95 to reflect the consideration of mobility management / travel planning for trip-intensive developments.

SMAP-05 It is Council policy that larger-scale, trip intensive developments, such as high employee dense offices and retail, should in the first instance be focused into central urban locations and developed in a sequential manner **and may be subject to Mobility Management / Travel Planning.**

- o) DM 61 in Chapter 13 Development Management Standards of the draft Plan states:

‘Motor fuel stations and service areas located on the National Road network will be assessed with regard to the Spatial Planning and National Roads Guidelines for Planning Authorities DoECLG, 2012 and NRA Service Area Policy 2014’.

It is considered that the development management standard is sufficient to address the need to have regard to the SPNRG when assessing service areas. Accordingly, no additional changes are required.

- p) It is recommended to insert the policy requested but rather than restricting it to national roads it could apply to all roads. The new recommended policy is as follows:

‘It is Council policy that the capacity and efficiency of the road network drainage regimes in County Offaly will be safeguarded for road drainage purposes’.

- q) DM 110 in Chapter 13 Development Management Standards addresses what is considered in assessing planning applications for solar farms. One of the considerations listed is ‘the effect of glint and glare on landscapes, traffic and aircraft safety’. Accordingly, this is already addressed in the draft Plan.
- r) An EIAR must address ‘alternatives’ one being alternative grid connection routing, so this is already addressed through the Development Management process.
- s) Offaly County Council will support the preparation of a comprehensive after-use framework plan for the industrialised peatlands, however this framework will not be led by Offaly County Council. Accordingly, reference to the SPHRG is considered not necessary in policy CAEP-13.
- t) Reference to the NRA Design Manual for Roads and Bridges should be removed and replaced with **‘design standards detailed in TII publications’**.
- u) References to the Design Manual for Roads and Bridges in the draft plan will be amended to also make reference to the TII publication titled **‘The Treatment of Transition Zones to Towns and Villages on National Roads’**.
- v) Reference is recommended to be made to **Table 2.3 of the Traffic and Transportation Guidelines** (which refers to sub-threshold criteria) in Development Management Standard DM-105.
- w) The reference to ‘Road Safety Audit Guidelines (TII, 0217)’ in Development Management Standard DMS-105 is recommended to remove reference to the year as TII publications are updated regularly. Rather use **‘Road Safety Audit Guidelines (TII publication)’**.
- x) DMS-86 should be reviewed to incorporate reference to Section 3.8 of SPNRG and to omit reference to TII consent being required for signage on national roads (as TII are not the consenting authority) as follows:

‘Applications for advertisement structures along national routes outside 50 kph speed limits will generally not be permitted except for tourist attractions of national or regional importance. ~~All such signage will require the written consent of Transport Infrastructure Ireland (TII), where appropriate.~~ Applications for advertisement structures shall comply with the “Policy on the Provision of Tourist and Leisure Signage on National Roads” published by the National Roads Authority (or any such other relevant standards and legislation that may be enacted), ~~and~~ Traffic Signs Manual published by Dept. of Transport **and Section 3.8 of the Spatial Planning and National Roads Guidelines’**.

- y) It is recommended that the following policy be included in Chapter 11 Water Services and Environment to address TII’s submission:

It is Council policy that noise sensitive development proposals located within proximity to a noise source, such as an existing or proposed national road, should include noise attenuation measures.

- z) It is noted that TII would like future consultation at design stages of particular proposals.

[Ref: CDP/D/74](#)

Person / Body:

National Transport Authority

Summary of submissions / observations:

- a) Refers to Guiding Principles such as: urban-generated development within urban area , sequential development, trip intensive development in central locations, priority and permeability for walking, cycling and public transport, maximise number of people living within walking and cycling distance of their services, maintain the strategic transport function of national roads, non-residential and residential development proposals should have maximum parking standards, travel plans should be conditioned for all major employment developments and all schools.
- b) Acknowledges that a Local Transport Plan (LTP) will be prepared for Tullamore as set out in the draft plan. Requests that one be prepared for all settlements for which a Local Area Plan (LAP) will be undertaken, to make reference to the Guidance document 'Area Based Transport Assessment' published by NTA in conjunction with TII, and that LTPs be prepared in tandem with the LAP.
- c) States that it is acceptable to include objectives for rail connections as set out in the draft Plan however there is no funding in the National Development Plan 2018-2027 for their provision.
- d) Seeks the role of the Local Link Rural Transport Programme to provide social and economic connectivity to be reflected in policy.
- e) The Plan should recognise the importance of sustainable modes of transport, permeability and ensure people are living within walking and cycling distance of services at a local level e.g. schools.
- f) The Plan should make provision for cycling facilities and the implementation of cycle lanes besides just Greenways and Bord na Móna routes.
- g) Sets out the importance of maintaining the strategic function of national roads including motorways and refer to the Strategic Planning and National Roads Guidelines (SPNRG).
- h) Notes that the draft Plan states that a car parking financial contribution may be sought in lieu of a shortfall of car parking spaces. However, the submission states that car parking standards shall be maximum.
- i) The submission makes suggestions regarding cycle parking standards for apartments. It seeks compliance with standards in the 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities which states on page 24: a minimum of 1 cycle

storage space per bedroom; studios at least 1 space shall be provided; visitor cycle parking of 1 space per 2 residential units. In contrast DMS-99 in the draft Plan states 1 stand per unit and 1 visitor stand per 2 units. Requests the Council to consider the document ‘Standards for Cycle Parking and associated Cycling Facilities for New Developments’ published by Dun Laoghaire Rathdown County Council in setting cycle parking standards.

- j) States the importance of referring to disabilities, accessibility, universal design and Part M Building Regulations in the draft Plan. Seeks reference be made to the need for Accessibility Audits. Seeks 5% of car parking spaces as accessible spaces.
- k) Seeks the inclusion of modal share indicators.
- l) Makes suggested policies / objectives for consideration in the Plan to ensure new development areas are permeable for walking and cycling, facilitate access to public transport, make provision for bus stops etc., support public transport routes and to retrospectively provide public transport / walking and cycling infrastructure.
- m) Recommends that the word ‘transport’ be replaced by ‘private transport’ in SMAP-06.

CE Response:

- a) All Guiding Principles are addressed in the draft plan except the need to address the latter two, namely non-residential development proposals should have maximum parking standards, and travel plans should be conditioned for all major employment developments and all schools. In addition, section 7 of the submission states ‘the NTA recommends that residential parking standards should be expressed as maximum values, i.e. as rates not to be exceeded’. According, it is recommended to change the title of a column in Development Management Standard DMS 102 which relates to car parking standards to state ‘*maximum car parking provision*’. The recommended heading changes to DMS-102 is as follows:

DMS-102 Car Parking Standards Requirements	Land Use	Maximum Car Parking Provision Spaces Stated Requirement
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It is recommended to insert the following policy in Chapter 8 Sustainable Mobility and Accessibility ‘*All proposed major employment developments and schools shall be subject to Travel Plans in a manner consistent with National Transport Authority Guidance*’.

- b) Local Area Plans exist for Edenderry and Portarlinton, whilst LAPs will be prepared for Tullamore and Birr. In relation to the making of Local Transport Plans, the RSES states that ‘*The settlements for which Local Transport Plan will be made will include, but will not be limited to...Tullamore... and certain large settlements and development in the Dublin Metropolitan Area*’. See extract below. Co. Offaly is not located within the Dublin Metropolitan Area.

It is recommended based on the element of the above quotation that states ‘but will not be limited’ that consideration should be made to preparing LTPs for the other towns that are subject to LAP’s namely Birr, Edenderry and Portarlinton. Reference should also be made to ‘*Area Based Transport*

Assessment Guidance’ by TII and NTA. Accordingly, it is recommended to amend Objective SMAP-02 in Chapter 7 Sustainable Mobility and Accessibility as follows:

SMAO-02 It is an objective of the Council to prepare a Local Transport Plan **in accordance with ‘Area Based Transport Assessment Guidance’ by TII and NTA**, for the Key Town of Tullamore in conjunction with the National Transport Authority **and in tandem with the Local Area Plan, and to consider the preparation of Local Transport Plans for other towns that are subject to Local Area Plans, namely Birr, Edenderry and Portarlinton subject to the provision of funding and agreement with statutory agencies.**

Local Transport Plans (LTP)

Local Transport Plans (LTP) will represent the lowest tier of the NPF’s framework for the integration of land use and transport planning and the achievement of the NPF’s objective of ‘compact smart growth’, they will be subject to further environmental assessment at local level as appropriate.

LTPs will be based on a clear set of objectives and the most recent demographic and travel information taking into account the policies and objectives of the local authorities, insofar as they align with those of National and Regional Policy. LTPs will include the transport priorities for each settlement in terms of public transport infrastructure and services; cycle investment; improvements to the pedestrian environment; and road enhancements. Local Link Offices (Transport Coordination Units) will be consulted in the development of LTPs.

The policies, objectives and measures which emerge from the LTPs shall be incorporated into the relevant statutory land use plans pertaining to each settlement.

The settlements for which Local Transport Plans will be made will include, but will not be limited to, Athlone, Dundalk, Drogheda, Arklow, Ashbourne, Balbriggan, Longford, Mullingar, Portlaoise, Naas, Navan, Newbridge, Tullamore and Wicklow-Rathnew and certain large settlements or development areas within the Dublin Metropolitan Area.

REGIONAL POLICY OBJECTIVE:

Local Transport Plans

RPO 8.6: In order to give local expression to the regional level Transport Strategy within the Region in conjunction with the NTA, Local Transport Plans (LTP) will be prepared for selected settlements in the Region.

- c) Noted that there is no funding in the National Development Plan 2018-2027 for the provision of specific rail lines listed in the draft Plan.
- d) It is recommended to reflect the role of the Local Link Rural Transport Programme in policy SMAP-16 that refers to the Programme in the draft Plan, as follows:

SMAP-16 It is Council policy to support the Local Link Rural Transport Programme 2018-2022 in County Offaly and subsequent programmes **which provides for social and economic connectivity between settlements and rural areas.**

- e) The Plan recognises the importance of sustainable modes of transport and permeability in numerous chapters of the draft plan and has provided zoned residential land in proximity to local services.
- f) It is considered that there is substantial reference to cycling and cycling facilities in the draft Plan for example the following policies / objectives in Chapter 8 Sustainable Mobility and Accessibility. There are also cycle parking standards in Chapter 13 Development Management Standards and cycle lane objectives in numerous settlement plans in Volume 2 of the draft Plan.

SMAP-08 It is Council policy to prioritise the need for people to be physically active in their daily lives; to improve permeability and to promote walking and cycling in the design of streets and public spaces as an alternative and sustainable mode of transport; and to support safer walking and cycling routes to schools under the Green Schools Initiative subject to appropriate environmental assessments, including Habitats Directive Assessment.

SMAP-09 It is Council policy to support the pedestrianisation and permeability of town and village centres where appropriate, in order to create accessible, attractive, vibrant and safe places. In doing this the Council will strive to support the;

- (iv) Provision of 'cycle friendly' towns and villages;
- (v) Provision of key cycling routes through larger towns;
- (vi) Potential for a walking and cycling route around Tullamore incorporating the Grand Canal, the banks of the Tullamore river and inside the barriers of the Tullamore by-pass.

SMAP-10 It is Council policy to facilitate and support, subject to appropriate environmental assessments (including the 'Corridor and Route Selection Process' set out in section 8.5.4 of this Plan), the continued development of walking and cycling routes including greenways, blueways and peatways in County Offaly for recreational and utility purposes.

SMAP-11 It is Council policy to support the provision of secure cycle parking facilities in the public realm of towns and villages, at all public service destinations and in other developments.

SMAO-05 It is an objective of the Council that cycle lanes are designed and maintained in accordance with the National Cycle Manual by the National Transport Authority 2011.

- g) Protecting the strategic function of national roads is provided for in the draft Plan. Reference should also be made to motorways as inserted in red below.

SMAP-20 It is Council policy to maintain and protect the safety, strategic transport function, capacity and efficiency of national roads, **motorways** and associated junctions **and in accordance with Strategic Planning and National Roads Guidelines 2012 or any subsequent edition.**

- h) Car parking spaces shall be stated as a maximum i.e. ‘Maximum car parking provision’ in DMS 102 as recommended in (a) above.

Reference to a car parking financial contribution may be sought in lieu of a shortfall of car parking spaces should be removed as follows:

~~Offaly County Council may in lieu of shortfall of car parking spaces require the payment of a financial contribution under the Offaly County Council contribution scheme effective on the date of the grant of permission.~~

- i) It is recommended to change the cycle parking standards for apartments in DMS-99 from 1 stand per unit and 1 visitor stand per 2 units to a minimum of 1 cycle storage space per bedroom; studios at least 1 space shall be provided; visitor cycle parking of 1 space per 2 residential units.

It is also recommended to make the changes below to DMS 100 having considered Dun Laoghaire Rathdown’s ‘Standards for Cycle Parking and associated Cycling Facilities for New Developments’

<p>DMS-100 Cycle Parking Dimensions</p>	<p>Cycle stand dimensions shall be 2.0 metres x 1.0 metres and shall be placed at least 1.0 metres apart to provide access for all users and types of bike.</p> <p>All A minimum of 50% of short term cycle parking and all long term cycle parking to be provided shall be sheltered for retail, other commercial, and enterprise and employment uses.</p> <p>In residential developments without private gardens or wholly dependent on balconies for private open space, covered secure bicycle stands should be provided in private communal areas.</p> <p>It may be a requirement to provide showers, changing facilities, lockers and clothes drying facilities, for use by staff that walk or cycle to work. CCTV cameras or passive surveillance of car parks and cycle parks may be required for personal safety and security considerations.</p> <p>All cycle facilities in multi-storey car parks shall be at ground floor level and completely segregated from vehicular traffic. Cyclists should also have designated entry and exit routes at the car park and with minimum headroom of 2.4m to facilitate access by cyclists.</p> <p>Within larger new developments cycle routes shall link to the existing cycle network where possible and maintain a high degree of permeability through developments. Cycle Audits may be required in such developments.</p>
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- j) There are many policies / objectives in the draft Plan which refer to disabilities, universal design and accessibility as indicated below. In addition, the Offaly Age Friendly County Programme which is referred to in policy SICCDP-10 of the draft Plan addresses these concerns also. Walkability Audits (aka Accessibility Audits) are referred to in policy also as indicated below.

SICCDP-10 It is Council policy to support ‘the Offaly Age Friendly County Programme 2018-2021’ as implemented by the Offaly Age Friendly Alliance (and any updated editions) and any key actions in relation to the physical environment.

SICCDP-12 It is Council policy to ensure that all buildings, public open spaces, recreational and amenity areas are accessible for people with disabilities, having regard to;

- Part M of the Building Regulations and the requirement for Disability Access Certificates (DACs)
- Buildings for Everyone: A Universal Design Approach (National Disability Authority, 2012);
- Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities and its companion document Urban Design Manual (DEHLG, 2009); and
- Great Outdoors - A Guide for Accessibility (2018)

SICCDP-13 It is Council policy to cater for all levels of disability, through the appropriate mitigation of the built environment for example, through the selection of building materials; the provision of quiet rooms and sensory gardens where appropriate; and in the design of pedestrian facilities for the visually impaired.

SICCDP-14 It is Council Policy to promote Universal Design and well-designed lifetime adaptable and age friendly housing in accordance with best practice and the policies and principles contained in Building for Everyone: A Universal Design Approach (National Disability Authority, 2012) and Sustainable Residential Development in Urban Area: Guidelines for Planning Authorities and its companion document Urban Design Manual (DEHLG, 2009) and particularly in infill and brownfield developments walkable to existing services and facilities.

SICCDP-15 It is Council policy to ensure that new social infrastructure developments are accessible and inclusive for a range of users by adopting a universal design approach and provide for an age friendly society in which people of all ages can live full active, valued and healthy lives.

HP-17 It is Council policy to encourage the compact growth of settlements; to promote healthy place-making; to increase the liveability factor of a place; to encourage the most efficient use of land; to ensure a mixture of residential unit types that are designed and constructed on the principles of universal design, life-long adaptability and energy efficiency; to support permeability and sustainable mobility with priority for pedestrians and cyclists; and in general to support the transition to a low carbon economy by way of reduction of greenhouse gases.

HP-06 It is Council policy to ensure that new social and affordable housing developments are designed and constructed on the principles of universal design and life-long adaptability, are energy efficient, and of excellent design and contribute to healthy place-making.

HP-07 It is Council policy to ensure that a mixture of house types, tenures and sizes is developed to reasonably match the requirements of different categories of households, and ensure that the special requirements of older persons, persons with disabilities and persons with learning difficulties are developed in convenient, easily accessible and permeable locations.

RP-16 It is Council policy that scheduled town and village improvement schemes shall be informed by joint walkability audits involving local older people together with relevant local authority officials in accordance with the Age Friendly Strategy for Offaly 2018-2021, and any future editions.

It is recommended to insert the word 'accessibility' into Policy SMAP-04 as indicated below:

SMAP-04 It is Council policy to promote the integration of landuse and transport planning to:

- (i) Ensure a sustainable, safe, coherent, efficient, and effective approach to transport provision for development in County Offaly;
- (ii) Support permeability, **accessibility** and connectivity in settlements (both in terms of new development and retrofitting into existing built-up areas);
- (iii) Strive to continue decreasing the distance between housing and employment;
- (iv) Reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources;
- (v) Reduce anthropogenic greenhouse house emissions; and
- (vi) Address the necessity of adaptation to climate change

In particular, having regard to location, layout and design of new developments.

DMS 101 Car Parking Dimensions should be amended to reflect the wording 'Accessible space' as follows: Car parking bay (~~disabled-disability / accessible user space~~): 5 metres x 3.75 metres;

DMS 102 Car Parking Standards should be amended to reflect the following standard: **A minimum of 5% of car parking spaces shall be accessible spaces.**

- k) Modal share policy exists within the draft plan for example:

SMAP-06 It is Council policy to promote more compact development forms that reduce overall demand for **private** transport and **private** transport infrastructure and support proposals that encourage modal shift towards sustainable travel modes.

It is recommended to strengthen the plan by inserting the following policies and objective:

'It is Council policy to allow for the reduction in car parking standards in suitable town centre locations in order to encourage a modal shift away from the private car to more sustainable forms of transport, such as public transport, cycling and walking'.

'It is an objective of the Council to specify baseline figures and targets for modal share in new / varied Local Area Plans in order to encourage a modal shift away from the private car to more sustainable forms of transport, such as public transport, cycling and walking.'

'It is Council Policy to continue to work with the relevant transport providers, agencies and stakeholders to facilitate the integration of active travel (walking, cycling) with public transport'.

‘It is an objective of the Council to set modal share targets within the county in cooperation with NTA, CARO, EMRA and other relevant stakeholders and in accordance with any relevant Guidelines that may come into effect’.

It is recommended to make the following change to DMS 103 in order to encourage modal share:

(i) DMS-103 Car Free Developments	In very limited circumstances, The Council may will also consider the development of car-free developments on suitable small-scale sites within or adjacent to town centres which have high levels of public transport accessibility, have convenient and safe access to local shops and community facilities.
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It is recommended to amend DMS 102 as follows to encourage modal share:

Land Use	Car Parking Spaces Stated Requirement Maximum Car Parking Provision
House (town and village centre location)	1 space per unit in Birr and Tullamore town centres. 1.5 spaces per unit in all other town and village centres. 1 space per unit in town and village centres unless the Planning Authority is satisfied that DMS-103 applies.

Baseline modal share charts should be inserted into the Plan. These are shown in Section 4 of this CE Report in relation to the OPR submission (see b in section 4 of this CE Report). Also please see table in Appendix 1 of section 4 of this CE Report which collates policies / objectives / development management standards relating to modal share.

l) It is recommended to include the following policy suggested by NTA:

‘It is Council policy to support and develop public transport routes throughout the county through collaboration with the National Transport Authority and other relevant statutory bodies’.

It is considered that bus stops and associated facilities are adequately addressed in the following policy of the draft Plan:

SMAP-15 It is Council policy to support and facilitate the operation of existing bus services and to facilitate the provisions of improved facilities and services for bus users in towns and villages including the provision of set down areas for coaches and bus shelters at all bus stops where feasible.

It is considered that there is sufficient reference to permeability and sustainable mobility in the draft Plan to address the recommendations of the submission.

m) It is recommended that word 'transport' be replaced by 'private transport' in SMAP-06 as follows:

SMAP-06 It is Council policy to promote more compact development forms that reduce overall demand for private transport and private transport infrastructure and support proposals that encourage modal shift towards sustainable travel modes.

3.2.9 Eco-Villages

[Ref: CDP/D/64](#)

Person / Body:

Michelle Hallahan

Summary of submission / observation:

This submission requests that planning laws and regulations should allow for the creation of eco villages and clustered rural small housing, comprising green buildings, Net Zero Energy homes, solar power and organic food production in Co. Offaly as well as land trusts.

The submission refers to a number of Principles for Growth that eco villages and clustered rural housing fulfil, which are summarised as follows; compact growth; establishing a low carbon society; aligning population, employment, community and housing growth, reducing car dependency and outward commuting; creating well designed, attractive, liveable places and promoting social inclusion.

The submission proceeds to refer to examples of similar communities that have been established in Leeds, Wales and Cloughjordan, Co. Tipperary.

CE Response:

No action proposed.

The Draft Plan reflects the provisions of the National Planning Framework and the Regional Spatial and Economic Strategy, including an evidence-based Core Strategy informed by the Housing Need Demand Assessment and the Housing Strategy and an asset based approach in relation to deciding what land should be zoned in towns and villages or permitted in sraids contained in Volume 2 of the Draft Plan. The Draft Plan also includes policies and objectives to promote and support all of the relevant National Policy Outcomes as contained in the National Planning Framework, especially in relation to 'Compact Growth, Strengthened Rural Economies and Communities, Sustainable Mobility, and Transition to low carbon and climate-resilient society'.

To designate or limit part of the 'New Residential' zoned land in towns and villages or in sraids as specifically being for green buildings, Net Zero Energy homes, solar power and organic food production as detailed in this submission would not be conducive to and could potentially constrain Offaly's contribution to the Government's plan, Rebuilding Ireland-Action Plan for Housing and Homelessness which aims to double the annual level of residential construction, while making the best use of the existing housing stock and laying the foundations for a more vibrant and responsive private rented sector.

To allow multiple residential units near agricultural land whether that would be on the outer fringes of towns and villages or in the open countryside and to make provision for the range of uses as proposed in this submission in these areas, would contribute to urban sprawl rather than consolidating and achieving effective densities in our centres, would increase car dependency, militating against the following National Strategic Outcomes (NSO) from the NPF;

- NSO 1 Compact Growth
- NSO 4 Sustainable Mobility and
- NSO 8 Transition to a Low Carbon Resilient Society.

It is further considered that there is no need to make the type of distinction proposed in this submission as;

- the type of residential development referred to in this submission can generally be accommodated under the 'New Residential' zoning classification as described in Section 12.4.2 in Chapter 12 Land Use Objectives of the Draft Plan, in sraids subject to compliance with Development Management Standards 35-44 outlined in Chapter 13, on individual sites within the open countryside subject to compliance with Rural Housing Policies SSP-21 and SSP-22 from Chapter 2 and is of a nature that would generally be considered acceptable in sraids subject to compliance with Development Management Standards 35-44 outlined in Chapter 13; and
- the Development Management Standards in Chapter 13 were formulated having regard to the following Common Principles; 'Green Infrastructure' (Section 13.2.3), 'Healthy Placemaking' (Section 13.2.6) and 'Sustainability and Energy Efficiency' (Section 13.2.7), and contain specific standards relating to Design Statements for residential developments (DMS-07), Green Infrastructure Masterplans (DMS-22) and Residential Energy Efficiency and Climate Change Adaptation Design Statement (DMS-31).

[Ref: CDP/D/65](#)

Person / Body:

Selene Aswell

Summary of submission / observation:

This submission requests that a path be provided for eco villages and low impact cluster housing on or near agricultural land and that co-working hubs, workshops, libraries, training and education centres, housing for people with disabilities and older people and medical practices be permitted and encouraged in relevant polices listed in the submission. In addition, the submission requests that 'tiny homes' or small clustered housing for eco village developments be included under the description of 'Existing Residential' and eco villages be considered as an appropriate land use on 'New Residential' zoned lands.

In relation to the Ferbane Town Plan, the submission requests that reference be made to 'eco villages' in Strategic Aim 5 to urban eco villages and 'and the surrounding areas' in Strategic Aim 4.

CE Response:

No action proposed.

Please refer to CDP/D/64.

[Ref: CDP/D/66](#)**Person / Body:****Wendy Stephens****Summary of submission / observation:**

This submission would like to see a place for small eco communities with low impact housing to be created to assist with making Offaly a sustainable and environmentally friendly county.

CE Response:

No action proposed.

Please refer to CDP/D/64.

[Ref: CDP/D/72](#)**Person / Body:****Siobhan Lavelle****Summary of submission / observation:**

This submission requests that eco villages be included as a list of strategies to mitigate climate change in Chapter 3; Climate Action and Energy and that in Chapter 2: Core Strategy, Settlement and Housing Strategy as a means of addressing rural depopulation and commuting. In addition, in relation to Chapter 9: Social Inclusion, Community and Cultural Development, the submission states that allowing eco villages to build community and education centres could increase social inclusion and employment in these areas.

The submission refers to examples of eco villages in the One Planet Development Scheme in Wales, Cloughjordan in Co. Tipperary, Tamera in Portugal and Findhorn in Scotland.

CE Response:

No action proposed.

Please refer to CDP/D/64.

Ref: CDP/D/76**Person / Body:****Michelle Heery****Summary of submission / observation:**

This submission requests that eco villages can help achieve the transition to a low carbon society (one of the principles for growth from Section 2.1.4 of the Draft Plan) and should be considered as one of the possible strategies to halt and reverse climate change in that inhabitants live off the land in a sustainable way supporting biodiversity, soil regeneration and carbon sequestration. The submission refers to similar developments in Cloughjordan and Findhorn in Scotland which have had benefits such as increased entrepreneurship, income generation, rural regeneration and increased tourism.

CE Response:

No action proposed.

Ref: CDP/D/92**Person / Body:****Pat Keating****Summary of submission / observation:**

This submission requests that eco villages be considered as a way of addressing issues such as rural depopulation and commuting which are referred to in Chapter 2 of the Draft Plan. Mr Keating states that for eco villages to become a possibility there would need to be allowances made for small clusters of low impact houses to be built on agricultural land and refers the Council to the One Planet Development Scheme in Wales model.

CE Response:

No action proposed.

Please refer to CDP/D/64.

Ref: CDP/D/99 and CDP/D102**Person / Body:****Michal Masar****Summary of submission / observation:**

This submission would like to include loosening of Building Codes for rural and community areas and/or including of Earthships, which often include water reusing and cleaning ecosystems, and tiny

homes as carbon neutral sustainable dwellings and use natural materials like hempcrete, strawbale and others, as well as the use of used tyres and other material as upcycling.

CE Response:

No further action proposed.

Rather than being an issue for the Draft Plan, this is primarily a Building Control issue, specifically in relation to the Building Control Acts 1990 to 2014 which set out;

- the minimum requirements for the design and construction of buildings as set out in the Building Regulations;
- detailed Technical Guidance Documents showing how these requirements can be achieved in practice;
- procedures set out in the Building Control Regulations for demonstrating compliance in respect of an individual building or works.

Notwithstanding this, the key messages in relation to rural house design and siting are contained in its publication 'Designing houses creating homes, a guide for applicants on the siting and design of new houses in the Offaly countryside' (2008).

Ref: CDP/D/119

Person / Body:

Coole Eco-Community

Summary of submission / observation:

This submission states that the Coole Eco-Community is planning to create a land based eco village on 38 acres near Ferbane and recommends that the County Development Plan provide a framework that permits people who want to live and work in the countryside to build their own home there, on condition they achieve a drastically reduced ecological footprint, engage in restoring biodiversity and make at least 50% of their income from land based enterprises.

CE Response:

No further action proposed.

Please refer to CDP/D/64.

3.2.10 Biodiversity and Landscape

Ref: CDP/D/123

Person / Body:

Nessa Darcy

Summary of submission / observation:

This submission states that;

- a) She would like to see a real commitment to education and awareness raising about biodiversity, with support expressed for Offaly Naturalists Club and their moth recording scheme, All Ireland Ladybird Survey and the Garden Butterfly Monitoring Scheme carried out in conjunction with National Biodiversity Data Centre;
- b) Paragraphs referring to the statutory requirements of the Plan in Section 4.3.2 and Section 4.7 do not convince that the Council is on board with these policies and are implementing them unwillingly. The Plan should include more on the reasoning behind the policies in this regard and the opportunities it provides;
- c) The contribution of trees, forestry and hedgerows to flood prevention;
- d) The mental and physical benefits of biodiversity should be recognised;
- e) There should be an emphasis on the conservation of existing, intact, long established habitats, as a priority over planting native plants and rehabilitating;
- f) The White Tailed Eagle and Golden Eagle are sometimes seen in Offaly and should perhaps be included in Table 4.4 Occurrence in Co. Offaly of birds protected under Annex 1 of the EU Birds Directive.
- g) We need a shift from over tidying and 'creating' habitat to rewilding and allowing nature to progress organically;
- h) Policy BLP-24 should refer to biodiversity conservation as old, hollow, decaying trees and dead wood are a scarce and important habitat, particularly for uncommon insect species;
- i) Offaly can make a significant contribution to mitigating the environmental crisis, particularly through bog conservation, regenerative forestry and enabling the development of low impact eco villages.

CE Response:

- a) Noted. It is recommended to include a policy in Chapter 4 Biodiversity and Landscape stating that **'It is Council policy to raise public awareness and understanding of the County's natural heritage and biodiversity'**.
- b) No further action proposed. I do not agree that by referring to the statutory obligation of the Council to include objectives for the conservation and protection of Natura 2000 sites (European sites) as set out in Section 10(2)(c) of the Planning and Development Act, that it is implied that the Council is implementing these policies unwillingly. In addition, it is considered Section 4.1 'Introduction' and Table 4.1 within this section outline the benefits of the biodiversity and ecosystems in Offaly to the local population.
- c) No further action proposed. The Council recognises the importance of riparian buffer zones, which are strips of vegetated land bordering a river or stream in enhancing flood alleviation

and the Draft Plan includes a policy, BLP-20, to protect riparian corridors by reserving land along their banks for ecological corridors and maintain them free from inappropriate development.

- d) No further action proposed. Table 4.1 outlines the non-material services that ecosystems provide such as 'spiritual enrichment, intellectual development, recreation and aesthetic values' while reference to health and well-being benefits of Green Infrastructure is also made in Section 4.10 of the Draft Plan.
- e) No further action proposed. The Planning Authority considers that the inclusion of specific policy in Chapter 4, BLO-16 to *"encourage the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the county. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, provision of the same type of boundary will be required of similar length and set back within the site in advance of the commencement of construction works on the site (unless otherwise agreed by the Planning Authority)"* as being sufficient in this regard.
- f) Noted. On advice of the Department in their submission (Ref. No. CDP/D/152) to the Draft Plan, it is proposed to omit Table 4.4 entitled 'Occurrence in County Offaly of birds protected under Annex 1 of the EU Birds Directive' from Chapter 4 as requested and to include an objective *"In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas."*
- g) No further action proposed. The following policies and objectives from Chapter 4 of the Draft Plan sufficiently recognise and support the importance of established habitats for example:
- encourage pursuant to Article 10 of the Habitats Directive, the management of features of the landscape, such as traditional field boundaries, important for the ecological coherence of the Natura 2000 network and essential for the migration, dispersal and genetic exchange of wild species (BLP-16);
 - support the protection and management of existing networks of woodlands, trees and hedgerows which are of amenity or biodiversity value and/or contribute to landscape character, and to strengthen local networks (BLP-22);
 - support the aims and objectives of the All Ireland Pollinator Plan 2015-2020 by encouraging the planting of pollinator friendly trees and plants and encouraging management options to improve pollinator populations within a number of areas including grass verges, hedgerows and public spaces (BLP-30); and
 - to require all new developments to identify, protect and enhance ecological features by making provision for local biodiversity and provide links to the wider Green Infrastructure network as an essential part of the design process (BLO-17).
- h) No further action proposed. It would be problematic to implement such a policy having regard to different scenarios where trees can be felled under Section 19 of the Forestry Act 2014 and in relation to planning, Section 4(1)(i) and Section 205(11) of the Planning and Development Act 2000 as amended. Notwithstanding this, it should be noted the Draft Plan contains a policy, BLP-24, requiring, where practical, the management of mature trees, such as tree surgery instead of felling particularly where the trees contribute to amenity.
- i) No further action proposed. In relation to ecovillages please refer to CDP/D/64. The Draft Plan contains numerous policies and objectives recognising and supporting the role that peatlands, forestry and trees can play in relation to climate action.

3.2.11 Quarries

Ref: CDP/D/115

Person / Body:

Derryarkin Sand and Gravel

Summary of submission / observation:

This submission;

- a) Refers to the importance of extractive industries as expressed in National Policy Objective 23 of the National Planning Framework and Regional Policy Objective 6.7 of EMRA;
- b) Refers to the recently published Irish Concrete Federation document ‘Essential Aggregates – Providing for Ireland’s Needs to 2040’ of which the objective is to highlight the need for a national planning policy for aggregates;
- c) Summarises the relevant policies of the current 2014-2020 Co. Development Plan and the Draft Plan;
- d) States that it is necessary for the Plan to include further emphasis on the sector’s significance and added value in terms of the local, regional and national economy. It is particularly important to highlight the sectors central role within construction and development supply chains, therefore, supporting economic development and employment in Offaly and further afield;
- e) States that it should be the aim of the proposed Plan to safeguard areas of significant resources from incompatible developments to ensure the continued viability of the extractive industry and that appropriate control measures should be put in place in this regard;
- f) States that the introduction of additional policy constraints on existing quarry operations such as the policy in the Draft Plan favouring the use of extensions to existing permitted quarries over proposals from extraction from green field sites and a presumption against new quarry developments on the county’s eskers should be avoided to ensure that the efficient use of these existing facilities is maximised.

CE Response:

- a) Noted. No further action required.
- b) Noted. No further action required.
- c) Noted. No further action required. Submission omits reference to Policy, REDP-02 from the Draft Plan “to continue to protect existing resource-based industry from encroachment by residential development, for example mining, quarrying, gravel pits, and intensive agriculture.”
- d) Noted. No further action required. Section 5.6.8 ‘Aggregates and Minerals’ from the Draft Plan already refers to the “importance of sand and gravel extractions in the economic life of the county and its importance as a valuable source of employment in parts of the county”.
- e) Noted. No further action required. It is considered that policies in the draft Plan strike a satisfactory balance between the needs of the building industry and the need to protect the environment. In this regard, whilst the Draft Plan does contain necessary policies regarding;
 - not permitting sand and gravel extractions which would result in the visual amenity of a number of listed protected areas in the Plan (Policy REDP-16); and
 - protecting the county’s eskers from impacts of quarrying (Policy BLP-12 and 13);

- but also includes a policy, REDP-02 to “to continue to protect existing resource-based industry from encroachment by residential development, for example mining, quarrying, gravel pits, and intensive agriculture.”
 - In addition, Chapter 13 contains an extensive development management standard, DMS-112 that details the requirements that need to be included in planning applications for quarry and ancillary developments.
- f) Noted. No further action required. It should be noted that as a result of the implementation of Section 261 and Section 261A of the Planning and Development Act, a significant number of quarries attained a planning authorisation to continue operations, whilst a number of other quarries have received permissions in recent years. It is considered that policies in the Draft Plan favouring the use of extensions to existing permitted quarries over proposals from extraction from green field sites and a presumption against new quarry developments on the county’s eskers should not affect the viability of the extractive industry in the county.

Ref: CDP/D/116

Person / Body:

Roadstone Ltd

Summary of submission / observation:

This submission;

- a) Refers to the importance of extractive industries as expressed in National Policy Objective 23 of the National Planning Framework and Regional Policy Objective 6.7 of EMRA;
- b) Refers to the recently published Irish Concrete Federation document ‘Essential Aggregates – Providing for Ireland’s Needs to 2040’ of which the objective is to highlight the need for a national planning policy for aggregates;
- c) Summarises the relevant policies of the current 2014-2020 County Development Plan and the Draft Plan;
- d) States that it is necessary for the Plan to include further emphasis on the sectors significance and added value in terms of the local, regional and national economy. It is particularly important to highlight the sectors central role within construction and development supply chains, therefore, supporting economic development and employment in Offaly and further afield;
- e) States that it should be the aim of the proposed Plan to safeguard areas of significant resources from incompatible developments to ensure the continued viability of the extractive industry and that appropriate control measures should be put in place in this regard;
- f) States that the introduction of additional policy constraints on existing quarry operations such as the policy in the Draft Plan favouring the use of extensions to existing permitted quarries over proposals from extraction from green field sites and a presumption against new quarry developments on the county’s eskers should be avoided to ensure that the efficient use of these existing facilities is maximised; and
- g) States that due consideration should be given to the operational needs and planned expansion of Roadstones Tullamore Sand and Gravel Pit during route selection stage of the Tullamore Western Bypass. In this regard, Roadstone Ltd will engage with the Coucnty Council during the consultation process for the corridor and route selection.

CE Response:

- a) Noted. No further action required.
- b) Noted. No further action required.
- c) Noted. Please refer to CDP/D/115 c).
- d) Noted. Please refer to CDP/D/115 d).
- e) Noted. Please refer to CDP/D/115 e).
- f) Noted. Please refer to CDP/D/115 f).
- g) Noted. No further action required. The sourcing of materials during projects from licenced and authorised quarries/pits is an operational issue for appointed contractors and not within the remit of this Plan.

3.2.12 Other

[Ref: CDP/D/39](#)

Person / Body:

Niamh Ni Bhroin

Summary of submission / observation:

The submission requests that a serviced site close to existing secondary schools be provided that can cater for both male and female students that wish to pursue a second level education through the medium of Irish.

CE Response:

The submission does not say what settlement that the proposed service site for the purposes of second level Irish language education is to be located within. Notwithstanding this, it is considered that the Draft Plan has zoned sufficient land for the purposes of 'Community Services/Facilities' and it is not within the remit of the Planning Authority to specify what type of education should take place within these zoned areas, but rather it is the responsibility of the Department of the Education in this regard.

[CDP/D/80:](#)**Person / Body:****Desmond Kampff****Summary of submissions / observations:**

Items listed in the submission constitute:

- Extension to 7th October deadline
- Restoration of all watercourses
- Presentation of Draft Plan perceived as final plan
- Promotion of linkages between small towns, villages and hamlets
- Understanding of promotion of vast wind farm development
- Control on infrastructure/building involving non self-draining surfaces
- Plan without strategies/actions
- Rewilding
- Designation of land areas

CE Response:

This submission constitutes headings with no further elaboration. Possibly a supporting document was intended to be submitted but wasn't. Accordingly, it does not lend itself to a reasoned response.

[Ref: CDP/D/91](#)**Person / Body:****Vincent Hussey****Summary of submissions / observations:**

- a) The Council must respond to the demise of the peat industry by securing funding for a strategy for the development of County Offaly to recreate a vibrant County, for example, some of the following issues could be highlighted:
 - (i) The food industry;
 - (ii) Resource-based activity e.g. sand and gravel, concrete works, timber/forestry generated industry;
 - (iii) Heritage and Culture: e.g. Birr Heritage Town, Monastic Heritage; and
 - (iv) Scientific and Educational and Literary Connection.
- b) Accessibility and Connectivity are key to the future well-being of the people of Offaly.
 - (i) Urgent improvement of the N52 from Junction 5 on the M6 to Tullamore
 - (ii) The improvement of the N80 from the Tullamore bypass to Mountmellick along a new line avoiding Killeigh village and its monastic complex. From Mountmellick connect with the M7 and M8 south of Portlaoise.

- (iii) Develop the N62 Southwards from Doon, bypassing Ferbane, Birr and Roscrea to link with the M7 Northeast of Roscrea.
 - (iv) Progressively improve the road from Tullamore to the Edenderry bypass and then to the M4 near Enfield.
 - (v) Bypass Kilcormac to the North of the town thus securing a new link road Northwards to Lough Boora Parklands.
- c) In the interests of Climate Change promote public transport both road and rail.
 - d) Bus services throughout the county are fragmented and require rationalisation in the first instance and then integration with the rail network at Tullamore.
 - e) Promote Tullamore as a pilot scheme for an integrated cycle network to become the Tilburg of Ireland.
 - f) Develop renewal energy infrastructure on cutaway peatlands.
 - g) Connectivity to 3rd and 4th level Education is vital to the well-being of the people of Offaly in the post peat burning era.
 - Access to University-level education needs to be provided urgently.
 - A good start has been made in both Birr and Tullamore through connecting local based resources with Universities in Dublin, Limerick, Galway and Cork.
 - The Natural, Heritage and Cultural resources of County Offaly provide fertile ground for linkages with Universities throughout Ireland and the rest of the world. These initiatives can be built into a university-style complex.
 - h) Working from home which is usually skill-based gives scope for expansion into hubs and larger units.
 - i) Clara has much more potential than the other “towns” with which it is categorised. Clara deserves to be categorised with Edenderry and Portarlinton or at least it should be in a category of its own. Commuting from Clara has strong links with Tullamore. This can be facilitated by an improved road/rail public transport initiative.
 - j) Opportunity Sites - submission makes some specific suggestions in relation to opportunity site as follows;
 - (i) Clara Opportunity Site Number 2 could be extended to include underused buildings on Main Street and the Square. Saint Anthony’s old school site could likewise be identified as an opportunity site.
 - (ii) Ferbane: Opportunity site No. 2 could be extended northwards to cater for a link road to the Athlone road thus consolidating the town centre.
 - (iii) Kilcormac: There is inadequate provision for the development of industry/employment.
 - (iv) Tullamore Opportunity site No. 1: Extend the site to include the Parochial House block and car park Site No 2. Extend the site to the Patrick St. and Bury Quay frontages. Provide a link road from Harbour St. to Kilbride Plaza (Site 2).
 - (v) No.4 Develop a link from Tanyard Lane to the High Street to allow the removal of through traffic from O’Connor Square.
 - (vi) Site No. 5: Develop a public transport hub.
 - (vii) Facilitate access to back lands between the railway station and the malt house.
 - k) Delete the objective to provide a Regional hub sludge centre in Tullamore. This type of activity should be located elsewhere.
 - l) Care should be exercised in allowing data centres. These consume large amounts of renewable energy that may be put to more productive use.

CE Response:

- a) There are numerous policies and objectives in the draft Plan addressing the after-use of industrial peatlands and power plants.

Section 5.6.2 of the draft Plan in particular acknowledges these concerns and the importance of the Just Transition Progress Report 2020 as follows:

'The Council recognises the importance of cutaway bogs as a major natural and archaeological resource. The Council also recognises the potential for the utilisation of protected peatland areas for tourist, amenity, environmental, educational and research purposes. Bord na Móna is the largest single landowner in County Offaly and owns approximately 27,650ha of the 32,400ha of peatland within the county.

The term 'cutaway' is used to describe the land area left after the major portion of the original peat deposit has been removed or exploited for fuel. This cutaway now presents an opportunity for alternative uses/ rural diversification and to be part of a comprehensive afteruse plan.

Cutaway bogs have potential landuses that can enhance both the employment, renewable energy generation, and tourism sectors of the county as well as providing a potential habitat considering much of the area will return to wilderness and contribute to the green infrastructure network.

A number of the peatlands within the county are protected through European and national designations. The Council will seek to achieve a balance in developing such a valuable land resource whilst also protecting the heritage and environmental value of these areas where required.

The Council notes the closure of ESB's peat fired electricity generating plants at Shannonbridge and Edenderry this decade, and recognises the transition that faces Bord na Móna considering the phased elimination of peat-fired electricity generation. The Council supports the longer-term strategic planning for industrial peatland areas. This should include the preparation of a comprehensive after-use framework plan for the peatlands and related infrastructure, which addresses environmental, economic and social issues including employment and replacement enterprise reflecting the current transition from employment based around peat extraction. Though this is in the interests of reducing Ireland's carbon footprint, it is recognised that Bord na Móna face the issue of accommodating staff in alternative work processes. Offaly County Council support the redeployment of Bord na Móna staff in alternative employment.

The Council acknowledges and is in favour of the re-development and/or expansion of currently used and disused sites such as former ESB power station sites and Bord na Móna works.

The Council supports the efforts of the Midland Transition team to:

- *Pursue funding opportunities and actions to mitigate the impact of the Bord na Móna job losses on the individuals concerned, and the impact on the local and regional economy; and*
- *Position the region to develop alternative forms of employment, attract investment and maximise existing employment opportunities and resources'.*

RDO-05 It is an objective of the Council to support the longer-term strategic planning for industrial peatland areas, which should include a comprehensive after-use framework plan for the industrial

peatlands and associated infrastructure including workshops, office buildings and industrial sites, which addresses environmental, economic and social issues including employment and replacement enterprise reflecting the current transition from employment based around peat extraction. Examples of after use and re-purposing of workshops and production facilities could include outreach training centres, gravel extraction, bike-hire facilities, enterprise space / co-working facilities, aquaculture, birch water harvesting, herb growing, resource management / recycling centre, climate change mitigation (such as through renewable energy, carbon sink, data centres, battery energy storage, afforestation including native woodland, a Green Energy Hub, flood management), and tourism (such as through peatways, recreational forestry, wilderness, eco-tourism based on biodiversity, and a designation of a National Peatlands Heritage Park).

RDO-06 It is an objective of the Council to support the Midlands Regional Transition Team in developing a ‘Holistic Plan for Just Transition in the Midland Region’ including an inventory of project proposals and actions to support just transition in the Midlands and to assist the region in identifying potential investment needs for inclusion in a programme of support under the new EU Just Transition Fund.

RDO-08 It is an objective of the Council to consider proposals for the potential re-purposing of both Shannonbridge and Edenderry peat powered electricity generating plants, and the appropriate rehabilitation of associated lands.

CAEP-13 It is Council policy to support the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the midlands and adjacent parts of the north west and southern regions, which meets the environmental, economic and social needs of communities in these areas, and also demonstrating leadership in climate change mitigation and land stewardship. The Council recognises that the industrial peatlands in the midlands are a significant resource will transition to after uses ranging from amenity, tourism, biodiversity services, ‘wild areas’, flood management, climate mitigation, energy development, industry, education, conservation and many more.

b) The following road schemes are listed in Chapter 8 of the draft Plan that address the routes raised in the submission:

SMAO-09 It is an objective of the Council to facilitate the development of the national secondary road network in Offaly through the continued construction, upgrading and improvement of the national secondary roads in the county, the **N62**, the **N52** and the N80 where on examination it is found to be feasible, including as outlined in the accompanying table:

Scheme Description
<p>N52: To support the construction of a road between Tullamore and Kilbeggan (Link Road) taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, including section 8.5.4 Corridor and Route Selection Process.</p>
<p>To examine the feasibility of the provision of a Western Bypass/Relief Road to the west of Tullamore town linking the R420 to the north west of the town with the N52 to the south west of the town taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and</p>

/ or facilitate the relevant project, subject to other provisions in the Plan, including section 8.5.4 Corridor and Route Selection Process. The line on the map in Volume 2 is indicative only.

To co-operate with Transport Infrastructure Ireland in the examination of the feasibility of providing a bypass for the following towns and villages, taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, including section 8.5.4 Corridor and Route Selection Process. Where lines are shown on the maps in Volume 2, they are indicative only.

- **N52: Kilcormac**
- N80: Killeigh

N62: To investigate the feasibility of constructing a Birr Relief Road and construction of **Birr By-pass** and Distributor Road Network (Birr LUTS), taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, including section 8.5.4 Corridor and Route Selection Process. The lines on the map in Volume 2 are indicative only.

SMAO-12 It is an objective of the Council to facilitate the continued improvement and upgrading of all roads, should their status be re-graded, under the national roads programme and / or the Council's road programme. The Council will seek and support the upgrading of the status of regional roads in the midlands which perform functions akin to National Secondary Routes for example the R420 Tullamore to Monastervin road and the routes that link **Tullamore to the M6 at Enfield via Edenderry**, namely the R420 and R402.

SMAP-25 It is Council policy to support the upgrading of the R422 from the M7 motorway in County Laois to **Mountmellick** in County Laois where it links with the N80 route that links to Tullamore a Key Town.

SMAO-14 It is an objective of the Council to examine the feasibility of providing future relief roads adjacent to the following towns and villages, taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, including section 8.5.4 Corridor and Route Selection Process. Where lines are shown on the maps in Volume 2, they are indicative only.

- Tullamore
- **Birr**
- Clara
- **Ferbane**
- Portarlinton
- Cloghan
- **Killeigh**

- Geashill
- Cloneygowan
- Edenderry
- **Kilcormac**

c) The following public transport policies are listed in Chapter 8 of the draft Plan:

SMAP-12 It is Council policy to co-operate with and encourage Iarnród Éireann to (i) secure the upgrading of the existing rail linkages between Athlone, Clara, Tullamore and Portarlinton (ii) improve the frequency of trains between Athlone and Dublin and (iii) ensure that train stations in County Offaly are manned and have frequent services.

SMAP-13 It is Council policy to promote and facilitate, in co-operation with the Department of Transport, Tourism and Sport, Iarnród Éireann and adjoining local authorities, the provision of a second rail line between Portarlinton and Athlone. In conjunction with this there is an opportunity for:

- Tullamore Train Station and adjoining lands to be developed as a transport (bus/rail) node with possible integration of local bus services to serve the town and catchment area; and
- Clara Train Station and adjoining lands to be developed as a transport (bus/rail) node with possible integration of local bus services to serve the town and catchment area.

SMAP-14 It is Council policy to support the reopening of Geashill Train Station.

SMAP-15 It is Council policy to support and facilitate the operation of existing bus services and to facilitate the provisions of improved facilities and services for bus users in towns and villages including the provision of set down areas for coaches and bus shelters at all bus stops where feasible.

SMAP-16 It is Council policy to support the Local Link Rural Transport Programme 2018-2022 in County Offaly and subsequent programmes.

d) In relation to improving bus connections for the county the following policies and objectives contained in the draft Plan are relevant;

SMAP-13 It is Council policy to promote and facilitate, in co-operation with the Department of Transport, Tourism and Sport, Iarnród Éireann and adjoining local authorities, the provision of a second rail line between Portarlinton and Athlone. In conjunction with this there is an opportunity for:

- Tullamore Train Station and adjoining lands to be developed as a transport (bus/rail) node with possible integration of local bus services to serve the town and catchment area; and
- Clara Train Station and adjoining lands to be developed as a transport (bus/rail) node with possible integration of local bus services to serve the town and catchment area.

SMAP-15 It is Council policy to support and facilitate the operation of existing bus services and to facilitate the provisions of improved facilities and services for bus users in towns and villages including the provision of set down areas for coaches and bus shelters at all bus stops where feasible.

SMAP-16 It is Council policy to support the Local Link Rural Transport Programme 2018-2022 in County Offaly and subsequent programmes.

- e) As part of the response to the OPR Submission CDP/D/172; **Appendix 1: Table identifying policies, objectives and development management standards in the Plan that promote a transport modal shift** details the strong measures, policies and objectives towards achieving targets in the modal shift.

SMAP-08 It is Council policy to prioritise the need for people to be physically active in their daily lives; to improve permeability and to promote walking and cycling in the design of streets and public spaces as an alternative and sustainable mode of transport; and to support safer walking and cycling routes to schools under the Green Schools Initiative subject to appropriate environmental assessments, including Habitats Directive Assessment.

SMAP-09 It is Council policy to support the pedestrianisation and permeability of town and village centres where appropriate, in order to create accessible, attractive, vibrant and safe places. In doing this the Council will strive to support the;

- (vii) Provision of 'cycle friendly' towns and villages;
- (viii) Provision of key cycling routes through larger towns;
- (ix) Potential for a walking and cycling route around Tullamore incorporating the Grand Canal, the banks of the Tullamore river and inside the barriers of the Tullamore by-pass.

Offaly County Council in conjunction with Waterways Ireland seek to complete the construction of the Grand Canal Greenway in Offaly over the lifetime of the plan, while also progressing extensive plans for the development of the Offaly, Midlands Cycling Destination.

TRO-15 It is an objective of the Council to implement the '*Feasibility Study on the Development of a Major Cycling Destination in the Midlands of Ireland*' (2016) in conjunction with Bord na Móna, Coillte, Waterways Ireland, the Office of Public Works and the Product Development Group, in accordance with the Offaly Tourism Statement of Strategy 2017-2022.

The development of Local Transport Plan will be made in tandem with the forthcoming Local Area Plan (LAP) for Tullamore:

SMAO-02 It is an objective of the Council to prepare a Local Transport Plan for the Key Town of Tullamore in conjunction with the National Transport Authority.

CSO-04 It is an objective of the Council to make Local Area Plans for Tullamore and Birr. During the transition period between adoption of this County Development Plan and the adoption of the Local Area Plans for Tullamore and Birr, the objectives (including zoning objectives), policies and standards in this County Development Plan shall apply to Tullamore and Birr.

- f) Renewable energy – see response to (a) above. In addition, the following policies in the draft Plan relate:

CAEP-15 It is Council policy to investigate the feasibility of an energy park with educational and amenity facilities relating to any future development of renewable energy projects of significant scale that comes forward over the lifetime of this Plan. Any development of renewable energy on

cutaway bog will be required to provide increased opportunities for amenity access and educational facilities.

CAEP-21 It is Council policy to actively promote and support the ‘Just Transition’ and the EU Programme for Coal Regions in Transition, in particular to support communities which have been dependent on the peat industry for decades.

- g) The establishment of third level education in Tullamore is strongly supported in the Draft Plan as follows;

It is noted in **Table 2.3: Summary of criteria utilised to develop the settlement hierarchy for Offaly 2021-2027** of the draft Plan, that the *Midland Regional Hospital Tullamore is a Teaching/University hospital for a number of institutions including University College Dublin and University of Limerick, acting as a strong economic driver for the town and also providing a springboard for further linkages to existing and new med-tech businesses and research facilities.*

In the context of the Regional Spatial and Economic Strategy, Regional Policy Objective RPO 4.70: *To examine the need for complementary third level outreach educational facilities at Tullamore, particularly with regard to support for Tullamore Regional Hospital and where appropriate, its continued development as a Teaching/University Hospital, together with potential for linkages to existing and new med-tech businesses and research facilities’.*

It is deemed appropriate to allow for student accommodation / residences as part of an overall Masterplan strategy for Opportunity Site No. 9 based on and in conjunction with a third level campus expansion within that opportunity site.

The following sections and policies from the draft Plan are of relevance:

9.7 Other Education/Skills Training/Third Level:

The Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-31 states that by 2031 there will be a significant increase in the number of people in the 15-24 years’ age cohort which will lead to greater demand for third level education. The Council considers that Offaly has the potential to accommodate multiple campuses based on its sectoral strengths in areas such as food, energy, biodiversity, pharma and medtech, engineering and advanced manufacturing. Tullamore can provide complementary third level outreach educational facilities supporting the Midland Regional Hospital and its continued development as a Teaching/University Hospital. There also exists an opportunity to develop a centre in the county for exploring/evaluating new technologies in energy provision with Research and Development components based on the expertise available in the Athlone Institute of Technology (AIT), University of Limerick (UL) and Maynooth University nexus.

SICCDP-35 It is Council policy to support the designation of the Midland Regional Hospital Tullamore as a major trauma centre, its continued development as a ‘teaching’ hospital and the potential of a ‘regional’ hospice at this location.

ENTP-22 It is Council policy to encourage and establish links between County Offaly, Maynooth University, Trinity College Dublin, University of Limerick, Athlone Institute of Technology and Cork Institute of Technology and other higher level colleges as appropriate, which will improve the skills base/education of inhabitants within County Offaly.

ENTP-23 It is Council policy to encourage third level education in County Offaly through the provision of outreach / campus facilities for the accommodation of courses.

ENTP-25 It is Council policy to support the examination of a need for complementary third level outreach facilities in Tullamore, particularly with regard to support for Midland Regional Hospital Tullamore and where appropriate, its continued development as a Teaching / University Hospital, together with potential for linkages to existing and new med-tech businesses and research facilities.

h) Under Chapter 5 'Economic Development Strategy' the Council recognises that access to quality high speed broadband is essential for economic growth, sustainable development (by facilitating remote working and reducing long distance commuting), social inclusion and an enhanced quality of life for all. The following relevant policies and objectives are contained in the draft Plan.

ENTP-19 It is Council policy to support remote working opportunities from home and innovative designated hub/ co-working spaces, in the interests of mitigating long commuting times.

ENTP-47 It is Council policy to support and facilitate the delivery of the National Broadband Plan and the Offaly Digital Strategy as a means of developing further opportunities for enterprise, employment, education, innovation and skills development.

ENTO-14 It is an objective of the Council to work with government agencies and telecommunication providers to facilitate the delivery of high speed broadband to all premises in Offaly.

ENTO-17 It is an objective of the Council to avail of funding opportunities for the provision of Wi-Fi and broadband in the county to support economic development and social inclusion.

In Volume 2 of the Draft Plan various town plans such as Clara, Ferbane and Banagher include objectives for incubator units and digital hubs at Opportunity Sites to facilitate remote working and creative spaces, to support home based employment, and non- commuting.

No change to the draft Plan is recommended.

- i) As a result of the Office of the Planning Regulator submission CDP/D/172 (CE response v) Clara and Banagher are identified as smaller towns in the settlement hierarchy and are defined as follows; *the towns have a local service and employment function. There is a need to promote regeneration and revitalisation of towns and support local enterprise and employment opportunities to ensure their viability as service centres for the surrounding rural areas. Those in proximity to the larger urban centres have experienced significant growth and urban generated pressures and require the levels of growth to be managed and to ensure that there is a requisite service level for the existing population.*
- j) In general, in relation to the Opportunity Sites these sites were chosen because of their prominence and underutilisation. In addition to promoting local economic growth, it is considered that their redevelopment would contribute greatly to the renewal, enhancement and regeneration of the towns and villages in which they are located. These sites also provide the greatest potential for development and consolidation. Regeneration lands as defined in the Urban Regeneration and Housing Act 2015 (as amended) include these Opportunity sites.

Opportunity site boundaries **have not been identified definitively and can be added to**, to provide for logical site boundaries or the inclusion of other potential Opportunity Sites. Some of the sites may be owned by different parties and would require an element of site assembly for a coherent development strategy to progress. This approach to re-development is encouraged over a piecemeal approach.

- k) The Tullamore waste water treatment plant has capacity and was designed for this purpose and is currently operating at a low level of intake in terms of sludge treatment.
- l) Noted. Data Centres are addressed in the draft Plan as follows:

Section 3.7:

It is Government Policy as set out in the National Planning Framework and the Government Statement on The Role of Data Centres in Ireland to promote Ireland as a sustainable international destination for Information Communications Technology (ICT) infrastructure such as Data Centres. To date, some of the world's best known companies including Microsoft, Google, IBM and Amazon AWS have chosen Ireland as the location for their European data centre footprint and up to now this growth has largely been concentrated in and around Dublin city. Committed expansions and expected growth in the ICT sector in Dublin has created significant demand for more data centres which in turn has increased the demand for renewable energy to facilitate this growth. Increasingly, counties in the midlands and west are seen as attractive locations for data centres with cheap and extensive land, secure energy suppliers and plenty of cooling wind. Offaly County Council acknowledges that data centres contribute to job creation during construction, maintenance and from associated areas such as research and development, data analytics, customer service, technical support, marketing and sales. Data centres generally need to be located in areas where there exists a significant and sustainable electricity supply, high powered fibre optic cables, good accessibility, large land banks that are easily developable with future expansion possibilities and which offers good security. In addition, the Council is mindful that Data Centres should avoid sensitive landscapes and environments as outlined in Chapter 4 Biodiversity and Landscape.

The following are policies that feature in the Climate chapter and Economic chapter of the draft Plan:

CAEP-39 It is Council policy that any application for a data centre shall take account of the cumulative impact of the proposed connections of the data centre with electricity transmission, renewable energy and broadband infrastructure in the area.

CAEP-38 It is Council policy to consider applications for proposed data centres in County Offaly in line with the following criteria;

- Accessibility/ease of connection to power;
- Availability of renewable energy to power proposed data centre;
- Availability of high powered fibre optic infrastructure;
- Transport/road accessibility;
- Compatibility of surrounding land uses/zoning;
- Avoidance of designated sites; and
- Availability of significant land banks, minimum of circa 50 acres in size.

ENTO-13 It is an objective of the Council to support the national objective to promote Ireland as a sustainable international destination for Information and Communications Technology (ICT) infrastructures such as data centres and associated economic activities at appropriate locations. In this regard, the Council will support the provision of data centres at appropriate locations in the county subject to appropriate environmental assessment and the planning process and the criteria set out in Policies CAEP-38 and CAEP-39 in Chapter 3 of this Plan.

RDO-05 It is an objective of the Council to support the longer-term strategic planning for industrial peatland areas, which should include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure including workshops, office buildings and industrial sites, which addresses environmental, economic and social issues including employment and replacement enterprise reflecting the current transition from employment based around peat extraction. Examples of after use and re-purposing of workshops and production facilities could include outreach training centres, gravel extraction, bike-hire facilities, enterprise space / co-working facilities, aquaculture, birch water harvesting, herb growing, resource management / recycling centre, climate change mitigation (such as through renewable energy, carbon sink, data centres, battery energy storage, afforestation including native woodland, a Green Energy Hub, flood management), and tourism (such as through peatways, recreational forestry, wilderness, eco-tourism based on biodiversity, and a designation of a National Peatlands Heritage Park).

Ref: CDP/D/103

Person / Body:

Laois Offaly Social Democrats

Summary of submission / observation:

This submission;

- a) Requests that the Council make a commitment for the duration of the plan to abolish the 100% refund on rates for commercial properties in an attempt to bring empty commercial properties back into use and where a planning application is received for the building of a new property that the Council possibly through LEO investigate whether a suitable empty premises already exist within the county.
- b) States that accommodation for the elderly be provided similar to that of McAuley Place in Naas and shows Inchmore House in Clara as a possible location;
- c) Supports rewilding and the planting of wildflower gardens both on roundabouts and “floating islands”;
- d) Would like to see the multi-storey car park on Main Street in Tullamore brought back into use in order to encourage shopping within the town;
- e) Calls upon Offaly County Council to declare a Climate Emergency within the framework of the finalised county development plan. The submission states that Offaly can pursue a clear pathway towards carbon neutrality by restoring the existing cutaway bogs to become net carbon sinks, renewable energy expansion, creation of additional renewable energy and forestry industries, community-led renewable energy projects, increased investment within electric vehicle infrastructure, district heating initiatives and the establishment of a specialised higher education institute specialising in renewable energy and hydrogen power technologies;

- f) States that the county development plan should contain a commitment to engage with and become a member of 'CDP' (stands for the organisation's name Carbon Disclose Project), the world's leading non-profit organisation who engage with companies, regions and state in establishing pathways through which they can significantly reduce their carbon emissions, thereby reaching carbon neutrality;
- g) States that the county development plan should contain a commitment to establish the Offaly Climate and Sustainability Committee (OCSC) involving the council, local government, industry leaders, independent experts and local citizens to shape, renew and enhances the counties climate and energy policies;
- h) Actively welcomes the Council's assessment of wind energy and look forward to the future establishment of further wind farms across the county, provided that appropriate public consultation and distancing from existing residential homes are maintained. The submission states that all proposed wind turbines should be fitted with wildlife sensory technology; to protect migratory birds;
- i) Welcomes the inclusion of solar energy within the Draft Plan especially so given the geographical advantages Offaly has, namely its relatively low lying topography and its average sunshine hours. States that all social and housing schemes should have micro generating solar panels and that the Council should engage with SEAI and other government agencies to ensure all public buildings are powered by renewable energy sources;
- j) States that Offaly is particularly well suited to the development of scalable municipal heating systems via the exploitation of the county's natural availability of subsurface geothermal energy and recommends that the Council commence a feasibility study on the potential of developing district heating projects across the towns of Tullamore, Birr and Edenderry;
- k) Encourages the location of an additional battery storage facility to be considered on the grounds of Bord na Móna's existing Derrygreenagh facility on the Offaly Westmeath border north of Rhode;
- l) Calls for the Council to require energy intensive data centres if granted within the county to be powered entirely by purchased renewable energy or be in a position to generate its own renewable energies within the immediate vicinity of the data centre;
- m) States that the forestry industry should be supported through whatever means necessary having regard to its significant benefits including the capture of carbon emissions, increased biodiversity and positive psychological benefits. The submission also refers to the idea of urban miniature forests on brownfield sites;
- n) Expresses concerns that the overall focus on peatlands may be directed towards replacing one industrial landscape with another and that carbon sequestration and the rewilding of peatlands is at its most effective when landscapes remain in a natural state. The submission states that there should be a focus on establishing a strategic overview commission with Bord na Móna and other stakeholders in this regard;
- o) Calls upon the Council to establish a domestic flood defence warning system which could be extended to other Councils;
- p) Recommends that the Council develop a county transportation strategy with a primary goal to reduce the level of carbon emissions from transportation within the county;
- q) Refers to the tourism potential of "Experience Tourism" such as outdoor pursuits (hiking, mountain biking etc.) to festivals and events;
- r) Encourage the Council to consider the feasibility of establishing wellness ways along stretches of the Grand Canal, especially in towns such as Edenderry, Daingean, Tullamore, Pollagh and Shannonbridge;
- s) States that a series of inclusive activities celebrating the diversity of Offaly's present population would help harbour greater feelings of community and social togetherness;

- t) Supports a change of zoning for the lands known as 'The Esso Pitch' on Wilmer Road in Birr from its present zoning as Open Space to Community/Educational to allow the delivery of a Primary Care Centre.

CE Response:

- a) Noted. No further action required. Issues relating to commercial rates are not in within the remit of the Development Plan;
- b) Noted. No further action required. Chapter 2 of the Draft Plan contains policies to ensure that groups with special needs such as older people in accordance with the Age Friendly Strategy for Offaly 2018-2021 and any subsequent editions are accommodated (HP-02) and that the special requirements of older persons are developed in convenient, easily accessible and permeable locations (HP-07).
- c) Noted. No further action required as issue covered under the updated Policy BLP-30 'It is the Council policy to support the aims and objectives of the All Ireland Pollinator Plan by delivering appropriate management actions as set out in their guidance documents' (as amended in response to submission 152 by the Department of TCAGSM).
- d) Noted. No further action required. This is not an issue for the Development Plan;
- e) Noted. No further action required. It is noted that Dáil Eireann in May 2019 declared a Climate and Biodiversity Emergency. The Draft Plan in its numerous policies and objectivities recognise the importance of Climate Action and the need to prevent the loss of biodiversity.
- f) Noted. No further action required. The Draft Plan in its numerous policies and objectivities recognise the importance of Climate Action and sets out a framework to achieve transition to a competitive, low carbon, climate resilient and environmentally sustainable economy.
- g) Noted. No further action required. The Draft Plan in its numerous policies and objectivities recognise the importance of Climate Action and sets out a framework to achieve transition to a competitive, low carbon, climate resilient and environmentally sustainable economy.
- h) Noted. No further action required. DMS-107 sets out that the Council will have regard to the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines in this regard and that the impact on nature conservation and ecology will be considered by the Planning Authority in considering planning applications.
- i) Noted. No further action required. Under Policy HP-06 in Chapter 2, it is Council policy to ensure that new social and affordable housing developments are energy efficient whilst under under Policy CAEP-04 in Chapter 3 it is Council policy to support the Offaly Climate Change Adaptation Strategy which covers energy efficiency in public buildings. Under policy CAEP-43 it is Council policy to support and facilitate the development of an Energy Efficient Building Centre of Excellence in East Offaly.
- j) Noted. No further action required. Chapter 3 of the Draft Plan contains policies to;
- encourage and facilitate the production of energy from renewable sources, such as geothermal subject to proper planning and environmental considerations (CAEP-22);
 - facilitate large and smaller scale geothermal energy generating developments both standalone and in conjunction with other renewable energy projects, subject to the proper planning and sustainable development of the area and consideration of environmental and ecological sensitivities (CAEP-27); and
 - promote the use of geothermal heat pumps for space heating and cooling as well as water heating in domestic, commercial and recreational buildings subject to the protection of water quality and any other relevant considerations (CAEP-28).
- k) Noted. No further action required. Policy CAEP-03 promotes the use of efficient energy storage systems and infrastructure that supports energy efficiency and reusable energy system optimization, in accordance with proper planning and sustainable development.

- l) Noted. No further action required. Policy CAEP-38 outlines the criteria under which the Council considers planning application for data centres; one of which is 'Availability of renewable energy to power proposed data centre';
- m) Noted. The Draft Plan contains the following supportive policies relating to forestry;

CAEP-61 It is Council policy to promote forestry development of appropriate scale and character whilst ensuring that the development does not have a negative visual impact on the countryside or cause pollution or degradation to wildlife habitats, natural waters or European designated sites.

CAEP-12 It is Council policy to support the enhancement of carbon sinks such as peatlands, forestry, and permanent grasslands, with consideration of ~~afforestation on cut away peatlands~~ **re-wetting and restoration of cut away peatlands, where appropriate.** (the amended text is proposed to be inserted in response to submission CDP/D/152 by the Department of TCAGSM).

Table 3.1 of the draft Plan which lists decarbonisation projects includes: 'Create or enhance delivery of carbon sinks, for example, wetlands, bogs, forestry, permanent grassland'.

The following policy and objective in the draft Plan addresses the association of forestry and its benefits such as tourism / recreation / environmental value:

TRP-03 It is Council policy to co-operate with strategic partners such as Bord na Móna, National Parks and Wildlife Service and Coillte on the identification of land use strategies for appropriate areas of peatland and forestry within the county focusing on the tourism, environmental and heritage value of these areas.

TRO-09 It is an objective of the Council to facilitate the development of a tourism resource using cutaway peatlands in conjunction with Bord na Móna and Fáilte Ireland, subject to environmental considerations and nature designations for example, recreational forestry, outdoor pursuits, peatways on the network of bogs and industrial railways and a designation of a National Peatlands Heritage Park.

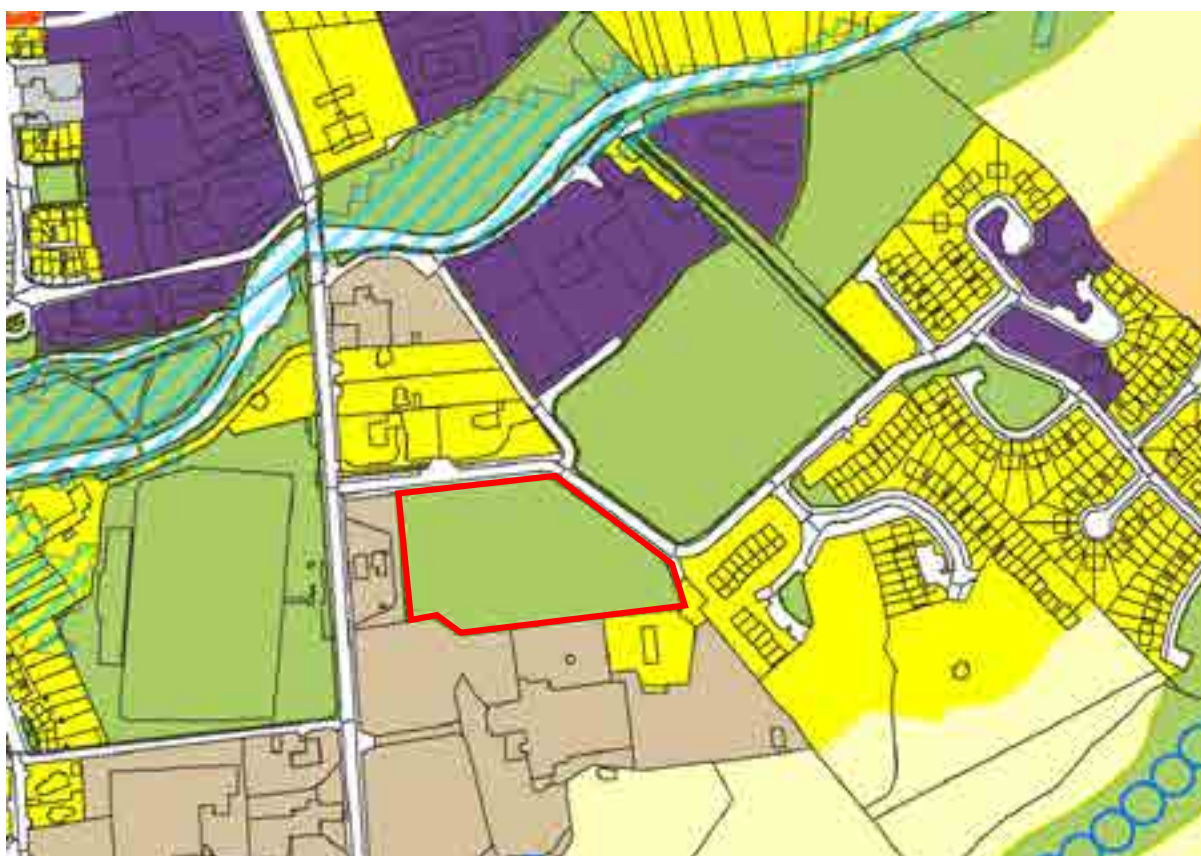
Section 4.9 of the draft Plan states the functions of forestry. It is proposed to insert the red text in response to the positive psychological benefits referred to in the submission:

'Trees, forestry and hedgerows make a valuable contribution to the landscape and visual amenity of County Offaly and provide wider environmental benefits that include carbon storage. Trees, either individually, as specimen trees, or in groups also make an important contribution to the landscape of many of the country house demesnes throughout the county. They perform many functions such as shelter from wind, act as a natural barrier, absorb pollutants, produce oxygen, **contribute to wellness** and provide a biodiversity function in terms of provision of habitat and food sources. Hedgerows, in many instances double hedgerows, often form townland boundaries and as such are an important historic resource. These hedgerows also act as wildlife corridors'.

- n) Noted. It proposed to include the following objective in Chapter 3; **"It is an objective of the Council to ensure that renewable energy projects located on peatlands or in close proximity to peatlands do not negatively impact on any rehabilitation measures including enhanced rehabilitation measures (i.e. drain blocking and rewetting)"** while also adding an extra criteria to DMS 108 in Chapter 13 **"consideration of existing and future rehabilitation measures including enhanced rehabilitation measures (i.e. drain blocking and rewetting)"**
- o) Noted. No further action proposed, this is an operational issue for the Office of Public Works (OPW) the lead organisation for flood risk management in Ireland. The Draft Plan and in

particular the Strategic Flood Risk Assessment (SFRA) facilitates the appropriate zoning of areas that are at elevated risk of flooding and the integration of flood risk management provisions into Development Plans.

- p) Noted. No further action proposed. Please see the OPR submission ref. CDP/D/172 (b) in this CE Report which addresses modal share as a means to reduce carbon emissions.
- q) Noted. No further action required. I am satisfied with the extensive list of policies and objectives contained in Chapter 6 of the Draft Plan relating to the development of Offaly's tourism experience.
- r) Noted. No further action required. I am satisfied with the range of policies and objectives contained in Chapter 4 Climate Action and Energy and Chapter 6 Tourism and Recreational Development relating to amenity routes, greenways, blueways and peatways.
- s) Noted. No further action required as this is not issue that falls within the remit of the Development Plan.
- t) Noted. While the submission does not contain a map showing the specific site, the subject is in the location shown in the below map. This submission requests a change of zoning for these lands known as 'The Esso Pitch' on Wilmer Road in Birr from its present zoning as Open Space to Community/Educational to allow the delivery of a Primary Care Centre. It should be noted in this regard that An Bord Pleanála (302063-18) and Offaly County Council (Pl. Ref. 17/296) refused permission for a Primary Care Centre on the land recently as the proposed development of a Primary Care Centre would be contrary to the zoning objectives of the Birr Town and Environs Development Plan 2010-2016 (as extended) aimed at promoting open space, sports, recreation and amenity uses at this location.



Policy SICCDP-17 of the Draft Plan is of particular relevance stating that; "It is Council policy to preserve the land use of existing public and private recreation areas, including sports clubs, built leisure facilities and open space areas. In exceptional circumstances, a change of use

may be sought, but must demonstrate that alternative recreational provisions are provided in a suitable location. Further, it is Council policy to identify, where possible and appropriate, sites for possible future extensions of public open space areas and amenities within settlement plans.”

In respect of this site, it is considered that it, along with the adjoining rugby pitches and GAA grounds further west, are important open / green space resources for the town and should be protected as such. It is recommended therefore that the site should remain zoned ‘Open Space and Amenity’ in the Draft Plan.

Ref: CDP/D/108

Person / Body:

Tesco Ireland Ltd.

Summary of submissions / observations:

- a) States that Tesco Ireland is one of the primary convenience retail operators in Offaly and one of the largest private sector employers in the State. Tesco currently operates three stores in the County at Birr, Edenderry and Tullamore.
- b) It is noted that as part of the Draft Plan, the 'Commercial' zoning objective previously set out under both the Birr and Tullamore Town & Environs Development Plans 2010-2016, has been replaced by an 'Enterprise and Employment' zoning objective. While the uses stated as being permitted in principle under this new zoning are generally in line with the previous 'Commercial' zoning, the stated objective of the 'Enterprise and Employment' zoning varies quite considerably from that of the 'Commercial' zoning.
- c) Queries whether an 'Existing Retail', 'Neighbourhood Centre' or a general 'Commercial' zoning objective would be more appropriate to secure the long term viability of these facilities which provide an important local service to neighbourhoods that are likely to expand over the plan period.



CE Response

a) Noted

b) Noted

c) It is considered that Enterprise and Employment is the appropriate land use zoning category, for both Tesco stores at Tullamore and Birr. It is noted that under the Zoning Matrix contained within Chapter 13 of the Draft Plan, shops over 200 m² are open for consideration under the Enterprise and Employment land use zoning. It is therefore not advised to amend this.

CDP/D/118

Person / Body:

Inclusion Ireland

Summary of submissions / observations:

States that Offaly County Council was the first county council to complete the Inclusion Ireland accessibility training and review of services. The project raised awareness of the services provided by Offaly County Council and the successes and challenges experienced by people with intellectual disability in accessing services. Requests that Offaly County Council supports "Offaly County Council Accessibility Project 2020" recommendations in relation to:

- service planning,
- accessible information,
- responsibility for the public sector duty, and
- reporting on progress

in the Offaly County Council Development Plan 2021 -2027.

CE Response

Propose the inclusion of the *Offaly County Council Accessibility Project, 2020* under the local Context table and propose an additional policy as follows in Chapter 9 Social Inclusion, Community and Cultural Development;

'It is Council policy to support 'Offaly County Council Accessibility Project 2020, (and any updated editions) and any key recommendations in relation to the physical environment'.

Ref: CDP/D/159

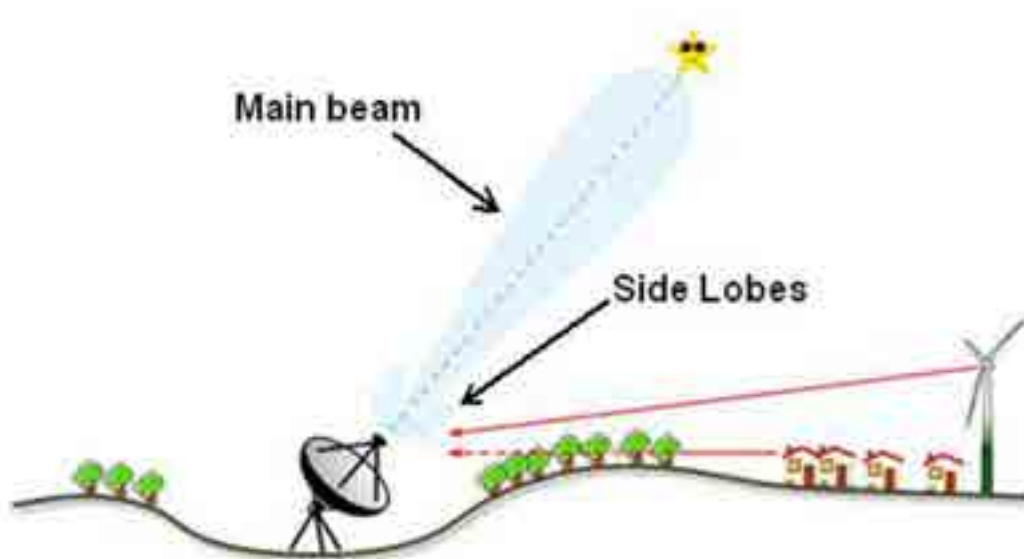
Person / Body:

The I-LOFAR Consortium

Summary of submission / observation:

This submission states that the internationally important Irish Low Frequency Array (I-LOFAR) Radio Observatory at Birr Castle, used to measure radio waves from faint astronomical objects that are at great distances from the earth, is particularly sensitive to wind turbines, photo-voltaic converters, LED lighting regulator systems, high frequency switching electronics and conventional radio transmitters in its vicinity due to:

- Emission of unwanted signals which can enter either the main beam or the sidelobes of the telescope; and
- Reflection from the turbines (blades and structures) of unwanted signals (both terrestrial and astronomical) into either sidelobes or the main beam of the telescope.



The submission requests that no further large wind farm/photo-voltaic installations are allowed within a radius of 5 km from the I-LOFAR station and limitations be placed on the turbine height for wind farms within 10 km along with other restrictions/consultations regarding LED lighting, large power inverters, photo-voltaic installations.

CE Response:

Noted. No further action required.

Neither the Section 28 Wind Energy Guidelines 2006 or the Draft Wind Energy Guidelines 2019 provide for exclusion zones around existing developments that would be impacted by electromagnetic interference as a result of wind farm development. It is therefore not considered appropriate to include a condition requiring an exclusion zone around the I-LOFAR station for wind energy developments as a specific policy or objective in the Plan. As the 2006 Guidelines in Section 7.16 state that *“Where electromagnetic interference is difficult to predict, conditions may require the developer to consult with the service provider concerned and undertake remedial works to rectify any interference caused”*, it is considered appropriate to add in a requirement in Development Management Standard 109 for Windfarms to take account of potential impacts of the proposed development on Radio Observatories and broadcast communication and to include proposed mitigation measures in this regard. Similarly, in relation to solar farms and DMS 110, it is proposed to add in a similar requirement.

DMS-109 Wind Farms

“When assessing planning applications for wind energy developments the Council will have regard to;

- the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made; and
- the Wind Energy Strategy Designations Map from the County Wind Energy Strategy showing areas identified as ‘Areas Open for Consideration for Wind Energy Developments’ and ‘Areas not deemed suitable for Wind Energy Developments’, and specific policy for wind development in these areas as outlined in Section 8 of the County Wind Energy Strategy.

In addition to the above, the following local considerations will be taken into account by the Council in relation to any planning application;

- Impact on the visual amenities of the area;
- Impact on the residential amenities of the area;
- Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape;
- Visual impact of the proposal with respect to protected views, scenic routes and designated scenic landscapes;
- Impact on nature conservation, ecology, soil, hydrology, groundwater, archaeology, built heritage and public rights of way;
- Impact on ground conditions and geology;
- Consideration of falling distance plus an additional flashover distance from wind turbines to overhead transmission lines;
- Impact of development on the road network in the area;
- **Impact of the development on radio observatories and broadcast communication in the area;** and
- Impact on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region), shadow flicker and air quality.

This list is not exhaustive and the Council may consider other requirements contained in the chapter on a case by case basis with planning applications should the need arise. **Where impacts are predicted to arise as a result of the development proposed, suitably detailed mitigation measures shall be proposed.”**

DMS-110 Solar Farms

“The Council will consider the following factors in assessing a planning application for a solar farm;

- The reuse of previously developed land such as brownfield land, contaminated land or industrial land and non-productive agricultural land in preference to productive agricultural land;
- The proximity of the proposal to the electricity infrastructure such as substations and indicative proposals to connect to existing or proposed grid connections;
- The effect of glint and glare on landscapes, traffic and aircraft safety;
- The extent to which there may be additional impacts if solar arrays follow the daily movement of the sun;
- The need for, and impact of, security measures such as lights and fencing;
- The visual impact of a proposal on heritage assets, designated sites and key views and prospects identified in Chapter 4 of the Plan;
- The potential impact on the ecological characteristics and features of the site and its sensitivity to the proposed changes arising from the construction, operation and decommissioning stages of a development. On a proposed site where a significant level of ecological impact is predicted an Ecological Management Plan may be used to mitigate against the predicted impact and/or a Natura Impact Statement if applicable;
- The potential to mitigate landscape and visual impacts through appropriate siting, design and screening with native hedges;
- The cumulative impact of the proposal with other ground mounted solar panels and wind turbines in the area;
- An appraisal of the existing roads infrastructure and the potential impact of the proposed development, including traffic numbers and movements during the construction, operation and decommissioning phases of the proposal should be carried out. Evidence of appropriate sight lines at the entrance to the development from public roads shall also be provided;
- Adequate drainage, surface water run-off and flooding mitigation. Where access tracks need to be provided, permeable tracks should be used, and localised SUDs, such as swales and infiltration trenches should be used to control any run off. Sites should be selected and configured to avoid the need to impact on existing drainage systems and watercourses. Culverting existing watercourses/drainage ditches should be avoided unless it is demonstrated that no reasonable alternatives exist and where necessary only temporarily for the construction period. The preparation of an outline Construction Environmental Management Plan setting out key environmental management controls for all phases of the development minimising impacts on existing drainage systems and watercourses may be required.

This list is not exhaustive and the Council may consider other requirements contained in the chapter on a case by case basis with planning applications should the need arise. Where impacts are predicted to arise as a result of the development proposed, suitably detailed mitigation measures shall be proposed.”

[Ref: CDP/D/165](#)

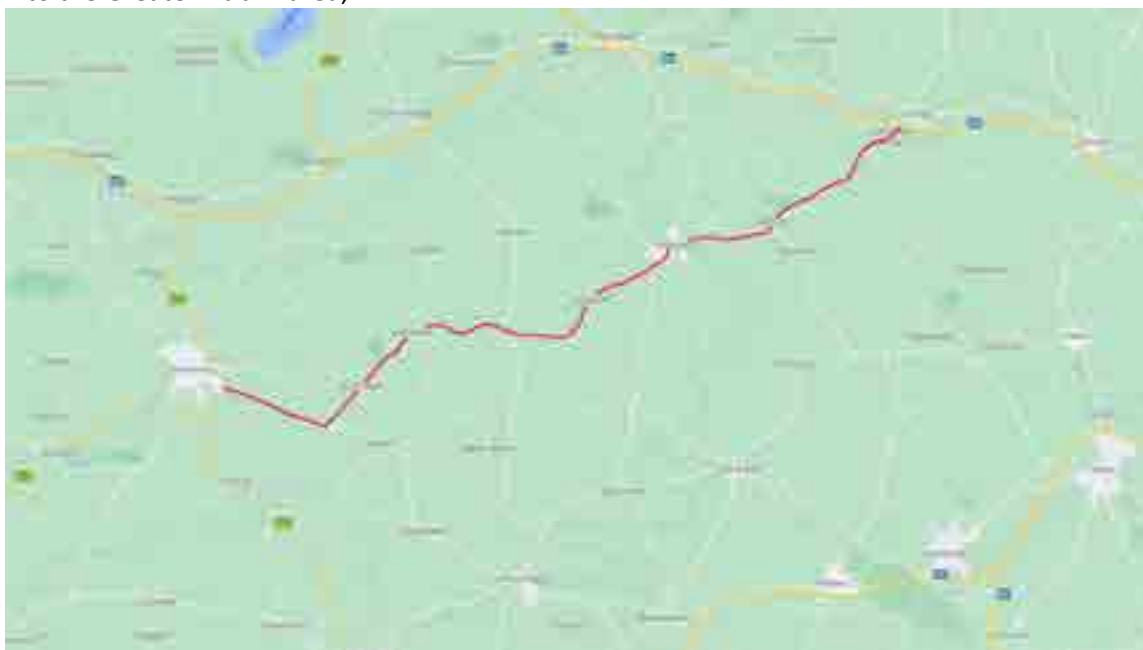
Person / Body:

Mark Mahon, Edenderry Municipal District

Summary of submission / observation:

This submission states that;

- a) It is critical that Offaly County Council advance efforts to seek to reclassify the R402 (and some section of the R420) to National Secondary status as this route functions as a key corridor supporting the development of enterprise within Offaly as well as enabling good quality access to the Greater Dublin area;



- b) Important that minimum land takes for Data Centres are not set too high as the technology is advancing and overly restrictive limits could curtail opportunities over the life of this Plan;
- c) The repurposing of Rhode Business Park into Rhode Green Energy Park provides the opportunity to be an energy leader with an exemplar project with regional/national significance;
- d) It is important that the Council advance plans to continue to enhance broadband to enable Data Centres or other high use users;
- e) It is critical that the Council consider the opportunities which may arise for the Shannon pipeline, and plan economic development and infrastructure accordingly to support these high water intensity industries;
- f) It is important that the long term use of water towers as defacto telecoms masts is examined to ensure that the long term visual amenity of the surrounding landscapes and settlement is not diminished.

CE Response:

- a) It is noted that objective SMAO012 in the draft Plan addresses this, namely:
SMAO-12 It is an objective of the Council to facilitate the continued improvement and upgrading of all roads, should their status be re-graded, under the national roads programme

and / or the Council's road programme. The Council will seek and support the upgrading of the status of regional roads in the midlands which perform functions akin to National Secondary Routes for example the R420 Tullamore to Monasterevin road and the routes that link Tullamore to the M6 at Enfield via Edenderry, namely the R420 and R402.

- b) Noted. It is proposed to amend Policy CAEP-38 in Chapter 3 as follows; "It is Council policy to consider applications for proposed data centres in County Offaly in line with the following criteria;
- (b) Accessibility/ease of connection to power;
 - (c) Availability of renewable energy to power proposed data centre;
 - (d) Availability of high powered fibre optic infrastructure;
 - (e) Transport/road accessibility;
 - (f) Compatibility of surrounding land uses/zoning;
 - (g) Avoidance of designated sites; and
 - (h) Availability of significant landbanks, ~~minimum of circa 50 acres in size.~~"
- c) Noted. Chapter 5 Economic Development contains a separate section on the Rhode Energy Park along with policies and objectives to supports and acknowledges the opportunities that are presented in this regard.
- d) Noted. No further action required. This issue is covered through the following objectives from Chapter 5;
- **ENTO-10** "It is an objective of the Council to work with statutory undertakers to make the most efficient use of infrastructure in the delivery of broadband in the county, particularly encouraging the use of existing telecommunications ducting where it is available".
 - **ENTO-12** "It is an objective of the Council to avail of funding opportunities for the provision of Wi-Fi and broadband in the county to support economic development and social inclusion.
 - **ENTP-30** "It is Council policy to support and facilitate the delivery of the National Broadband Plan and the Offaly Digital Strategy as a means of developing further opportunities for enterprise, employment, education, innovation and skills development."
- e) Noted.
The following objectives from the Draft Plan in relation to the Shannon Water Project should be noted;
- WSO-03** It is an objective of the Council to co-operate with Irish Water in the delivery of the Eastern and Midlands Water Supply Project and to ensure the maximum benefit from this project to County Offaly, in particular with respect to economic development potential and security of supply to Tullamore.
- WSO-04** It is an objective of the Council to engage with Irish Water to examine significant raw water sources which may be made redundant by the Water Supply Project for the Eastern and Midlands Region with a view to reserving and protecting them for future back up or 'windfall' type economic development opportunities where high water use is required.
- It is proposed to amend the wording of WSO-03 as follows to reflect the economic potential and the benefit of security of supply to the whole county (proposed deletion in strikethrough);

WSO-03 It is an objective of the Council to co-operate with Irish Water in the delivery of the Eastern and Midlands Water Supply Project and to ensure the maximum benefit from this project to County Offaly, in particular with respect to economic development potential and security of supply ~~to Tullamore.~~

- f) Noted. No further action required. Policy ENTP-32 from Chapter 5 of the Draft Plan is relevant in this regard stating that; “It is Council policy to achieve a balance between facilitating the provision of telecommunications services in the interests of social and economic progress and protecting residential amenity and environmental quality. The Council will have regard to the Department of the Environment, Community and Local Governments Guidelines on Telecommunications Antennae and Support Structures (and any future editions) and Circular Letter PL07/12 (Telecommunications Antennae and Support Structures) in assessing development proposals.”

[Ref: CDP/D/163](#)

Person / Body:

Mental Health Day Hospital – Our Lady’s Hospital

Summary of submissions / observations:

Welcomes the specific inclusion and naming of the *National Housing Strategy for People with Disabilities*.

‘One of the key objectives is to address the specific housing needs of people with a mental health disability, including through the development of frameworks to facilitate housing in the community, for people with low and medium support needs moving from mental health facilities, in line with good practice.’

Mental health services are seeing an increasing need for single unit accommodation for individuals to live independently, units for shared accommodation and specialist housing in a continued move away from congregated settings.

This includes service users of mental health services currently living in the community. It is important that we continue to work towards more permanent housing solutions for all housing needs identified.

CE Response:

Groups with special housing needs are addressed in various policies and objectives contained in Chapter 2, Core Strategy, Settlement Strategy and Housing Strategy and Chapter 9. Social Inclusion, Community and Cultural Development, as outlined below.

HP-02 It is Council policy to seek to ensure that groups with special housing needs, such as older people (in accordance with the Age Friendly Strategy for Offaly 2018-2021 and any subsequent editions), single person households, persons with physical and / or learning disabilities, the homeless, the travelling community, asylum seekers and refugees, and those in emergency accommodation are accompanied in a way suitable to their specific needs.

HP-07 It is Council policy to ensure that a mixture of house types, tenures and sizes is developed to reasonably match the requirements of different categories of households, and ensure that the special requirements of older persons, persons with disabilities and persons with learning difficulties are developed in convenient, easily accessible and permeable locations.

SICCDP-12 It is Council policy to ensure that all buildings, public open spaces, recreational and amenity areas are accessible for people with disabilities, having regard to;

- Part M of the Building Regulations and the requirement for Disability Access Certificates (DACs)
- Buildings for Everyone: A Universal Design Approach (National Disability Authority, 2012);
- Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities and its companion document Urban Design Manual (DEHLG, 2009); and
- Great Outdoors - A Guide for Accessibility (2018)

SICCDP-14 It is Council Policy to promote Universal Design and well-designed lifetime adaptable and age friendly housing in accordance with best practice and the policies and principles contained in Building for Everyone: A Universal Design Approach (National Disability Authority, 2012) and Sustainable Residential Development in Urban Area: Guidelines for Planning Authorities and its companion document Urban Design Manual (DEHLG, 2009) and particularly in infill and brownfield developments walkable to existing services and facilities.

SICCDP-13 It is Council policy to cater for all levels of disability, through the appropriate mitigation of the built environment for example, through the selection of building materials; the provision of quiet rooms and sensory gardens where appropriate; and in the design of pedestrian facilities for the visually impaired.

SICCDP-14 It is Council Policy to promote Universal Design and well-designed lifetime adaptable and age friendly housing in accordance with best practice and the policies and principles contained in Building for Everyone: A Universal Design Approach (National Disability Authority, 2012) and Sustainable Residential Development in Urban Area: Guidelines for Planning Authorities and its companion document Urban Design Manual (DEHLG, 2009) and particularly in infill and brownfield developments walkable to existing services and facilities.

It is not recommended to change the draft Plan.

[Ref: CDP/D/177](#)

Person / Body:

Durrow High Cross Committee

Summary of submission / observation:

This submission makes the following points regarding the Draft Plan;

- a) The provision of the N52 Tullamore to Kilbeggan link road needs to be progressed as a matter of urgency;
- b) The below items are required for Durrow Abbey and Mónastic Site:
 - Signage
 - Professional information leaflets

- Toilet facilities
 - Site promotion
- c) Durrow Abbey Estate is suitable for walking tracks, cycle tracks, bird watching, and wild plant and grass studies;
 - d) Offaly needs to plan for the fifteenth centenary of the birth of St Colmcille;
 - e) Rights of way at Durrow Abbey and grounds should be protected without difficulty as they are owned by the state;
 - f) The Council must put pressure on the OPW to make Durrow Abbey available for sensitive tourism development in cooperation with Fáilte Ireland, Coillte and National Parks and Wildlife;
 - g) An Taisce has now listed Durrow Abbey House as an endangered structure and funding must be assigned in the next budget to develop all aspects of its heritage.

CE Response:

- a) No further action required. Objective SMAO-09 in Chapter 8 provides for the support of the construction of a road between Tullamore and Kilbeggan (Link Road) taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility.
- b) No further action required. Chapter 6 'Tourism and Recreational Development' includes the following relevant policies / objectives that address this issue:
TRO-05: 'It is an objective of the Council to ensure that the tourist attractions of the county are appropriately signposted and to seek to promote the provision of tourism amenity signs in accordance with the Policy on the Provision of Tourist and Leisure Signage on National Roads (March 2011) and the Spatial Planning and National Roads Guidelines (2012) or any updated editions, and any other relevant Government policy';
TRO-08 'It is an objective of the Council to develop proposals in conjunction with the OPW for Durrow Abbey and Monastic Site to become a key tourist attraction in County Offaly and potentially become a UNESCO World Heritage Site by enhancing the visitor experience through the provision of signage, improved access, and associated infrastructure as appropriate and as resources allow'; and
TRP-13: 'It is Council policy to promote the Monastic sites of County Offaly as tourist attractions in conjunction with Fáilte Ireland, the OPW and relevant stakeholders, in particular Durrow Abbey and Monastic Site and Clonmacnoise Monastic Site with a view to developing proposals to enhance their visitor experience through the provision of signage, improved access in the case of Durrow Monastic Site, and associated infrastructure as appropriate and as resources allow'.
- c) Noted. No further action required.
- d) No further action required. This is not an issue for the Draft Plan. The Councils Heritage Officer should be contacted for assistance in this regard.
- e) No further action. Whilst the Council under Policy TRP-31 in Chapter 6 of the Draft Plan supports the preservation, protection, promotion and improvement, for the common good, existing public rights of way for recreation and tourism purposes, particularly those which provide access to state and semi-state lands, the Council is cognisant that it needs the co-operation of landowners in this instance between the owner of Durrow Abbey and Monastic site, the OPW and the leaseholder, The Arts for Peace Foundation.
- f) No further action required. It is noted that Policy BHP-41 in the Draft Plan supports this item already stating that "It is Council policy to investigate the potential of Durrow Demesne as a public amenity and tourism asset."
- g) No further action required. Specific issues regarding endangerment and restoration of the character of protected structures are governed by Section 59 or Section 60 of the Planning

and Development Act (as amended) which are separate functions of the Planning Authority outside the remit of the Plan.

Ref: CDP/D/180

Person / Body:

Mr. Barry Cowen TD

Summary of submissions / observations:

- a) Requests that professional expertise/ advice from relevantly qualified person/persons be afforded by Offaly County Council to its members.
- b) States that in relation to public consultation and stakeholder engagement, it is trusted that extensive communication/liaising with various stakeholders throughout the county prior to and since the draft Development Plan's publication, has taken place.
- c) Suggests that if the development plan making process points to diverging views on the content of the plan, the emergence of a process where it's the executive's views versus the rest should not be allowed.
- d) Tullamore has too high a concentration of housing proposed north of the canal versus the south of the canal and there should be a more even balance.
- e) The boundary of the Core Retail Area in Tullamore is at odds with recent grants of planning permission for commercial activities.
- f) Requests consideration of the loss of Bord na Móna Rates Base to the local authority (€3.3m or 18.5%) and the potential future losses resulting if Edenderry Power's application for further dual fired burning was to be refused and that it is imperative that the aspirations of the Offaly Task Force set up to respond to implications of Bord na Móna/ESB closures are aligned to the County Development Plan.
- g) In the context of the response to COVID 19 and the emphasis on remote working, requests that provision be made for villages and towns to explore the potential to provide digital and enterprise hubs which support and augment remote and home working.
- h) Commends the Council and recommends the continuation of the Greenway Strategy.
- i) Offaly County Council should redouble its efforts to work with relevant stakeholders in providing, enhancing and growing its offering in the areas of Sport, Culture and the Arts.
- j) In relation to changing agricultural practices, the Development Plan should carefully study and provide for the forthcoming Climate Action Plan and the general scheme of the withdrawal of the United Kingdom from the European Union (Consequent Provisions Bill 2020).
- k) In recent years there has not been any progress in the housing functions of the local authority. Requests that in light of increased discretion for local authorities to provide social housing from €2m to €6m, a one stage rather than four stage approval from the Department of Housing is provided for, which gives greater ownership of housing solutions to members. Requests that this Development Plan commits to early engagement and the subsequent delivery of Government backed Affordable Housing Scheme.

- l) Refers to town and village centres being hollowed out and asks that Offaly Council play a leading role in the re-energising of major populated centres such as Edenderry, Portarlington, Daingean, Clara, Ferbane, Banagher and Birr.
- m) Acknowledges the leading role of the Council in devising a suitable mixed development site encompassing old Tesco/ Granary site in Edenderry.
- n) Notes the recent funding towards a Sports Hub in Daingean which has the potential to expose the potential of the former reformatory property.
- o) Requests a commitment to conclude proposals encompassing off-road shared parking for schools, playing pitches, housing and a public park on lands purchased in Clara.
- p) With respect to Ferbane and its central role previously relating to Bord na Móna/ ESB, it should be central to piloting a community green project such as wind or solar, in co-operation with the Midlands Just Transition team.
- q) With regard to Banagher the Plan should commit to finalise the provision of a digital hub in the vacant property at Liberty Square while focusing on continuing to further develop the marina as a focal point of tourism development.
- r) Together with OPW and Bord Fáilte, Offaly County Council must broaden infrastructure to accommodate visitors to Clonmacnoise while developing better links and provisions to assist enhancing the tourism product for Shannonbridge.
- s) Requests that the County Development Plan prioritises further investment in Birr Technology Centre and for work with the Department of Tourism to further Birr Castle's place in the region's tourism trail.
- t) It should be the remit of Offaly County Council to partner with the Department of Rural Development in ensuring community centres cater for a proper range of local services and activities. They should further partner with Offaly Local Development Company coordinating an audit of presently unused Bord Na Móna / ESB lands and plant in order for Just Transition Team to make recommendations to Government for future uses benefiting the county and region.

CE Response:

- a) The forward planning team is made up of trained professionals. In addition, training is provided by the Office of the Planning Regulator to elected members which all members are invited to in relation to matters associated with proper planning and sustainable development in accordance with section 31Q(1)(b) of the Planning and Development Act 2000 (as amended).
- b) Statutory Consultation as set out in the Planning and Development Act, 2000 (as amended) has been adhered to as set out in Section 2.1 of this CE Report.
- c) The making of the Co. Development Plan will be in accordance with the provisions set out in the Planning and Development Act 2000 (as amended).
- d) The southern part of Tullamore has an infrastructural deficit and will require significant levels of investment by Irish Water and / or private developers in order to service the lands zoned Strategic Residential Reserve, which are primarily located in the Southern Masterplan area of the Tullamore Town and Environs Development Plan 2010-2016 as extended.
- e) The Retail Planning Guidelines (2012) define retail areas as 'that part of a town centre which is primarily devoted to shopping'. Therefore, the core retail area in Tullamore contains the primary retail

streets of the centre where the main concentration of retail activity takes place. In light of this it is not recommended to change the boundary of the core retail area. It is recommended to insert the red text into chapter 7 as follows for clarity purposes:

Extract from Chapter 7 of draft Plan regarding Core Retail Areas:

*'Volume 2 of the Development Plan provides for settlement plans for all settlement areas within Offaly (except where a separate Local Area Plan exists). The core retail area of each settlement area has been delineated to identify clearly that part of a town centre which is primarily devoted to shopping as distinct from the wider town or village centre / mixed use zoning objective. **Core retail areas contain the primary retail streets of a centre where the main concentration of retail activity takes place.** Identifying and delineating core retail areas allows a focused approach for retailing and town / village centre action initiatives as well as the proper application of the sequential approach to retail development'.*

f) There are numerous policies and objectives in the draft Plan addressing the after-use of industrial peatlands and power plants.

Section 5.6.2 in particular acknowledges these concerns and the importance of the Just Transition Progress Report 2020 as follows:

'The Council recognises the importance of cutaway bogs as a major natural and archaeological resource. The Council also recognises the potential for the utilisation of protected peatland areas for tourist, amenity, environmental, educational and research purposes. Bord na Móna is the largest single landowner in County Offaly and owns approximately 27,650ha of the 32,400ha of peatland within the county.

The term 'cutaway' is used to describe the land area left after the major portion of the original peat deposit has been removed or exploited for fuel. This cutaway now presents an opportunity for alternative uses/ rural diversification and to be part of a comprehensive afteruse plan.

Cutaway bogs have potential landuses that can enhance both the employment, renewable energy generation, and tourism sectors of the county as well as providing a potential habitat considering much of the area will return to wilderness and contribute to the green infrastructure network.

A number of the peatlands within the county are protected through European and national designations. The Council will seek to achieve a balance in developing such a valuable land resource whilst also protecting the heritage and environmental value of these areas where required.

The Council notes the closure of ESB's peat fired electricity generating plants at Shannonbridge and Edenderry this decade, and recognises the transition that faces Bord na Móna considering the phased elimination of peat-fired electricity generation. The Council supports the longer-term strategic planning for industrial peatland areas. This should include the preparation of a comprehensive after-use framework plan for the peatlands and related infrastructure, which addresses environmental, economic and social issues including employment and replacement enterprise reflecting the current transition from employment based around peat extraction. Though this is in the interests of reducing Ireland's carbon footprint, it is recognised that Bord na Móna face the issue of accommodating staff in alternative work processes. Offaly County Council support the redeployment of Bord na Móna staff in alternative employment.

The Council acknowledges and is in favour of the re-development and/or expansion of currently used and disused sites such as former ESB power station sites and Bord na Móna works.

The Council supports the efforts of the Midland Transition team to:

- *Pursue funding opportunities and actions to mitigate the impact of the Bord na Móna job losses on the individuals concerned, and the impact on the local and regional economy; and*
- *Position the region to develop alternative forms of employment, attract investment and maximise existing employment opportunities and resources’.*

RDO-05 It is an objective of the Council to support the longer-term strategic planning for industrial peatland areas, which should include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure including workshops, office buildings and industrial sites, which addresses environmental, economic and social issues including employment and replacement enterprise reflecting the current transition from employment based around peat extraction. Examples of after use and re-purposing of workshops and production facilities could include outreach training centres, gravel extraction, bike-hire facilities, enterprise space / co-working facilities, aquaculture, birch water harvesting, herb growing, resource management / recycling centre, climate change mitigation (such as through renewable energy, carbon sink, data centres, battery energy storage, afforestation including native woodland, a Green Energy Hub, flood management), and tourism (such as through peatways, recreational forestry, wilderness, eco-tourism based on biodiversity, and a designation of a National Peatlands Heritage Park).

RDO-06 It is an objective of the Council to support the Midlands Regional Transition Team in developing a ‘Holistic Plan for Just Transition in the Midland Region’ including an inventory of project proposals and actions to support just transition in the Midlands and to assist the region in identifying potential investment needs for inclusion in a programme of support under the new EU Just Transition Fund.

RDO-08 It is an objective of the Council to consider proposals for the potential re-purposing of both Shannonbridge and Edenderry peat powered electricity generating plants, and the appropriate rehabilitation of associated lands.

CAEP-13 It is Council policy to support the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the midlands and adjacent parts of the north west and southern regions, which meets the environmental, economic and social needs of communities in these areas, and also demonstrating leadership in climate change mitigation and land stewardship. The Council recognises that the industrial peatlands in the midlands are a significant resource will transition to after uses ranging from amenity, tourism, biodiversity services, ‘wild areas’, flood management, climate mitigation, energy development, industry, education, conservation and many more.

(Please note the red insertions are changes recommended from other submissions).

g) Under Chapter 5 ‘Economic Development Strategy’ the Council recognises that access to quality high speed broadband is essential for economic growth, sustainable development (by facilitating remote working and reducing long distance commuting), social inclusion and an enhanced quality of life for all. The following relevant policies and objectives are contained in the draft Plan.

ENTP-19 It is Council policy to support remote working opportunities from home and innovative designated hub/ co-working spaces, in the interests of mitigating long commuting times.

ENTP-47 It is Council policy to support and facilitate the delivery of the National Broadband Plan and the Offaly Digital Strategy as a means of developing further opportunities for enterprise, employment, education, innovation and skills development.

ENTO-14 It is an objective of the Council to work with government agencies and telecommunication providers to facilitate the delivery of high speed broadband to all premises in Offaly.

ENTO-17 It is an objective of the Council to avail of funding opportunities for the provision of Wi-Fi and broadband in the county to support economic development and social inclusion.

In Volume 2 of the Draft Plan various town plans such as Clara, Ferbane and Banagher include objectives for Incubator Units and Digital Hubs at Opportunity Sites to facilitate remote working and creative spaces, to support home based employment, and non- commuting.

No change to the draft Plan is recommended.

(h) Noted. Offaly County Council in conjunction with Waterways Ireland seek to complete the construction of the Grand Canal Greenway in Offaly over the lifetime of the plan, while also progressing extensive plans for the development of the Midlands Cycling Destination-Offaly.

TRO-15 It is an objective of the Council to implement the *'Feasibility Study on the Development of a Major Cycling Destination in the Midlands of Ireland'* (2016) in conjunction with Bord na Móna, Coillte, Waterways Ireland, the Office of Public Works and the Product Development Group, in accordance with the Offaly Tourism Statement of Strategy 2017-2022.

(i) Chapter 9 Social Inclusion, Community and Cultural Development contains a number of objectives and policies aimed at supporting and working with sporting organisations and stakeholders involved in community, culture and the arts.

(j) Chapter 3 Climate Action and Energy, contains the following policy which supports the objectives for climate adaptation and mitigation as follows:

CAEP-04 It is Council policy to support and facilitate European and national objectives for climate adaptation and mitigation as detailed in the following documents, taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage);

- Climate Action Plan (2019 and any subsequent versions);
- National Mitigation Plan (2017 and any subsequent versions);
- National Climate Change Adaptation Framework (2018 and any subsequent versions);
- Relevant provisions of any Sectoral Adaptation Plans prepared to comply with the requirements of the Climate Action and Low Carbon Development Act 2015, including those seeking to contribute towards the National Transition Objective, to pursue, and achieve, the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of the year 2050; and

- Offaly Climate Change Adaptation Strategy.

k) In accordance with Part V of the Planning and Development Act 2000 (as amended) the draft Plan incorporates a Housing Strategy which includes measures to address social and affordable housing need within the county. The Housing Section of Offaly County Council actively are addressing social and affordable housing need in accordance with Government policy and Guidelines. A Capital Works Housing Design Team within the Housing Section addresses new build provision. Development must proceed in accordance with the Settlement Strategy and Core Strategy.

l) Chapter 7: Retail and Town Centre Strategy, and Regeneration Chapter in Volume 1 of the CDP is dedicated to Town Centre health and regeneration and supplementary to this the Town Plans in Volume 2 contain specific objectives in relation to opportunity sites, within the respective towns.

m) Noted

n) Noted. The reformatory grounds are identified as an Opportunity Site in the draft Daingean Town Plan.

o) There are commitments contained in the Clara Town Plan, Volume 2 which address this issue.

It is recognised within the **Clara Town Plan, Volume 2, Section 6.1**, that Clara suffers from traffic congestion as a result of the parking of cars on both sides of streets.

The following locations shown on the Clara Settlement Plan Objectives Map may be suitable for off-street car parks within the town centre and on the edge of the town centre;

Possible Location 1: *An off-street car park off Church Street would alleviate existing parking constraints along Church Street and would serve demand generated by the Church during mass times and businesses along Church Street.*

Possible Location 2: *The land to the rear of Main Street and River Street would provide great connectivity and permeability with these streets along with alleviating pressure for parking on Main Street.*

Possible Location 3: *The existing pedestrian bridge across the River Brosna would provide access to River Street and the rest of the Town Centre.*

Further to this, it is in an objective of the Plan to prepare a Traffic Management Plan for Clara Town Centre,

KIO-10 Support the provision of public off-street car parks at the locations shown on Clara Settlement Plan Objectives Map.

p) Please refer to section (f) of this CE Response above in relation to Just Transition.

Also note that the Ferbane Town Plan, which is contained in Volume 2 of the Draft Plan contains a specific objective in relation to Green Energy as follows:

EDO-01 Promote and develop Ferbane Business and Technology Park as:

- A centre for green energy and renewables research and development, manufacturing and bio-energy;
- A location for satellite offices for large multinationals, Small and Medium Enterprises (SMEs) and campus space for third level institutions linked to ongoing research at Ferbane Bog and green energy projects; and

- A centre of excellence for food research, development and production

q) Noted – the following objective relates to the proposal for a digital hub and the Marina development in Banagher.

CECO-07 Support and facilitate the relocation of the library in Banagher to larger premises, and to include provision of community and enterprise space for meetings, digital hub, creative spaces, exhibition spaces and study spaces.

EDO-05 *Support and facilitate new and diverse economic and tourism related uses and development associated with the River Shannon, marina and harbour in Banagher, including the enhancement of mooring, cruising, boat hire, fishing, water sports and other similar activities and amenities.*

CECO-08 *Support further enhancement of amenities, facilities and public realm in the marina area including the land in the vicinity of the Billiard's hall.*

CECO-09 *Encourage the provision of pedestrian linkages between the marina and Main Street.*

r) There are objectives in the Draft Plan Volume 1 & 2 which address the Clonmacnoise Visitor Centre and the aspect of broadening the tourism experience for Shannonbridge, as follows:

TRP-13 It is Council policy to promote the monastic sites of County Offaly as tourist attractions in conjunction with Fáilte Ireland, the OPW and relevant stakeholders, in particular Durrow Abbey and Monastic Site and Clonmacnoise Monastic Site with a view to developing proposals to enhance their visitor experience through the provision of signage, improved access in the case of Durrow Monastic Site, and associated infrastructure as appropriate and as resources allow.

SO5 To explore the provision of a visitor centre in Shannonbridge for Clonmacnoise monastic site and the monastic heritage of the county.

SO6 To make provision for developments that establish Shannonbridge as a visitor base for Clonmacnoise monastic site and as a destination along the proposed Shannon Monastic Greenway and Shannon Blueway as contained in Figure 6.14 of Volume 1 of this County Development Plan and to encourage uses and development that achieve this objective.

SO7 To support the development of camping and camper van infrastructure in the village.

SO9 To support the delivery of the proposed greenway network around Shannonbridge and developing physical linkages to Clonmacnoise.

s) The plan has addressed Birr Technology Centre in the following objectives in Chapter 5 Economic Development, however prioritising investment is not within the remit of the Draft County Development Plan.

ENTP-10 It is Council policy to support leveraging opportunities in big data and data analytics from Irish Low Frequency Array (I-LOFAR), which is the Birr-based Irish station in a European wide network of state of the art radio telescopes used to observe the universe at low frequencies, and in this regard recognise Birr as a technology hub.

ENTO-06 It is an objective of the Council to support leveraging opportunities in big data and data analytics from Irish Low Frequency Array (I-LOFAR), which is the Birr-based Irish station in a European

wide network of state of the art radio telescopes used to observe the universe at low frequencies, and in this regard facilitate the development of Birr as a technology hub.

Birr Castle Gardens and Science Centre is a key component of Offaly's tourism Strategy being one of the Big 6, and is addressed in section 6.5.2 of the Draft Plan. See also Figure 6.2 Offaly's Key Tourist Attractions.

TRP-25 It is Council policy to support Birr's role as a Tourism Destination Town having particular regard to its built heritage including Birr Castle, Gardens and Science Centre, its accessibility and proximity to key tourism destinations including natural amenities, and recreational opportunities including the Slieve Bloom Mountains, Lough Boora Discovery Park and Banagher marina on the River Shannon.

t) Please refer to response to Section (f) above.

[Ref: CDP/D/193](#)

Person / Body:

Darrell Hooper

Summary of submissions / observations:

- a) In order to develop Tullamore as a "Key Town" it is important that a new "Tourism Product" is developed within Tullamore Metropolitan Area and surrounding rural area.
- b) It is suggested that "The Book of Durrow", 100 years older than "The Book of Kells", is marketed as a new tourism product for Tullamore Area.
By using "The Book of Durrow" it would be possible to deliver, for Tullamore, a significant tourism attraction of Offaly's Early Christian Heritage. This could include:
 - The potential to use Bury Quay Tullamore DEW Visitor Centre as an Early Christian Interpretive Centre in addition to showcasing the history of Tullamore and the Grand Canal;
 - The potential to remove pressure from Clonmacnoise;
 - The potential for a Triangle of Early Christian Monastic locations within the vicinity of Tullamore, Durrow, Rahan, and Killeigh; and
 - Community involvement in rural areas would be essential with maybe other alternative heritage sites included (e.g. Castles) and with the possible spinoff of Community Archaeology.
- c) In relation to Taller Buildings for Tullamore, which are addressed under Chapter 7: Retail and Town Centre Strategy, and Regeneration, it is suggested that the buildings either side of Tullamore Dew Visitor Centre should be designated as 6 stories, similar to Texas Site (7.8 Potential Taller Buildings Sites: Texas Site, Tullamore) taking into account of daylight and shadow projection diagrams".

CE Response:

- a) Tullamore's role as a tourism hub and its development as a tourism destination town is strongly supported by the following objective in the draft County Development Plan

TRP-26 It is Council policy to support Tullamore's role as a tourism hub and its development as a Tourism Destination Town having particular regard to its distilling heritage including Tullamore Dew Visitor Centre, its accessibility and proximity to key tourism destinations including natural amenities, and recreational opportunities including the Grand Canal and adjoining greenway, Lough Boora Discovery Park, Slieve Bloom Mountains, Durrow Monastic Site and Clara Bog Visitor Centre.

- b) The Monastic Heritage of County Offaly as a tourist attraction is addressed in Section 6.5 of the Draft County Development Plan and the following policy and objectives relate to Durrow Abbey and Durrow Monastic Site.

TRP-13 It is Council policy to promote the monastic sites of County Offaly as tourist attractions in conjunction with Fáilte Ireland, the OPW and relevant stakeholders, in particular Durrow Abbey and Monastic Site and Clonmacnoise Monastic Site with a view to developing proposals to enhance their visitor experience through the provision of signage, improved access in the case of Durrow Monastic Site, and associated infrastructure as appropriate and as resources allow.

TRO-08 It is an objective of the Council to develop proposals in conjunction with the OPW for Durrow Abbey and Monastic Site to become a key tourist attraction in County Offaly and potentially become a UNESCO World Heritage Site by enhancing the visitor experience through the provision of signage, improved access, and associated infrastructure as appropriate and as resources allow.

Objective TRO-08, in particular, which seeks to develop proposals for Durrow Abbey and Monastic Site to become a key tourist attraction in County Offaly and potentially become a UNESCO World Heritage Site by enhancing the visitor experience would support the concepts for an enhanced Durrow Abbey and Monastic Site offer outlined in this submission.

- c) It is not proposed to have taller buildings on the Bury Quay Waterfront, i.e. either side of Tullamore DEW building as suggested in the submission.

The Texas Site Opportunity Site 2, was identified as a potential site where taller buildings may be permitted dependent on assessment by the Planning Authority of the following documents prepared by a prospective applicant / applicant;

- A masterplan and local planning framework to deal with movement, public realm and design;
- An urban design statement addressing the impacts on the historic built environment;
- A specific design statement on the individual proposal from an architectural perspective;
- A visual impact assessment; and
- Daylight and shadow projection diagrams.

4 Summary of Office of the Planning Regulator Submission

This section examines the submission received by the Office of the Planning Regulator (OPR) by summarising the points raised and addressing them through the CE Responses.

[Ref: CDP/D/172](#)

Person / Body:

Office of the Planning Regulator (OPR)

Summary of submissions / observations:

Climate Action:

- a) Advises the inclusion of an objective to consider a variation of the development plan within a reasonable period of time, or to include such other mechanism, to ensure that the development plan will be consistent with the approach to climate action recommended in the revised Development Plan Guidelines as adopted or any relevant guidelines.
- b) Section 10(2)(n) of the act is a mandatory objective for the promotion of sustainable settlement and transport strategies for urban and rural areas, including the promotion of measures to reduce energy demand and GHG emissions and to adapt to climate change. Provide objectives to achieve evidence-based targets for GHG emissions and energy use reductions e.g. sustainable settlement strategies and sustainable transport strategies for urban and rural areas, with appropriate cross-referencing between related sections / chapters. (CARO may provide assistance). A key policy lever in influencing development patterns and transportation choices is actively delivering significant modal shift. The OPR is not satisfied that Chapter 8 can be considered a sustainable transport strategy in line with section 10(2)(n) as there is a lack of objectives / policies relating to sustainable transport for urban and rural areas. The sustainable transport strategy needs to be informed by existing baseline figures for modal share and set targets for modal change for individual settlements.
- c) Chapter 13 includes conflicting standards i.e. DMS-03 which suggests that 'regard only' has to be had to DMURS. Chapter 13 applies DMURS to residential development only, whereas it applies to all developments which impact on urban roads and streets within the 60kph and 50 kph zones (Observation no. 3 of submission).

Core Strategy:

- d) Requests information on the population growth in the settlements since 2016; which is necessary to inform the balance of population growth that is to take place during the period of the forthcoming County Development Plan.
- e) State the extent of lands to be zoned for residential use and a mixture of residential and other uses and the number of residential units this can accommodate.
- f) State how the zoning proposals will result in development of land taking place on a phased basis, within the life of the plan in accordance with the Department's Guidance Notes on

Core Strategies (this excludes strategic residential reserve). Phasing objectives should promote residential and mixed residential lands on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

- g) The Plan should include zoning objectives for Edenderry and Portarlinton (subject of recently made LAPs) which are consistent with the core strategy.
- h) Seeks removal of one parcel of Enterprise and Employment zoning in Moneygall west of the R490 as it extends the development boundary of Moneygall and would militate against compact growth of the village. Seeks the omission also of a larger parcel of Enterprise and Employment zoning in proximity to the junction of the M7 unless it can be evidence –based for its inclusion or evidence based for a very significantly reduced area.

Settlement Strategy:

- i) The Core Strategy provides for the allocation of growth strongly in favour of Tullamore Key Town, which would account for 52.5% of total population growth in the county over the plan period, and would increase its population by 33% (4,753 persons) over the 2016 baseline. The OPR questions whether this level of growth is sustainable, having regard to the overall growth rate anticipated for EMRA area to 2040 (c. 23.4%) and the limit to the growth of certain settlements imposed under NPO 9 of the NPF.
- j) The OPR queries the appropriateness of the low growth rate of 5% for the Self-Sustaining Towns of Portarlinton and Edenderry compared to the growth rate of 25% for Birr, a Self-Sustaining Growth Town and compared to the growth rates of 16-18% applying to lower tier towns. OPR suggests that a higher level of growth be considered for Edenderry and Portarlinton.
- k) The OPR queries the growth allocation for towns which is higher than for Portarlinton and Edenderry.
- l) In view of the provisions of section 10(2A)(f)(vi) of the Act, the inclusion of settlements of <1500 persons (Daingean, Ferbane and Kilcormac) as towns should be reconsidered.
- m) The population allocation for rural (villages, sraids and open countryside) is considered reasonable and would further increase to circa 15.1% with the addition of smaller towns as advised above.
- n) The proposed very low rate of housing allocation for the open countryside and sraids has not been informed by an evidence based approach in determining the demand for housing. The HNDA does not indicated the need or demand for one-off rural housing over the plan period as requested by NPO 20 which states: *'Project the need for single housing in the countryside through the local authority's Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes'*.

Compact Growth:

- o) A range of occupancy rates appear to have been applied 3.24 to 0.4 without a clear rationale or justification which are excessively high and low.
- p) Core Strategy Table needs to include quantum of lands zoned for a mixture of residential and other uses including mixed use Opportunity Sites (as required under section 10(2A)(d) of the act), and the area of any land already so zoned (as required under section 10(2A)(c) of the act).

Section 10(2A)(d) of the act states: *A core strategy shall in respect of the area in the development plan proposed to be zoned for residential use or a mixture of residential and other uses, provide details of-*

- (i) *The size of the area in hectares,*
- (ii) *How the zoning proposals accord with national policy that development of land shall take place on a phased basis.*

Section 10(2A)(c) of the act states: *A core strategy shall in respect of the area in the development plan already zoned for residential use or a mixture of residential and other uses, provide details of-*

- (i) *The size of the area in hectares, and*
 - (ii) *The proposed number of housing units to be included in the area.*
- q) Include an Infrastructural Assessment Report. As part of the Tiered approach to zoning (TAZ) (as required under NPO 72a, 72b and 72c of NPF), indicate which lands are already serviced or can connect to services, and what lands are to be provided with full services within the life of the plan. The TAZ must comprise a written infrastructural assessment. The core strategy includes numerous reference to the sequential approach, however it does not clearly demonstrate provision for development phasing as required under section 10(2A)(f) (this section relates to the settlement hierarchy) within the plan or the implementation of the sequential approach as recommended in the Development Plan Guidelines.

NPO 72a: Planning authorities will be required to apply a standardised, tiered approach to differentiate between (i) zoned land that is serviced and (ii) zoned land that is serviceable within the life of the plan.

NPO 72b: When considering zoning land for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages.

NPO 72 c: When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development.

- r) In order to ensure the delivery of 30% of all new homes targeted within settlements is provided within their existing built-up footprint, the Plan should define in plan such areas.
- s) Having regard to RPO 3.3 of the RSES and the Guiding Principles under the RSES, the planning authority should:
 - Include a clear objective to implement the Active Land Management Strategy approach that is set out in objective RO-07 of the draft plan (e.g. set out a clear timeline and strategic approach and set measurable targets against which the implementation can be monitored and measured).

RO-07 It is an objective of the Council as per the Urban Regeneration and Housing Act 2015 (as amended), to use site activation measures such as the Vacant Site Levy in specific areas to bring forward vacant or underutilised 'Residential Lands' and 'Regeneration Lands' (which includes Opportunity Sites) into beneficial use where considered necessary for renewal and regeneration.

- t) Requests reference be made to smaller towns and villages making provision for one-off housing including active land management measures.

- u) Consider including objectives for the implementation of a pilot project(s) as examples of what can be achieved going forward as suggested in Appendix 3; Box 2 of the Sustainable Rural Housing Guidelines for Planning Authorities (2005) (see below). Without prejudice this may include land activation measures such as site acquisition, provision of serviced sites and design advice.

Selecting particular small villages and towns to pilot combined local authority and private investment to stimulate attractive high quality individual housing or private site developments to attract population growth and further investment,

- v) Need to address reducing GHG emissions and energy use in relation to the location, layout and design of new development.

Consistency with Section 28 Guidelines:

- w) The OPR is concerned with the inclusion of villages within the definition of 'local rural areas' under policy SSP-21 as it would undermine the national and regional objectives to regenerate and target their decline.
- x) The submission states that the Core Strategy calculations for new residential land use zoning that are set out in the core strategy table of the draft plan are based on an average residential density for each settlement, in a graded manner across the settlement hierarchy. The submission states that the planning authority has applied the lowest density levels allowed per settlement type under the guidelines, except that they have been applied at a gross rather than net density level. Given the strongly rural nature, it is reasonable that the average densities applied are at the lower scale of the density range, however the OPR is not satisfied that the application of the lowest density rate across the four 'large towns' (Tullamore, Birr, Portarlinton, Edenderry) is appropriate or that it has been appropriately justified. A more nuanced, evidence-based approach is required in order to ensure consistency with the guidelines and with the objectives for compact growth under the NPF and RSES. In addition, the calculations fail to take account of the potential for brownfields regeneration, including the significant opportunity sites identified in the four large towns which can be expected to achieve higher densities.
- y) The draft Plan would not appear to take account of the Specific Planning Policy Requirement (SPPR) in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017) because it does not acknowledge the full extent of national policy on renewable energy; it does not indicate how the implementation of the development plan will contribute to realising national targets on renewable energy and climate change mitigation and in particular wind energy production and the potential wind energy resource in megawatts; and it proposes to introduce mandatory setback distances of 2km between wind turbines and the settlement boundary of towns and villages. The SEA does not appear to have considered the likely significant effects on climatic factors, in terms of the constraints on renewable energy projects

arising from the proposed 2km setback. The draft Plan does not include a positive and supportive statement of the importance of wind energy in achieving national targets relating to climate change, together with an objective to ensure security of energy supply; or objectives to secure maximum potential from the wind energy resources. The Wind Energy Strategy does not take account of the strategies of neighbouring planning authorities.

CE Response:

- a) It is proposed to insert the following objective into Chapter 3:
 ‘It is an objective of the Council to consider a variation of the development plan within a reasonable period of time, or to include such other mechanism, as may be appropriate, to ensure that the development plan will be consistent with the approach to climate action recommended in the revised Development Plan Guidelines as adopted or any relevant guidelines’.
- b) A table of measures to reduce energy demand and GHG emissions with targets will be inserted into Chapter 3 with cross referencing to it by objective and cross reference made to it in Chapter 8. It is recommended to rename Chapter 8 from Sustainable Mobility and Accessibility to ‘Sustainable Transport Strategy’ and change any references to the chapter title throughout the plan to the revised title. Another table of modal shift measures will be inserted into Chapter 8 with cross reference to it by an objective.

Modal share policy exists within the draft plan for example:

SMAP-06 It is Council policy to promote more compact development forms that reduce overall demand for private transport and private transport infrastructure and support proposals that encourage modal shift towards sustainable travel modes.

It is recommended to strengthen the plan by inserting the following policies and objective:

‘It is Council policy to allow for the reduction in car parking standards in suitable town centre locations in order to encourage a modal shift away from the private car to more sustainable forms of transport, such as public transport, cycling and walking’.

‘It is an objective of the Council to specify baseline figures and targets for modal share in new / varied Local Area Plans in order to encourage a modal shift away from the private car to more sustainable forms of transport, such as public transport, cycling and walking.’

‘It is Council Policy to continue to work with the relevant transport providers, agencies and stakeholders to facilitate the integration of active travel (walking, cycling) with public transport’.

‘It is an objective of the Council to set modal share targets within the county in cooperation with NTA, CARO, EMRA and other relevant stakeholders and in accordance with any relevant Guidelines that may come into effect’.

It is recommended to make the following change to DMS 103 in order to encourage modal share:

DMS-103 Car Free Developments	In very limited circumstances, The Council may will also consider the development of car-free developments on suitable small-scale sites within or adjacent to town centres which have high levels of public transport accessibility, have convenient and safe access to local shops and community facilities.
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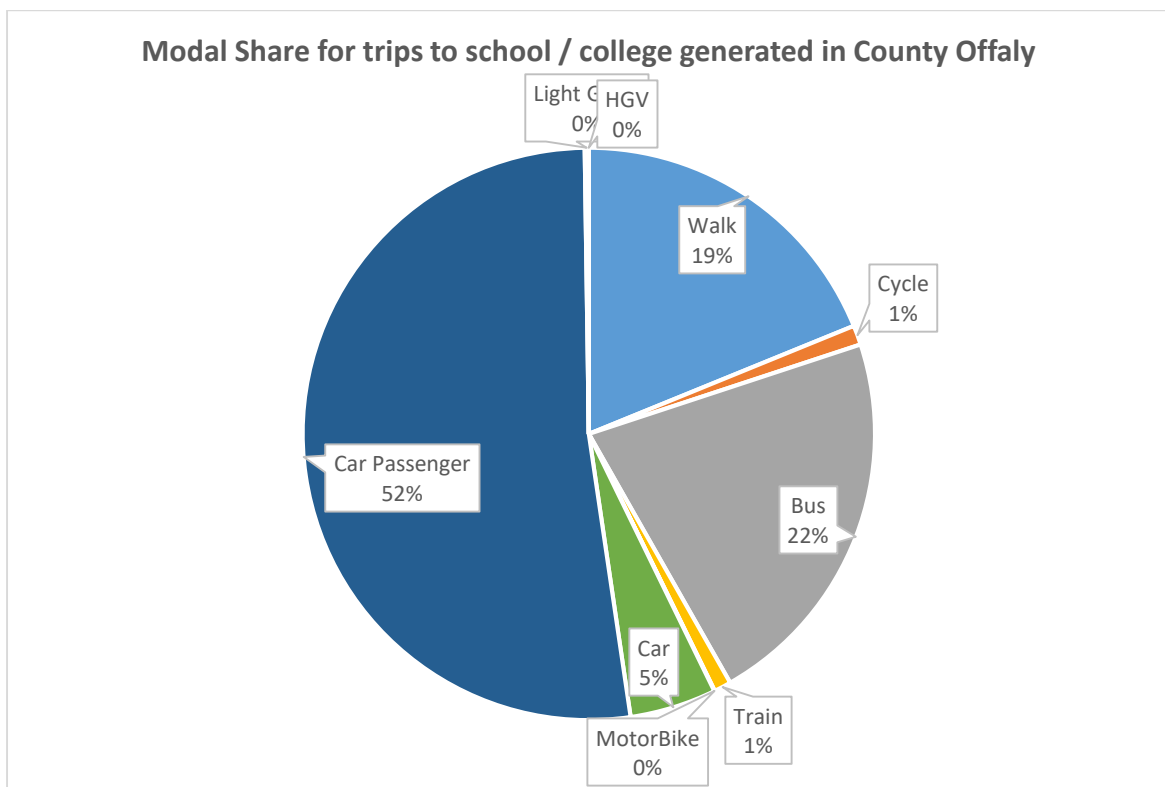
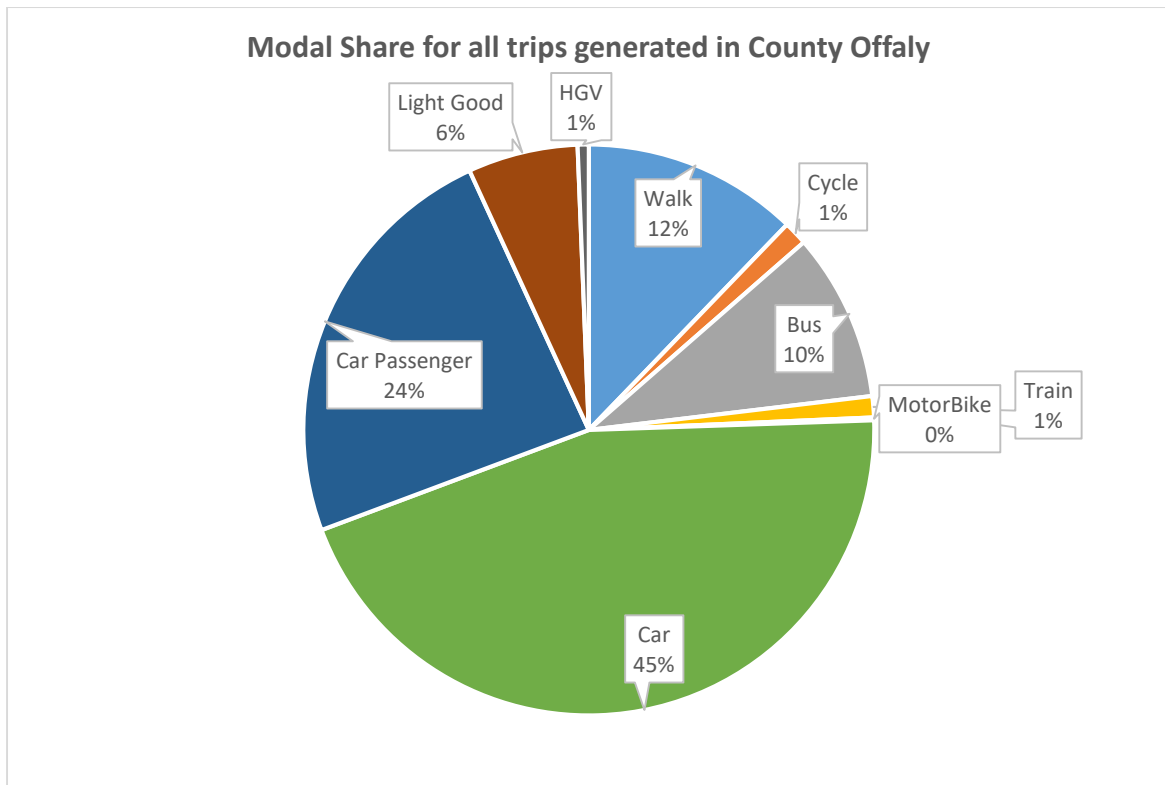
It is recommended to amend DMS 102 as follows to encourage modal share:

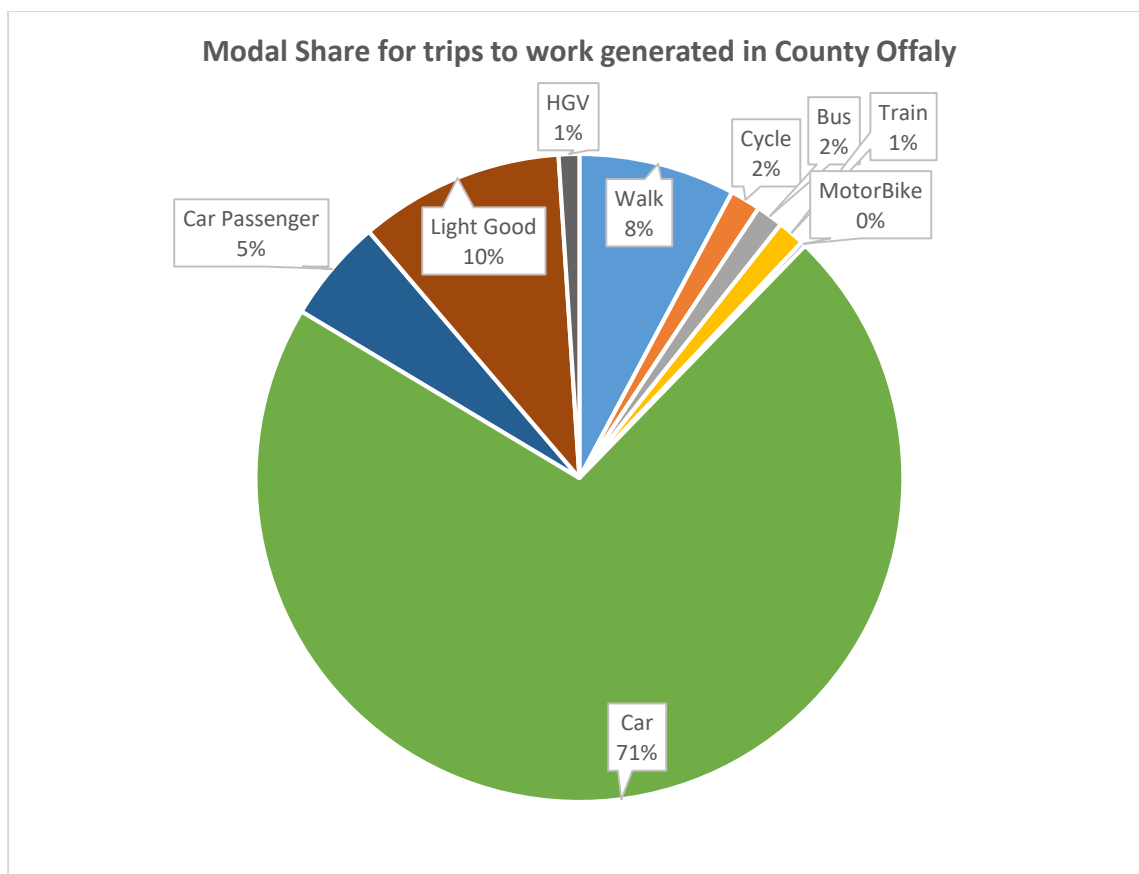
Land Use	Car Parking Spaces Stated Requirement Maximum Car Parking Provision
House (town and village centre location)	1 space per unit in Birr and Tullamore town centres. 1.5 spaces per unit in all other town and village centres. 1 space per unit in town and village centres unless the Planning Authority is satisfied that DMS-103 applies.

It is recommended that the following text be inserted into a new section in Chapter 8 titled **Modal Share**.

A summary of the travel patterns by all (only students and workers combined), students and workers in the County in 2016 is as follows based on the charts below.

- The car is the most popular mode of transport got students and workers combined with 69% of all trips made by car / car passenger (45% and 24% respectively)
- 57% of students are travelling to school by car / car passenger (5% and 52% respectively);
- The car is the dominant mode of transport for workers with 76% travelling to work by car / car passengers (71% and 5% respectively);
- There are a high proportion of students utilising available bus services at 22%;
- There are fewer workers travelling by bus (2%) than there are car sharing (5%);
- Travelling by train is low at 1% for each category namely students and workers;
- Only 1% trips made by students are by cycling. The figure is 2% for workers.





This data confirms and highlights the challenges facing the County with regard to promoting a modal shift away from the car. This Plan will strive to reduce the reliance on the private car by promoting and facilitating more sustainable modes of transport and supporting development in locations that would reduce the need to travel.

Appendix A of this Plan includes a list of policies, objectives and standards within many chapters of the Plan that strive to encourage a higher proportion of modal share for sustainable modes of travel such as walking, cycling, bus and rail.

Each town plan includes a graph depicting its baseline modal share figures with accompanying objectives tailored to its specific needs in an attempt to improve sustainable modal share.

Please see table at end of this Section 4 OPR Submission (titled Appendix 1) which collates policies / objectives / development management standards relating to modal share.

It is recommended that the following changes are made and graphs inserted into the **Banagher** Town Plan.

2.6.1 Movement and Connectivity

The Sustainable Transport Strategy chapter (Chapter 8) in the draft Plan examines county level data on modal split and identifies the need to reduce the reliance on the private car by promoting and facilitating more sustainable modes of transport and supporting development in locations that would reduce the need to travel. The Council seeks to reduce travel demand by integrating land use and transportation and to promote sustainable mobility including walking, cycling and public transport, in order to create a sustainable settlement pattern and environmentally sustainable town. It is also

important that Banagher maintains good transportation linkages to surrounding urban and rural areas, which is a contributing factor to its future growth.

The graphs in Figure 2.15 show the modal share for trips generated at various distances travelled from and within Banagher for work and education. The graphs are based on data derived from Census 2016, and provide a baseline to inform objectives in this Town Plan, which seek to improve the modal share away from private car and in favour of walking, cycling and public transport.

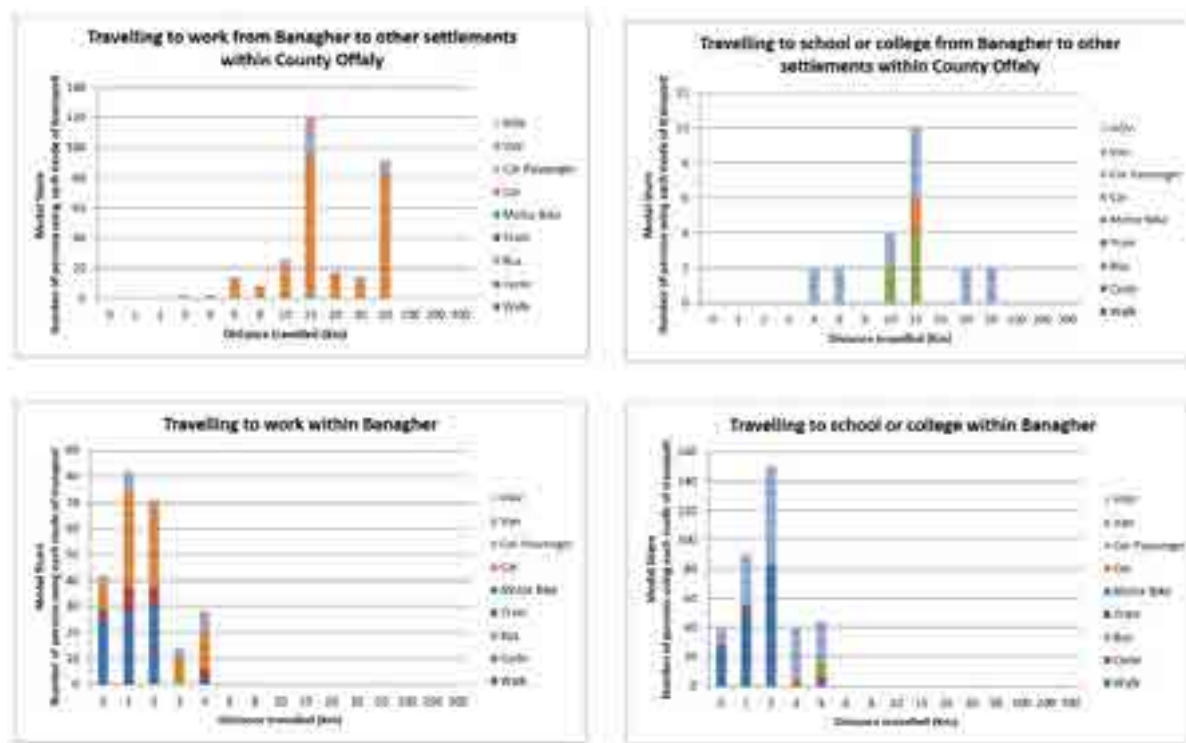


Figure 2.15 Modal Share of trip generation in Banagher

The graphs in Figure 2.15 indicate the following statistics:

- For journeys to work in which the trip is from Banagher to another settlement within County Offaly, 69% of trips are less than 30km with the remaining being less than 50km; 90% of workers travel either by private car or a passenger in a private car; 0% travel by public transport.
- For journeys to work in which the trip starts and ends in Banagher itself, 88% of trips are less than 3km; 50% of workers travel either by private car or a passenger in a private car; 37% walk and 9% cycle.
- For journeys to school/college in which the trip starts and ends in Banagher itself, 88% of trips are less than 3km; 47% of students travel as a passenger in a private car; 45% walk and 3% cycle.

In terms of work related journeys to other settlements within the county, the statistics support a review of local bus services in the county in terms of connections and frequency. In terms of work and schools trips within the town, while the statistics do show a relatively positive modal share in favour of walking, travel by private car still dominates modal share. As such, the data supports provision of / improvements to walking and cycling infrastructure and permeability within the town.

Critical infrastructure necessary to improve the modal share in favour of sustainable modes of transport is further discussed under separate headings below, with identified improvement measures supported by critical infrastructure objectives set out under Section 2.6.5 of this Town Plan.

It is recommended that the following changes are made and graphs inserted into the **Daingean** Town Plan.

2.6.1 Movement and Connectivity

The Sustainable Transport Strategy chapter (Chapter 8) in the draft Plan examines county level data on modal split and identifies the need to reduce the reliance on the private car by promoting and facilitating more sustainable modes of transport and supporting development in locations that would reduce the need to travel. The Council seeks to reduce travel demand by integrating land use and transportation and to promote sustainable mobility including walking, cycling and public transport, in order to create a sustainable settlement pattern and environmentally sustainable town. It is also important that Daingean maintains good transportation linkages to surrounding urban and rural areas, which is a contributing factor to its future growth.

The graphs in Figure 2.9 show the modal share for trips generated at various distances travelled from and within Daingean for work and education. The graphs are based on data derived from Census 2016, and provide a baseline to inform objectives in this Town Plan, which seek to improve the modal share away from private car and in favour of walking, cycling and public transport.

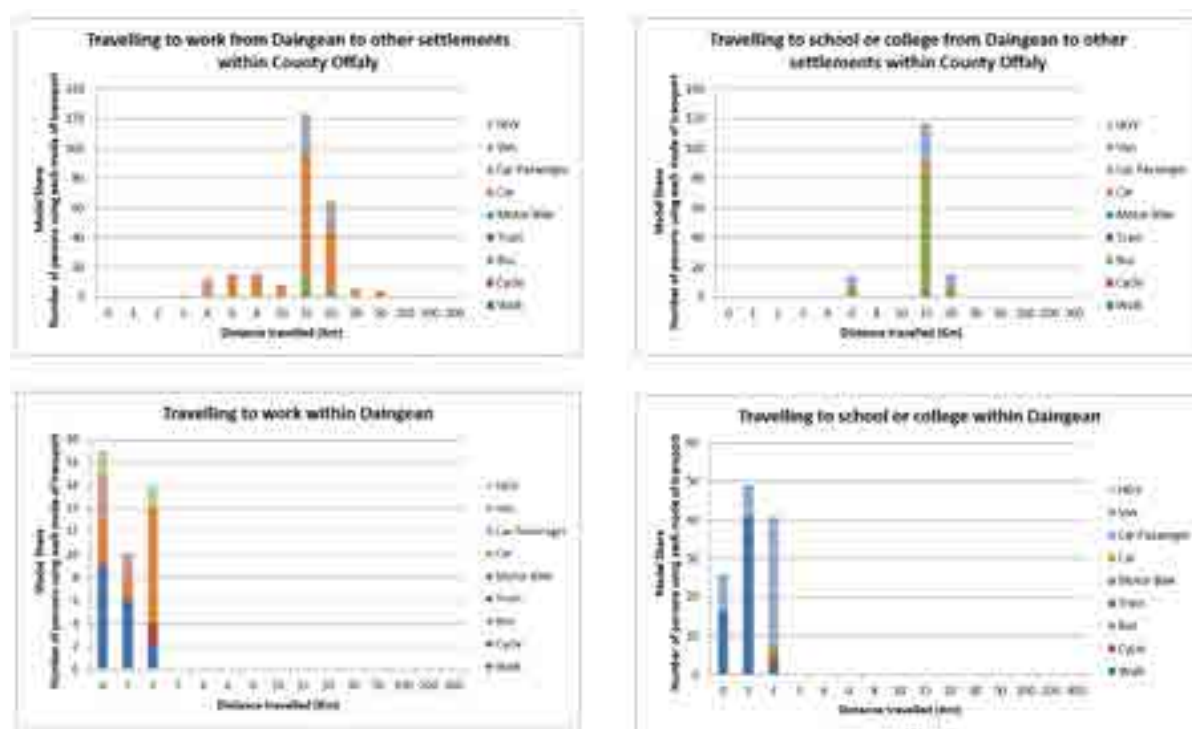


Figure 2.9 Modal Share of trip generation in Daingean

The graphs in Figure 2.9 indicate the following statistics:

- For journeys to work in which the trip is from Daingean to another settlement within County Offaly, 98% of trips are less than 30km; 84% of workers travel either by private car or a passenger in a private car; 5% travel by public transport (bus).

- For journeys to work in which the trip starts and ends in Daingean itself, 100% of trips are less than 2km; 36% of workers travel either by private car; 38% walk and 4% cycle.
- For journeys to school/college in which the trip starts and ends in Daingean itself, 100% of trips are less than 2km; 44% of students travel as a passenger in a private car; 51% walk and 2% cycle.

In terms of work related journeys to other settlements within the county, the statistics support a review of local bus services in the county in terms of connections and frequency. In terms of work and schools trips within the town, while the statistics do show a relatively positive modal share in favour of walking, travel by private car still dominates modal share. As such, the data supports provision of / improvements to walking and cycling infrastructure and permeability within the town.

Critical infrastructure necessary to improve the modal share in favour of sustainable modes of transport is further discussed under separate headings below, with identified improvement measures supported by critical infrastructure objectives set out under Section 2.6.5 of this Town Plan.

In respect of Kilcormac, please note that baseline figures are expected from NTA and if and when received it will be incorporated into the Kilcormac Town Plan in conjunction with any necessary modal share objectives. In the absence of baseline data from the NTA, improvements in modal share in the town in favour of walking and cycling are already underpinned by objectives KIO-01 and KIO-05 in the draft Kilcormac Town Plan.

KIO-01 Deliver a high level of permeability for walking and cycling in Kilcormac town centre, through new build and retro-fitting, to create an accessible, attractive, vibrant and safe place to live, work and engage in community life.

KIO-05 Improve cycle infrastructure in the town as part of development and public realm proposals and investigate the feasibility of providing dedicated cycle lanes in the town.

Notwithstanding the above, it is recommended that the following changes are made to the **Kilcormac** Town Plan.

2.6.1 Movement and Connectivity

The Sustainable Transport Strategy chapter (Chapter 8) in the draft Plan examines county level data on modal split and identifies the need to reduce the reliance on the private car by promoting and facilitating more sustainable modes of transport and supporting development in locations that would reduce the need to travel. The Council seeks to reduce travel demand by integrating land use and transportation and to promote sustainable mobility including walking, cycling and public transport, in order to create a sustainable settlement pattern and environmentally sustainable town. It is also important that Kilcormac maintains good transportation linkages to surrounding urban and rural areas, which is a contributing factor to its future growth.

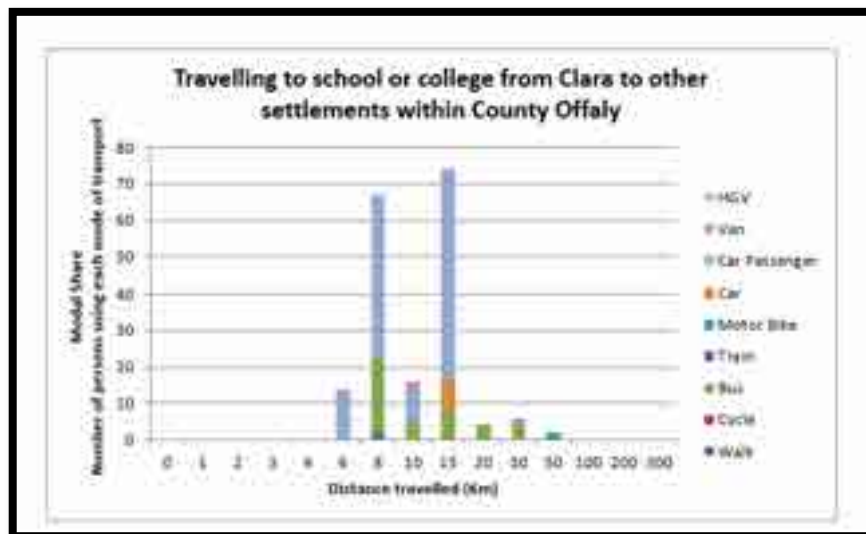
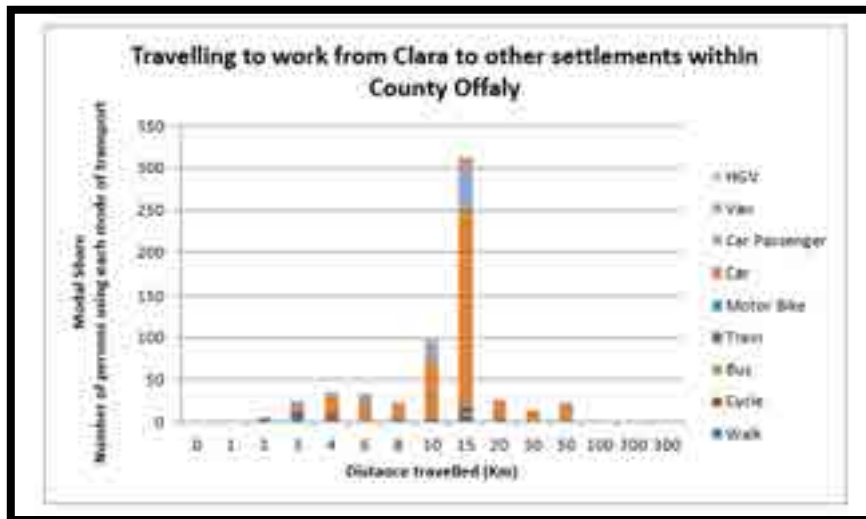
It is recommended that the following changes are made and graphs inserted into the **Clara** Town Plan;

7.2 Movement and Connectivity

The Sustainable Transport Strategy chapter (Chapter 8) in the draft Plan examines county level data on modal split and identifies the need to reduce the reliance on the private car by promoting and facilitating more sustainable modes of transport and supporting development in locations that would reduce the need to travel. The Council seeks to promote sustainable mobility including walking, cycling and public transport, in order to create a sustainable settlement pattern and environmentally

sustainable town. It is also important that Clara maintains good transportation linkages to surrounding urban and rural areas, which is a contributing factor to its future growth.

The graphs in Figure 7.1 show the modal share for trips generated at various distances travelled from and within Clara for work and education. The graphs are based on data derived from Census 2016, and provide a baseline to inform objectives in this Town Plan, which seek to improve the modal share away from private car and in favour of walking, cycling and public transport.



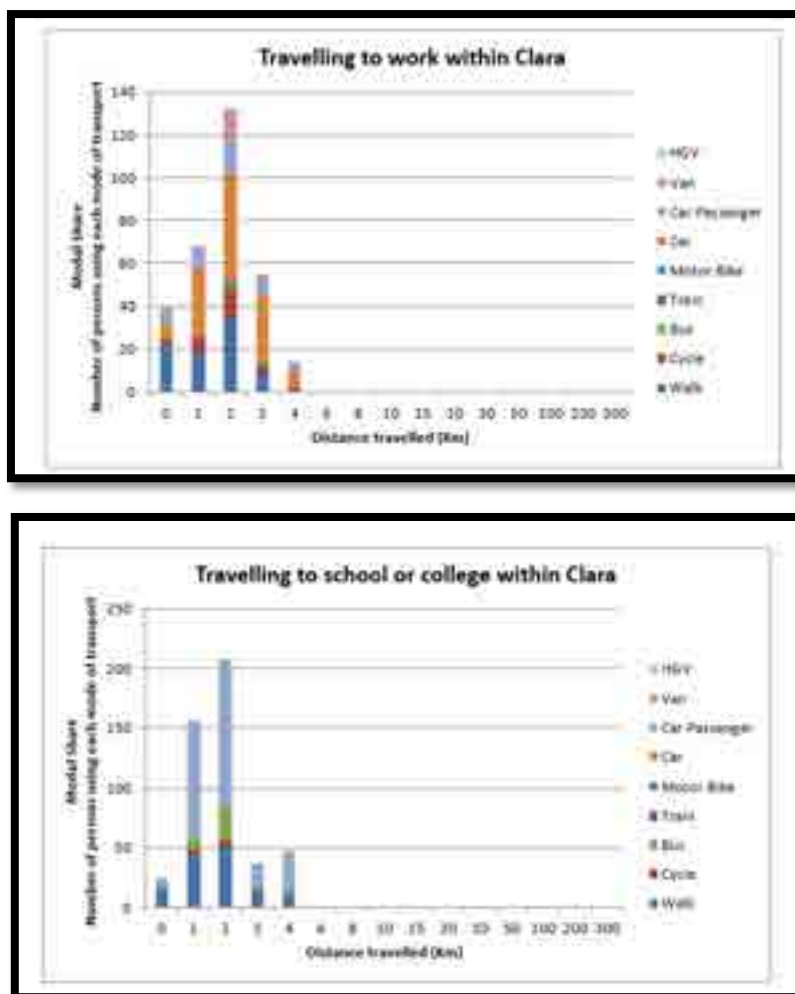


Figure 7.1 Modal Share of trip generation in Clara

The graphs in Figure 7.1 indicate the following statistics:

- For journeys to work in which the trip is from Clara to another settlement within County Offaly, 90% of trips are 15km or less; 91% of workers travel either by private car, passenger or van; 1% travel by public transport (bus).
- 62% of those who work in Clara travel to work by car or van while 36% walk or cycle to work;
- 76% of those attending school or college outside Clara travel by car or van compared to 22% who use the bus.
- 60% of students travel to school in cars compared to modes such as walking 28%, cycling 3% and bus 10 %.

In terms of work related journeys to other settlements within the county, the statistics support a review of local bus services in the county in terms of connections and frequency. In terms of work and schools trips within the town, while the statistics do show a relatively positive modal share in favour

of walking, travel by private car still dominates modal share. As such, the data supports provision of / improvements to walking and cycling infrastructure and permeability within the town.

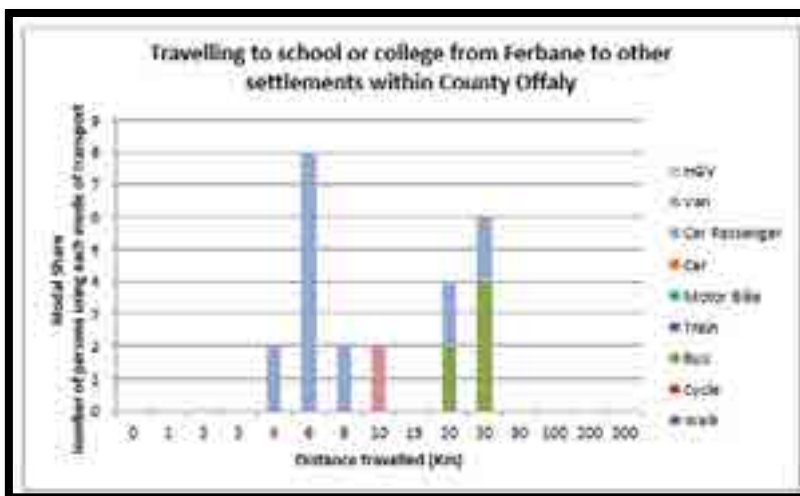
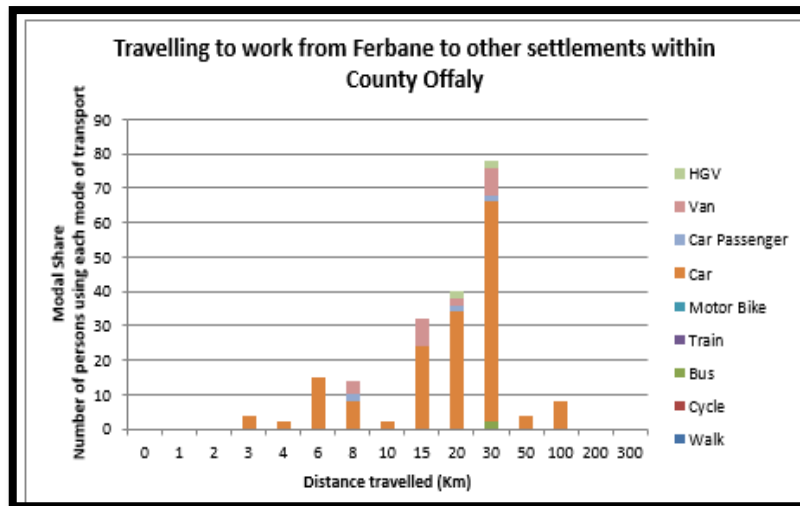
Critical infrastructure necessary to improve the modal share in favour of sustainable modes of transport is further discussed under separate headings below, with identified improvement measures supported by critical infrastructure objectives set out under Section 7.11 of this Town Plan.

It is recommended that the following changes are made and graphs inserted into the **Clara** Town Plan;

7.1 Movement and Connectivity

The Sustainable Transport Strategy chapter (Chapter 8) in the draft Plan examines county level data on modal split and identifies the need to reduce the reliance on the private car by promoting and facilitating more sustainable modes of transport and supporting development in locations that would reduce the need to travel. The Council seeks to promote sustainable mobility including walking, cycling and public transport, in order to create a sustainable settlement pattern and environmentally sustainable town. It is also important that Ferbane maintains good transportation linkages to surrounding urban and rural areas, which is a contributing factor to its future growth.

The graphs in Figure 7.1 show the modal share for trips generated at various distances travelled from and within Ferbane for work and education. The graphs are based on data derived from Census 2016, and provide a baseline to inform objectives in this Town Plan, which seek to improve the modal share away from private car and in favour of walking, cycling and public transport.



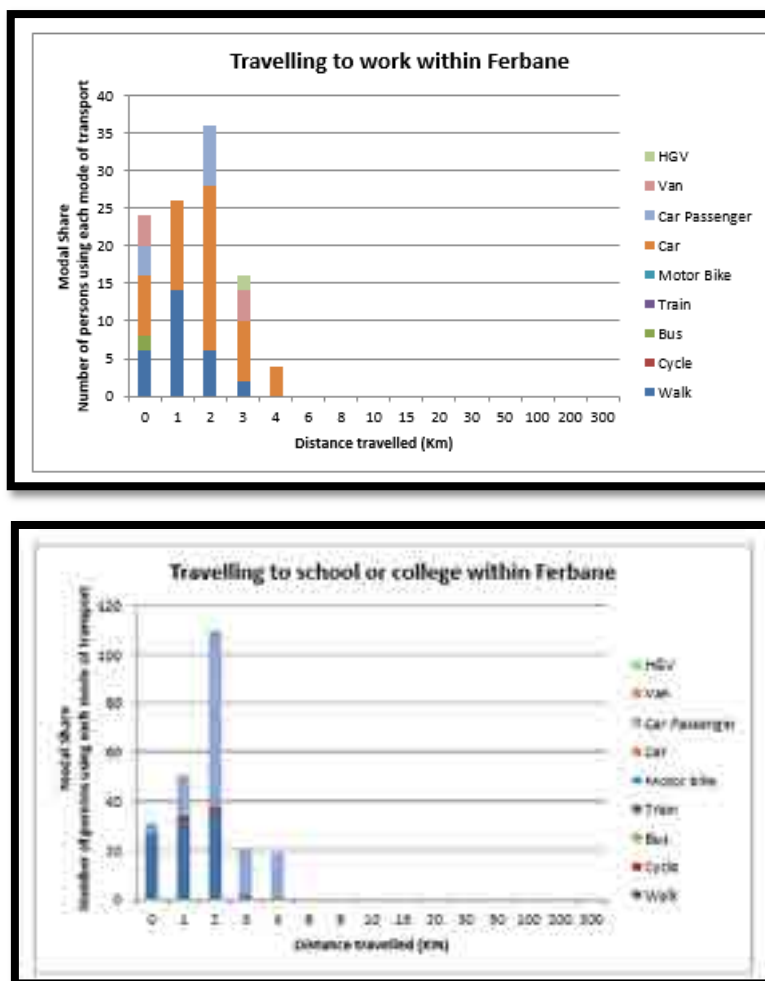


Figure 7.1 Modal Share of trip generation in Ferbane

The graphs in Figure 7.1 indicate the following statistics:

- For journeys to work in which the trip is from Ferbane to another settlement within County Offaly, 94% of trips are less than 30km; 85% of workers travel either by private car or as a passenger in a private car; 1% travel by public transport (bus).
- 66% of those who work in Ferbane travel to work by car or van while 26% walk to work;
- 42% of those travelling to school within Ferbane walk compared to 57% who are car passengers;
- 75% of those attending school or college outside Ferbane travel by car or van compared to 25% who use the bus.

In terms of work related journeys to other settlements within the county, the statistics support a review of local bus services in the county in terms of connections and frequency. In terms of work and schools trips within the town, while the statistics do show a relatively positive modal share in favour of walking, travel by private car still dominates modal share. As such, the data supports provision of / improvements to walking and cycling infrastructure and permeability within the town.

Critical infrastructure necessary to improve the modal share in favour of sustainable modes of transport is further discussed under separate headings below, with identified improvement measures supported by critical infrastructure objectives set out under Section 7.3 of this Town Plan.

- c) It is recommended to retain the wording 'due regard' in DMS-03 based on consideration of the following quotation from the Manual and the Planning and Development Act 2000 (as amended)

The section titled 'About this Guide' in the manual states: *'This Manual does not purport to account for every scenario that a designer will encounter, particularly when retrofitting existing streets. Nor can this Manual cover every technical detail. Many matters are left to the professional expertise and judgement of users, while others are covered elsewhere in relevant Irish, British or European standards, in codes of practice and guidelines, many of which are cross-referenced throughout this Manual'.*

Section 28(1) of the Planning and Development Act 200 (as amended): *'The Minister may, at any time, issue guidelines to planning authorities regarding any of their functions under this Act and planning authorities shall have regard to those guidelines in the performance of their functions'.*

It is recommended to insert into section 13.2.4 of Chapter 13 Development Management Standards which relates to Permeability and Sustainable Mobility, for following sentences immediately after the reference to the Design Manual for Urban Roads and Streets; **'These Guidelines apply to all developments which impact on urban roads and streets within the 60kph zone or less'**.

- d) Please see the last table in Appendix 2 at the end of this OPR submission summary which (using the Department methodology for housing supply targets as set out in the Section 28 Guidelines 'Housing Supply Target Methodology for Development Planning', December 2020) includes CSO house completions. In addition, a revised Core Strategy Table is presented in Appendix 3 at the end of this OPR submission summary.
- e) The Core Strategy table will include the hectares of land in each settlement proposed to be zoned for new residential and a mixture of residential and other use (i.e. mixed use / town or village centre zoning).

Please see revised Core Strategy Table in Appendix 3 and revised zoning maps arising from this in Appendix 5 at the end of this OPR submission summary.

- f) The following objective is proposed to be inserted into Chapter 2:

'It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure'.

As stated in section 2.1.5 of the draft Plan:

'Where the amount of land that was zoned under the 2014-2020 County Development Plan is surplus to the amount of land that is required to meet the needs of the current Plan period (2021-2027), the following approaches are available to address the difference:

- *designation of lands as 'strategic residential reserve';*
- *zoning of lands for an alternative use; or*
- *dezoning of lands.*

These measures are to ensure that towns grow at a sustainable level appropriate to their position in the settlement hierarchy, as required by the NPF and RSES’.

It is noted on page 7 of the DHLGH Guidance Notes on Core Strategies states that ‘Prioritising / phasing of development can be provided *‘by indicating on relevant tables and maps, where any surplus capacity of land and/or housing will be regarded as a **strategic reserve** and that proposals for the development of such lands or housing will not be considered for development purposes during the plan period’.* The draft Plan provides for strategic residential reserve. Accordingly, strategic residential reserve is an acceptable method of phasing. The draft plan has all de-zoned and zoned to alternative uses as methods to address surplus zonings in the Plan 2014-2020.

In addition, DMS 28 in Chapter 13 of the draft Plan states that for residential developments ‘A phasing programme, which has regard to Recommendations for Site Development Works for Housing Areas (1998), is required for housing developments of 50 dwellings or more detailing proposals for completing roads, open space, public lighting etc. in line with house completions’. Phasing conditions are supported in the Government Guidelines Sustainable Residential Development in Urban Area Guidelines (page 75).

- g) As noted on Page 7 of the DHLGH Guidance Notes on Core Strategies states that ‘A number of county development plans around the country do not contain detailed zoning maps and such zoning is addressed in subsidiary local area plans. In such cases, the Core Strategy of the development plan must identify the relevant population figure and housing land requirement for the various urban centres in its area and a schedule of the **local area plans** that will have to be **amended** to take account of the Core Strategy and the timeframe for such amendments bearing in mind the provisions of the 2010 Act with regard to the review of local area plans to ensure their consistency with newly adopted development plans (section 12(2B))’.

In this regard it is considered appropriate to vary / review the Edenderry and Portarlington Local Area Plans after completion of the new Offaly County Development Plan.

It is recommended to amend CSO-02 as follows:

CSO-02 It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of **Portarlington Joint Local Area Plan and Edenderry Local Area Plan during plan period of the County Development Plan 2021-2027 if required**, to ensure consistency with the provisions of the Core Strategy.

As set out in Section 2.4 of the Local Area Plans Guidelines for Planning Authorities, ‘Local area plans must play a key role in achieving the objectives contained in higher-level plans and strategies such as...County Development Plans’. Two thirds of Portarlington is located in County Laois. Portarlington is subject to a current Joint Local Area Plan 2018-2024 made by Laois County Council and Offaly County Council. The Laois County Development Plan is currently under review but it is behind the Offaly County Development Plan review. A Portarlington zoning objectives map should not be made until it is informed by both the new Laois and Offaly County Development Plans. It would be improper planning for Laois County Council to prepare a joint zoning map for Portarlington before completion of the Laois County Development Plan review.

- h) The first parcel of Enterprise and Employment zoning should be removed from the Moneygall zoning map (north west of the village).

In respect of the larger area of land east of the village centre, zoned 'Enterprise and Employment', it is noted firstly, that the NPF supports the rejuvenation of all settlement types with increased population and employment activity.

National Policy Objective 6

Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

National Policy Objective 7

Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on:

In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.

In a similar vein, the EMRA RSES supports local enterprise and employment opportunities in small towns and villages to ensure their viability as service centres for their surrounding areas.

GROWTH ENABLERS FOR THE REGION

The key enablers for growth across the Region align with the Growth Strategy and state the priorities for each part of the Region to meet its potential.

- Promote global connectivity and regional accessibility as part of an integrated land use and transport strategy, with a focus on protecting national assets and enhanced inter-regional connectivity.
- Support the future success of Dublin as Ireland's leading global city of scale by better managing strategic assets to increase opportunity and sustain national economic growth and competitiveness.
- Deliver strategic development areas identified in the Dublin Metropolitan Area Strategic Plan (DMA SP) to ensure a steady supply of serviced development lands to support Dublin's sustainable growth.
- Facilitate collaboration to support the development of the Dublin-Belfast Economic Corridor, to drive synergy in the Ormeau-Stranmillis ferry route, border network and strengthen economic links with the south east extending to Rosare Europort.
- Target significant growth in the Regional Growth Centres of Athlone, Drogheda and Dundalk to enable them to act as regional drivers, with a focus on improving local economies and quality of life to attract investment and the regeneration of urban areas (UAP).
- Promote compact urban growth to realise targets of at least 50% of all new homes to be built to be within or contiguous to the existing built-up areas of Dublin city and suburbs and a target of at least 30% for other urban areas.
- Embed a network of Key Towns throughout the Region, which have the capacity to deliver sustainable compact growth and employment for their catchments in tandem with enabling public transport, infrastructure and services.
- Promote balanced growth in a limited number of economically active settlements which have the identified capacity and potential for self-sustaining growth.
- Promote targeted public sector investment to support self-sustaining local employment, and in services, sustainable transport and amenities in places that have experienced rapid commuter-driven population growth.
- Promote regeneration and revitalisation of small towns and villages and support local enterprise and employment opportunities to ensure their viability as service centres for their surrounding rural areas.
- Support rural areas by harnessing natural resources to develop renewable, recreation and tourism opportunities including green infrastructure planning and the development of an integrated network of greenways, boulevards and pathways.

RPO 4.79: Local authorities shall identify and provide policies that recognise the contribution that small towns, villages and rural areas contribute to social and economic wellbeing. As part of this policy provision that seeks to support and protect existing rural economies such as valuable agricultural lands to ensure sustainable food supply, to protect the value and character of open countryside and to support the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, renewable energy, tourism and forestry enterprise is supported.

RPO 4.84: Support the rural economy and initiatives in relation to diversification, agri business, rural tourism and renewable energy so as to sustain the employment opportunities in rural areas.

RPO 6.2: Support local authorities to ensure their LECPs and city and county development plans are sufficiently agile to account for unexpected opportunities, to accommodate valid propositions for enterprise development that may emerge and for which there are strong locational drivers that do not apply to the same extent elsewhere.

Chapter 2 (Core Strategy) of the draft Plan identifies 20 no. *principles for growth* upon which to encourage the focus of new development, with the following noted:

- (v) *Aligning population, employment, community and housing growth in a balanced fashion;*

- (xii) *Developing the designated Key Town of Tullamore of sufficient scale and quality to be a driver of regional growth, investment and prosperity, followed by Self-Sustaining Growth Towns and Self-Sustaining Towns to grow to a sustainable level. Other towns need to be promoted for regeneration, local employment and managed levels of growth, and the rural area which includes villages, Sráids and the open countryside, shall be promoted for regeneration and local employment and services with targeted rural housing policies;*
- (xvii) *Promoting economic development and enterprise activity.*

The policy framework for Villages under the Settlement Strategy (Section 2.5, Chapter 2) is consistent with above principles for growth.

SSP-12 *It is Council policy to support housing and repopulation taking place within villages in a consolidated, sustainable and sequential manner, and to promote the provision of serviced sites supported by Irish Water in order to attract people to build their own homes and live in villages, whilst also managing the levels of growth at an appropriate scale to ensure compliance with the Core Strategy Table.*

SSP-13 *It is Council policy to facilitate the expansion of and provision of new mixed-use and employment-generating development within villages at an appropriate size and scale subject to normal planning requirements.*

SSP-14 *It is Council policy that there will be a presumption in favour of small developments of differing scale and character rather than larger, more homogenous urban-scaled housing 'estates'. (For example 3 separately designed 10-house developments would generally be preferable to a single homogenous suburban style 30-house development). This approach would be more likely to create a sense of individualism and differing aspirations to each development.*

Section 5.6, Chapter 5 (Economic Development) of the draft Plan provides a Rural Economic Strategy for the county, and in terms of villages, states the following:

- *support start up enterprises;*
- *ensure sufficient land is zoned to facilitate employment and enterprise development;*
- *accommodate remote-working hubs; and*
- *encourage high quality and well-designed buildings, structures, public spaces and streets, in order to make places more attractive. Attractive places attract more inward investment, skills and talent, and increase the livability factor of a place.*

Policy ENTP-05 and Objective ENTO-01 promote and support employment creation at each settlement level across the county.

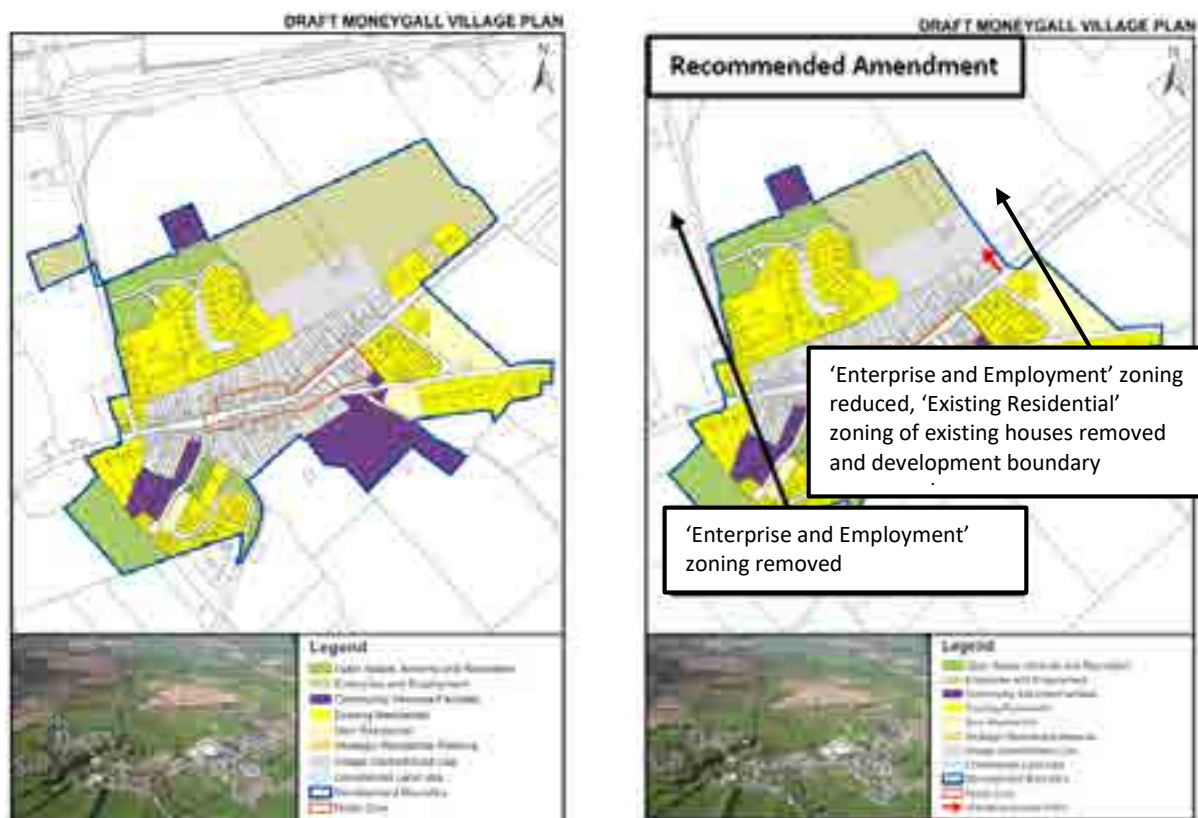
ENTP-05 *It is Council policy that future economic and enterprise development in Offaly that is urban in nature should be in the first instance located in urban areas and be largely distributed throughout the county's settlement hierarchy, having regard to each individual area's (a) identified role within the region, (b) existing size, (c) existing function (d) capacity for sustainable growth (i.e. growth without detriment to its surroundings, its built or natural assets and/or its character) and (e) available infrastructure capacity. There is, however, a positive presumption in terms of employment creation and therefore it is Council policy to examine such proposals within other locations on a case-by-case basis for example employment related development in a location clearly linked to a rural resource activity.*

ENTO-01 *It is an objective of the Council to encourage, in co-operation with Enterprise Ireland, the Local Enterprise Office, and other local development bodies, the development of further small / medium-scale industries and services. Further, to promote the establishment of a number of small incubator units, together with a county-wide support programme, within designated areas to accommodate new business start-ups.*

Moneygall Village has a population of 313 (Census 2016) and includes a number of local employers including Liam Buckley car sales, service and repairs. The Barrack Obama Plaza, located across the county boundary in Tipperary, is just 200m east of the Village settlement, and connected directly to the village via the R445. The section of the R445 between the village and the Barrack Obama Plaza has a footpath, cycle path and street lighting. The Barrack Obama Plaza, which opened in 2014, provides significant local employment, with staff numbers, between full and part time, typically peaking to c. 160 during the Summer months. In addition to on-line motorway services, the plaza provides conference facilities and a Barrack Obama visitor centre. Supported by good public infrastructure, Moneygall Village, including the Barrack Obama Plaza, has an important employment function, a function that should be maintained and supported through the County Development Plan.

Considering NPO6, NPO7, EMRA RSES '*Growth Enablers for the Region*', and draft Plan policy and objectives above, it is considered warranted to provide 'Employment and Enterprise' land in Moneygall, at a quantum that is suitable in scale to support new enterprise and employment uses for the Village, consistent with Rural Economic Strategy, policy ENTP-05 and Objective ENTO-01 of the draft Plan.

Accordingly, it is recommended that the area zoned 'Enterprise and Employment' on the north-eastern end of the draft Moneygall Village Plan be retained but reduced from 5.3ha to 2.2ha. See comparison zoning maps below. As a result, the development boundary of the village has been amended inwards, providing for a more compact settlement form, consistent with NSO 1 of the NPF. It is also recommended that the 'Existing Residential' zoning (applied to existing houses) east of the village centre be removed and the development boundary amended accordingly, to allow for a more compact village form.



In addition, it is recommended that Economic Development and Regeneration Objective S05 in the draft Moneygall Village Plan be removed. Objectives S04, S06 and S07 are considered sufficient to support and encourage new enterprise in the village, at a quantum and scale proportionate to the function and capacity of the settlement.

S04 To facilitate the expansion of the employment, retail and service base in the village. The re-use of existing vacant buildings in the village centre will be particularly encouraged.

~~*S05 To actively promote Moneygall as a destination for new business, for example in the distribution and warehousing sector, given its strategic location on the M7 motorway.*~~

S06 To grow a visitor economy in the village by encouraging tourism-related uses, activities and amenities.

S07 To capitalise on further tourist related opportunities for the village through the synergy with Barrack Obama Plaza, and to facilitate and develop uses, activities and public infrastructure to support the Village becoming a 'stop-off' destination for visitors to the midlands and south including visitors or tours on 'Ireland's Ancient East' trail.

i) The population growth rate of Tullamore will be revised from a 33% rate of growth to a 30% rate of growth in accordance with National Policy Objective (NPO) 9 of the National Planning Framework which states:

'In each Regional Assembly area, settlements not identified in Policy 2a of 2b of this Framework, may be identified for significant (i.e. 30% or more above 2016 population levels) rates of population growth at regional and local planning stages, provided this is subject to:

- *Agreement (regional assembly, metropolitan area and / or local authority as appropriate);*

- Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and / or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall target; and
- A co-ordinated strategy that ensures alignment with investment in infrastructure that the provision of employment, together with supporting amenities and services'.

This results in a 30% increase in population of Tullamore of 4382 in this CE Report as opposed to the 33% increase of 4853 in the draft Plan.

j) Edenderry and Portarlington have both experienced faster growth in population between 2011 and 2016 census periods compared to the Assembly area. They grew by 25% and 24% respectively as opposed to 15% for the assembly area. It is considered that these two towns need 'catch up investment' taking into account their jobs: resident workers ratios (0.637 and 0.435 respectively) and the fact that they are located within the 'Core Region' of EMRA area where catch-up investment is required. Please see table below for comparison purposes. The future development of Offaly's towns has been prepared on an asset-based approach including taking census data into consideration.

Settlement	Settlement Typology as set in RSES	Reason it falls within its Settlement Typology
Tullamore	Key Town	Designated in the RSES as a Key Town.
Birr	Self-Sustaining Growth Town	Birr's census boundaries differ between the 2011 and 2016 census which does not allow for easy comparison. Birr acts as an important local driver providing a range of functions for its resident population and its surrounding catchment including housing, employment, services, retail and leisure opportunities. The town should continue to grow at a sustainable level. It has a jobs: resident workers ratio of 0.965 which indicates a strong economic function (above 0.7 is a strong economic function according to RSES), therefore with the capacity to accommodate further residential development. It is not located within the area mapped as 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining; instead it is located within the 'Gateway Region'.
Edenderry	Self-Sustaining Town	It experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining.
Portarlington	Self-Sustaining Town	It experienced rapid population growth of 24% in the 10 years between 2006 and 2016 census

		(regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.435 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining.
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It is proposed to increase the population allocation to Edenderry and Portarlinton with the reduced population increase to Tullamore (as stated in (i) above) as follows:

- Edenderry: 5% growth in draft Plan (368 population increase) to 10% growth in CE report (721 population increase). This is reflected in the amended Core Strategy Table in Appendix 3 of this OPR submission summary.
 - Portarlinton: 5% growth in draft Plan (89 population increase) to 10% growth in CE report (207 population increase). This is reflected in the amended Core Strategy Table in Appendix 3 of this OPR submission summary.
- k) There is no guidance that stipulates that settlements on a lower tier of the settlement hierarchy must have a lower population growth rate. The growth of settlements is based on an asset based approach. Some towns are strong in terms of jobs: resident workers ratio and they are not located within the 'Core Region' so they may be equipped in that respect to accommodate a higher rate of population growth. As a baseline they have fewer houses than larger settlements so they won't be resulting in more housing than in a higher tier settlement. Their growth is still below the anticipated assembly area average of 23.4%.
- l) It is acknowledged that pages 58 and 71 of NPF provides a threshold of 1500 between the definition of urban and rural, which itself is derived from the CSO and this is reflected in section 10(2A)(f)(vi) of the Act.

Section 10(2A)(f)(vi) states that 'Without prejudice to the generality of subsection (1A), a core strategy shall aggregate projected population, other than population referred to in subparagraph (v), in – (i) villages and smaller towns with a population of under 1,500 persons, and (ii) open countryside outside of villages and towns...

[Subparagraph (v) states projected population growth of cities and towns in the hierarchy]

It is acknowledged that 3 of Offaly's settlements described as 'towns' in the settlement hierarchy have a population below 1,500, namely Daingean, Ferbane and Kilcormac at 1077, 1191 and 935 respectively in the 2016 census. Town plans have been prepared for these settlements in the draft Plan. The current Offaly Co. Development Plan classifies Ferbane as a Service Town whilst Daingean and Kilcormac were classified as Local Service Towns. These three settlements have a local service and employment function with a large catchment area that supports a network of villages. They have services such as secondary schools, fire stations, libraries, health centres, post office, with a number of them featuring business parks. It is considered that in practice they function on a higher level than

villages in the county do. Accordingly, it is considered appropriate to reclassify these three settlements as Smaller Towns in the category of 10(2A)(f)(vi)(I).

It is noted that section 4.8 of the RSES refers to Rural Places as including towns, villages and the countryside.

References to the settlement hierarchy and retail hierarchy including associated maps should include 'smaller towns' with policy changes to cater for smaller towns provided for in Chapter 2 as follows:

Towns (Banagher, Clara, Daingean, Ferbane, Kilcormac)

SSP-10 It is Council policy to support housing and repopulation taking place within towns in a consolidated, sustainable and sequential manner, ~~and to promote the provision of serviced sites supported by Irish Water in order to attract people to build their own homes and live in small towns,~~ whilst also managing the levels of growth at an appropriate scale to ensure compliance with the Core Strategy Table.

SSP-11 It is Council policy to promote the regeneration and revitalisation of towns and support local enterprise and employment opportunities to ensure their viability as service centres for the surrounding rural areas.

Rural (Smaller Towns, Villages, Sráids and Open Countryside)

Smaller Towns (Daingean, Ferbane, Kilcormac)

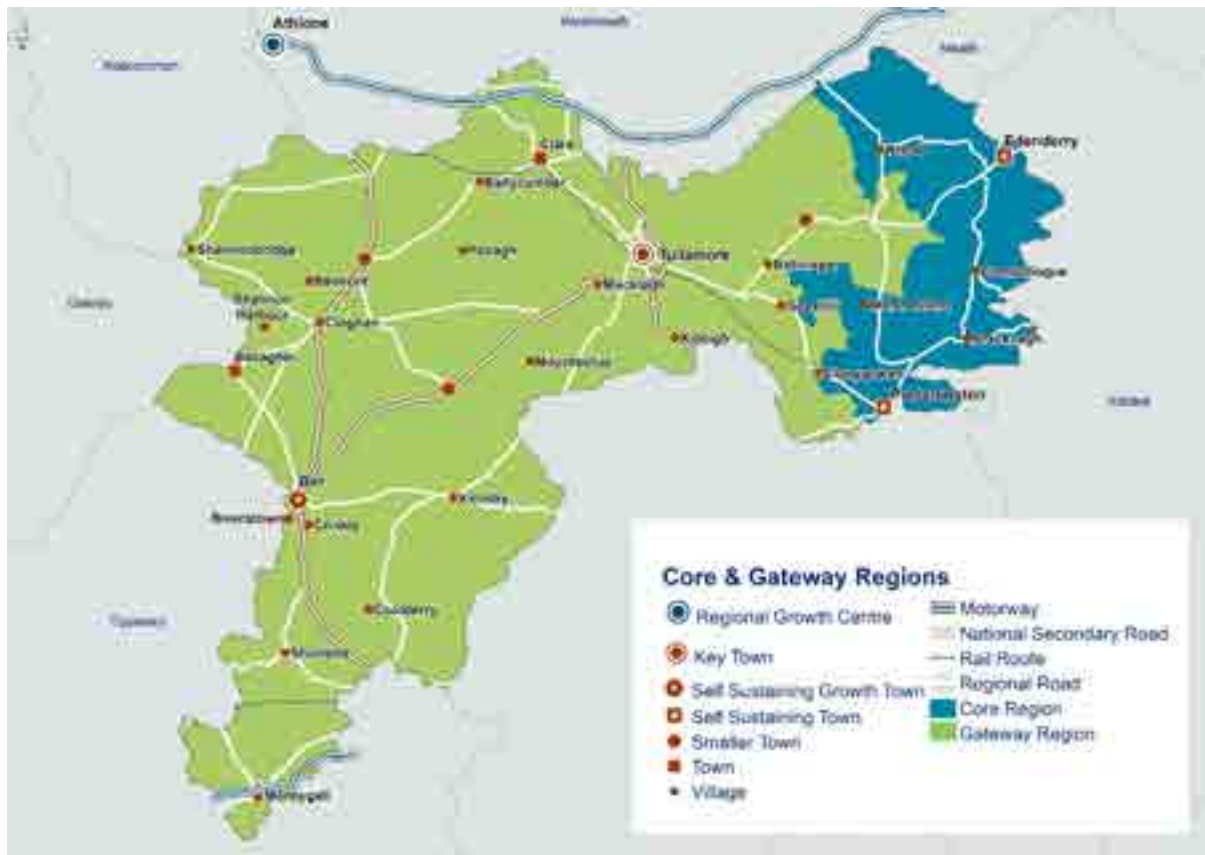
It is Council policy to support housing and repopulation taking place within smaller towns in a consolidated, sustainable and sequential manner, and to promote the provision of serviced sites supported by Irish Water in order to attract people to build their own homes and live in small towns, as an alternative to one-off housing whilst also managing the levels of growth at an appropriate scale to ensure compliance with the Core Strategy Table.

It is Council policy to promote the regeneration and revitalisation of smaller towns and support local enterprise and employment opportunities to ensure their viability as service centres for the surrounding rural areas.

In addition, policy SSP-21 of the draft Plan which relates to housing in the open countryside and which defines what the local rural area should exclude, should incorporate reference to smaller towns.

Reference should also be made in the town plans for Daingean, Ferbane and Kilcormac that they are 'smaller towns'.

Recommended changes to maps as follows to reflect smaller towns:



- m) The population allocation for rural will be adjusted to incorporate smaller towns as requested in the submission which is based on the Act. It is also noted that section 4.8 of the RSES addresses Rural Places as including towns, villages and the countryside.
- n) The number of additional households identified for the Sráids and Open Countryside tier was informed by an application of declining average household size with respect to the targeted level of population change. Assessments of population growth within the tier were undertaken, which would have informed a higher number of additional households, however, this would not align with the targeted rate of growth to be achieved under the County target.

Section 5.2 of the Housing Strategy explores the likely future demand arising for single one-off dwellings as part of the HNDA's analysis of housing requirements in the County. The evidence basis is informed by a review of historic precedent in planning applications. By doing so, it was observed that 33% of the total number of residential units granted planning have been for single one-off dwellings in recent years, and that this is a stable and upward-leaning trend. This demand indicator can be used to quantify the number of reckonable single one-off dwellings on an ongoing basis for this housing type over the plan period (should prevailing trends continue).

In the absence of published HNDA guidelines, the specificity of producing a prescriptive figure for single housing in the countryside is unclear. The level of need is projected to be 33% of total granted planning applications going forward.

662 residential units in sraids and open countryside are provided for in the Core Strategy Table in Appendix 3 of this OPR submission.

- o) The rate of occupancy applied was a graduated range of average household sizes falling from 2.84 in 2016 to 2.62 in 2027.

This variable rate of occupancy was produced with regard to alignment with the NPF rate of 2.5 by 2040, however, on review of historic rates of change within the County, there was sufficient evidence to support a quicker pace of decline.

Occupancy in each typology was then aligned with this County-level trajectory between 2017 and 2027. The number of additional households formed per annum was calculated using the applicable year's average household size.

Calculating occupancy based on the total change over a period as reported in the Core Strategy Table, may not reproduce the per annum application of occupancy accurately. This was noted in Footnote 5, Page 29, Chapter 2 of the Draft Development Plan (as pertains to Sráids and Open Countryside specifically).

Please see Appendix 2 at the end of this OPR submission summary for further detail on household size calculations.

- p) The Core Strategy Table will be amended to reflect the quantum of lands zoned for a mixture of residential and other uses including mixed use Opportunity Sites (as required under section 10(2A)(d) of the act). Please see amended Core Strategy Table in Appendix 3 at the end of this OPR submission summary. The Core Strategy Chapter will be amended to address the

area of any land already so zoned to accommodate residential units (as required under section 10(2A)(c) of the act) through the red text changes below.

Residential land in Previous County Development Plan

Section 10(2A)(c) of the Planning and Development Act 2000 (as amended) states that ‘A core strategy shall in respect of the area in the development plan already zoned for residential use or a mixture of residential and other uses, provide details of –

- (i) The size of the area in hectares, and
- (ii) The proposed number of housing units to be included in the area.

The term ‘already zoned’ is taken to mean the Co. Development Plan that was in effect (2014-2020) during the time of the preparation of the new Development Plan (2021-2027). The following table sets out the area of land zoned for residential use ~~/mixture of residential and other uses~~ in the County Development Plan 2014-2020, together with the number of housing units allocated for these lands.

Table 2.1 Extract from County Development Plan 2014-2020 (Table 1.3)

Land zoned residential	238 ha
No. of residential units	3163

Plan	Mixed Use Zoning	Residential Zoning
Offaly County Development Plan 2014-2020	110.74	468.2
Tullamore Town Plan 2016-2010 as extended	58.77	682.96
Birr Town Plan 2016-2010 as extended	26.81	243.03
Edenderry Local Area Plan 2017-2023	23.25	137.41
Portarlington Joint Local Area Plan 2018-2024	28.31	143.93
Total hectares	247.88	1675.53

The County Development Plan 2014-2020 did not allocate a residential unit figure to zonings for a mixture of residential and other uses. The amount of land that was zoned mixed use (which included developed and undeveloped land) was 110.74 hectares. The number of units allocated to the residential zoned figure under the County Development Plan 2014-2020 was 3163.

Going forward, it will be simpler to compare the new residential zonings and undeveloped mixed use zonings of this County Development Plan 2021-2027 with the next County Development Plan 2027-2033.

- q) A written Infrastructural Assessment Report will be included in the Plan which will identify the infrastructure available and its proximity to lands for servicing purposes. It will state the deficiencies and proposals for improvement within the life of the Plan. A copy of this is inserted in Appendix 4 at the end of this OPR summary submission of this CE Report. In the actual Co. Development Plan it will be known as Appendix 2. Cross-referencing will be made to it in the town and village settlement plans as follows:

‘Appendix 2 of Volume 1 of the County Development Plan includes an Infrastructural Assessment Report which addresses infrastructure provision, deficiencies and investment proposals relating to the towns and villages’.

Chapter 2 of the draft Plan is titled ‘Core Strategy, Settlement Strategy and Housing Strategy’. It is divided up under 3 Topics: Topic 1 Core Strategy, Topic 2 Settlement Strategy and Topic 3 Housing Strategy. It is considered that this chapter provides for development phasing as required under section 10(2A)(f) which relates to a settlement hierarchy. The Settlement hierarchy is located within Topic 2 Settlement Strategy. This is in accordance with section 3.10 of the Development Plan Guidelines which states ‘...the settlement strategy within the development plan will normally take the form of a statement of the settlement hierarchy...’ Reference will be made within Topic 1 of where the Settlement Hierarchy is located within the chapter as follows:

‘The Settlement Hierarchy is located within Topic 3 Settlement Strategy’.

Section 4.19 (f) of the Development Plan Guidelines 2007 relates to ‘**Sequential Approach**’. It states *‘In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. ‘leapfrogging’ to more remote areas should be avoided); (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan’.*

It is considered that the Plan adheres to the above section of the Development Plan Guidelines. Accordingly, a paragraph will be inserted into the Plan as follows:

‘Sequential Approach:

In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach was taken to the zoning of land for development: (i) Zoning extends outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes given preference (i.e. ‘leapfrogging’ to more remote areas has been avoided); (ii) A strong emphasis is placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas zoned are contiguous to existing zoned development lands’.

- r) The boundary of the built-up footprint of settlements has yet to be defined in the revised Development Plan Guidelines as the CSO definition as quoted in the NPF extends beyond settlement boundaries in many cases and is too extensive. However, the Council considers that the extent of the built-up footprint is what is currently built on the ground to date. Placing a line on the map is too premature pending the publication of the revised Guidelines.

- s) Having regard to RPO 3.3 of the RSES and the Guiding Principles under the RSES, it is recommended to update Objective RO-07 in order to implement the Active Land Management Strategy approach (e.g. set out a clear timeline and strategic approach and set measurable targets against which the implementation can be monitored and measured).

RO-07 It is an objective of the Council as per the Urban Regeneration and Housing Act 2015 (as amended), to use site activation measures such as the Vacant Site Levy in specific areas to bring forward vacant or underutilised 'Residential Lands' and 'Regeneration Lands' (which includes Opportunity Sites) into beneficial use where considered necessary for renewal and regeneration. **Each year of the plan period the planning authority will assess the county's settlements for the purposes of identifying vacant sites for addition to the Vacant Site's Register and accordingly implement the statutory provisions for same.**

It is considered that there are substantial policies / objectives in the draft Plan which address the content of RPO 3.3 and the Guiding Principles that are laid on in the RSES in proximity to RPO 3.3, for example:

RP-01 It is Council policy to promote the regeneration of settlements by making better use of under-utilised land and buildings, particularly within the existing built-up areas where a transformational difference in the sustainability of a settlement can take place through compact growth.

RP-02 It is Council policy to promote and encourage the suitable redevelopment of derelict and vacant sites as an alternative to new build on greenfield sites.

RP-03 It is Council policy to promote and facilitate the habitation of vacant homes in accordance with the Council's Vacant Homes Action Plan.

RP-04 It is Council policy to support initiatives that promote the reuse, refurbishment and retrofitting of existing buildings within urban centres.

RP-05 It is Council policy to promote heritage-led regeneration in historic towns / villages through the reuse of historic buildings, the enhancement of places of special cultural / natural interest and the protection of the historic urban fabric.

RP-06 It is Council policy to encourage a mixture of uses within built-up areas in order to promote the liveability and sustainability of our settlements.

RP-07 It is Council policy to 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, for example, under the Urban and Rural Regeneration and Development Funds and Town and Village Renewal Schemes.

RP-11 It is Council policy to facilitate, promote and encourage the re-development of Opportunity Sites identified in Volume 1 and Volume 2 of the County Development Plan and Local Area Plans for appropriate development that contributes positively to the character of the settlement. Any proposal brought forward on Opportunity Sites shall be in accordance with the Development Principles for Opportunity Sites as set out in section 7.2.4 of the County Development Plan, with the inclusion of an

urban design statement and masterplan and shall demonstrate the rationale for the proposal and how it will interact within its context and the wider urban area.

RP-13 It is Council policy to promote a collaborative approach between Offaly County Council, central government, semi-state bodies, the community, the private sector and voluntary associations to successfully achieve the regeneration of areas.

RP-14 It is Council policy to work in conjunction with the Land Development Agency in co-ordinating and developing strategic publically owned land banks suitable for housing provision in order to contribute towards achieving compact growth, sustainable development and regeneration.

RP-15 It is Council policy to support the consolidation and aggregation of land where required in order to enable regeneration and proper planning and sustainable development.

RO-01 It is an objective of the Council to encourage and facilitate, where appropriate, the development and renewal of areas throughout the county which are in need of regeneration and in particular to apply for funding under government urban and rural regeneration / renewal schemes.

RO-03 It is an objective of the Council to promote the development and renewal of areas identified in need of regeneration in order to prevent (i) adverse effects on existing amenities in such areas, in particular as a result of the ruinous or neglected condition of any land, (ii) urban blight and decay, (iii) anti-social behaviour, or (iv) a shortage of habitable houses or of land suitable for residential use or a mixture of residential and other use.

RO-04 It is an objective of the Council to establish a database of strategic brownfield and infill sites so that brownfield land re-use can be managed and co-ordinated across multiple stakeholders as part of an active land management process.

RO-06 It is an objective of the Council to identify derelict sites and vacant sites which are suitable for redevelopment and to maintain the respective registers.

RO-08 It is an objective of the Council to encourage and be proactive in the habitation of vacant homes in accordance with the Council's Vacant Homes Action Plan.

The Design Principles set out in Section 7.2.4 of the Draft Plan also address some of the issues raised in RPO 3.3 and the Guiding Principles of the RSES.

- t) It is proposed to insert the following policies relating to smaller towns to address alternatives to one-off housing. It is proposed to amend policy SSP-12 which relates to villages to clarify the serviced sites are an alternative to one-off housing. Active land management measures such as vacant sites levy are addresses in the Regeneration Chapter of the draft Plan.

Smaller Towns (Daingean, Ferbane, Kilcormac)

It is Council policy to support housing and repopulation taking place within smaller towns in a consolidated, sustainable and sequential manner, and to promote the provision of serviced sites supported by Irish Water in order to attract people to build their own homes and live in small towns, as an alternative to one-off housing whilst also managing the levels of growth at an appropriate scale to ensure compliance with the Core Strategy Table.

It is Council policy to facilitate the expansion of and provision of new mixed-use and employment-generating development within smaller towns at an appropriate size and scale subject to normal planning requirements.

SSP-12 It is Council policy to support housing and repopulation taking place within villages in a consolidated, sustainable and sequential manner, and to promote the provision of serviced sites supported by Irish Water in order to attract people to build their own homes and live in villages **as an alternative to one-off housing**, whilst also managing the levels of growth at an appropriate scale to ensure compliance with the Core Strategy Table.

As smaller towns are a new tier in the settlement hierarchy, a density level between towns (25 / hectare) and villages (15 / hectare) is proposed at **20/hectare**. This will be reflected in the core strategy table.

The Sráid policy in the draft Plan SSP-15 refers to acting as an alternative to one-off housing in the open countryside.

- u) Having regard to Appendix 3: Box 2 of the Sustainable Rural Housing Guidelines for Planning Authorities 2005, it is recommended to include the following policies in chapter 2 of the Plan relating to smaller towns and villages:

It is Council policy to be proactive in piloting combined local authority and private investment to stimulate high quality individual housing or private site development to attract population growth and further investment in smaller towns, subject to resources.

It is Council policy to be proactive in piloting combined local authority and private investment to stimulate high quality individual housing or private site development to attract population growth and further investment in villages, subject to resources.

- v) It is considered that there are adequate policies in Chapter 3 of the draft Plan which address reducing GHG emissions and energy use in relation to the location, layout and design of new development, for example the following policies:

CAEP-18 It is Council policy to proactively encourage decarbonisation of local journeys by focusing on compact growth and reduced sprawl by targeting infill and brownfield lands in the existing built-up footprint of settlements.

CAEP-19 It is Council policy to improve walking and cycling connectivity within settlements and in particular with schools, town centres and employment areas, and to work with the National Trails Office, Coillte, the Department of Planning, Housing and Local Government, the Department of Transport, Tourism and Sport, and other relevant stakeholders, to improve on the existing level of infrastructure and facilities for walking and cycling in this regard.

CAEP-40 It is Council policy to encourage development proposals that are low carbon, well adapted to the impacts of climate change and which include energy saving measures and which maximise energy efficiency through siting, layout and design.

CAEP-41 It is Council policy to support and encourage pilot schemes which promote innovative ways to incorporate energy efficiency.

CAEP-42 It is Council policy to consider the adaptability of buildings over time and seek to improve the efficiency of existing building stock, promote energy efficiency and high levels of energy conservation and the use of renewable energy sources in the design and development of all new buildings in the county.

CAEP-43 It is Council policy to support and promote structural materials in the construction industry that have low to zero embodied energy and carbon dioxide emissions.

CAEP-44 It is Council policy to support and facilitate the development of an Energy Efficient Building Centre of Excellence in East Offaly.

CAEP-18 It is Council policy to proactively encourage decarbonisation of local journeys by focusing on compact growth and reduced sprawl by targeting infill and brownfield lands in the existing built-up footprint of settlements.

CAEP-19 It is Council policy to improve walking and cycling connectivity within settlements and in particular with schools, town centres and employment areas, and to work with the National Trails Office, Coillte, the Department of Planning, Housing and Local Government, the Department of Transport, Tourism and Sport, and other relevant stakeholders, to improve on the existing level of infrastructure and facilities for walking and cycling in this regard.

- w) It is considered that the villages in Co. Offaly will not weaken through the inclusion of villages within the rural area of Policy SSP-21. Villages are defined as part of the rural typology as set out in Table 4.2 of the RSES. Likewise, section 5.2 of the NPF states *‘there are many examples of vibrant rural communities right across Ireland, in towns, villages and the countryside as well as on our islands’*. Accordingly, ‘villages’ are considered part of the rural area. The draft Plan makes provision for safeguarding and strengthening villages irrespective of the inclusion of villages as part of ‘rural areas’ in policy SSP-21, for example the following policy SSP-13:

SSP-13 It is Council policy to facilitate the expansion of and provision of new mixed-use and employment-generating development within villages at an appropriate size and scale subject to normal planning requirements.

In addition, a proposed policy is recommended in part (u) of this OPR submission which assists in the strengthening of villages, as follows:

It is Council policy to be proactive in piloting combined local authority and private investment to stimulate high quality individual housing or private site development to attract population growth and further investment in villages, subject to resources.

Accordingly, it is recommended that policy SSP-21 remains unchanged from the draft Co. Development Plan except for the incorporation of reference to ‘smaller towns’ as raised in part (l) of this OPR submission, as follows:

SSP-21 Having regard to the need to protect County Offaly’s natural resources, environment, landscape and infrastructure, it is Council policy to consider a single dwelling for the permanent

occupation of an applicant in Rural Areas under Strong Urban Influence and Stronger Rural Areas and Areas of Special Control where **all** of the following (1-5) can be demonstrated:

1. The applicant was born within the **local rural area**, or is living or has lived in the local rural area for a minimum of 5 years (15 years particular to Areas of Special Control) at any stage prior to making the planning application. It includes returning emigrants seeking a permanent home in their local rural area. The 'Local Rural Area' for the purpose of this policy is defined as the area generally within an 8km radius (5km radius particular to Areas of Special Control) of where the applicant was born, living or has lived. For the purpose of this policy, the rural area is taken to include 'Villages' listed in the Settlement Hierarchy, but excludes Tullamore, Birr, Edenderry, Portarlinton, Banagher, Clara Daingean, Ferbane and Kilcormac (i.e. the Key Town, Self-Sustaining Growth Town, Self-Sustaining Towns, ~~and~~ **Towns and Smaller Towns** listed in the Settlement Hierarchy).
 2. The applicant has a **functional economic or social requirement** to reside in this particular rural area such as in any of the following 2 situations:
 - Economic requirements will normally encompass persons referred to in the revision to the Sustainable Rural Housing Guidelines 2005 and, if applicable, circulars. It includes persons involved in full-time farming, horticulture or forestry as well as similar rural-based part-time occupations where it can be demonstrated that it is the predominant occupation.
 - Social requirements will normally encompass persons referred to in the revision to the Sustainable Rural Housing Guidelines 2005 and, if applicable, circulars. Pending the making of the revised Sustainable Rural Housing Guidelines by the Minister, a Functional Social Requirement in County Offaly shall be taken as compliance with point 1 above. Special consideration shall be given in cases of exceptional health circumstances - supported by relevant documentation from a registered medical practitioner and a disability organisation proving that a person requires to live in a particular environment or close to family support, or requires a close family member to live in close proximity to that person.
 3. The applicant does **not already own or has not owned a house in the open countryside**.
 4. If the site is located within an Area of Special Control, there is no **alternative site** outside of Areas of Special Control.
 5. High quality **siting and design**.
- x) Although Tullamore, Birr, Portarlinton (Offaly and Laois side together) and Edenderry all have a population over 5,000 which is the population referred to in respect of cities and larger towns in Chapter 5 of the Sustainable Residential Development in Urban Area Guidelines, they should be treated differently as they are on different tiers of the settlement strategy namely Tullamore as a Key Town, Birr as a Self-Sustaining Growth Town, Portarlinton and Edenderry as Self Sustaining Towns. As stated in the RSES, *'Higher densities in core strategies should be applied to higher order settlements such as Dublin City, Regional Growth Centres and Key Towns. However, there should be a graded reduction in residential densities for Self Sustaining Growth Towns, Self-Sustaining Towns, towns and villages that is commensurate to the existing built environment'*. Accordingly, each tier of the settlement hierarchy will be treated differently in terms of density levels for the Core Strategy.

The density levels set out in the draft Plan for the four large towns are as follows:

Key Town (Tullamore) – 35/ha

Self-Sustaining Growth Town (Birr) and Self-Sustaining Towns (Edenderry and Portarlington): 30/ha

These figures are averages. It is accepted that the density levels in town centres and brownfields sites and opportunity sites can be higher than that and that is acknowledged in the draft Plan which states:

CSP-02 It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

DMS-02 Density	<p>The appropriate residential density of a site shall be determined with reference to;</p> <ul style="list-style-type: none"> • Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009) and the accompanying Urban Design Manual (2009); • Sustainable Urban Housing: Design Standards for New Apartments 2018 2020; • Urban Development and Building Heights Guidelines 2018; • Recommended maximum Densities per settlement tier as shown in Table 2.2 Core Strategy Table in Chapter 2 of this Plan; and • the prevailing scale and pattern of development in the area.
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Section 7.4.2 of the draft Plan states in relation to the development of Opportunity Sites that they shall be of ‘compact form and of high density’.

In relation to sites where taller buildings could be considered section 7.2.5 of the draft plan states that ‘Offaly County Council promotes greatly increased levels of residential development in our urban centres and where appropriate increases in the building heights and overall density of development. While achieving higher density does not automatically imply taller buildings, increased building height is a significant component in making optimal use of the capacity of sites in urban locations where transport, employment, services or retail development can achieve a requisite level of intensity for sustainability’.

In summary, the density figures in the Sustainable Residential in Urban Areas Guidelines 2009 for cities/ large towns states as follows:

- **Public Transport Corridors:**
Increased densities should be promoted within 500 metres walking distance of a bus stop, or within 1 km of a light rail stop or a rail station.
Minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes.
- **Infill:**
A balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill.

- Institutional lands:
Important to retain some of the open character of the lands. Net densities in the range of 35-50 dwellings per hectare should prevail and the objective of retaining the open character of the lands can be achieved by concentrating increased densities in selected parts.
- Outer Suburban / Greenfield Sites:
Net residential densities in the range of 35-50 dwellings per hectare. Densities of less than 30 dwellings per hectare should be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares.

As set out in Appendix A of the Sustainable Residential Development in Urban Area Guidelines, all densities are net densities. The densities used in the draft Development Plan were based on the figures in the Guidelines and accordingly are net also.

In terms of the first bullet point above relating to public transport corridors, further explanation can be found on page 33 of 'Smarter Travel, A Sustainable Transport Future' 2009-2020 which states:

Ensuring a general minimum housing density of between 35 and 50 dwellings per hectare in urban areas of suitable size and population and requiring substantially higher densities where local circumstances warrant, particularly in high capacity public transport corridors

Regards the larger towns, a single railway station exists in Tullamore and Portarlington to Dublin / Galway. There is no rail travel from one location to another within a particular town. In terms of bus services, there is low frequency bus services within the towns either. Accordingly, it is considered based on the above that high capacity public transport corridors do not exist within the larger towns.

In terms of the second bullet point, it is acknowledged that infill sites represent a large segment of the sites available for development in the larger towns. There is no density level set for these in the Guidelines but rather to strike and balance and to protect the character of the area. The general density in Tullamore is circa 25-30 residential units per hectare.

In terms of the third bullet point, there are no institutional lands in Tullamore.

In terms of the fourth bullet point, no less than 30 units per hectare will be encouraged.

Accordingly, the lowest density acceptable is 30 in Tullamore.

However, the Guidelines state that town centre and brownfield sites are also appropriate locations for increased densities but no density figure is provided in those Guidelines for them. Masterplans have not been prepared for the Opportunity sites in order to determine likely densities as these sites will be expected to accommodate a mix of uses. Please note that the Blundell Masterplan in Edenderry under the Rural Regeneration and Development Fund is ongoing. Also the Urban Regeneration and Development Fund (URDF) application for the Tullamore Regeneration Framework which will identify detailed opportunities for the Opportunity Sites in the Tullamore Development Plan, if funded. Inevitably the residential elements will be higher density. These represent our first opportunity under Project Ireland 2040 to do such work as the previous URDF was for significant street enhancements as a prerequisite to the development of the Opportunity Sites. In other words, we are not inactive in

trying to get good quality housing and mixed development in our main town centres. If we assign very high density in Opportunity Sites without the benefit of these Frameworks, we risk substandard applications being made.

Based on the fact that 30 units per hectare is the lowest that can be accepted on the suburban / greenfield sites, and respecting established character of area (at circa 25/30 units / hectare), but with the commitment to encourage higher densities in the town centre and brownfield sites it is considered reasonable to use the average of 35 units per hectare for Tullamore.

Planning applications will be assessed on a case by case basis.

Based on the fact that Tullamore will have an average of 35 units per hectare, and using the transcending scale for density on the settlement hierarchy, it is considered reasonable to set the other 3 large towns at a density of 30 units per hectare. These towns have an established density lower than Tullamore at circa 20-25 units per hectare to which infill sites must consider. Again each site will be assessed on its merits.

y) Re. Specific Planning Policy Requirement contained in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change:

In relation to OPR Recommendation 13, both Section 3.1.7 Legislative and Policy Context in Chapter 3 Climate Action and Energy and Section 3.4 Wind Energy Policy Context in the County Wind Energy Strategy should be amended to include specific reference to the Specific Planning Policy Requirement contained in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change as follows:

“It is a specific planning policy requirement under Section 28(1C) of the Act that, in making, reviewing, varying or amending a development plan, or a local area plan, with policies or objectives that relate to wind energy developments, the planning authority shall carry out the following:

(1) Ensure that overall national policy on renewable energy as contained in documents such as the Government’s ‘White Paper on Energy Policy - Ireland’s Transition to a Low Carbon Future’, as well as the ‘National Renewable Energy Action Plan’, the ‘Strategy for Renewable Energy’ and the ‘National Mitigation Plan’, is acknowledged and documented in the relevant development plan or local area plan;

(2) Indicate how the implementation of the relevant development plan or local area plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts); and

(3) Demonstrate detailed compliance with item number (2) above in any proposal to introduce or vary a mandatory setback distance or distances for wind turbines from specified land uses or classes of land use into a development plan or local area plan. Such a proposal shall be subject to environmental assessment requirements, for example under the SEA and Habitats Directives. It shall also be a material consideration in SEA, when taking into account likely significant effects on climatic factors, in addition to other factors such as landscape and air, if a mandatory setback or variation to a mandatory setback proposed by a planning authority in a development plan or local area plan would create a significant limitation or constraint on renewable energy projects, including wind turbines, within the administrative area of the plan.”

Re. Mandatory Setback between turbines and settlement boundaries

In line with Recommendation 14 of the OPR's submission, it is recommended to **remove the mandatory setback distance of 2 km** between turbines and settlement boundaries of towns & villages as the inclusion of such mandatory separation distances would restrict the potential for wind farm development in the county, would undermine other policy objectives supporting wind farm development and be contrary to national policy and Ministerial guidance on wind farm development.

Re. Positive and supportive statement on importance of wind energy in achieving national targets relating to climate change

In relation to OPR Observation 7 (regarding including a positive statement of the importance of wind energy in achieving national targets relating to climate change), no further action is proposed as a positive and supportive statement of this nature is already contained in Section 1 of the County Wind Energy Strategy which contains 5 objectives, one of which, no. 2, is to *"Support wind energy as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and greenhouse gas emissions."*

Re. Security of energy supply

In relation to OPR Observation 7 (regarding an objective to ensure security of energy supply or objectives to secure maximum potential from wind energy resources), it is recommended to include a new objective, in Chapter 3 Climate Action and Energy to *"ensure the security of energy supply by supporting the potential of the wind energy resources of the County in a manner that is consistent with proper planning and sustainable development of the area."*

Re. Reflect targets in contained in Climate Action Plan

In relation to OPR Observation 7, in the absence of Guidelines on how local authorities can set a target for wind energy generation, it is not possible to propose a specific target for renewable energy generation in Co. Offaly in the Plan period. It is therefore proposed to include a new objective in Chapter 3 Climate Action and Energy to;

"Work with key stakeholders to carry out an assessment on how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource. "

In addition, the following paragraph should be added to Section 4 'Review of Wind Energy Development and Future Energy Requirements in Offaly' of the County Wind Energy Strategy;

"In the absence of Guidelines on how local authorities can set a target for wind energy generation, it is not possible to propose a specific target for renewable energy generation in County Offaly in the Plan period yet. Notwithstanding this, it should be noted that, as reflected by Objective CAEO-xx, in Chapter 3 Climate Action and Energy, that the Council, is committed to working with key stakeholders in the carrying out of an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource during the lifetime of this Plan."

Re. Co-ordinate with adjacent local authorities' objectives for wind energy development along with assessments of wind energy capacity

In relation to OPR Observation 8, no further action is proposed as Section 9 of the County Wind Energy Strategy already details extensively in Table 4 other adjacent Local Authorities Wind Strategies and level of consistencies. I am satisfied subject to material amendments that the Council is applying National policy and guidelines to our own functional area. The Council will monitor and make submissions relating to any wind strategies or renewable energy policies prepared as part of forthcoming development plans in adjacent counties.

Appendix 1: Table identifying policies, objectives and development management standards in the Plan that promote a transport modal shift

Modal Shift Principle	Volume 1 Written Statement		Volume 2 Settlement Plans
<p>Compact Growth</p>	<p>Chapter 2: Core Strategy, Settlement Strategy and Housing Strategy</p>	<p>Relevant Policy/Objective/Actions Paraphrased</p> <p>Section 2.1.4 ‘Principles of Growth’- including Compact growth, by targeting at least 30% of all new homes that are proposed in settlements within their existing built-up footprints, with a focus on infill / brownfield lands, rather than continually sprawling outwards.</p> <p>CSP-02 – compact growth of towns and villages and that development proceeds sequentially.</p> <p>SSP-02 – 30% of all new homes in settlements to be in the built up footprint in an effort to make them more compact and reduce unsustainable urban sprawl.</p> <p>SSP-07 - require sustainable, compact, sequential growth and urban regeneration in Tullamore.</p> <p>HP-17 - encourage the compact growth of settlements and support permeability and sustainable mobility with priority for pedestrians and cyclists.</p>	<p>Town Plans</p> <p>Each Town Plan has a(n);</p> <ul style="list-style-type: none"> • Strategic Aim to reinforce the town centre as the heart of the town by avoiding undesirable and inefficient sprawl; by consolidating new development within the built-up footprint of the town, through targeting a significant proportion of future development on infill/brownfield/underutilised/vacant sites; by delivering sustainable re-use and regeneration outcomes; and by extending out sequentially subject to available infrastructure. • Objective to encourage the appropriate redevelopment of brownfield and infill sites for mixed uses within the existing built-up footprint of the town. • Objective to facilitate the re-use and development of existing vacant and underutilised buildings and sites for town centre uses to create a compact, vibrant town centre. <p>Villages</p>
	<p>Chapter 3: Climate Action and Energy</p>	<p>Table 3.1 Decarbonisation Actions and Projects including Compact Growth of settlements, reduce sprawl, higher densities, reuse buildings.</p>	
	<p>Chapter 7: Retail and Town Centre Strategy, and Regeneration</p>	<p>RP-01 - making better use of under-utilised land and buildings through compact growth.</p> <p>RP-14 - work in conjunction with the Land Development Agency in co-ordinating and developing strategic publically owned land banks suitable for housing provision in order to contribute towards achieving compact growth.</p>	

		<p>RP-11 - Requirement for masterplans on Opportunity Sites to incorporate a compact form and higher densities.</p>	<p>Each Village Plan has an objective to encourage the development of infill sites to create a compact, vibrant village.</p>
	<p>Chapter 8: Sustainability Mobility and Accessibility</p>	<p>SMAP-06 - promote more compact development forms that reduce overall demand for private transport and private transport infrastructure and support proposals that encourage modal shift towards sustainable travel modes.</p>	
	<p>Chapter 13: Development Management Standards</p>	<p>Section 13.2 outlines principles that Development Management Standards are based on – including compact growth and building heights.</p>	
<p>Implementing DMURs and Promoting Permeability</p>	<p>Chapter 8 Sustainability and Accessibility</p>	<p>SMAP-03 - reducing the need for travel through the use of design solutions and innovative approaches with regards to the Design Manual for Urban Roads and Streets, and TII documents and subsequently a shift to environmentally sustainable modes of transport.</p>	<p>Town Plans</p> <p>Each Town Plan has a(n);</p> <ul style="list-style-type: none"> • Strategic Aim to ‘promote permeable, healthy sustainable communities that focus on place making and a sense of well-being to ensure each settlement is an attractive place to live and work.’ • Objective promoting a high level of permeability for walking and cycling in town centre; • Objective to improve the walking and cycling infrastructure in the town; and • Objective to provide walking and walking connections with green infrastructure within and in certain towns the Grand Canal Greenway. • Objective to facilitate the redevelopment of Opportunity Sites. As part of the requirements to develop these sites, adequate provision for pedestrians and cyclists within the site and externally with linkages with main thoroughfares in accordance
	<p>Chapter 13: Development Management Standards</p>	<p>Section 13.2 outlines principles that Development Management Standards based on – including Permeability and Sustainable Mobility. DMS-07 requires Design Statement to show how residential development in excess of 10 units complies with DMURS. Section 13.2.4 states that DMURS applies to all developments within the 60kph zone or less.</p>	
	<p>Chapter 2: Core Strategy, Settlement Strategy and Housing Strategy</p>	<p>Section 2.1.4 ‘Principles of Growth’- including “Reducing Car Dependency, promoting sustainable mobility and regional accessibility, and integrating transportation and land use”.</p>	

			with Section 3 ‘Best Practice Principles for Maintaining and Providing Permeability’ from “Permeability Best Practice Guide” (NTA, 2015).
Integrated Transportation and Land Use	Chapter 3: Climate Action and Energy	Table 3.1 Decarbonisation Actions and Projects – including integrated transportation and landuse planning.	All land zoned in Settlement Plans (Towns and Villages) are based on five principles as laid out in Section 12.2 ‘Zoning Principles’ one of which is to: “Ensure alignment of zoning with availability of services, investment in infrastructure and the provision of employment, together with supporting amenities and services.”
	Chapter 8: Sustainability and Accessibility	<p>SMAP-04 - promote the integration of land use and transport planning.</p> <p>SMAO-02 - It is an objective of the Council to prepare a Local Transport Plan in accordance with ‘Area Based Transport Assessment Guidance’ by TII and NTA, for the Key Town of Tullamore in conjunction with the National Transport Authority and in tandem with the Local Area Plan, and to consider the preparation of Local Transport Plans for other towns that are subject to Local Area Plans, namely Birr, Edenderry and Portarlington subject to the provision of funding and agreement with statutory agencies.</p> <p>SMAP-05 - Larger-scale, trip intensive developments, such as high employee dense offices and retail, should in the first instance be focused into central urban locations and developed in a sequential manner and may be subject to Mobility Management / Travel Planning.</p> <p>Proposed new objective: To specify baseline figures and targets for modal share in new / varied Local Area Plans in order to encourage a modal shift away from the private car to more sustainable forms of transport, such as public transport, cycling and walking.</p> <p>Proposed new policy: All proposed major employment developments and schools shall be subject to Travel Plans in a manner consistent with NTA Guidance.</p>	

	<p>Chapter 3: Climate Action and Energy</p>	<p>CAEP-19 - improve walking and cycling connectivity within settlements and in particular with schools, town centres and employment areas... improve on the existing level of infrastructure and facilities for walking and cycling. CAEO-10 Prepare Mobility Management and Travel Plans for Tullamore and Edenderry to bring about behaviour change and more sustainable transport use.</p>	
<p>Walking and Cycling</p>	<p>Chapter 4: Biodiversity and Landscape</p>	<p>BLP-16 - support the provision of outdoor pursuits, walking and cycling routes through the county's peatlands and network of industrial railways. BLP-28 - integrate the provision of green infrastructure with infrastructure provision and replacement, including walking and cycling routes.</p>	<p>Town Plans</p> <p>Each Town Plan has a(n);</p> <ul style="list-style-type: none"> • Strategic Aim to provide ecological connectivity and walking and cycling infrastructure throughout the town which links all the Green Infrastructure available to residents • Objective to improve the walking and cycling infrastructure in the town; and • Objective to provide walking and walking connections with green infrastructure within and in certain towns the Grand Canal Greenway. <p>Village Plans</p> <p>Village Plans have a range of specific objectives relating to the provision of walking and cycling links between the villages and natural amenities in the area.</p>
	<p>Chapter 7: Retail and Town Centre, and Regeneration</p>	<p>Section 7.2.4 - Movement and Access Requirements for Opportunity Sites include:</p> <ul style="list-style-type: none"> • Design for an alternative to the car (for example, walking, cycling, public transport) and enhance accessibility and connectivity, by prioritising cycling and walking as active sustainable transport modes; • Provide an integrated, safe, convenient, direct and comfortable network of routes for walking and cycling; • Provide bicycle parking and charging point infrastructure for electric vehicles; • Movement and access should also be informed by future strategies / plans relating to transportation. 	
	<p>Chapter 8: Sustainable Mobility</p>	<p>Proposed new policy: Continue to work with the relevant transport providers, agencies and stakeholders to facilitate the integration of active travel (walking, cycling) with public transport. Proposed new policy: Specify baseline figures and targets for modal share in new / varied Local Area</p>	

		<p>Plans in order to encourage modal shift away from the private car to more sustainable forms of transport, such as public transport, cycling and walking.</p> <p>Proposed new objective: It is an objective of the Council to set modal share targets within the county in cooperation with NTA, CARO, EMRA and other relevant stakeholders and in accordance with any relevant Guidelines that may come into effect.</p> <p>SMAO-04 Implement Connecting People Connecting Places: A Strategy for Walking and Cycling in Offaly September 2015.</p> <p>SMAO-05 Cycle lanes shall be designed and maintained in accordance with the National Cycle Manual by the NTA.</p> <p>SMAO-06 - Collaborate with Bord na Móna and Coillte in the development of the 'Major Cycling Destination in the Midlands of Ireland – Feasibility Study 2016' and to pursue the development of greenway links to adjoining counties.</p> <p>SMAP-08 - Prioritise the need for people to be physically active in their daily lives; to improve permeability and to promote walking and cycling in the design of streets and public spaces as an alternative and sustainable mode of transport; and to support safer walking and cycling routes to schools under the Green Schools Initiative subject to appropriate environmental assessments, including Habitats Directive Assessment.</p> <p>SMAP-09 - Support the pedestrianisation and permeability of town and village centres where appropriate, in order to create accessible, attractive, vibrant and safe places. In doing this the Council will strive to support the;</p>	<p>Sráid Plans</p> <p>A number of sráid plans have objectives to improve connectivity with proximate cycle routes / greenways.</p>
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		<ul style="list-style-type: none"> (x) Provision of 'cycle friendly' towns and villages; (xi) Provision of key cycling routes through larger towns; (xii) Potential for a walking and cycling route around Tullamore incorporating the Grand Canal, the banks of the Tullamore river and inside the barriers of the Tullamore by-pass. <p>SMAP-10 - continued development of walking and cycling routes including greenways, blueways and peatways.</p> <p>SMAP-17 - Be supportive of exploring opportunities for the provision of cycle lanes along the N80, preferably off road cycle tracks separated from vehicular traffic where feasible, subject to adhering to road safety standards and complying with Transport Infrastructure Ireland's Guidelines Publications, safeguarding the strategic function of the N80 and the undertaking of a safety audit.</p>	
	Chapter 13: Development Management Standards	DMS-21 In greenfield sites, public open space shall be provided within 150 metres walking distance of every house in a new residential development.	
	Chapter 9: Social Inclusion, Community and Cultural Development	SICCDP-33 - ensure the integration of safe and convenient alternatives to the car into the design of our communities by prioritising walking and cycling accessibility to both existing and proposed developments.	
	Chapter 2: Core Strategy	Section 2.1.4 'Principles of Growth'- including 'Moving towards self-sustaining rather than long distance commuter driven activity.'	
Parking	Chapter 8: Sustainable Mobility	SMAP-02 - Support the growth in the use of electric vehicles, autonomous vehicles and fuel cell	

		<p>vehicles; prioritise car parking spaces for these vehicles; and facilitate the provision of battery charging infrastructure and refuelling infrastructure for these vehicles where considered appropriate.</p> <p>SMAP-11 - Support the provision of secure cycle parking facilities in the public realm of towns and villages, at all public service destinations and in other developments.</p> <p>Proposed new policy: Allow for the reduction in car parking standards in suitable town centre locations in order to encourage a modal shift away from the private car to more sustainable forms of transport, such as public transport, cycling and walking.</p>	
	<p>Chapter 13: Development Management Standards</p>	<p>DMS-99 sets out the minimum cycle parking standards to be provided for different classifications of developments.</p> <p>DMS-100 sets out cycle parking dimensions including:</p> <ul style="list-style-type: none"> • Cycle parking to be provided shall be sheltered for retail, other commercial, and enterprise and employment uses; • In residential developments without private gardens or wholly dependent on balconies for private open space, covered secure bicycle stands should be provided in private communal areas. • It may be a requirement to provide showers, changing facilities, lockers and clothes drying facilities, for use by staff that walk or cycle to work. CCTV cameras or passive surveillance of car parks and cycle parks may be required for personal safety and security considerations. 	<p>Town Plans have an objective to;</p> <ul style="list-style-type: none"> • identify car parks and other appropriate locations for the provision of battery charging infrastructure for electric cars; • To provide adequate, secure and sheltered bicycle parking facilities at appropriate locations: (i) in the town centre (ii) at employment areas and (iii) adjacent to heritage, community and amenity destinations; • Have particular regard to the needs and access for people with disabilities. The further provision of cycle parking as part of development and public realm proposals will be required.

		<ul style="list-style-type: none"> • All cycle facilities in multi-storey car parks shall be at ground floor level and completely segregated from vehicular traffic. Cyclists should also have designated entry and exit routes at the car park and with minimum headroom of 2.4m to facilitate access by cyclists. • Within larger new developments cycle routes shall link to the existing cycle network where possible and maintain a high degree of permeability through developments. Cycle Audits may be required in such developments. <p>DMS-102 sets out maximum car parking provisions for different classifications of developments.</p> <p>DMS-103 makes provision for car free developments on suitable small-scale sites within or adjacent to town centres which have high levels of public transport accessibility, have convenient and safe access to local shops and community facilities.</p> <p>DMS-104 requires that a minimum of 10% of the proposed car parking spaces required for the category of development listed in car parking standards contained in DMO-102 shall be provided with electrical connection points, to allow for functional electric vehicle charging.</p>	
<p>Trails / Greenways / Peatways for Walking / Cycling</p>	<p>Chapter 6: Tourism and Recreational Development</p>	<p>TRO-14 - Implement 'A Strategy for Walking and Cycling in Offaly; Connecting People Connecting Places' (2015).</p> <p>TRO-15 - Implement the 'Feasibility Study on the Development of a Major Cycling Destination in the Midlands of Ireland' (2016) in conjunction with Bord na Móna, Coillte, Waterways Ireland, the Office of Public Works and the Product</p>	<p>A number of settlement plans address the provision or extension of trails and greenways.</p>

		<p>Development Group, in accordance with the Offaly Tourism Statement of Strategy 2017-2022.</p> <p>TRO-17 - Protect potential greenway, blueway and peatway routes (i) along and in proximity to abandoned rail lines and (ii) routes identified in Figure 6.14 'Midlands Cycling Destination, Offaly Network Map' from inappropriate development that could compromise the delivery of a cycling or walking route in the future.</p> <p>TRP-16 - Support the extension of greenways, blueways, peatways and trails within the county and the integration and linkage of them with other existing / proposed greenways, blueways, peatways and trails both within and outside County Offaly.</p> <p>TRP-17 - Promote the provision of appropriate infrastructural requirements to meet the needs of greenways, blueways, and peatways and other pedestrian / cycling trails such as high quality signage, bicycle stands, service facilities, seating and if necessary, car parking (all with regard to Department of Transport, Tourism and Sport's 'Greenways and Cycle Routes Ancillary Infrastructure Guidelines'), and the provision of visitor interpretation along these routes such as storyboards, artworks and other media to create a greater sense of place, connecting and immersing visitors in the local heritage and stories.</p> <p>TRP-19 - Further investigate the potential of and opportunities for the development of existing and new trails in County Offaly to include a mixture of walking, cycling and driving trails, for the provision of appropriate services along these trails, and for the development of linkages between these trails and key tourism assets both within Offaly and adjoining counties. An example includes</p>	
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		<p>Derrycastle Experience Lake and Trails and its potential linkage to the People’s Park in Portarlinton and the wider linkages to the Mount Lucas windfarm. The Council will only support such developments where it is demonstrated that no significant environmental effects would arise as a consequence of their construction or operation.</p> <p>TRP-20 - Promote and facilitate the continued development of the Slieve Bloom Mountains bike trail as a key tourism asset for the county and as part of the tourism offer on the Slieve Bloom Mountains, in conjunction with Laois County Council. In addition, it is the Council policy to (i) promote the further development of walking trails on the mountains, (ii) connect to and develop Kinnitty as a service hub for the area and (iii) promote and facilitate links to / from other existing and proposed greenways, blueways and peatways.</p> <p>TRP-22 - Promote the <i>‘Feasibility Study on the Development of a Major Cycling Destination in the Midlands of Ireland’</i> (2016) in conjunction with Bord na Móna and Coillte in accordance with ‘Outdoor Recreation Plan for Public Lands and Waters in Ireland’ 2017-2021 and in particular to recognise Tullamore as a hub in this respect.</p> <p>TRP-23 - Support Fáilte Ireland in the making of <i>‘The Beara Breifne Way Tourism Activation Plan’</i> which will identify a number of towns as walking hubs along a trail which extends from Cork to Cavan through Offaly.</p>	
<p>Public Transport</p>	<p>Chapter 8: Sustainable Mobility and Accessibility</p>	<p>SMAO-02 - Prepare a Local Transport Plan in accordance with ‘Area Based Transport Assessment Guidance’ by TII and NTA, for the Key Town of Tullamore in conjunction with the National Transport Authority and in tandem with the Local Area Plan, and to consider the</p>	<p>Each Town Plan contains measures to ensure that all development in the Plan Area will contribute positively towards reduced energy consumption and the associated carbon footprint. One of these measures is to;</p>

		<p>preparation of Local Transport Plans for other towns that are subject to Local Area Plans, namely Birr, Edenderry and Portarlinton subject to the provision of funding and agreement with statutory agencies.</p> <p>SMAO-07 - Safeguard all existing rail infrastructure, to encourage the re-opening of rail stations, and to preserve disused stations / halts and tracks, appropriate to future strategic county public transport needs.</p> <p>SMAP-07 - Encourage better integration of transport services with the aim of reducing car trips by encouraging and fostering improved consultation and co-operation between both public and private providers of transport services operating in the county and in the midland region, including all providers of bus and rail services.</p> <p>SMAP-12 - Co-operate with and encourage Iarnród Éireann to (i) secure the upgrading of the existing rail linkages between Athlone, Clara, Tullamore and Portarlinton (ii) improve the frequency of trains between Athlone and Dublin and (iii) ensure that train stations in County Offaly are manned and have frequent services.</p> <p>SMAP-13 - Promote and facilitate, in co-operation with the Department of Transport, Tourism and Sport, Iarnród Éireann and adjoining local authorities, the provision of a second rail line between Portarlinton and Athlone. In conjunction with this there is an opportunity for:</p> <ul style="list-style-type: none"> • Tullamore Train Station and adjoining lands to be developed as a transport (bus/rail) node with possible integration of local bus services to serve the town and catchment area; and • Clara Train Station and adjoining lands to be developed as a transport (bus/rail) node with 	<p>“Prioritise sustainable mobility i.e. public transport, walking and cycling and integrate land use and transportation in order to reduce travel demand.”</p> <p>A number of specific objectives in each Town Plan represent this measure.</p> <p>A number of Settlement Plans have an objective to support the Local Link Rural Transport Programme 2018-2022 in County Offaly and subsequent programmes.</p>
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		<p>possible integration of local bus services to serve the town and catchment area.</p> <p>SMAP-14 - Support the reopening of Geashill Train Station.</p> <p>SMAP-15 - Support and facilitate the operation of existing bus services and to facilitate the provisions of improved facilities and services for bus users in towns and villages including the provision of set down areas for coaches and bus shelters at all bus stops where feasible.</p> <p>SMAP-16 - Support the Local Link Rural Transport Programme 2018-2022 in County Offaly and subsequent programmes which provides for social and economic connectivity between settlements and rural areas.</p> <p>Proposed new policy: It is Council policy to support and develop public transport routes throughout the county through collaboration with the National Transport Authority and other relevant statutory bodies.</p>	
<p>Reduce outward commuting</p>	<p>Chapter 5: Economic Development</p>	<p>ENTP-19 - Support remote working opportunities from home and innovative designated hub/ co-working spaces, in the interests of mitigating long commuting times.</p> <p>ENTP-20 - Where feasible, encourage home-based employment including the provision of small-scale individual enterprises</p> <p>ENTP-21 - Support local employment creation where it can mitigate against long distance commuting.</p>	<p>Town Plans</p> <p>Many of the Plans identify key opportunity sites with the potential for mixed use developments incorporating employment uses which would help reduce outward commuting.</p>
	<p>Chapter 9: Social Inclusion, Community and Cultural Development</p>	<p>SICCDP-23 - Support and facilitate the establishment of co-working/ remote working hubs and creative hubs as either standalone facilities themselves or ancillary to public buildings, libraries and community centres or in towns and village centres</p>	

Appendix 2: Assessment of Average Household Sizes and Forecasted Options

Avg. HH Size (AHS)	1971	1981	1991	2002	2006	2011	2016
State	3.94	3.68	3.34	2.95	2.81	2.73	2.75
Offaly	4.08	3.88	3.55	3.10	2.93	2.90	2.84369

% Change in AHS	1971	1981	1991	2002	2006	2011	2016
State	-	-6.6%	-9.2%	-11.7%	-4.7%	-2.8%	0.6%
Offaly	-	-4.9%	-8.5%	-12.7%	-5.5%	-1.0%	-1.9%

# Intercensal Years	1971	1981	1991	2002	2006	2011	2016
Years	-	10	10	11	4	5	5

Annualised Change	1971	1981	1991	2002	2006	2011	2016
State	-	-0.7%	-0.9%	-1.1%	-1.2%	-0.6%	0.1%
Offaly	-	-0.5%	-0.9%	-1.2%	-1.4%	-0.2%	-0.4%

Trends in AHS	AHS
Avg. Rate 1981-2016: State	-0.71%
Avg. Rate 1981-2016: Offaly	-0.74%

NPF Target	AHS
2040 (National)	2.5
Difference between 2016 & 2040	0.34
Number of years	24
Annualised Change	0.014320

Offaly	2016
All private households (HHs)	77,755
All persons in private HHs	27,343
Total Population	77,961

Forecasted Changes OFFALY	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Option 1: Maintain Fixed 2016	2.84	2.84	2.84	2.84	2.84	2.84	2.84	2.84	2.84	2.84	2.84	2.84	2.84
Option 2: Alignment with NPF	2.84	2.83	2.82	2.80	2.79	2.77	2.76	2.74	2.73	2.71	2.70	2.69	2.67
Option 3: Trend Adjustment	2.84	2.82	2.80	2.78	2.76	2.74	2.72	2.70	2.68	2.66	2.64	2.62	2.60
Option 4: Target Adjustment	2.84	2.84	2.83	2.82	2.81	2.80	2.79	2.78	2.78	2.77	2.76	2.75	2.75

Forecasted Changes STATE	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Option 1: Maintain Fixed 2016	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75
Option 2: Alignment with NPF	2.75	2.73	2.72	2.70	2.69	2.68	2.66	2.65	2.63	2.62	2.60	2.59	2.58
Option 3: Trend Adjustment	2.75	2.73	2.71	2.69	2.67	2.65	2.63	2.61	2.59	2.58	2.56	2.54	2.52

Forecasted Changes OFFALY	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040
Option 1: Maintain Fixed 2016	2.84	2.84	2.84	2.84	2.84	2.84	2.84	2.84	2.84	2.84	2.84	2.84
Option 2: Alignment with NPF	2.66	2.64	2.63	2.61	2.60	2.59	2.57	2.56	2.54	2.53	2.51	2.50
Option 3: Trend Adjustment	2.58	2.56	2.54	2.52	2.51	2.49	2.47	2.45	2.43	2.41	2.40	2.38
Option 4: Target Adjustment	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75

Forecasted Changes STATE	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040
Option 1: Maintain Fixed 2016	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75	2.75
Option 2: Alignment with NPF	2.56	2.55	2.53	2.52	2.50	2.49	2.48	2.46	2.45	2.43	2.42	2.50
Option 3: Trend Adjustment	2.50	2.49	2.47	2.45	2.43	2.42	2.40	2.38	2.36	2.35	2.33	2.31

Offaly County Council		Annual Average Households	Total Households
A	ESRI NPF scenario projected new household demand 2017 to end Q3 2027	362 (3890 / 10.75) It's 10.75 to reflect 10 full years plus three quarters of 2027	3890 (NPF 50:50 City Scenario, as per Dept. spreadsheet - full figures for 2017 to 2026 and using a pro-rata figure for Q1, Q2, Q3 2027)
B	Actual new housing supply 2017 to end Q3 2021 (estimated future delivery projected pro rata from year to date)	172 (815 / 4.75) It's 4.75 to reflect 4 full years plus three quarters of 2021	815 (CSO figures now available for 2017 to end 2020, which totals 668. Estimated figure for Q1, Q2 and Q3 2021 based on projected pro-rata from 2020 completions (196 units). $196/4 * 3Q = 147$ so $668 + 147 = 815$)
C	Homeless households (latest data), and unmet demand as at most recent Census	N/a	114 (Figure taken from Appendix 1 to Dept's Letter to CE)
D	Plan Housing Demand = Total (A-B+C) (Projected ESRI NPF demand - new completions) = Unmet demand	532 (3189 / 6 years)	3189 (A-B)+C
E	Potential adjustment 1 to end 2026 portion of plan period to facilitate convergence to NPF strategy (where justified)	Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above	Adjusted Total Demand
E1	ESRI Baseline scenario projected new household demand 2017, to Q4 2026	518 (5180 / 10 years)	5180 (Baseline figures as per Dept. spreadsheet)
E2	ESRI NPF scenario projected new household demand Q1, Q2 & Q3 2027	287	287 (NPF 50:50 City Scenario, as per Dept. spreadsheet - using a pro-rata figure for Q1, Q2, Q3 2027) $382 / 4 * 3Q$
E3	Mid-point between A - E2 (ESRI NPF and baseline scenarios to Q4 2026)	439 (4392/10 years)	4392 $((A-E2)+E1)/2$
E4	Adjusted Total Demand calculation based on E2 + E3 in lieu of A above	663 (3978/6 years)	3978 (E2+E3-B)+C
F	Potential adjustment 2 (plus 25%) to end 2026 is not applicable for Offaly because B (actual housing supply 2017-2020) does not exceed or close to D (plan period housing demand)	N/a	N/A

The above Table is based on the County Development Plan in effect date of Q4 2021 to end of Q3 2027. The table is set out in accordance with the methodology designed by the Department for formulating the housing supply target for Development Plans as set out in the section 28 Guidelines titled: *'Housing Supply Target Methodology for Development Planning'*, December 2020, and subsequent spreadsheets provided by the Department. These Guidelines utilise recent research undertaken by the Economic and Social Research Institute (ESRI) titled *'Regional Demographic and Structural Housing Demand at a County Level'*. The table indicates that County Offaly has a housing supply target of 3978 households to be used in the Core Strategy Table.

Appendix 3: Core Strategy Table

Typology	Settlement	Population 2016 Census	Projected Population Increase to 2027	Projected Population 2027	Housing Supply Target 2021-2027 (total based on Dept spreadsheet)	Quantum of land in hectares zoned mixed use and town / village centre including Opportunity Sites that can accommodate an element of residential units and other uses	20% of the quantum of land zoned mixed use and / town / village centre including Opportunity Sites that can accommodate residential units	Potential number of residential units to be delivered on mixed use and town / village centre zoning including Opportunity Sites - using density levels in box below	Residual number of residential units required 2021-2027	Quantum of land required to be zoned 'New Residential' to cater for number of residential units required (Column K) (using density levels in box below)	Quantum of land zoned 'New Residential' in the Plan	Number of residential units that can be accommodated on brownfield / infill sites	Residential units that can be accommodated on brownfield / infill sites as a percentage of all proposed residential units in the settlement (in order to strive to satisfy 30% within built up footprint)	
Key Town	Tullamore	14607	4,382	18,989	1379	12	2.40	84	1295	37.0	39.81	1392	101%	
Self Sustaining Town	Birr & Crinkill	5052	1263	6,315	441	3.8	0.76	23	418	13.9	14.4	313	71%	
Self Sustaining Growth Town	Edenderry	7359	721	8,080	323	4.03	0.81	24	299	10.0	requires new LAP	requires new LAP	requires new LAP	
	Portarlington (OY)	1989	207	2,196	140	0.63	0.13	4	137	4.6	requires new LAP	requires new LAP	requires new LAP	
Town	Banagher	1760	317	2,077	158	1.42	0.28	7	151	6.0	6.4	51	32%	
	Clara	3336	534	3,870	213	1.9	0.38	10	203	8.1	8.1	114	54%	
Rural	Daingean	1077	172	1,249	64	1.3	0.26	5	59	2.9	2.9	64	100%	
	Smaller Town	Ferbane	1191	214	1,405	119	3.35	0.67	14	105	5.3	5.26	77	65%
		Kilcormac	935	155	1,090	57	0.62	0.12	2	54	2.7	2.7	56	98%
	Villages		7044	954	7,998	421	8.78	1.76	26	394	26.2	26.85	n/a	n/a
	Sraids and Open Countryside	33611	320	33,931	662	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
	Total	77961	9239	87,200	3978	37.83	7.57	199	3116	116.8	106.42*	2067	n/a	

* The quantum of land to be zoned 'New Residential' in Edenderry and Portarlington to align with the Core Strategy will be established as part of a variation/review to the respective Local Area Plans, the process for which will commence following adoption of the Offaly County Development Plan 2021-2027. The extent of lands zoned residential (which doesn't differentiate between new and existing residential zonings) under the Joint Portarlington LAP 2018-2024 and Edenderry Local Area Plans 2017-2023 is proposed to be inserted into a table in Chapter 2 as set out in section (p) of the CE Response to the OPR submission.

Settlement Typology	Average Density Levels
Key Town	35/ha
Self-Sustaining (Growth) Towns	30/ha
Towns	25/ha
Smaller Towns	20/ha
Villages	15/ha

Appendix 4: Infrastructural Assessment Report

National Planning Framework

The National Planning Framework (NPF) emphasises the requirement for better linkage between the zoning of land for development and the availability of or investment in infrastructure that is required to facilitate development. The following three National Policy Objectives (NPOs) are relevant in this case, namely:

NPO 72a: Planning authorities will be required to apply a standardised, tiered approach to differentiate between (i) zoned land that is serviced and (ii) zoned land that is serviceable within the life of the plan.

NPO 72b: When considering zoning land for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages.

NPO 72c: When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development.

Appendix 3 of the NPF provides a methodology for a tiered approach to land zoning as referred to in NPO 72a. The implementation of this tiered approach allows for greater co-ordination between land use zoning and infrastructure availability. Appendix 3 of the NPF provides a description of Tier 1 (Serviced Zoned Land) and Tier 2 (Serviceable Zoned Land) as follows:

Tier 1: Serviced Zoned Land	Land that is <u>able to connect to existing development services</u> i.e. road and footpath access, public lighting, foul sewer drainage, surface water drainage and water supply, for which there is <u>service capacity available</u> .
Tier 2: Serviceable Zoned Land	Land that is not currently sufficiently serviced to support new development but <u>has the potential to become fully serviced within the life of the Plan</u> . The potential for the delivery of the required services and / or capacity to support new development must be identified.

In this regard, lands have only been identified for development where they are able to connect to existing development services for which there is service capacity available or has the potential to become fully serviced within the life of the Plan.

Development Plan Guidelines

The Planning Authority engaged comprehensively with Irish Water (IW) in the preparation of the Plan. In the absence of updated Development Plan Guidelines, the advice from both IW and the Council's Water Services Section was used to inform zoning decisions. It is anticipated that further guidance on this methodology will be set out in detail in the updated Development Plan Guidelines for Planning Authorities.

Plan-led Approach

Section 33 (5) of the Water Services (no. 2) Act 2013 as amended by the Planning and Development Amendment Act 2018 concerns Irish Water's Water Services Strategic Plan (2015, under review in 2020), which sets out the strategic objectives for the delivery of water services over the next 25 years up to 2040 and sets a context for investment and implementation plans. This plan is reviewed every five years. It states that *'Irish Water shall when preparing a water services strategic plan have regard to proper planning and sustainable development in line with any development plans within the meaning of the Act 2000, in particular the Core Strategy under section 10 of the Act'*.

Accordingly, the Core Strategy shall set the desired population allocation within the county whilst the IW Water Services Strategic Plan shall follow pursuit by having regard to it.

The following policies set out in Chapter 11 of the County Development Plan demonstrate Offaly County Council's commitment to work in conjunction with Irish Water to deliver an improved water and wastewater infrastructure in the county:

WSP-02 It is Council policy to liaise and co-operate with Irish Water in the implementation and delivery of the 'Water Services Strategic Plan' (2015, under review in 2020), the 'Irish Water Business Plan 2015-2021', the 'Irish Water National Water Resources Plan' (expected in 2021) and the 'Irish Water Investment Plan 2020-2024' (or any amendment thereof) and other relevant investment works programmes of Irish Water, to provide infrastructure to service settlements in accordance with the Council's Core Strategy and Settlement Strategy.

WSP-03 It is Council policy to work in conjunction with Irish Water to protect existing water supply and wastewater infrastructure, to maximise the potential of existing capacity and to facilitate the timely delivery of new water supply and wastewater infrastructure to facilitate future growth in accordance with the Council's Core Strategy and Settlement Strategy.

Infrastructure Requirements

Wastewater and Water:

As stated by Irish Water in their submission on the draft Offaly County Development Plan:

'The County is served by a large number of wastewater treatment plants. Available capacity at any plant varies daily. Where there are constraints, applications for developments are on a first come, first served basis. If no [IW] project is associated with a constrained area, then any infrastructure will be developer-led. Irish Water can work with developers to form the best solution for a particular site'.

On this basis, where there are deficiencies in the capacity of a particular wastewater treatment plant to cater for all of the proposed population allocation for a settlement that is advocated under the Development Plan, the sites that come forward first for development may be served by I.W. based on their first come first served approach, whilst later sites might require a developer-led approach to

finance the infrastructure. Accordingly, it is impossible to identify the order of which sites will be developed first irrespective of the local authority encouraging sequential growth and infill / brownfield development of a settlement.

The following are a list of deficiencies in the waste water and water infrastructure within the settlements and the actions proposed to be undertaken in order to address these up to the year 2027.

Wastewater Deficiencies:

Settlement	Proposed Additional Population 2021-2027	Current Wastewater treatment capacity headroom	Investment up to the year 2027
Birr	1263	Headroom for approximately 900 persons	Currently after heavy rain the incoming flow to the plant overflows to the river. The proposed wetlands will prevent this occurring and will pump the effluent to the Plant when storm subsides. Also, this wetland will prevent the Plant from washing out. It will not increase the capacity of the Plant. No current proposals to expand the plant. In the event of no remaining headroom, any proposed development would require developer investment.
Edenderry	721	Headroom for approximately 512 persons	Capacity will be increased on completion of upgrade to the treatment plant during the plan period. The expectant plant design capacity is for a population equivalent of 12,500. IW are in the process of appointing a consultant to design the new extension.
Daingean	172	Headroom for approximately 90 persons	Surface water getting into the network is a problem. Offaly County Council proposing it under the IW Small Towns and Villages Growth Programme for rectification.
Walsh Island	35	No capacity	An alteration of the treatment plant through improved aeration and improved sludge rates would increase it to 500 PE which is sufficient to cater for the proposed village growth.
Rhode	150	Headroom for approximately 60 persons	Offaly County Council proposing it for upgrade under the IW Smaller Towns and Villages Growth Programme.

Water Deficiencies:

Settlement	Proposed Additional Population 2021-2027	Problem	Investment up to the year 2027
Tullamore	4382	Very limited / constrained water supply capacity	See Paragraph below.
Birr	1263	Limited water supply capacity	See Paragraph below.
Edenderry	721	Very limited / constrained water supply capacity	See Paragraph below. There are 3 supplies feeding Edenderry. One supply from Rhode is experiencing problems and a new source will be provided which would be beneficial.
Portarlinton (OY)	207	Very limited / constrained water supply capacity	See Paragraph below. Water is fed from Laois County Council. There are problems with supply and boreholes will be drilled on the Offaly side.
Daingean	172	Limited water supply capacity	See Paragraph below
Kilcormac	155	Limited water supply capacity	See Paragraph below. A booster pump will be provided which will be beneficial.
Mountbolus	24	In the year 2018 the Shallow well dried up and so water had to be tinkered in to the village.	A search for a new bore hole will be undertaken to address this.
Clonbullogue	81	Access to site for disinfection purposes is a problem.	Disinfection programme being implemented at present which will solve Clonbullogue issues. Access is being addressed.

Where there are water supply constraints, the availability of water will be on a first come, first served basis with priority given to domestic customers. Non-domestic developments will be asked by IW to review their proposals to reduce water requirements. In the meantime, IW and Offaly County Council are continually progressing leakage reduction activities, mains rehabilitation activities and lead replacement activities. These are priorities based on leakage rates, water quality issues and ongoing disruption to customer's supplies. IW and Offaly County Council will continue to monitor the performance of the network to ensure that the most urgent works are priorities as required. The National Water Resources Plan (which is due to be published for consultation early 2021) will include four Regional Water Resources Plans which will develop a strategic plan for each water supply including short, medium and long term options to address risk across our water supplies. However according to IW although water is constrained in the above areas at critical times such as drought and freeze events, this need not necessarily halt growth.

Surface Water:

There are some constraints in sewer networks in various locations around the county, depending on size and scale of proposed developments. Infrastructure will have to be assessed on a case by case basis. The Council estimate spending approximately €1,825,000 on surface water improvements during the plan period.

A Drainage Area Plan (DAP) is currently being prepared for Tullamore. This DAP will model the existing sewer network / future scenarios and develop solutions to overcome the current constraints. IW will develop concept designs for the noted constraints such as flooding, pollution and trunk sewer capacity upgrades.

IW are developing an additional Infrastructure Development Plan (expected to be completed December 2020). This will assess all zoned land in the Tullamore catchment and develop a flow profile from each site. This will identify the requirements to allow the site to develop and connect to the trunk network. The output of this study will outline any upgrades in the network as a result of the flow from each parcel of land individually and communally.

IW have also started the design of the proposed Southern Interceptor Sewer for Tullamore. This will inform requirements of trunk infrastructure required to be co-located within new roads and how the flow will be connected to the existing system and to the waste water treatment plant.

IW and the Council are continually progressing sewer rehabilitation activities, capital maintenance activities at pumping stations, storm water over flow assessments county wide. IW and the Council will continue to monitor the performance of the networks to ensure that the most urgent works are priorities as required.

Transport:

Site access arrangements and some road improvement works will generally be developer-led.

The key settlements of Tullamore [Key town], Birr, Edenderry and Portarlington [Self Sustaining (Growth) Towns] are or will be subject to Local Area Plans and governed by the requirement to include an 'Implementation and Infrastructure Delivery Schedule' in accordance with the Local Area Plan Guidelines 2013.

Local Transport Plans (LTPs) will be carried out in tandem with the above Local Area Plans during the Development Plan period. These LPP's will help inform the location and type of infrastructure relating to movement.

Capital Costs Estimates

The delivery of infrastructure is funding dependent. The key funding sources for the delivery of infrastructure are set out in Chapter 14 Implementation and Monitoring.

The estimation of capital costs for the required infrastructure is challenging due to a variety of parameters such as distance of rising mains, site investigations, wayleaves, landowners and contractors. IW has indicated that it does not have resources or capacity to carry out such an exercise and therefore no costings have been provided in terms of water services.

The Roads Section has estimated costs of approximately €26,000,000 (year 1) to €204,000,000 (year 6) on delivering roads projects (annual grants, larger strategic projects and various sources of funding) as per Chapter 8 of Volume 1 of this Plan titled Sustainable Transport Strategy. The Roads Section has estimated costs of approximately €82,000,000 for projects identified in the Volume 2 Settlement

Plans, which does not include annual programme of works but rather projects. Roads related infrastructure listed in the Volume 2 Settlement Plans has estimated costs of approximately €82,000,000, which is included within the figure of €204,000,000 above. The cost per settlement would include larger projects and smaller footpaths and cycleway measures that will be addressed through the Town and Village Renewal Scheme.

Additional Works

It should be noted that the infrastructure works included in this Plan are not exhaustive and there may be additional works required when a more detailed analysis of an area and land / site is carried out as part of a planning application. The level of works required will also be dependent on the nature and scale of the development on the subject lands / site. This will be assessed and reviewed in greater detail at the planning application stage of any development proposals on the subject lands / sites.

Infrastructure Provision

Zoning maps for each of the towns and villages that also identify the extent of existing water mains, waste water mains, footpaths and lighting are set out hereunder [this will be at material amendment and final plan stages]. These maps illustrate the proximity of infrastructure relative to a particular site and accordingly demonstrate whether a particular site is Tier 1 or 2.

Appendix 5: Changed Land Use Zoning Maps in response to the Core Strategy Table

Tullamore

Draft Plan

- Draft Plan, Core Strategy Table, Chapter 2 = 43ha of ‘New Residential’ allocated to Tullamore
- Quantum of land zoned ‘New Residential’ for Tullamore in draft Plan = 47ha.

Core Strategy Amendment

- Amended Core Strategy Table, Chapter 2 = 37 ha of ‘New Residential’ allocated to Tullamore
- Required reduction in ‘New Residential’ zoned land in Tullamore = 10 ha (47 minus 37)

It is recommended that the zoning of approximately 4.0 ha of land (identified as site ‘A’ on the maps below –be changed from ‘New Residential’ to part ‘Industrial and Warehousing’ and part ‘Community Services / Facilities’, as per existing Tullamore Town & Environs Development Plan 2010-2016 (as extended).

It is recommended that the zoning of approximately 4.0 ha of land (identified as site ‘B’ on the maps below –be changed from ‘New Residential’ to ‘Strategic Residential Reserve’

- Quantum of land zoned ‘New Residential’ in Tullamore = 39.8. ha which is considered acceptable for the Key Town of Tullamore.



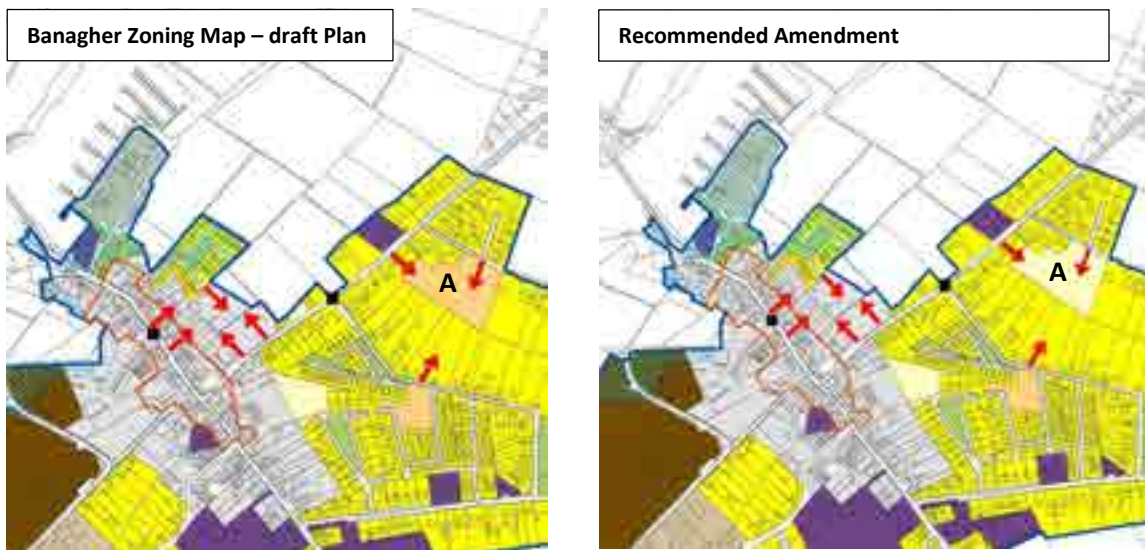
Banagher

Draft Plan

- Draft Plan, Core Strategy Table, Chapter 2 = 4.5ha of 'New Residential' allocated to Banagher
- Quantum of land zoned 'New Residential' for Banagher in draft Plan = 4.6ha

Core Strategy Amendment

- Amended Core Strategy Table, Chapter 2 = 6ha of 'New Residential' allocated to Banagher
- It is recommended that the zoning of 1.8ha of land (identified as site 'A' on the maps below) be changed from 'Strategic Residential Reserve' to 'New Residential'.
- Quantum of land zoned 'New Residential' in Banagher with recommended increase = 6.4ha



Ferbane

Draft Plan

- Draft Plan, Core Strategy Table, Chapter 2 = 3 ha of 'New Residential' allocated to Ferbane
- Quantum of land zoned 'New Residential' for Ferbane in draft Plan = 2.99 ha

Core Strategy Amendment

- Amended Core Strategy Table, Chapter 2 = 5.3 ha of 'New Residential' allocated to Ferbane
- Recommended increase in 'New Residential' zoned land in Ferbane = 2.2 ha
It is recommended that the New Residential zoning on the below sites on the Athlone Road be increased by 0.29 hectares and at Ballyvora be increased by 1.87 hectares (See Response to Submission CDP/D/136) to meet this recommended increase, an overall increase of 2.16 hectares.
- Quantum of land zoned 'New Residential' in Ferbane with recommended increase = 5.3 hectares.



Draft Plan



Recommended Amendment



Draft Plan



Recommended Amendment

Kilcormac

Draft Plan

- Draft Plan, Core Strategy Table, Chapter 2 = 2.3ha of ‘New Residential’ allocated to Kilcormac
- Quantum of land zoned ‘New Residential’ for Kilcormac in draft Plan = 2.34ha

Core Strategy Amendment

- Amended Core Strategy Table, Chapter 2 = 2.7ha of ‘New Residential’ allocated to Kilcormac
- Recommended increase in ‘New Residential’ zoned land in Kilcormac = 0.36ha
It is recommended that the zoning of 0.36ha of land (identified as site ‘A’ on the maps below) be changed from ‘Strategic Residential Reserve’ to ‘New Residential’.
- Quantum of land zoned ‘New Residential’ in Kilcormac with recommended increase = 2.7ha

Kilcormac Zoning Map – draft Plan





Recommended Amendment

A

Daingean

Draft Plan

- Draft Plan, Core Strategy Table, Chapter 2 = 3.4ha of 'New Residential' allocated to Daingean
- Quantum of land zoned 'New Residential' for Daingean in draft Plan = 3.46ha

Core Strategy Amendment

- Amended Core Strategy Table, Chapter 2 = 2.9ha of 'New Residential' allocated to Daingean
- Recommended reduction in 'New Residential' zoned land in Daingean = 0.5ha
It is recommended that the 'New Residential' zoning of site 'A' identified on the maps below be reduced by 0.5ha, and the development boundary amended accordingly.
- Quantum of land zoned 'New Residential' in Daingean with recommended reduction = 2.96ha



Villages

The table below shows the quantum of land zoned 'New Residential' in each village under the draft Plan, and shows how each figure compares with the Core Strategy allocation as per the draft Plan and subsequently the amended Core Strategy.

	Draft Plan Core Strategy allocation	Area of land zoned 'New Residential' in the draft Plan	Amended Core Strategy allocation	Area of land zoned 'New Residential' on foot of amended Core Strategy
Ballinagar	1.2	1.1	1.6	1.6
Ballycumber	1.0	1.0	0.8	1.0
Belmont	0.8	0.8	0.8	0.8
Bracknagh	1.0	0.8	1.4	1.4
Cloghan	1.6	1.4	1.5	1.4
Clonbullogue	2	1.8	1.9	1.8
Cloneygowan	0.8	0.8	1.3	1.2
Coolderry	0.4	0.4	0.3	0.4
Geashill	1.0	1.0	1.0	1.3
Killeigh	0.5	0.5	0.8	0.85
Kinnitty	1.6	1.4	1.5	1.4
Moneygall	1.4	1.4	1.3	1.4
Mountbolus	0.6	0.6	0.5	0.6
Mucklagh	2.2	2.2	1.9	2.2
Pollagh / Lemanaghan	0	0.0	0.3	0.0
Rhode	3.8	3.9	4.3	4.7

Riverstown	0.2	0.2	0.4	0.4
Shannon Harbour	0	0.0	0.2	0.0
Shannonbridge	0.7	0.9	0.7	0.9
Shinrone	2.8	2.4	2.8	2.4
Walsh Island	1.1	1.1	0.9	1.1
Total	24.7	23.8	26.2	26.85

In respect of the table above, the following is noted:

- Under the draft Plan, the Core Strategy allocated a total of 24.7ha across the 21 no. villages. Under the draft Plan, a total of 23.8ha of land was zoned ‘New Residential’ across all the villages, which equates to 0.9ha below the Core Strategy allocation.
- The amended Core Strategy shows a total allocation of 26.2ha, equating to an additional 2.4ha of land. Following a review of each settlement, and having due regard to the asset-based approach, additional ‘New Residential’ zoning was allocated to Ballinagar, Bracknagh, Cloneygowan, Geashill, Killeigh, Rhode and Riverstown. Details outlined below.

Ballinagar

- Draft Plan Core Strategy allocation = 1.2ha
- Amended Core Strategy allocation = 1.6ha
- It is recommended that 0.5ha of land (identified as site ‘A’ on the maps below) be zoned ‘New Residential’, with development boundary extended accordingly.
- Quantum of land zoned ‘New Residential’ with recommended increase = 1.6ha



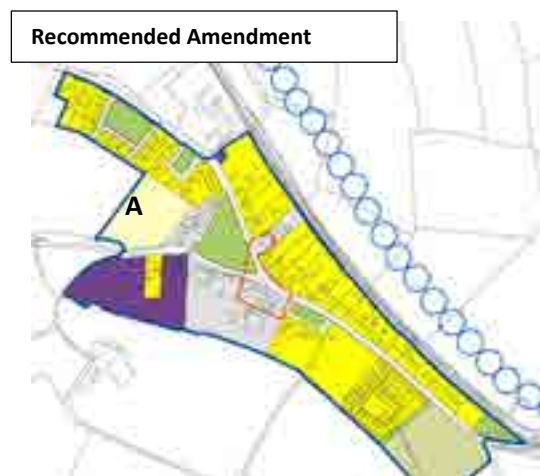
Bracknagh

- Draft Plan Core Strategy allocation = 1.0ha
- Amended Core Strategy allocation = 1.4ha
- It is recommended that the zoning of 0.6ha of land (identified as site 'A' on the maps below) be changed from 'Open Space, Amenity & Recreation' to 'New Residential'.
- Quantum of land zoned 'New Residential' with recommended increase = 1.4ha



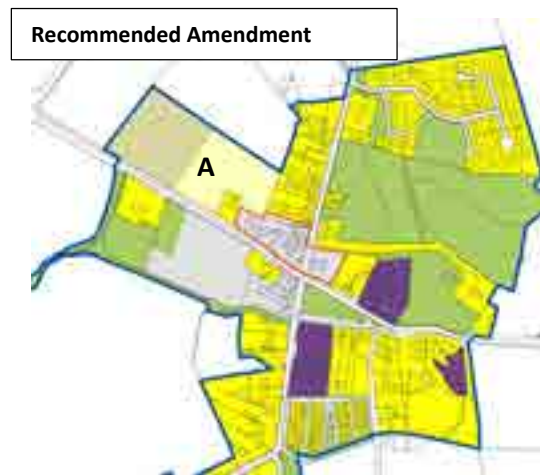
Cloneygowan

- Draft Plan Core Strategy allocation = 0.8ha
- Amended Core Strategy allocation = 1.3ha
- It is recommended that 0.4ha of land (identified as site 'A' on the maps below) be zoned 'New Residential', and the development boundary extended accordingly.
- Quantum of land zoned 'New Residential' with recommended increase = 1.2ha



Geashill

- Draft Plan Core Strategy allocation = 1.0ha
- Amended Core Strategy allocation = 1.0ha
- It is recommended that the zoning of 0.3ha of land (identified as site 'A' on the maps below) be changed from 'Enterprise & Employment' to 'New Residential'.
- Quantum of land zoned 'New Residential' with recommended increase = 1.3ha



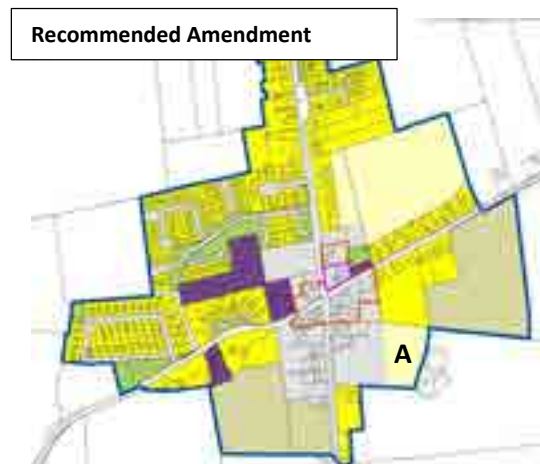
Killeigh

- Draft Plan Core Strategy allocation = 0.5ha
- Amended Core Strategy allocation = 0.8ha
- It is recommended that the zoning of 0.35ha of land (identified as site 'A' on the maps below) be changed from 'Open Space, Amenity & Recreation' to 'New Residential'.
- Quantum of land zoned 'New Residential' with recommended increase = 0.85ha



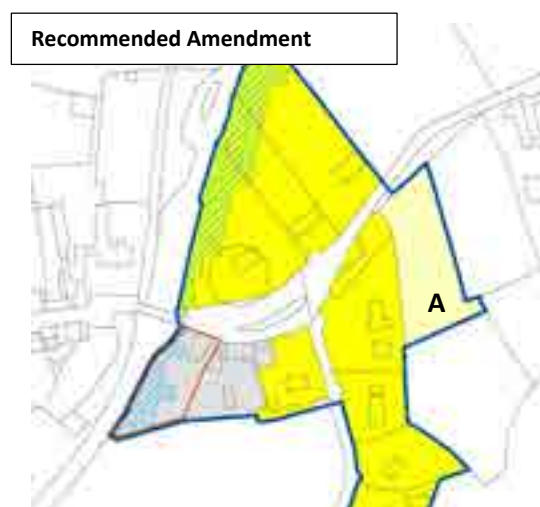
Rhode

- Draft Plan Core Strategy allocation = 3.8ha
- Amended Core Strategy allocation = 4.3ha
- It is recommended that 0.8ha of land (identified as site 'A' on the maps below) be zoned 'New Residential', and the development boundary extended accordingly.
- Quantum of land zoned 'New Residential' with recommended increase = 4.7ha



Riverstown

- Draft Plan Core Strategy allocation = 0.2ha
- Amended Core Strategy allocation = 0.4ha
- It is recommended that 0.2ha of land (identified as site 'A' on the maps below) be zoned 'New Residential', and the development boundary extended accordingly.
- Quantum of land zoned 'New Residential' with recommended increase = 0.4ha



5 Summary of Eastern and Midland Regional Assembly Submission

This section contains a summary of the issues raised and recommendations made by the Eastern and Midland Regional Assembly (EMRA) in its written submission and outlines the recommendations of the CE in relation to the manner in which those issues and recommendations will be addressed in the Development Plan.

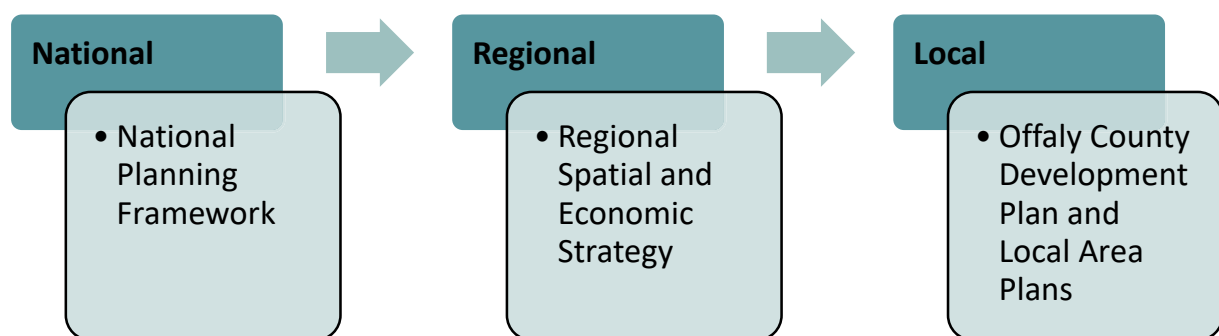
Ref: CDP/D/26

1. Issue raised & recommendation made by EMRA:

- a) Need to reference the NPF and RSES in terms of the legislative context and planning policy hierarchy within which the Co. Development Plan is required to be consistent with in section 1.4 of the Draft Plan.
- b) Figure 1.4 should state Regional Strategic Outcome and not Regional Policy Objective.
- c) There is a more up to date version of Figure 1.5 which is presented as Figure 4.2 of the RSES.

CE Recommendation:

- a) The Planning and Development (Amendment) Act 2018 enacted legislative requirements, to enable the co-ordinated and timely incorporation of the National Planning Framework (NPF) and the relevant Regional Spatial and Economic Strategy (RSES) into each City or County Development Plan. Section 11(1)(b)(i) of the Planning and Development Act 2000 (as amended), sets out legal provisions which deferred the review of a County Development Plan until no later than 13 weeks after the making of the relevant RSES. The review of the previous Offaly County Development Plan 2014-2020 and the making of this County Development Plan 2021-2027 commenced within the 13-week legislative timeframe. It is not considered necessary to insert the legislative explanation into the Plan however the **planning policy hierarchy** as set out below should be inserted into the Plan.



Planning Policy Hierarchy

- b) The Figure name will be amended to reflect the phrase '**Regional Strategic Outcome**'.

c) See updated map below of Settlement Strategy for EMRA as supplied by EMRA.



2. Issue raised & recommendation made by EMRA:

A rationale in accordance with NPO 9 of the NPF is required which outlines the suitability of the proposed growth level for Tullamore exceeding 30% on 2016 census levels.

CE Recommendation:

National Policy Objective (NPO) 9 of the National Planning Framework states:

'In each Regional Assembly area, settlements not identified in Policy 2a of 2b of this Framework, may be identified for significant (i.e. 30% or more above 2016 population levels) rates of population growth at regional and local planning stages, provided this is subject to:

- *Agreement (regional assembly, metropolitan area and / or local authority as appropriate);*
- *Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and / or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall target; and*
- *A co-ordinated strategy that ensures alignment with investment in infrastructure that the provision of employment, together with supporting amenities and services'.*

It is noted that the Office of the Planning Regulator (OPR) advises not exceeding 30% growth. Accordingly, the growth figure for Tullamore is recommended to be reduced from 33% in the draft plan to 30%.

- The population target set for Tullamore is higher than for other settlements in County Offaly in recognition that it is a Key Town as set out in the Regional Spatial and Economic Strategy (RSES) (2019) and accordingly it is the top settlement typology in the Settlement Hierarchy in this Development Plan.
- The jobs: resident works ratio is 1.488 for Tullamore which represents a strong economic function. Appendix A of the RSES states that a ratio of 0.7 or more indicates a strong economic function. Therefore, Tullamore has capacity to accommodate substantial population growth due to the current strong economic function and the proposals for further jobs growth.
- Tullamore has a number of other existing / proposed physical / social infrastructural features which can support the proposed 30% population growth rate, namely:
 - Spare capacity of 23,000 PE in the town's waste water treatment plant;
 - Good quality roads, footpaths, street lighting and broadband;
 - Midland Regional Hospital Tullamore, a big employer in the town;
 - Excellent quality of life and attractiveness of place with the town having undergone recent public realm enhancements with the assistance of Urban Regeneration Development funding and Street Enhancement funding;
 - Arts Centre redevelopment underway with the assistance of funding;
 - Train station on the Dublin- Westport and Dublin Galway lines;
 - 80 km of Greenway is expected in Offaly with 26 km constructed to date, much of which has been funded by Central Government. Tullamore is the expected to be the starting point / destination for many.
 - A well-connected and accessible town both within the region and to other regions;
 - High educational attainments to support further job growth and residential development;

- 9 no. Opportunity Sites identified in Tullamore dues to their prominence, underutilisation and great potential for redevelopment and consolidation. Their redevelopment will contribute greatly to the renewal, enhancement and regeneration of the town;
- Reflecting Regional Policy Objective (RPO) 4.27 of the RSES which states that Key Towns (such as Tullamore) shall act as economic drivers and provide for strategic employment locations to improve the economic base by increasing the ratio of jobs to workers, the Plan provides two Strategic Employment Zones (SEZ) within Tullamore town; and
- In accordance with RPO 4.70 of the RSES, the Council will support the examination of a need for complementary third level outreach facilities in Tullamore, particularly with regard to support for Midland Regional Hospital Tullamore and where appropriate, its continued development as a Teaching / University Hospital, together with potential for linkages to existing and new med-tech businesses and research facilities.

The proposed population growth ensures the alignment of zoning to cater for the availability of services, investment in infrastructure and the provision of employment, together with supporting amenities and services. It allows for critical mass levels to be sustained.

3. Issue raised & recommendation made by EMRA:

Regarding Core Strategy:

- a) An indication in the Core Strategy Table of the quantum of residential land that is zoned in the draft Plan including all zoning categories that provide for residential development.
- b) Include a column in the Core Strategy Table that indicates the quantum of new homes that will be delivered within the existing built-up footprints of each of the settlement categories.
- c) Include details of infill / brownfield and greenfield capacity of the land zoned as part of the draft plan in accordance with page 6 of the NPF Roadmap.
- d) It is noted that varying household size figures have been used across different settlement tiers. A clear rationale should be provided as part of the finalised Co. Development Plan to ensure that it meets the requirements of the housing strategy and for transparency purposes.
- e) A policy would be welcomed promoting the regeneration of underutilised town centre and brownfield / infill lands in accordance with RPO 3.3 of the RSES.
- f) Include the number of permitted single rural houses as part of objectives CSO-01 and HO-03 that relate to maintaining a record of permitted residential development, in order to reflect NPO 36 of the NPF.

CE Recommendation:

- a) Please see amended Core Strategy Table in Appendix 3 at the end of the OPR submission summary in this CE Report, which addresses this.
- b) Please see amended Core Strategy Table in Appendix 3 at the end of the OPR submission summary in this CE Report, which addresses this.
- c) Page 6 of the NPF Roadmap refers to local authority areas that include all five categories of housing location i.e. starting at cities and their suburbs, to large towns, small towns, settlements of 1,500 people or fewer, and down to the countryside, they must include specific considerations of infill / brownfield and greenfield capacity. Co. Offaly does not include a city so it does not fall into this description on page 6 of the document. However, such detail is included in the Core Strategy Table as found in Appendix 3 at the end of the OPR submission summary in this CE Report.

- d) The rate occupancy applied was a graduated range of average household sizes falling from 2.84 in 2016 to 2.62 in 2027.

This variable rate of occupancy was produced with regard to alignment with the NPF rate of 2.5 by 2040, however, on review of historic rates of change within the County, there was sufficient evidence to support a quicker pace of decline.

Occupancy in each settlement typology (i.e. tier of the settlement hierarchy) was then aligned with this County-level trajectory between 2017 and 2027. The number of additional households formed per annum was calculated using the applicable year's average household size.

In light of this, it is proposed to insert the following text into Chapter 2 Core Strategy, Settlement Strategy and Housing Strategy of the Plan:

‘Occupancy Rate

The occupancy rate applied in the Core Strategy Table is a graduated range of average household sizes falling from 2.84 in 2016 to 2.62 in 2027. This variable rate of occupancy was produced with regard to alignment with the NPF rate of 2.5 by 2040, however, on review of historic rates of change within the County, there was sufficient evidence to support a quicker pace of decline. Occupancy in each settlement typology was then aligned with this County-level trajectory between 2017 and 2027. The number of additional households formed per annum was calculated using the applicable year's average household size’.

The second last table in Appendix 4 of the OPR Submission Summary constitutes an **Assessment of Average Household Size and Forecasted Options** which is recommended to be inserted into Chapter 2 of the Plan.

- e) RPO 3.3 of RSES states ‘Local authorities shall, 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...’

Chapter 2 of the draft Plan (titled Core Strategy, Settlement Strategy and Housing Strategy) states under the sub-heading ‘Employment, Retail and Regeneration’ that ‘Chapter 7 (titled Retail and Town Centre Strategy, and Regeneration) also includes policies and objectives relating to regeneration and an outline of a number of Opportunity Sites [i.e. Regeneration Areas] that are considered appropriate for significant improvement, many of which are brownfield, infill, vacant, derelict or underutilised. The individual settlement plans also contain sites considered suitable for regeneration purposes’. Therefore, a separate chapter 7 deals specifically with retail and regeneration.

The Guiding Principles set out in the RSES which is referred to in RPO 3.3 is provided for Chapter 13 (titled Development Management Standards) / Chapter 7 of the draft Plan.

Examples of some relevant policies / objectives in the draft plan include:

RP-01 It is Council policy to promote the regeneration of settlements by making better use of under-utilised land and buildings, particularly within the existing built-up areas where a transformational difference in the sustainability of a settlement can take place through compact growth.

RP-04 It is Council policy to support initiatives that promote the reuse, refurbishment and retrofitting of existing buildings within urban centres.

RP-07 It is Council policy to 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, for example, under the Urban and Rural Regeneration and Development Funds and Town and Village Renewal Schemes.

RP-11 It is Council policy to facilitate, promote and encourage the re-development of Opportunity Sites identified in Volume 1 and Volume 2 of the County Development Plan and Local Area Plans for appropriate development that contributes positively to the character of the settlement. Any proposal brought forward on Opportunity Sites shall be in accordance with the Development Principles for Opportunity Sites as set out in section 7.2.4 of the County Development Plan, with the inclusion of an urban design statement and masterplan and shall demonstrate the rationale for the proposal and how it will interact within its context and the wider urban area.

RO-01 It is an objective of the Council to encourage and facilitate, where appropriate, the development and renewal of areas throughout the county which are in need of regeneration and in particular to apply for funding under government urban and rural regeneration / renewal schemes.

RO-04 It is an objective of the Council to establish a database of strategic brownfield and infill sites so that brownfield land re-use can be managed and co-ordinated across multiple stakeholders as part of an active land management process.

Section 7.2.3 of the draft plan states that “‘Compact Growth’ is a National Strategic Outcome of the National Planning Framework. Creating more compact development requires a focus on:

Regeneration and development of the existing built up areas, for example, infill sites and brownfield sites;”

Based on the above, it is considered that regeneration areas (aka Opportunity Sites), brown field / infill and Guiding Principles are satisfactorily presented in the draft Plan.

f) The submission refers to NPO 36 of the NPF which reads as follows:

‘New statutory guidelines, supported by wider methodologies and data sources, will be put in place under Section 28 of the Planning and Development Act to improve the evidence base, effectiveness and consistency of the planning process for housing provision at regional, metropolitan and local authority levels. This will be supported by the provision of standardised requirements by regulation for the recording of planning and housing data by the local authorities in order to provide a consistent and robust evidence base for housing policy formulation’.

Based on the submission received, it is recommended to make reference to single houses in the open countryside and sráids. Accordingly, the revised wording recommended in objectives CSO-01 and HO-03 is as follows, with the insertion of the red text:

CSO-01 It is an objective of the Council to monitor and manage the delivery of residential development in County Offaly through the development management process to ensure it is in line with the Core Strategy. In this respect, the Planning Authority shall maintain a record of residential development permitted in **the open countryside, sráids and** individual settlements in order to ensure compliance with the population allocations defined by the Core Strategy Table.

HO-03 It is an objective of the Council to support the ongoing monitoring and review of the Housing Need Demand Assessment (HNDA) in accordance with a forthcoming HNDA methodology to be issued by Central Government. Furthermore, it is an objective of the Council to monitor and maintain a record of residential development permitted in **the open countryside, sráids and individual** settlements in accordance with forthcoming Departmental guidance around the establishment of a Housing Need Demand Assessment Coordination and Monitoring Unit and related implementation of a centralised spatial database for local authority housing.

4. Issue raised & recommendation made by EMRA:

Regarding Settlement Strategy:

- a) Regarding Table 2.3 of the draft Plan; state that Tullamore was designated as a Key Town in the RSES rather than the NPF.
- b) It is noted that policies relating to the Key Town of Tullamore are provided at SSP 06-07 of the Draft Plan. It is considered that this section should reflect RPO 4.68 to 4.70 of the RSES which are specific to Tullamore.
- c) Provide reasoning for the designation of Birr as a Self-Sustaining Growth Town and for Edenderry and Portarlinton as Self-Sustaining Towns.
- d) Prior to finalising the Plan, the Council should ensure that policy relating to housing in the open countryside is consistent with RPO 4.80 and 4.81, NPO 19 of the NPF and the content of Circular Letter PL 2/2017 titled 'Sustainable Rural Housing Guidelines for planning authorities 2005 – local Needs Criteria in Development Plan'.

CE Recommendation:

- a) An amendment will be made to Table 2.3 of the draft Plan to state that Tullamore was designated as a Key Town by the RSES.
- b) RPO 4.68 to 4.70 of the RSES which are specific to Tullamore are set out below. It should be noted that a Local Area Plan for Tullamore will be prepared on adoption of the County Development Plan 2021-2027. As explained below, the RPOs listed have been addressed in the Draft Plan.

REGIONAL POLICY OBJECTIVES:**Tullamore Key Town**

RPO 4.68: Support Tullamore's role as a tourism hub and development as a Tourism Destination Town having particular regard to its distilling heritage and industry and accessibility to key tourist destinations, natural amenities and recreational opportunities including the Grand Canal Greenways, Lough Boora Discovery Park, Slieve Bloom Mountains and peatlands. This is coupled with support for Tullamore as a service hub for the 'Midlands Cycle destination - Offaly' and the recognition of the settlement's potential as a conferencing and event hub, given the town's central location, accessibility and experience of event provision.

RPO 4.69: Support the role of Tullamore as a major employment centre with key assets being its existing positive jobs to resident employee ratio, excellent quality of life and future strategic development sites, with support for the provision of enabling and facilitative infrastructural development to complement this role.

RPO 4.70: To examine the need for complementary third level outreach educational facilities at Tullamore, particularly with regard to support for Tullamore Regional Hospital and where appropriate, its continued development as a Teaching/University Hospital, together with potential for linkages to existing and new med-tech businesses and research facilities.

RPO 4.68 is addressed in Chapter 6 Tourism and Recreational Development of the draft Plan as follows:

TRP-26 It is Council policy to support Tullamore's role as a tourism hub and its development as a Tourism Destination Town having particular regard to its distilling heritage including Tullamore Dew Visitor Centre, its accessibility and proximity to key tourism destinations including natural amenities, and recreational opportunities including the Grand Canal and adjoining greenway, Lough Boora Discovery Park, Slieve Bloom Mountains, Durrow Monastic Site and Clara Bog Visitor Centre.

RPO 4.69 and RPO 4.70 are addressed in Chapter 5 Economic Development as follows:

ENTO-03 It is an objective of the Council to facilitate the development of Tullamore, a Key Town under the Regional Spatial and Economic Strategy, in accordance with regional policy. This will include measures to seek to reserve lands within Tullamore to make provision for potential nationally and

regionally significant activities and to attract specialist large-scale enterprise development within the county.

ENTO-04 It is an objective of the Council to identify and quantify suitable locations in Tullamore for strategic employment development, for large scale employment and enterprise activity.

Policy RPO 4.70 is addressed in chapter 5 Economic Development as follows:

ENTP-23 It is Council policy to encourage third level education in County Offaly through the provision of outreach / campus facilities for the accommodation of courses.

ENTP-25 It is Council policy to support the examination of a need for complementary third level outreach facilities in Tullamore, particularly with regard to support for Midland Regional Hospital Tullamore and where appropriate, its continued development as a Teaching / University Hospital, together with potential for linkages to existing and new med-tech businesses and research facilities.

- c) See the table below which addresses the issues raised regarding justification for the settlement typology for particular settlements.

Settlement	Settlement Typology as set in RSES	Reason it falls within its Settlement Typology
Tullamore	Key Town	Designated in the RSES as a Key Town.
Birr	Self-Sustaining Growth Town	Birr’s census boundaries differ between the 2011 and 2016 census which does not allow for easy comparison. Birr acts as an important local driver providing a range of functions for its resident population and its surrounding catchment including housing, employment, services, retail and leisure opportunities. The town should continue to grow at a sustainable level. It has a jobs: resident workers ratio of 0.965 which indicates a strong economic function (above 0.7 is a strong economic function according to RSES), therefore with the capacity to accommodate further residential development. It is not located within the area mapped as ‘Core Region’ by EMRA where catch-up investment is required to become more self-sustaining; instead it is located within the ‘Gateway Region’.
Edenderry	Self-Sustaining Town	It experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as ‘Core

		Region' by EMRA where catch-up investment is required to become more self-sustaining.
Portarlinton	Self-Sustaining Town	It experienced rapid population growth of 24% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.435 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining.
Banagher, Clara,	Towns	These towns have a local service and employment function with a large catchment area that supports a network of villages. They have services such as secondary schools, fire stations, libraries, health centres, post office, with a number featuring business parks.
Smaller Towns, Villages, Sráids and open countryside	Rural	As set out in the RSES 'rural' encompasses smaller towns, villages and the wider open countryside. It includes settlements with a population below 1,500 as per the definition of 'rural' in NPF. Overall there is a lack of good public transport or regional connections and they may be highly car dependent. Sráids form part of the rural area as they reflect traditional building patterns with a loose collection of rural dwellings clustered around one or more focal points.

Section 3.2 of the RSES addresses 'The Core Region'. It states the following:

'Some areas in the Core Region have emerged mainly as commuting towns, experiencing high rates of population growth but with a weak level of services and functions for their resident populations. These towns will require 'catch up' investment in local employment and services in order to become more self-sustaining and to improve sustainable mobility, particularly in those places where there are high levels of car dependency.'

The 'growth enablers for the Core region include:

- *To promote continued growth at more sustainable rates, while providing for increased employment and improved local economies, services and functions to allow towns become more self-sustaining and to create the quality of life to attract investment.*
- *'Catch up' investment to promote consolidation and improvement in the sustainability of those areas that have experienced significant population growth but have a weak level of services and employment for their residents'.*

Accordingly, this has been taken in to account in setting Edenderry and Portarlinton as 'Self-Sustaining Towns'.

- d) The Council is of the view that the rural housing policy in the open countryside is consistent with the stated documents.

5. Issue raised & recommendation made by EMRA:

Regarding Housing Strategy:

- a) Some of the material in the Housing Strategy should be provided as part of the Co. Development Plan to enhance the robustness of the chapter; clear information on the housing requirements for Co. Offaly and the housing yield provided by the quantum of lands zoned that enable residential development.
- b) Clarity should be provided between the Core Strategy Table and the Housing Strategy with respect to the number of residential units required and the period to which this applies.
- c) Include a clearly presented summary of the entire housing need in Co. Offaly, which includes the housing need broken down across tenures, what is required in terms of new housing supply and why this is the case, including social and affordable needs, housing types and sizes. This will present a clear and concise guide as to what is required to successfully deliver the housing requirements for the county over the plan period.
- d) NPO 20 of the NPF points to the requirement to project the need for single housing in the countryside through the local authority's overall Housing Need Demand Assessment (HNDA). It is welcomed that the rural single housing requirement is included in the Core Strategy and Housing Strategy, however this chapter of the Plan needs to include a rationale outlining how this figure was arrived at.

CE Recommendation:

- a) A recommended amended Housing Strategy and Housing Need and Demand Assessment forms part of this CE Report.
- b) The Core Strategy Table is amended. It can be found in Appendix 3 at the end of the OPR submission summary in this CE Report.
- c) The recommended revised Housing Strategy examines future housing requirements and includes an assessment of changing household size and tenure. Both of these assessments reflect established intercensal trends. Should a continuation of these trends persist throughout the Plan period, the formation of anticipated households is assumed to align, and therefore the rates identified would apply.
- d) The determination of the number of anticipated households in the Sráids and Open Countryside typology was informed by the application of a declining rate in average household size (in keeping with the County's trajectory for same), and the targeted population change for 2027. The projected figure for future applications being single one-off dwellings (33%) was informed by an assessment of historic data, from which this trend was observed. It is an indicator of how future demand of total applications (in a given year) may be for single one-off dwellings.

6. Issue raised & recommendation made by EMRA:

Regarding Climate Action and Energy:

- a) The Climate Action and Energy Chapter should include an aim that relates to the overall strategic vision and objectives contained in section 1.5 of the draft Plan.
- b) Reconsider the inclusion of all of the policy that runs to 17 pages in the chapter and include the role of the Climate Action Regional Office.
- c) RPO 3.6 (and the preceding paragraph in the RSES which outlined the requirement of Development Plans to assess their impacts on carbon reduction targets), RPO 3.7 and the RPOs contained in Chapter 7 of the RSES may be of assistance in this chapter.
- d) The Council is reminded of its obligation to comply with Ministerial Guidelines including the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017.
- e) The Council may wish to identify potential projects as part of the Plan in order to assist in availing of the Climate Action Fund.
- f) Objective CAEP-04 states that it is Council policy to support and facilitate European and national objectives for climate adaptation and mitigation including 'any regional decarbonisation plan prepared on foot of commitments included in the emerging Regional Spatial and Economic Strategy for the Eastern and Midland Region'. Given that the RSES is now in place, the Assembly asks that greater clarity is provided with regard to the meaning of this statement and updated as required.
- g) Prior to the finalisation of the Plan such as policy CAEP-35 and Development Management Standard 109, it is recommended that the Council have regard to the provisions of the Wind Energy Development Guidelines 2006, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017 and the Draft revised Wind Energy Guidelines 2019 which are expected to be finalised in the near future.

CE Recommendation:

- a) Noted. It is proposed to include a Strategic Objective at the start of Chapter 3 as follows;
Strategic Objective:

"To achieve a transition to an economically competitive, low carbon climate resilient and environmentally sustainable county, through reducing the need to travel, promoting sustainable settlement patterns and modes of transport, and by reducing the use of non-renewable resources, whilst recognising the role of natural capital and ecosystem services in achieving this."
- b) Noted. The Policy Context that EMRA refer to in Section 3.1 Introduction of this chapter actually only runs to 6 and ½ pages. Notwithstanding this, to aid the readability of this chapter, it is proposed to include following additional sub-headings for sections following the Policy Context;
 - 'Energy Infrastructure
 - Climate Adaptation
 - Risk Management'

In addition, it is proposed to insert a sub-section within Section 3.1 Introduction regarding the Climate Action Regional Office;

“In terms of addressing the future challenges of climate change, the Council will work closely with the Climate Action Regional Offices (CAROs). The Dublin Metropolitan Climate Action Regional Office (run by the four Dublin local authorities assisted by Codema) and the Eastern and Midland Climate Action Regional Office (run by Kildare County Council) will be responsible for planning and actions regarding Climate Change mitigation and adaptation in their regions. Climate Action Regional Offices shall ensure coherence and coordination with the RSES when formulating regional climate change adaptation plans.”

- c) Various climate action measures have been integrated throughout the Plan. As detailed in the SEA Environmental Report:

“Implementing the Plan will help to direct incompatible development away from the most sensitive areas in the County and focus on directing: compact, sustainable development within the existing envelopes of the County’s towns and villages; and sustainable development elsewhere, including in rural areas. Development of these generally more robust, well-serviced and well-connected areas of the County will contribute towards environmental protection and sustainable development, including climate mitigation and adaptation. Compact development can be accompanied by placemaking initiatives to enable the County’s towns and villages to become more desirable places to live – so that they maintain populations and services. Compatible sustainable development in the County’s sensitive areas is also provided for, subject to various requirements relating to environmental protection and management being met.”

There are currently no Guidelines available from the Government regarding measuring carbon emissions for Development Plans.

Notwithstanding this, the SEA includes an assessment of the impact of Plan provisions on climate reductions targets and includes measures to monitor and review progress towards carbon reduction targets – refer to SEA Environmental Report that accompanies the draft Plan, including:

- Section 4.10 “Air and Climatic Factors”, including baseline description and targets
- Section 5 “Strategic Environmental Objectives”, including measures relating to minimisation and reduction of greenhouse gas emissions
- Section 7 “Evaluation of Alternatives”, including assessment with regard to greenhouse gas emissions
- Section 8 “Evaluation of Plan Provisions”, including Section 8.6 “Interactions with Climate Mitigation and Adaptation” and assessment with regard to greenhouse gas emissions
- Section 9 “Mitigation Measures”, including measures relating to emissions reductions
- Section 10 “Monitoring Measures”, including measures relating to minimisation and reduction of greenhouse gas emissions.

To more clearly link the relevant legislative commitments referred to in the SEA Environmental Report and Strategic Environmental Objectives used in the assessment, it is recommended that the following should be included after SEO “Contribute towards the reduction of greenhouse gas emissions in line with national targets.”:

Please also refer to relevant legislation and requirements under Section 4.10, Section 8.8.11 and Appendix I. Targets under the national Climate Action Plan include:

Electricity

- Reduce CO₂ equivalent (eq.) emissions from the sector by 50–55% relative to 2030 pre-National Development Plan projections.
- Deliver an early and complete phase-out of coal and peat-fired electricity generation.
- Increase electricity generated from renewable sources to 70%, indicatively comprised of: at least 3.5 GW of offshore renewable energy; up to 1.5 GW of grid-scale solar energy; and up to 8.2 GW total of increased onshore wind capacity

Built Environment

- Reduce CO₂ eq. emissions from the sector by 40–45% relative to 2030 pre-National Development Plan projections.
- Sharply reduce fossil fuel use, given the current heavy reliance on gas, oil, coal and peat in the sector.
- Increase the number of Sustainable Energy Communities to 1,500.
- Complete the rollout of the Support Scheme for Renewable Heat (SSRH), including support for biomass and anaerobic digestion heating systems.

Transport

- Reduce CO₂ eq. emissions from the sector by 45–50% relative to 2030 pre-National Development Plan projections.
- Increase the number of EVs to 936,000.
- Build the EV charging network to support the growth of EVs at the rate required, and develop our fast-charging infrastructure to stay ahead of demand.

Agriculture, Forestry & Land Use

- Deliver 16.5-18.5 MtCO₂ eq. cumulative abatement.
- Achieve 26.8 MtCO₂ eq. abatement through Land-Use, Land-Use Change and Forestry (LULUCF) actions over the period 2021 to 2030, comprised of: an average of 8,000 ha per annum of newly planted forest, and sustainable forest management of existing forests (21 MtCO₂ eq. cumulative abatement) at least 40,000 ha per annum of reduced management intensity of grasslands on drained organic soils (4.4 MtCO₂ eq. cumulative abatement); and better management of grasslands, tillage land and non-agricultural wetlands (1.4 MtCO₂ eq. cumulative abatement).

Enterprise

- Reduce Ireland's Emission Trading System (ETS) industry emissions by 10-15% by 2030, relative to 2030 projections.
- Enterprise must contribute to the more ambitious targets for buildings (20-25%) and transport (45-50%).

In the absence of national guidance on how local authorities can set a target for wind energy generation within their functional area or targets set down in this regard in the RSES for the EMRA area, it is proposed to include an objective in Chapter 3 of the Draft Plan to “Work with key stakeholders to carry out an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.” To support this objective, an additional paragraph should be included in Section 3.2.6 Wind Energy of the Draft Plan stating that “Whilst due to the absence of national guidance on how local authorities can set a target for wind energy generation within their functional area it is not possible to set a specific target for renewable energy generation in the county during the plan period, the Council is committed to working with key

stakeholders in the carrying out of an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.”

d) Noted. In addressing both the EMRA and OPR Recommendations in their submissions, both Section 3.1.7 Legislative and Policy Context in Chapter 3 Climate Action and Energy and Section 3.4 Wind Energy Policy Context in the County Wind Energy Strategy in the Draft Plan should be amended as follows to include specific reference to the Specific Planning Policy Requirement contained in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change:

“It is a specific planning policy requirement under Section 28(1C) of the Act that, in making, reviewing, varying or amending a development plan, or a local area plan, with policies or objectives that relate to wind energy developments, the planning authority shall carry out the following:

(1) Ensure that overall national policy on renewable energy as contained in documents such as the Government’s ‘White Paper on Energy Policy - Ireland’s Transition to a Low Carbon Future’, as well as the ‘National Renewable Energy Action Plan’, the ‘Strategy for Renewable Energy’ and the ‘National Mitigation Plan’, is acknowledged and documented in the relevant development plan or local area plan;

(2) Indicate how the implementation of the relevant development plan or local area plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts); and

(3) Demonstrate detailed compliance with item number (2) above in any proposal to introduce or vary a mandatory setback distance or distances for wind turbines from specified land uses or classes of land use into a development plan or local area plan. Such a proposal shall be subject to environmental assessment requirements, for example under the SEA and Habitats Directives. It shall also be a material consideration in SEA, when taking into account likely significant effects on climatic factors, in addition to other factors such as landscape and air, if a mandatory setback or variation to a mandatory setback proposed by a planning authority in a development plan or local area plan would create a significant limitation or constraint on renewable energy projects, including wind turbines, within the administrative area of the plan.”

e) It is proposed to amend Table 3.1 Decarbonisation Actions and Projects in Chapter 3 Climate Action and Energy as follows;

Aim	Actions	Potential Projects
<p>Promote Compact Growth</p>	<p>Reduce urban sprawl, encourage higher densities, reuse buildings</p> <hr/> <p>Integrate transportation and landuse planning</p> <hr/> <p>Reduce the need to travel and move towards self-sustaining rather than commuter driven activity</p>	<p>1. Specific projects which may arise from development of Opportunity Sites as identified in Section 7.2.4 of the draft Plan relating to Tullamore, Birr, Edenderry and Portarlington and the Opportunity Sites outlined in Clara, Banagher, Fermoy, Kilmac, and Daingean in Volume 2. Provision</p>

	Support car free developments in suitable locations	<p>of community and enterprise space for meetings, digital hub, creative spaces, exhibition spaces and study spaces in specific objectives in Town and Village Plans contained in Volume 2 of this Plan.</p> <ol style="list-style-type: none"> 2. Development of incubator units, providing work space for start-up businesses in specific objectives in Town and Village Plans contained in Volume 2 of this Plan. 3. Develop a new purpose built modern community library and arts space at JKL Street Edenderry.
Provide mixed use developments and support the close location of jobs / shops / services / education and homes to minimise the need for the most common travel patterns.		
Promote the repair and reuse of existing buildings including underutilised upper floors in urban areas		
Reduce vacancy and dereliction in towns and villages		
Strengthen public transport linkages and encourage their use		
Sustainability Mobility	Greenways, pedestrian routes, cycleways, permeability, connectivity to facilities and amenities and public transport provision	<ol style="list-style-type: none"> 1. Improve cycling infrastructure including dedicated cycle lanes and footpath connections in settlements as outlined in specific objectives in Town and Village Plans contained in Volume 2 of this Plan. 2. Provision of outdoor pursuits, walking and cycling routes through the county's peatlands and network of industrial railways linking the River Shannon Blueway, Royal Canal, Grand Canal and Barrow Blueway across the midlands as outlined in the 'Major Cycling Destination in the Midlands of Ireland –Feasibility Study 2016'.

		<ol style="list-style-type: none"> 3. Continue to improve walkways, cycleways and facilities at Lough Boora Discovery Park. 4. Continue to improve walkways and facilities at Derryounce. 5. Prepare Local Transport Plans for Birr, Edenderry and Portarlinton. 6. Mobility Management and Travel Plans for Tullamore and Edenderry to bring about behaviour change and more sustainable transport use.
	<p>Electric vehicle recharging infrastructure and electrification of council fleet</p>	<ol style="list-style-type: none"> 1. Provision of EV charging points at County Buildings and facilitate the provision of battery charging infrastructure in the county. 2. Purchase of electric vans in the Council fleet.
<p>Transition to a Low Carbon and Climate Resilient Society</p>	<p>Cessation of peat fired electricity generation</p>	<ol style="list-style-type: none"> 1. Management, rewetting, rewilding and restoration of tracts of cutaway bog across the county. 2. EU LIFE fund supported raised bog restoration project in restoring Special Areas of Conservation sites in the county to favourable conservation status.
	<p>Support the restoration of peat bogs when turf cutting has ceased</p>	
	<p>Create or enhance delivery of carbon sinks, for example, wetlands, bogs, forestry, permanent grassland</p>	
	<p>Flood risk management, avoid development on flood plains and only facilitate the appropriate management and sustainable use of flood risk areas, and support the enhancement of flood resilience of buildings</p>	
	<p>Renewable and low carbon energy, Circular Bio-Economy</p>	<ol style="list-style-type: none"> 1. Development of Rhode Green Energy Park. 2. Feasibility assessment for district heating in County Offaly and identify local waste heat sources or renewable energy sources.
	<p>Promote links between developments and renewable energy resources, for instance by sourcing energy on-site</p>	

	<p>renewably or from low carbon fuel sources</p>	<p>3. Ongoing programme of upgrading public lighting to LEDs in Offaly.</p>
	<p>Green Technology and Jobs</p>	
	<p>Develop a Decarbonising Zone within County Offaly</p>	<p>Identify a spatial area to be designated a Decarbonising Zone and develop an implementation plan in which a range of climate mitigation, adaptation and biodiversity measures and actions are identified to address local low carbon energy, greenhouse gas emissions and climate needs to contribute to national climate action targets.</p>
	<p>Green Infrastructure, for example, green walls, green roofs, parks, waterways, wetlands, greenways, peatways, woodlands, plant drought-resistant plants / trees in public amenity areas to provide shade</p>	<p>Progression of Green Infrastructure provision as outlined in specific objectives in Town and Village Plans contained in Volume 2 of this Plan.</p>
	<p>Promote sustainable urban drainage systems (SuDs), for example, permeable surfaces to decrease run-off rates</p>	
	<p>Afforestation where environmentally appropriate; contributes to renewable fuels and acts as a carbon sink, and can enhance interception and infiltration of precipitation with river basin catchments</p>	
	<p>Energy efficient building design</p>	<p>1. Pilot schemes which promote innovative ways to incorporate energy efficiency amongst social housing.</p>
	<p>Support efforts to maximise water conservation, support grey-water recycling schemes</p>	<p>2. Development of an Energy Efficient Building Centre of Excellence in East Offaly.</p>

	Abatement of Greenhouse gas emissions in the agricultural sector	
	Green procurement	
	Implementation of Offaly Climate Change Adaptation Strategy	Applicable projects as outlined in Chapter 5 Adaptation Goals, Objectives and Actions of the Strategy.
	Climate proof major projects	
	Sustainable food production	Development of Ferbane Food Campus.

- f) Noted. It is proposed to amend CAEP-04 in Chapter 3 as follows;
- “It is Council policy to support and facilitate European and national objectives for climate adaptation and mitigation as detailed in the following documents, taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage);
- Climate Action Plan (2019 and any subsequent versions);
 - National Mitigation Plan (2017 and any subsequent versions);
 - National Climate Change Adaptation Framework (2018 and any subsequent versions);
 - ~~Any Regional Decarbonisation Plan prepared on foot of commitments included in the emerging Regional Spatial and Economic Strategy for the Eastern and Midland Region;~~
 - Relevant provisions of any Sectoral Adaptation Plans prepared to comply with the requirements of the Climate Action and Low Carbon Development Act 2015, including those seeking to contribute towards the National Transition Objective, to pursue, and achieve, the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of the year 2050; and
 - Offaly Climate Change Adaptation Strategy.”

- g) Noted.
- It is recommended to;
- make specific reference to the Council having regard to the provisions of the Wind Energy Development Guidelines 2006, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017 and the Draft revised Wind Energy Guidelines 2019 which are expected to be finalised in the near future;
 - remove the mandatory setback distance of 2 km between turbines and settlement boundaries of towns & villages from Policy CAEP-35 and DMS-109 as the inclusion of such mandatory separation distances would restrict the potential for wind farm

development in the county, would undermine other policy objectives supporting wind farm development and be contrary to national policy and Ministerial guidance on wind farm development.

Therefore, the additional text shown in red below is proposed to be inserted to policy CAEP-35 from the Draft Plan whilst strikethrough text is to be deleted;

“It is Council policy that in assessing planning applications for wind farms, the Council shall:

- (a) ~~have regard to the Department of the Environment, Heritage and Local Government’s Guidelines for Planning Authorities on Wind Energy Development (or any update of this document) including applying appropriate setback distances as identified in the Guidelines;~~ have regard to the provisions of the Wind Energy Development Guidelines 2006, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017 and the Draft revised Wind Energy Guidelines 2019 (and the finalised Guidelines);
- (b) have regard to ‘Areas Open for Consideration for Wind Energy Developments’ in the Wind Energy Strategy Designations Map from the County Wind Energy Strategy;
- ~~(c) require a 2 km separation distance from turbines to town and village settlement boundaries in the county;~~
- (d) have regard to Development Management Standard 109 on wind farms contained in Chapter 13 of this Plan; and
- (e) have regard to existing and future international, European, national and regional policy, directives and legislation.”

It is proposed to delete reference to a 2 km separation distance from turbines to towns and villages in DMS-109 from Chapter 13 of the Draft Plan as represented below by a strikethrough;

<p>DMS-109 Wind Farms</p>	<p>When assessing planning applications for wind energy developments the Council will have regard to;</p> <ul style="list-style-type: none"> • the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made; and • the Wind Energy Strategy Designations Map from the County Wind Energy Strategy showing areas identified as ‘Areas Open for Consideration for Wind Energy Developments’ and ‘Areas not deemed suitable for Wind Energy Developments’, and specific policy for wind development in these areas as outlined in Section 8 of the County Wind Energy Strategy; • 2 km separation distance from turbines to town and village boundaries in the county as required by policy CAEP-35 of this Plan. <p>In addition to the above, the following local considerations will be taken into account by the Council in relation to any planning application;</p> <ul style="list-style-type: none"> • Impact on the visual amenities of the area;
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	<ul style="list-style-type: none"> • Impact on the residential amenities of the area; • Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape; • Visual impact of the proposal with respect to protected views, scenic routes, designated scenic landscapes; • Impact on nature conservation, ecology, soil, hydrology, groundwater, archaeology, built heritage and public rights of way; • Impact on ground conditions and geology; • Consideration of falling distance plus an additional flashover distance from wind turbines to overhead transmission lines; • Impact of development on the road network in the area; and • Impact on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region), shadow flicker and air quality. <p>This list is not exhaustive and the Council may consider other requirements contained in the chapter on a case by case basis with planning applications should the need arise.</p>
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In addition, it is proposed to amend Section 3.1.7 Legislative and Policy Context in Chapter 3 Climate Action and Energy to make reference to “[Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017](#)” whilst Section 3.4 Wind Energy Policy Context in the County Wind Energy Strategy is proposed to be amended to include specific reference to the Specific Planning Policy Requirement contained in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change as follows:

“It is a specific planning policy requirement under Section 28(1C) of the Act that, in making, reviewing, varying or amending a development plan, or a local area plan, with policies or objectives that relate to wind energy developments, the planning authority shall carry out the following:

(1) Ensure that overall national policy on renewable energy as contained in documents such as the Government’s ‘White Paper on Energy Policy - Ireland’s Transition to a Low Carbon Future’, as well as the ‘National Renewable Energy Action Plan’, the ‘Strategy for Renewable Energy’ and the ‘National Mitigation Plan’, is acknowledged and documented in the relevant development plan or local area plan;

(2) Indicate how the implementation of the relevant development plan or local area plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts); and

(3) Demonstrate detailed compliance with item number (2) above in any proposal to introduce or vary a mandatory setback distance or distances for wind turbines from specified land uses or classes of land

use into a development plan or local area plan. Such a proposal shall be subject to environmental assessment requirements, for example under the SEA and Habitats Directives. It shall also be a material consideration in SEA, when taking into account likely significant effects on climatic factors, in addition to other factors such as landscape and air, if a mandatory setback or variation to a mandatory setback proposed by a planning authority in a development plan or local area plan would create a significant limitation or constraint on renewable energy projects, including wind turbines, within the administrative area of the plan.”

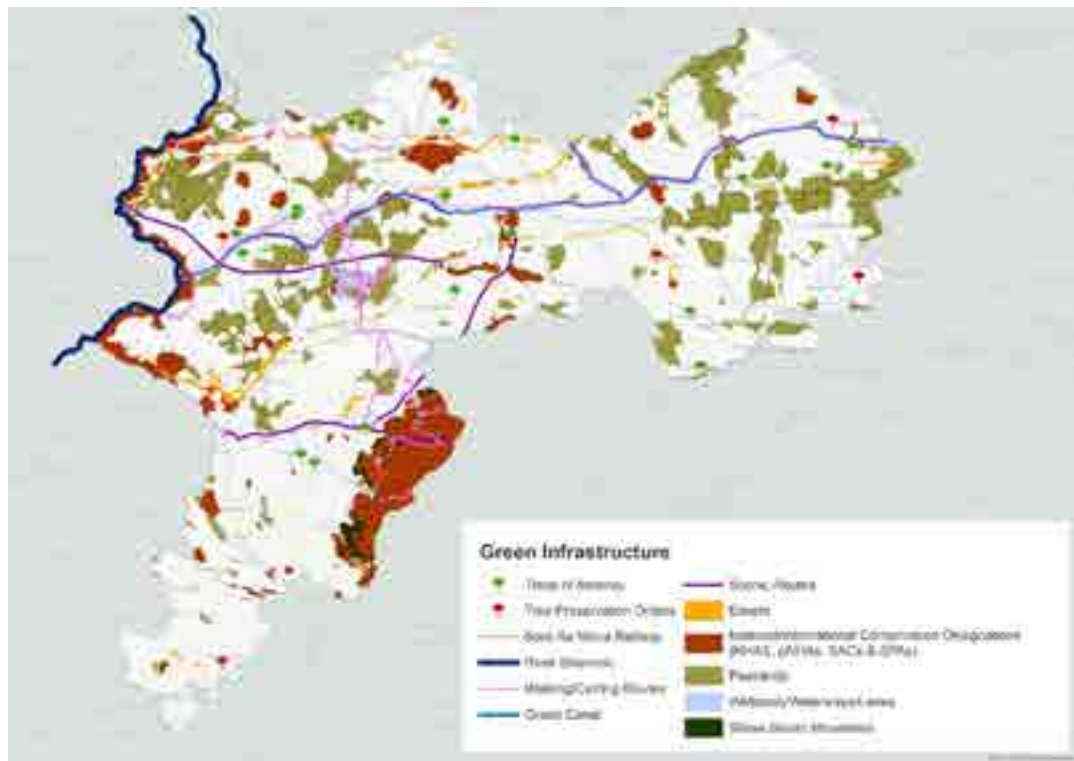
7. Issue raised & recommendation made by EMRA:

Regarding Biodiversity and Landscape:

- a) Include an overall chapter aim in line with the Strategic Vision and Objectives of the Draft Plan.
- b) Include additional green infrastructure objectives that provide for the development and / or enhancement of specific green infrastructure routes throughout the county, having regard to the numerous existing and potential greenways, blueways and peatways that exist, and this will help with funding applications. Should consult with section 7.7 of the RSES which addresses policy and guiding principles for green infrastructure.

CE Recommendation:

- a) Noted. It is proposed to include a Strategic Objective at the start of Chapter 4 as follows; Strategic Objective;
“Protect and enhance Offaly’s natural assets of clean water, biodiversity, landscape, green infrastructure, heritage and agricultural land.”
- b) Noted. No further action proposed. The below County Green Infrastructure Map shows the extensive Green Infrastructure available in Offaly at a Strategic level. Green Infrastructure is one of a number of cross cutting themes throughout Volume 1 and Volume 2 of the Plan with a significant number of policies and objectives at a macro and micro level which allow for the development and enhancement of Green Infrastructure whilst also providing for future funding applications. It should also be noted that a number of potential Green Infrastructure projects are listed in Table 3.1 Decarbonisation Actions and Projects in Chapter 3 Climate Action and Energy.



8. Issue raised & recommendation made by EMRA:

Regarding Economic Development:

- a) Include an economic profile of county Offaly which provides a strong evidence base for the formulation of related economic policy.
- b) Include additional policies and objectives tailored for each tier of the settlement hierarchy which would reinforce the commensurate economic development of each settlement tier in a focused manner.
- c) An Economic Briefing Paper currently being prepared by EMRA has found a shortage of appropriately sized land banks and FDI / IDA appropriate business premises throughout the region, including Tullmaore. In this regard, include a complimentary policy / objective to enable the delivery of same.
- d) The 'Sector Focused Approach' in the Economic Chapter would benefit from more detail on the sectors that are relevant to County Offaly at the moment and the potential sectors that are most relevant for the future. Some of these sectoral opportunities are identified at Section 6.4 of the RSES.
- e) The Rural Economic Strategy is welcome. In this regard the Council is directed to related RSES policies for 'rural areas' in chapter 4 of the RSES and also those contained in chapter 6 that relate to the 'rural economy'.
- f) In line with the economic strategy of the RSES, the plan should include additional policies and objectives relating to smart specialisation, clustering, placemaking, skills and innovation, future proofing and anticipating economic structural change. The Council is directed to chapter 6 of the RSES in this regard.

CE Recommendation:

Chapter 5 (Economic Development) sets out the employment and enterprise strategy and policies from a planning and economic development perspective for County Offaly over the Plan period. It is recommended that Chapter 5 'Economic Development' be renamed '**Economic Development Strategy**', which is more pertinent to the purpose of the chapter.

- a) It is recommended that the following economic profile of County Offaly be included in Chapter 5 'Economic Development Strategy'.

Economic Profile of County Offaly

This section provides a brief overview of the economic profile of County Offaly. It presents data from a number of key indicators that help to paint a picture of the economic profile of County Offaly and the information has been used to inform economic policy making as part of the Plan.

Located in the midlands, Offaly is bordered by seven counties and shares its western boundary with the River Shannon. The county is traversed along the northern boundary by the M6 Dublin to Galway motorway and along the south-eastern boundary by the M7 Dublin to Limerick motorway. In addition, the Dublin-Galway railway route passes through the County, with stops in Portarlington, Tullamore and Clara. Strategically located with good transport connections, the County is well positioned to attract economic investment.

Existing Employment in County Offaly

Tullamore, a Key Town in the RSES, is Nationally central and serves as a major employment hub for the Midlands, with Professional Services, Manufacturing and Engineering being its largest industries. Tullamore has a Total Jobs: Resident Workers ratio of 1.48, which is relatively high compared to the EMRA average of 0.82 (over 0.7 represents a strong economic function as stated in Appendix A of the RSES). An increasing cluster of medical-tech and biopharma companies are locating themselves in Tullamore; in proximity to the Midlands Regional Hospital, which is the major hospital for the region. This is a Teaching/University hospital for a number of institutions including University College Dublin and University of Limerick, acting as a strong economic driver for the town and also providing a springboard for further linkages to existing and new med-tech businesses and research facilities.

There are almost 1,150 active businesses within 5km of Tullamore, employing nearly 8,260 people each day from the town and the wider region. 26% of these businesses are in less conventional sectors, where emerging business clusters can often be found. These include Med-Tech, FinTech, ICT and Engineering employers (such as Integra, Kelpak Medical and McDonald International). Tullamore is also a growing hub for the Food & Drinks sector, with large employers like Tullamore Dew Distillery, Carroll Meats, and Glenisk. Professional services, scientific and technical activities, as well as various public service providers comprise the town's other key economic pillars, with traditional employment in peat production giving way to opportunities in the green economy.



Figure 5.1 Tullamore Business Activity and Clustering

The Midlands Skills Centre in Tullamore, located in the Axis Business Park, is amongst the country's best equipped facilities catering to the specialist training and upskilling of those who wish to seek employment in the rapidly growing biopharma and medical-tech sectors. The centre delivers holistic training solutions in a realistic Good Manufacturing Practice (GMP) simulated manufacturing environment, enhancing the learning experience through adjacent IT and meeting facilities. Facilities include a state-of-the-art cleanroom, laboratories and classrooms.

Also located in the Axis Business Park is the Junction Business Innovation Centre, which offers a professional, well-serviced co-working environment for remote workers, freelancers, young companies and entrepreneurs.

The Council recognises the importance of maintaining and supporting emerging clusters in the area of Med-Tech, FinTech, ICT and Engineering employers, by strengthening linkages or facilitating collective action to improve the cluster-specific business environment.

Other settlements in the County have a more localised employment base resulting in fewer jobs. Birr, Banagher and Ferbane are the exceptions with these towns having a healthy Total Jobs: Resident Workers ratio of 0.96, 0.80 and 0.76, respectively. These towns have a significant service function for their surrounding rural hinterland, which generates employment in the schools, retail outlets, hospitality / tourism sector. The employment base in Birr is also supported by established industrial / manufacturing businesses in Syngfield Industrial Estate, Roscrea Road and Crinkill to the south.

Clara has a long established industrial heritage, with the Goodbody Family in the early 1800s being particular prominent in this regard. Clara benefits from proximity to the county town of Tullamore. A

number of pharmaceutical/medical companies are situated along the Kilbeggan Road in the outskirts of Clara notably Bemis Healthcare, Steripack and Europharma Concepts. Clara's other significant sources of employment include local retailing and in community services such as Scoil Bhríde and Ardscoil Chiarain Naofa.

Banagher maintains a strong local industrial employment base, including Banagher Concrete, Liffey Mills and Inland and Coastal Marina Systems, remaining notable employers in the town, continuing to contribute to the local economy. Other businesses in the town such as Bo Bristle and Inland and Coastal Marina Systems reflect a diverse employment base while Silver Line Cruisers and Carrick Craft operate out of the marina.

Ferbane has a number of small or micro-enterprises which trade successfully and generate local employment. Ferbane Food Campus is a state-of-the-art food product development and training facility. It is the first timeshare production facility of its kind to be developed in the midlands and provides a significant opportunity for future growth. Ferbane Food Campus was awarded national winner in the 'Community Business Enterprise Initiatives' category in the annual Pride of Place Awards in 2016.

Kilcormac's employment base is through its role as a local retailing and a community centre with its local shops, Kilcormac Convent National School and Coláiste Naomh Cormac being the predominant examples.

In the east of the county, the economy was traditionally dependent on agriculture and peat production, however given this area's proximity to the Dublin Metropolitan Area, a trend of commuting emerged over previous Development Plan periods, which is evident by the jobs to resident workers ratio for Edenderry (0.63), Portarlinton (0.43) and Daingean (0.35), indicating a large proportion of outward commuting. Edenderry is the largest settlement in eastern Offaly with significant employment in retailing. Other significant employers include the Rosderra Meat factory in Edenderry.

The economy of West and South Offaly has traditionally been and continues to be heavily reliant on the primary sectors including agriculture, quarrying and tourism based on key asset such as the River Shannon, Lough Boora Discovery Park, Clonmacnoise monastic site, Birr Heritage Town and the Slieve Bloom Mountains.

Peat production and peat-fired electricity generation has been synonymous with County Offaly since the mid-1900s. Power stations at Shannonbridge, Edenderry and Rhode provided direct employment with additional contract and part-time staff, while further supporting employment in Bord na Mona for supply of milled peat from bogs. The West Offaly power station in Shannonbridge closed in 2021, the Rhode power station closed in 2003, while Edenderry power station, which is now co-firing with peat and biomass, has permission to stay in operation until 2023. In addition to milled peat for electricity generation, Bord na Móna has provided significant employment in the harvesting of peat for the retail sector, including production of peat briquette and compost.

Other smaller settlements in the County are largely dependent on outbound commuting to sustain employment for their populations.

Socio Economic Baseline

Labour Force Participation and 'At Work'

In Census 2016 the total labour force in the county was 36,031 people. Labour Force Participation (LFP) measures the percentage of all people aged 15 or over who are available for work, that is either at work or unemployed. The LFP rate for Offaly was 59.8% which is marginally below the State average of 61.4% and generally consistent with the other Midland counties of Laois, Longford and Westmeath, being 62%, 60.2% and 60.8%, respectively. There are also notable variations at sub-county level with higher LFP rates evident for Tullamore at 62.5% and Edenderry at 64.3%, and lowest rate for Ferbane at 48.1%.

Labour Force in County Offaly

	2011	2016
Total Labour Force	35,849	36,031
Total in Employment	27,536 (76.8%)	30,287 (84.1%)

According to Census 2016, 84.1% of the total Labour Force in County Offaly was ‘At Work’, demonstrating a positive trajectory from the Census 2011 rate of 76.8%. The 2016 Census rate is below the State average of 87.1% but compares well with the other Midland counties of Laois, Longford and Westmeath, being 84.7%, 80.4% and 84.1%, respectively. For the towns in County Offaly, the total Labour Force ‘At Work’ varies from 70.9% for Kilcormac to 79.9% for Tullamore, all being below the county rate, which is consistent with the urban/rural split at regional level of 79% / 85.9%, reflecting positively on the rural based workforce.

Labour Force Unemployment

In Census 2016, the unemployment rate (both unemployed and looking for their first job) for County Offaly was 5,744, representing a labour force unemployment rate of 15.9% compared to the national rate of 12.9%, and positively compared with the other Midland counties of Laois, Longford and Westmeath, being 15.3%, 19.6% and 15.9%, respectively.

At a sub-county level, the rate of unemployment for the towns of Tullamore, Birr, Edenderry, Banagher, Ferbane, Clara and Daingean fall between 19.1% and 23.3%, whereas Kilcormac is relatively high at 29.1%.

Industry of Employment

The most dominant sectors of employment of resident employees in the county are ‘Commerce and Trade’ (23.9%) and ‘Professional Services’ (23.5%), representing almost 50% of employment of total residents. When compared to State averages, employment in Offaly is characterised by a higher than average dependence on traditional sectors, such as ‘Agriculture, Forestry and Fishing’, ‘Building and Construction’ and ‘Manufacturing Industries’.

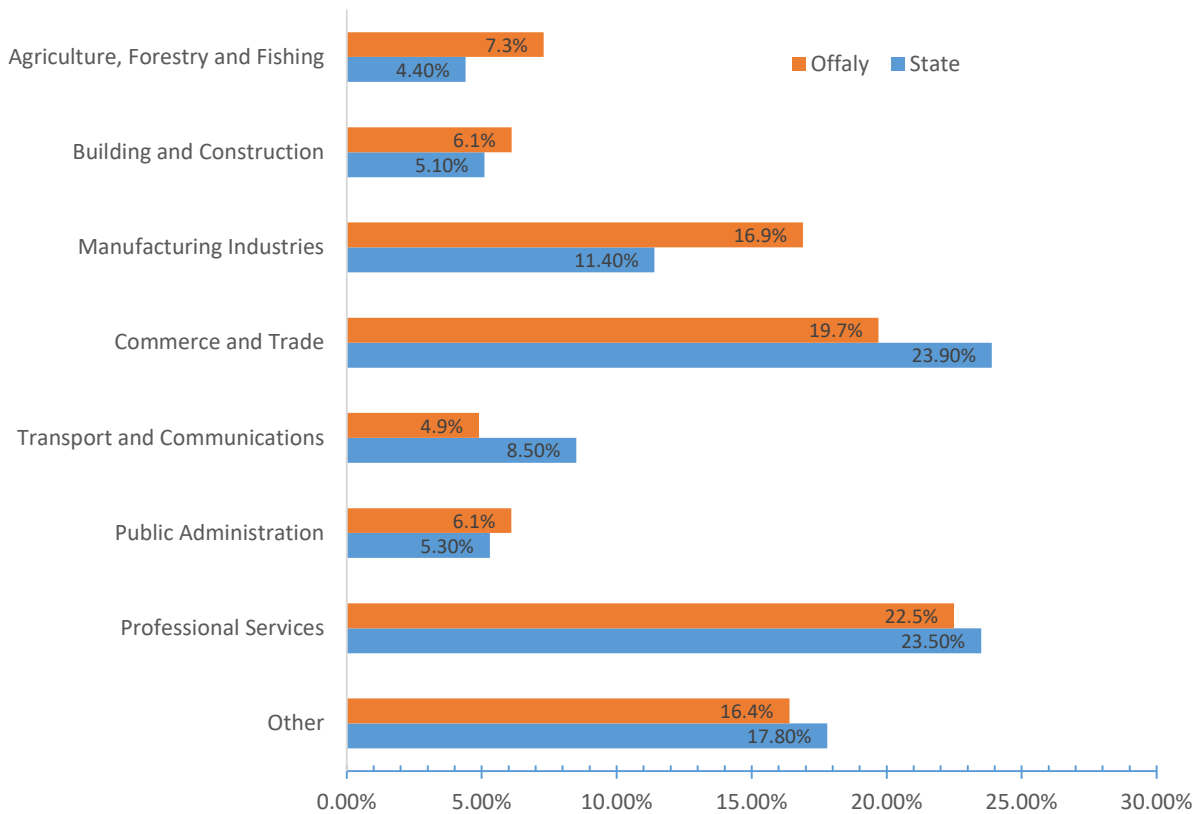


Figure above showing Industry of Employment

Occupations

The graph in Figure 5.2 shows the breakdown of occupations across all sectors of industry in Offaly as a percentage of the total workforce compared to the state average. The data demonstrates that Offaly records above average rates for four occupational groups; ‘Skilled Trades Occupations’ (18.5%), ‘Caring, Leisure and other Service Occupations’ (7.9%), ‘Process Plant and Machine Operatives’ (9.8%) and ‘Elementary Occupations’ (9.3%). These four groups account for 45.5% of the labour force in the county.

‘Occupations’ data is a useful indication of the broad range of employment in the County, in addition to highlighting the skill sets of the workforce. Since 2011, the ‘Caring, Leisure and Other Service Occupations’ occupational group has witnessed the highest rate of increase at 15% (an additional 425 workers), while the ‘Professional Occupations’ group increased by 6.7% (an additional 295 workers) since 2011. A number of occupational groups witnessed decreases in numbers, most notably ‘Skilled Trades Occupations’ which decreased by 10.02% (657 workers).

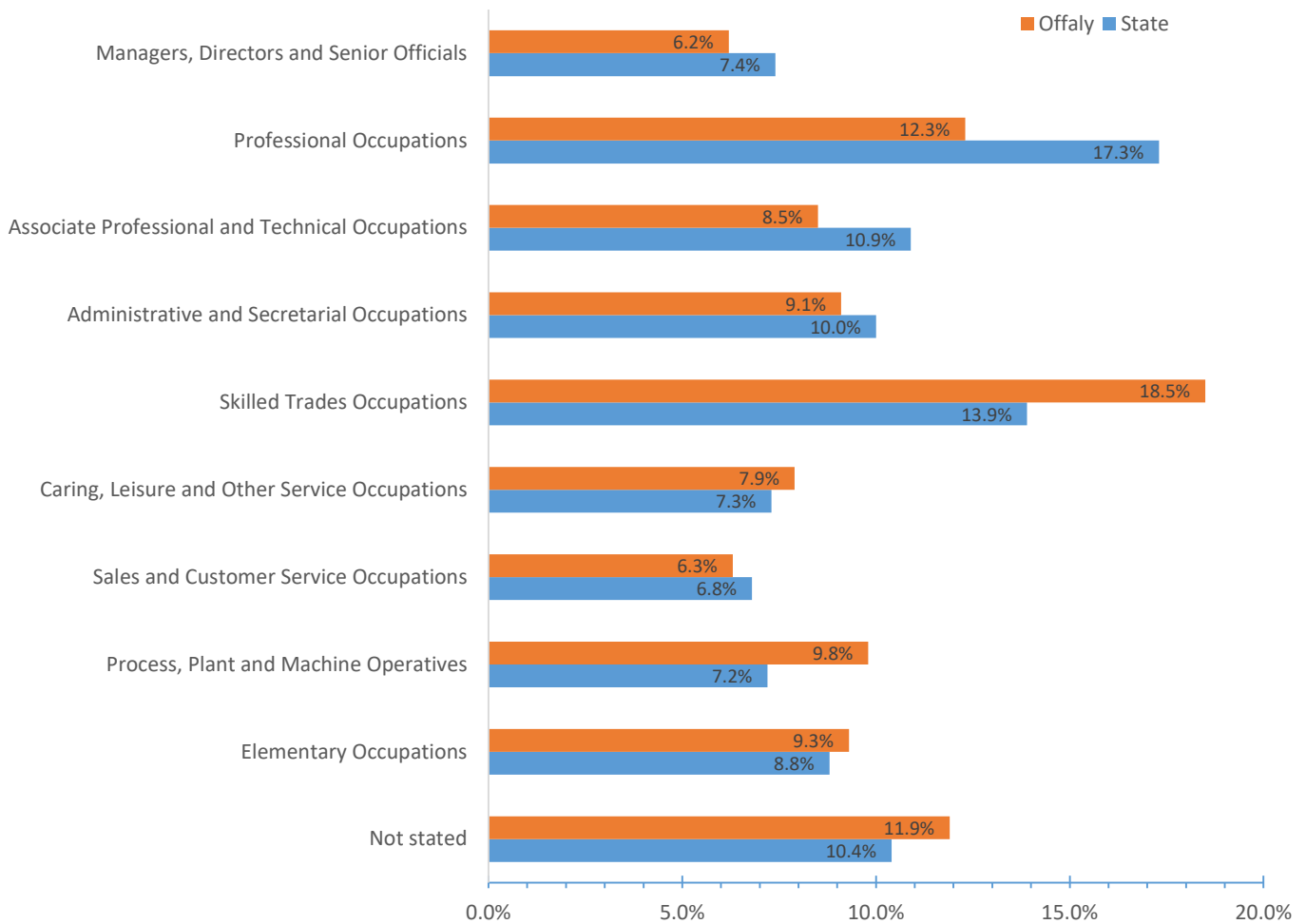


Figure above showing Occupations

- b) It is recommended that additional policies and objectives, tailored for each tier of the settlement hierarchy, be added to Section 5.9 (Enterprise Policies) and Section 5.10 (Enterprise Objectives) in Chapter 5 – Economic Development Strategy, as outlined below (new text in red). Rural Economic Development policies and objectives for the rural area (open countryside) are already provided under Section 5.11 in Chapter 5.

It should be noted that tourism related policies and objectives are located in Chapter 6 Tourism and Recreational Development, which include settlement specific policies/objectives, whilst Regeneration related policies and objectives are located in Chapter 7 Retail & Town Centre Strategy and Regeneration. Furthermore, some of the policies and objectives in Chapter 5 Economic Development Strategy are set out in a sector type fashion (e.g. higher education. Chapter 2 includes settlement specific policies relating to the settlement strategy also which make reference to economic development / regeneration.

Recommended changes (in red) to Section 5.9 of the draft Plan (Enterprise Policies):

Key Town – Tullamore

It is Council policy to promote Tullamore as a key location for economic development supporting the provision of increased employment through the expansion of the existing enterprise ecosystem in the town and smart specialisation and support the provision of physical infrastructure and zoned lands to realise the delivery of strategic employment lands in central accessible locations.

Self-Sustaining Growth Town – Birr

It is Council policy to promote Birr as a competitive and attractive location for economic development emphasising Foreign Direct Investment.

It is Council policy to promote and support the development of the lands zoned ‘Business or Technology Park’ in the northern part of the town.

It is Council policy to support economic development and job creation through Birr’s role as a Tourism Destination Town.

Self-Sustaining Towns – Edenderry, Portarlington

It is Council policy to support the proportionate economic growth of and appropriately designed development in self-sustaining towns that will contribute to their regeneration and renewal.

It is Council policy to promote Self-Sustaining Towns as an employment base for start-up businesses and enterprises.

Towns – Banagher, Clara

It is Council policy to promote employment and enterprise development in Towns.

Smaller Towns (Daingean, Fermoy, Kilmacomb) and Villages

It is Council policy to support the sustainability of Smaller Towns and Villages, by supporting appropriately scaled economic development and services together with the enhancement of local infrastructure and amenities and improved sustainable transport links.

Recommended changes (in red) to Section 5.10 of the draft Plan (Enterprise Objectives):

Key Town – Tullamore

Towns – Banagher, Clara

It is an objective of the Council to facilitate new employment and enterprise development in Towns.

Smaller Towns (Daingean, Fermoy, Kilmacomb) and Villages

It is an objective of the Council to facilitate appropriately scaled enterprise development and services in Smaller Towns and Villages, together with the enhancement of local infrastructure and amenities and improved sustainable transport links.

- c) It is recommended that the following text is added at the end of the paragraph addressing foreign-direct investment in the draft Plan in Chapter 5 – Economic Development Strategy. In collaboration with the IDA, the Council will endeavour to expand on this database to identify suitably sized land banks and business premises at suitable locations in Tullamore in order to attract foreign direct investment.

It is also recommended that a new policy and objective be included under Section 5.9 (Enterprise Policies) and Section 5.10 (Enterprise Objectives), respectively, in Chapter 5 – Economic Development Strategy, as follows:

It is Council policy to promote Tullamore as a suitable location for Foreign Direct Investment

It is an objective of the Council to work alongside IDA to identify appropriately sized land banks and business premises at suitable locations in Tullamore in order to attract foreign direct investment.

- d) It is recommended that the ‘Sector Focused Approach’ (Section 5.6 of Chapter 5) be amended to provide two sub-categories, ‘Traditional Sectors’ and ‘Emerging Sectors’. It is recommended that the content of this section be amended as follows (new text in red):

5.6.1 Traditional Sectors

Foreign-Direct Investment

The addition of the following text should be inserted at the end of the paragraph addressing foreign-direct investment in the draft Plan: In collaboration with the IDA, the Council will endeavour to expand on this database to identify suitably sized land banks and business premises at suitable locations in Tullamore in order to attract foreign direct investment.

Home Based Employment

Retain the content as per the draft Plan.

Small-Medium Enterprises (SMEs)

Retain the content as per the draft Plan.

Tourism

The Council recognises that the tourism sector is emerging as key economic driver for the county. The county possesses a rich array of natural, built and cultural heritage including Clonmacnoise monastic site, ‘Birr Castle, Gardens and Science Centre’, the Slieve Bloom Mountains, Lough Boora Discovery Park and the River Shannon.

Birr was chosen as a 'Destination Town' under the Government's 'Destination Towns' initiative launched in 2019 by the National Tourism Development Authority. The purpose of the funding, as issued through Fáilte Ireland, is to boost the attractiveness and tourism appeal of the town. The funding will assist in measures to sustain and improve the quality of the tourist experience in the town, a benefit of which is to increase visitor numbers and also to protect and increase direct employment in tourism related businesses in the town and wider area.

The Council also recognises that the Grand Canal Greenway is a valuable recreational and amenity route used by walkers and cyclists, key infrastructure to link many of the tourism and recreational sites in the county and the wider region. The Grand Canal Greenway has been serviced with free public Wi-Fi which is an innovative use of digital technology and infrastructure to deliver real, tangible benefits for local communities and visitors alike. The Council recognises the importance of continuing to extend and link in the form of a network, greenways and peatways in the interests of sustainable mobility, activity tourism, transition to a low carbon and climate resilient society, strengthening rural economies and job creation.

Offaly possesses a wealth of natural resources, unique heritage and a well-developed network of market towns and villages that could be promoted at international, national and local level for increased tourism potential and create positive economic opportunities locally.

Tourism is dealt with separately in Chapter 6 Tourism and Recreational Development.

5.6.2 Emerging Sectors

Remote Working / Co-Working Spaces

The addition of the following text should be inserted at the end of the paragraph addressing remote working / co-working spaces: Portarlinton Enterprise Centre on the Laois side of Portarlinton provides remote working space for the wider Portarlinton catchment.

Artisan Foods

Offaly has a long and strong tradition of producing high quality locally produced food from cheeses and chocolate to organic beef. There is increasing demand for training, product development and funding for equipment. The area of artisan food is ever expanding and has potential to develop into food trails.

Ferbane Food Campus is a state-of-the-art food product development and training facility, promoting smart specialisation and clustering of the food sector.

Remainder of the text in the draft Plan on artisan foods should remain.

Medtech (Medical Technology)

The synergy that exists between the Midlands Regional Hospital in Tullamore, a teaching/ university hospital, and the medtech sector is emerging as a key economic driver for Tullamore. The Council recognises and supports the strong linkages within the local economy between the hospital and the emerging med-tech sector, in which the hospital provides a

springboard for further linkages to existing and new med-tech businesses and research facilities. According to the Irish Medtech Association, the medtech sector in Ireland is recognised as one of the five global emerging hubs.

Green Energy

Whilst Offaly has a long history of energy production related predominantly to the commercial exploitation of peatlands, national environmental policies are dictating the wind down of traditional fossil fuel powered stations and a diversification of our energy production towards green energy such as wind, solar and bioenergy. Offaly County Council recognises the potential economic benefit of a transition from fossil fuel based energy production through to investment in renewable energy, the promotion of the green enterprise sector and the creation of green collar jobs; all components of a local 'smart green economy'.

The Rhode Green Energy Park (GEP) is strategically located on the outskirts of Rhode, just 7 km from the M6 Dublin to Galway motorway. The business park has been established on the site of a former ESB Power Station and occupies approximately 5.3 ha with 13 serviced sites. The area has a strong heritage in energy production and coupled with the strategic location, the park is considered suitable for Green Energy as well as other complementary green uses such as Green Enterprise, Food Processing, Manufacturing, Logistics, Engineering and Research and Development and is already home to a number of consented renewable energy generation proposals and facilities in the shape of wind, solar and flywheel battery storage. With the significant development of the business park infrastructure(s) in place and various energy related infrastructure and prospective developments nearby, Offaly County Council has identified the potential for a Green Energy Park at this location which can be a national exemplar of the transition from a historical dependency on fossil fuels to sustainable energy and energy innovation.



5.5.6.2 Strategic Opportunities

Offaly County Council has commissioned RPS Consultants to prepare an 'Opportunity Assessment Report' for Rhode GEP which has identified three strategic opportunity areas;

4. Energy decarbonisation/ innovation hub built around renewable energy, energy storage, hydrogen gas and electricity system integration.
5. Eco-Industrial Park model whereby large-scale energy intensive employment – for example in data centres, agri-food, horticulture, bio-economy – develops around the electricity and heat resources available.
6. Educational/ Innovation/ Centre of Learning for renewables and electricity grid: to improve awareness within the community of how the energy transition is happening, for collaboration with stakeholders across the Midlands Region and to create partnerships with University and Third Level Institutions.

These strategic opportunities offer considerable potential to;

- develop hybrid renewable energy facilities in co-location with industries and enterprise within the Business Park and renewable energy developments in the surrounding rural area; and
- provide mutual benefits and efficiencies for both energy producers and users by sharing outputs and by-products of their processes in a reliable, sustainable and cost competitive fashion and at the same time export renewable energy to the national grid to help transition to a low-carbon and climate resilient society.



5.5.6.3 Guiding Future Development of the Rhode Green Energy Park

In order to maximise the potential of the Rhode GEP, the following principles should apply to the future planning of the Rhode Green Energy Park, in order to realise its potential.

Table 5.2: Guiding Principles for the Rhode GEP

<p>8. Integration/ Interconnectivity of units/ enterprises</p> <p>Rather than conceiving each proposal as a stand-alone unit, developers should plan for future integration with other facilities in the park, following an eco-park model. This means interconnection of electricity, a local heat network, and physical connections for transfer of other materials (circular economy co-operation). This translates as a services corridor concept within the park. This can take into account potential for future connection of external services and utilities.</p> <p>9. Shared Approach – Wastewater, SUDS, offices/meeting room</p> <p>A more coherent and efficient park will develop if some aspects are shared; for example, a central sustainable drainage pond will avoid each plot needing its own system, a central wastewater treatment plant is preferable to several smaller units. A shared hub for office space and meeting</p>
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rooms will help create co-operation and synergy between tenant companies. Offaly County Council can take a lead in this regard.

10. Design Approach/ Coherence

The attractiveness and coherence of the park will benefit from a specific design guide to inform the approach on individual plots. Accordingly, it is an objective of this Plan to prepare a Design Statement for the Rhode Green Energy Park showing the developers the preferred approach to materials, colours, boundary treatment, signage etc. for individual units and sites in the Park. Until this Design Statement is prepared, developers shall as a minimum comply with the requirements of DMS-73. Individual developments will still have freedom meet their own design requirements but following overarching guidance.

11. Community Integration – Recreation, Connections and Green Infrastructure Provision

The Park forms part of an informal walking loop popular with the local community. This can be strengthened and expanded, for example with planned cycleway networks and connections to Croghan Hill. Access should be protected during construction work where possible. It is an objective of this Plan to prepare a Green Infrastructure Masterplan for the Rhode Green Energy Park to advise developers on how to retain and enhance existing green infrastructure and to provide new green infrastructure within and around the Rhode Green Energy Park. Until this Statement is prepared, developers shall as a minimum comply with the requirements contained in DMS-72.

12. Sustainable Design Approach

As part of the energy transition, the park should be developed as an exemplar of sustainability, using for instance low-carbon materials, encouraging sustainable transport, incorporating biodiversity gain, reducing impacts from lighting, and so on. It is an objective of this Plan for the Council to prepare an Energy Efficiency and Climate Change Adaptation Design Statement for the Park. Until this Statement is prepared, developers shall as a minimum comply with the requirements contained DMS-74 in Chapter 13 of this Plan in this regard. One avenue for developers to consider in this regard is to implement a sustainability standard such as CEEQUAL (for park infrastructure) or a community approach under BREEAM or LEED.

13. Technology/ WiFi zone

As a landmark, pioneering energy efficient, low carbon centre of industry, the Rhode Green Energy Park would benefit from a Wi-Fi zone to facilitate collaboration spaces in the park and any academic / research ties that the park will develop.

14. Future Expansion/ Phased Growth

The Council recognises that while the core area of the Rhode GEP provides several opportunities and already has operational energy facilities, some future proposals such as large scale renewable energy projects or data centres may require larger land banks adjacent to the site or in the general area. In this regard, there exists large tracts of flat peatland and transitional marginal land within the general area of the GEP which may be capable of accommodating such complimentary developments subject to proper planning and environmental considerations and the design ethos and coherence of the park being respected. The layout should be planned to enable future connections to adjacent land. The possible need to expand infrastructure such as the electricity substation and wastewater treatment installation should also be borne in mind.

5.5.6.3 Appropriate and Inappropriate Uses within the Rhode Green Energy Park

Table 5.3 below which is referred to in ENTO-13 outlines appropriate uses that will be considered and inappropriate uses that will not be considered by the Planning Authority within the Rhode GEP. It should be noted that the uses identified appropriate and inappropriate in Objective ENTO-13 relating to the Rhode GEP take precedence over the acceptability or otherwise of uses which apply to 'Industrial and Warehousing' as contained in Table 12.1 Land Use Zoning Matrix in Chapter 12 Land Use Zoning Objectives.

Table 5.3: Appropriate and Inappropriate Uses within the Rhode Green Energy Park

Uses considered appropriate for the Rhode Green Energy Park	Uses not considered appropriate for the Rhode Green Energy Park
<ol style="list-style-type: none"> 1. Low Carbon Peaking Plant 2. Hydrogen Electrolyser and Storage 3. Data Centre 4. Geothermal Heat Pumps 5. Steam Reformation Plant 6. Anaerobic Digester (Biogas) 7. Biofuel Production 8. Horticulture/Agrifood (Greenhouses) 9. Research and Development 10. Other uses which in the opinion of the Planning Authority are in keeping with and complementary to the strategic opportunities outlined in Section 5.5.6.2. 	<ol style="list-style-type: none"> 1. Batching plants 2. Fuel Depots 3. Heavy Vehicle Depots 4. Light or heavy industry not related to Green Energy or Green Innovation 5. Warehousing not related to Green Energy or Green Innovation 6. Logistics 7. Abattoir 8. Retail wholesale outlets 9. Boarding Kennels 10. Mart/Co-operatives 11. Scrap yards 12. Service Stations 13. Veterinary surgeries 14. Other uses which in the opinion of the Planning Authority are in not in keeping with and complementary to the strategic opportunities outlined in Section 5.5.6.3.

5.5.6.4 Necessary Infrastructure

Realising the potential of Rhode GEP will require further development of enabling infrastructure provided directly from developers and from national and European funding programs. Table 5.4 below lists a range of new infrastructure and upgrades to existing infrastructure that will be required in this regard.

Table 5.4: Future infrastructure requirements to facilitate development of Rhode Green Energy Park

<ul style="list-style-type: none"> • Upgrading physical environment of the existing Business Park (roads, footpaths, landscaping) • R400 road improvements • Footpaths/ cycleways • Improved telecommunications (fibre) infrastructure • Upgrade of capacity at Rhode Wastewater Treatment Plant • Water supply improvements • Electricity grid connections and potential expansion of existing substation • Gas grid connection to the site • Interconnecting services (heat networks, electricity, gas, water, etc.) between companies operating in and around the Park • Modern Interface (MI) Wholesale High Quality Access (WHQA) to fibre-optic communication

It is proposed to change Policy ENTP-27 to an objective in Section 5.9 as follows (additional text in red);

It is an objective of the Council policy to support and promote the development of Rhode Green Energy Park for Green Energy as well as other complementary green uses such as Green Enterprise, Food Processing, Manufacturing, Logistics, Engineering and Research and Development as outlined as 'Uses Considered Appropriate for the Rhode Green Energy Park in Table 5.3. 'Uses not considered appropriate for the Rhode Green Energy Park' in Table 5.3 will not be encouraged in the Rhode Green Energy Park.

It is also proposed to add the following objectives to Section 5;

It is an objective of the Council to ensure that proposed developments within the Rhode Green Energy Park adhere to the principles set out in Table 5.2: Guiding Principles for the Rhode Green Energy Park.

It is an objective of the Council to support and facilitate the infrastructural upgrades and works outlined in Table 5.4 in conjunction with the development of the Rhode Business Park.

It is an objective of this Plan for the Council to prepare the following;

- a Design Statement showing the developers the preferred approach to materials, colours, boundary treatment, signage etc. in the Rhode Green Energy Park;
- a Green Infrastructure Masterplan for the Rhode Green Energy Park to advise developers of how to retain and enhancing existing green infrastructure and to provide new green infrastructure within and around the Rhode Green Energy Park; and
- an Energy Efficiency and Climate Change Adaptation Design Statement for the Rhode Green Energy Park.

- e) The policies and objectives contained under Section 5.11 (Rural Economic Development Policies) and Section 5.12 (Rural Economic Development Objectives) of the draft Plan, respectively, are consistent with the regional policy objectives set out under Chapter 4 and 6 of the RSES concerning rural areas, and seek to promote the rural area of the county for new economic opportunities through diversification, innovation and enterprise, as well as through the more traditional natural and resource assets (e.g. food, energy, tourism), underpinned by the quality of life offering.

It is recommended that the following additional policies will strengthen the policy base and be included under Section 5.11 (Rural Economic Development Policies) in Chapter 5 – Economic Development Strategy, as follows:

It is Council policy to support the regeneration of smaller towns and villages through identification of regeneration projects which could harness untapped assets with community support and wider private and public sector support and investment including the Rural Regeneration and Development Fund.

It is Council policy to support rural entrepreneurship and rural enterprise development of an appropriate scale at suitable locations in the County.

- f) The economic strategy in the EMRA RSES seeks to promote smart specialisation and clustering underpinned by an orderly settlement strategy and investment in place-making.

Chapter 5 (Economic Development Strategy), of the draft Plan contains policies and objectives which support these economic principles, across the urban and rural areas of the county, aligning the economic strategy with the settlement hierarchy, with particular emphasis on Tullamore as a Key Town. Of particular note is Policy ENTP-13, which encourages the building of a resilient economic base by means of supporting investment in exporting, innovation, productivity, competitiveness, developing and enhancing accessibility and connectivity, development of talent / skills and the creation of attractive places and suitable infrastructure.

Policy ENTP-31 of the draft Plan addresses clustering as follows: It is Council policy to encourage foreign direct investment through greater levels of enterprise collaboration, clustering and global connectivity.

Smart specialisation, clustering and placemaking is also promoted through appropriate type and location of land use zonings, for example the identification of Strategic Employment Zones in Tullamore, a Key Town. Place-making is addressed in Chapter 7 Retail & Town Centre Strategy and Regeneration.

It is recommended that the following additional text, policies and objectives be included, which seek to further underpin the abovementioned economic principles of smart specialisation and clustering.

It is recommended to insert the additional text as follows into Table 5.2 of the draft Plan which lists key Initiatives in County Offaly:

Diversification and growth of smart specialisation of local economies with a strong focus on clustering, including sustainable farming and food production, tourism, energy and renewables, and bio-economy.

It is recommended under the new sub-heading **Emerging Sectors** and the sub-sub headings that follow to insert the following new red text to address smart specialisation and clustering:

Artisan Foods

Offaly has a long and strong tradition of producing high quality locally produced food from cheeses and chocolate to organic beef. There is increasing demand for training, product development and funding for equipment. The area of artisan food is ever expanding and has potential to develop into food trails.

Ferbane Food Campus is a state-of-the-art food product development and training facility, **promoting smart specialisation and clustering of the food sector**. It is the first timeshare production facility of its kind to be developed in the midlands. Its purpose is to give food entrepreneurs the opportunity to use a state-of-the-art kitchen, training facility and incubator units to develop their product without the prohibitive cost of maintaining their own commercial kitchen. It is operated by Ferbane Business and Technology Park Ltd which is a not-for-profit, voluntary group, whose objective is to support the creation of jobs in Ferbane and in the local region by providing infrastructure and supports to encourage business start-ups. Ferbane Food Campus was awarded national winner in the 'Community Business Enterprise Initiatives' category in the annual Pride of Place Awards in 2016.

Medtech (Medical Technology)

The synergy that exists between the Midlands Regional Hospital in Tullamore, a teaching/university hospital, and the medtech sector is emerging as a key economic driver for Tullamore. The Council recognises and supports the strong linkages within the local economy between the hospital and the emerging med-tech sector, in which the hospital provides a springboard for further linkages to existing and new med-tech businesses and research facilities. According to the Irish Medtech Association, the medtech sector in Ireland is recognised as one of the five global emerging hubs.

Green Energy

Whilst Offaly has a long history of energy production related predominantly to the commercial exploitation of peatlands, national environmental policies are dictating the wind down of traditional fossil fuel powered stations and a diversification of our energy production towards green energy such as wind, solar and bioenergy. Offaly County Council recognises the potential economic benefit of a transition from fossil fuel based energy production through to investment in renewable energy, the promotion of the green enterprise sector and the creation of green collar jobs; all components of a local 'smart green economy'.

The Rhode Green Energy Park (GEP) is strategically located on the outskirts of Rhode, just 7 km from the M6 Dublin to Galway motorway. The business park has been established on the site of a former ESB Power Station and occupies approximately 5.3 ha with 13 serviced sites. The area has a strong heritage in energy production and coupled with the strategic location, the park is considered suitable for Green Energy as well as other complementary green uses such as Green Enterprise, Food Processing, Manufacturing, Logistics, Engineering and Research and Development and is already home to a number of consented renewable energy generation proposals and facilities in the shape of wind, solar and flywheel battery storage. With the significant development of the business park infrastructure(s) in place and various energy related infrastructure and prospective developments nearby, Offaly County Council has identified the potential for a Green Energy Park at this location which can be a national exemplar of the transition from a historical dependency on fossil fuels to sustainable energy and energy innovation.

Please see response to point d) above which proposes the inclusion of an expanded Section 5.6.2 on the economic opportunities that the Rhode Green Energy Park provides along with specific objectives relating to its future development.

In addition, the following additional policies under Section 5.9 of the draft Plan (Enterprise Policies) are recommended:

It is Council policy to build a resilient economic base and promote innovation and entrepreneurship ecosystems that support smart specialisation, cluster development and sustained economic growth.

It is Council policy to support existing successful clusters in Offaly, such as those in Med-Tech, FinTech, ICT, and Engineering and Food and Drinks sectors, and promote new and emerging clustering opportunities across all economic sectors within the County.

It is Council policy to recognise the significant economic and employment benefits of similar enterprises clustering in an area.

It is Council policy to promote Tullamore as a key location for economic development supporting the provision of increased employment through the expansion of the existing enterprise ecosystem in the town and smart specialisation and support the provision of physical infrastructure and zoned lands to realise the delivery of strategic employment lands in central accessible locations.

It is recommended to amend ENTP-27 of the draft Plan as follows: It is Council policy to support and promote the development of Rhode Green Energy Park for Green Energy **and, through promotion of smart specialisation and clustering**, other complementary green uses such as Green Enterprise, Food Processing, Manufacturing, Logistics, Engineering and Research and Development.

Additional objectives recommended under Section 5.10 of the draft Plan (Enterprise Objectives):

It is an objective of the Council to improve the cluster-specific business environment by putting in place a favourable business ecosystem for innovation and entrepreneurship that supports the development of new industrial value chains and emerging industries.

It is an objective of the Council to support smart specialisation partnerships at a county and regional level.

Additional policy recommended under Section 5.11 of the draft Plan (Rural Economic Development Policies):

It is Council policy to support rural entrepreneurship and rural enterprise development of an appropriate scale at suitable locations in the County.

9. Issue raised & recommendation made by EMRA:

Regarding Tourism and Recreational Development:

- a) Cross-reference the information contained in the Chapter 6 Tourism and Recreational Development to the Green Infrastructure Section in Chapter 4 Biodiversity and Landscape.

CE Recommendation:

- a) Section 4.10 which addresses the Green Infrastructure Strategy in Chapter 4 Biodiversity and Landscape states that 'In addition to the policies and objectives in this chapter, the importance of green infrastructure is interwoven throughout the chapters of this Plan reflecting its importance'. A cross reference can be made in Chapter 6 to Section 4.10 of the draft Plan. The following wording can be inserted into Chapter 6:

'Green infrastructure itself can act as a tourist attraction and enhance sense of place. A Green Infrastructure Strategy is set out in Section 4.10 of Chapter 4 Biodiversity and Landscape'.

10. Issue raised & recommendation made by EMRA:

Regarding Retail, Town Centre Strategy and Regeneration:

- a) A policy should be included demonstrating a commitment to prepare a Retail Strategy for the county.
- b) Ensure that the information in the draft Plan detailing 'Taller Buildings' complies with the specific planning policy requirements of the 'Urban Development and Building Height Guidelines for Planning Authorities'

CE Recommendation:

- a) Chapter 7 of the draft Plan is titled 'Retail & Town Centre Strategy and Regeneration'. It is considered that the section 7.1.3 constitutes the Retail Strategy and complies with what the Retail Planning Guidelines 2012 describe as the matters to be addressed in a Retail Strategy, namely:
 - Retail Hierarchy to be in line with the Regional Spatial and Economic Strategy and the Settlement Hierarchy of the Core Strategy;
 - Outline the level and form of retailing activity appropriate to the various components of the hierarchy;
 - Define by way of a map the boundaries of the core shopping areas or town centres and if applicable the location of district centres;
 - Set out strategic guidance on the location and scale of retail development;
 - Identify sites to accommodate the needs of modern retail formats;
 - Include objectives supporting action initiatives for the improvement of town centres; and
 - Identify development management criteria for assessment of retail development.

Accordingly, it is not recommended to include a separate objective in the plan to make a Retail Strategy for the County. In addition, it should be noted that retail related and regeneration related policies and objectives are included in Chapter 7 Retail & Town Centre Strategy, and Regeneration.

RPO 6.10 of the RSES states that 'EMRA will support the preparation of a Retail Strategy / Strategies for the Region in accordance with the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update, to update the retail hierarchy and apply floorspace requirements for the Region'. It would be considered premature to change the Retail Strategy further in advance of the publication of the Retail Strategy for the Region.

- b) It is considered that the information in the draft Plan detailing 'Taller Buildings' complies with the specific planning policy requirements of the 'Urban Development and Building Height Guidelines for Planning Authorities'. Relevant SPPR's in the Guidelines are as follows:

SPPR 1

In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.

The Urban Development and Building Heights Guidelines for Planning Authorities, December 2018 state in paragraph 1.10 *'The rationale above for consolidation and densification in meeting our accommodation needs into the future must also be applied in relation to locations that development plans and local area plans would regard as city and town centre areas; for example, within the canal ring in Dublin and analogous areas in Cork, Limerick, Galway and Waterford and other major towns as identified and promoted for strategic development in the National Planning framework and Regional Spatial and Economic Strategies'*. Tullamore is identified in the RSES as a Key Town for strategic growth and accordingly it is the only settlement in Co. Offaly put forward in the draft Plan for consideration of taller buildings. Paragraph 2.11 of the Guidelines state examples of suitable locations which can include *'brownfield former industrial districts, dockland locations, low density urban shopping centres etc.'* The Texas site and Grand Canal Harbour site in Tullamore are both proposed for consideration based on their size, brownfield status, potential for improvements to the public realm and their location in Tullamore town centre thereby contribution to compact growth. Both are located alongside the Grand Canal Greenway thereby promoting walking and cycling. It is acknowledged that a Tullamore Local Area Plan will be prepared on adoption of the Co. Development Plan at which point further analysis can take place on their suitability.

SPPR 2

In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans² could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities.

Both sites proposed are zoned mixed use / town centre in the draft Plan. According to this zoning category a variety of uses are permitted and open for consideration. Development Management Standard no. DMS 09 in chapter 13 also addresses building heights including taller buildings. Section 7.2.5 of the draft Plan states that permitting taller buildings at these locations is dependent on assessment of the following documents;

- A masterplan and local planning framework to deal with movement, public realm and design;
- An urban design statement addressing the impacts on the historic built environment;
- A specific design statement on the individual proposal from an architectural perspective;
- A visual impact assessment; and
- Daylight and shadow projection diagrams.

It is acknowledged that a Tullamore Local Area Plan will be prepared on adoption of the Co. Development Plan at which point further analysis can take place on their suitability.

SPPR 3

It is a specific planning policy requirement that where;

- (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and
2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;***

then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.

- (B) In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme***
- (C) In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.***

SPPR3(A) is noted and accordingly, it is recommended to refer to the Development Management Criteria set out in Section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities, December 2018, in Development Management Standard DMS 09 of Chapter 13.

There are no Strategic Planning Zones in County Offaly, accordingly SPPR 3(B) does not apply. SPPR 3 (c) is noted.

SPPR 4

It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.*

Development Management Standard DMS -02 in Chapter 13 addresses density as follows which automatically addresses item 1 of SPPR 4.

DMS-02 Density	<p>The appropriate residential density of a site shall be determined with reference to;</p> <ul style="list-style-type: none"> • Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009) and the accompanying Urban Design Manual (2009); • Sustainable Urban Housing: Design Standards for New Apartments 2018-2020; • the Urban Development and Building Heights Guidelines 2018; • Recommended maximum densities per settlement tier as shown in Table 2.2 Core Strategy Table in Chapter 2 of this Plan; and • the prevailing scale and pattern of development in the area.
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Development Management Standard DMS -05 in Chapter 13 addresses mix of building types as follows which automatically addresses items 2 and 3 of SPPR 4.

DMS-05 Housing Mix	<p>The Planning Authority requires all applications for residential development of <u>10 houses</u> or more to contain a mix of house <u>types</u>, <u>heights</u> and sizes unless it can be demonstrated that there is a need for a particular type of unit and the proposed development meets the need.</p>
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	Apartments, duplexes, terraces, semi- detached, detached, people with disabilities and learning disabilities and older persons housing shall all be considered as possible elements of a housing mix.
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In addition, section 13.1 of Chapter 13 Development Management Standards states that ‘Specific Planning Policy Requirements set out in Section 28 Guidelines apply, notwithstanding the objectives and requirements of this Development Plan, Local Area Plans or future variations. Future planning guidelines or amendments to existing guidelines will be considered in the assessment of planning applications’.

11. Issue raised & recommendation made by EMRA:

Regarding Sustainable Mobility and Accessibility:

- a) The Council is directed to RPO 4.2 of the RSES requiring infrastructure investment and priority alignment with the spatial planning strategy of the RSES whereby all residential and employment developments shall be planned on a phased basis in collaboration with infrastructure providers so as to ensure availability of adequate capacity for services (e.g. water supply, wastewater, transport, broadband) to match projected demand and so that the assimilative capacity of the receiving environment is not exceeded.

CE Recommendation:

- a) Noted.

12. Issue raised & recommendation made by EMRA:

Regarding Water Services and Environment:

- a) The Council is directed to RPO 4.2 of the RSES requiring infrastructure investment and priority alignment with the spatial planning strategy of the RSES whereby all residential and employment developments shall be planned on a phased basis in collaboration with infrastructure providers so as to ensure availability of adequate capacity for services (e.g. water supply, wastewater, transport, broadband) to match projected demand and so that the assimilative capacity of the receiving environment is not exceeded.

CE Recommendation:

- a) Noted.

13. Issue raised & recommendation made by EMRA:

Regarding Land Use Zoning Objectives

- a) It is noted that Section 12.2 'Zoning Principles' of Chapter 12 states that land is only zoned if it is serviced and / or serviceable within the life of this Plan based on Appendix 3 of the NPF. NPO 72a of the NPF states that '*Planning authorities will be required to apply a standardised, tiered approach to differentiate between (a) zoned land that is serviced and (b) zoned land that is serviceable within the life of the plan*'. The Plan should be updated in order to comply with NPO 72a.

CE Recommendation:

- a) An Infrastructural Assessment Report will be inserted into the Plan which will address a tiered approach to zoning. A copy of this is set out at the end of Section 4 of this CE Report in response to the OPR submission.

14. Issue raised & recommendation made by EMRA:

Regarding SEA, AA, SFRA:

- a) EMRA note the inclusion of Table 8.3 as part of the Environment Report, which details motions that were advised against. EMRA request that a clear rationale be provided for the inclusion of same as part of the Plan and omitted where there is potential for significant negative environmental effects.
- b) The attention of the Council is drawn to the new EPA Guidance on SEA Statement and Monitoring (Second review of SEA Effectiveness in Ireland, published January 2020. The Guidance should inform the iterative SEA process and preparation of the monitoring programme as part of the SEA statement.

CE Recommendation:

- a) This will be covered as relevant in the SEA Statement that is required to be prepared following adoption of the Plan.
- b) The required information on monitoring measures is provided in Section 10 of the SEA Environmental Report - this will inform the final Programme to be included in the SEA Statement. The cited guidance will be taken into account when finalising the Monitoring Programme for inclusion in SEA Statement.

15. Issue raised & recommendation made by EMRA:

Regarding 'Other':

- a) Notwithstanding Section 1.7 of the Draft Plan, it is recommended that a Chapter detailing the strategic implementation and monitoring of the Co. Development Plan over its lifespan be provided. Chapter 12 of the RSES and Chapter 10 of the NPF may provide assistance in this regard.
- b) Notwithstanding policy CAEP-53 of Chapter 3, the attention of the Council is brought to RPO 7.43 of the RSES advising local authorities to consider the identification of Critical

Infrastructure within their functional area, as a first step in 'future proofing' services and to help to inform longer term adaptation planning and investment proprieties.

- c) In terms of the structure of the chapters, the consolidation of themes within each chapter would enhance comprehensibility and legibility of the plan. In this way the reader can access all of the information (such as context, objectives and policy provision) related to a topic at one point within a chapter.

CE Recommendation:

- a) A new Chapter should be inserted at the end of Volume 1 of the Plan titled Implementation and Monitoring which extracts section 1.7 from Chapter 1 that addresses this topic. It is recommended to insert the following as an additional sources of funding for infrastructure in that chapter: 'Private – The developer of lands can privately finance the delivery of infrastructure, Irish Water Capital Investment Plan funding, Smarter Travel funding by the National Transport Authority, and Transport Infrastructure Ireland funding, Town and Village Renewal funding, Active Travel funding and Government department funding'.
- b) RSES describes Critical infrastructure in Section 7.9 (p. 181) as including "transport Infrastructure, electricity and gas networks, flood risk management, and water services infrastructure." The Settlement Plans in Volume 2 identify the aforementioned types of infrastructure as 'Key Infrastructure' and include specific objectives in this regard. It is deemed appropriate to change the term used in the Settlement Plans from 'Key Infrastructure' to 'Critical Infrastructure.'
- c) It is considered that the layout of the individual chapters of the draft Plan is already set out in a format that presents the background information (context) first before finalising with the policies and objectives at the end of each chapter. Headings, sub-headings and sub-sub headings mean that a topic is covered in as much depth as is required before moving onto another topic; this allows for seamless legibility and comprehensibility.

6 Summary of Protected Structures Submissions

6.1	CDP/D/03,04,08,16	Clonbrin House, Clonbrin, Bracknagh, Edenderry
6.2	CDP/D/13	Grove Cottage, Ballycumber Road, ERRY (ARMSTRONG), Clara
6.3	CDP/D/15	Dick Conroy Tyre Service, Columcille Street, Tullamore
6.4	CDP/D/30	The Spinning Wheel, Clonsast Lower, Bracknagh, Edenderry
6.5	CDP/D/41	War Memorial, O'Connor Square, Tullamore
6.6	CDP/D/42	Swag Street, Crinkill, County Offaly
6.7	CDP/D/50	Kilroy's, High Street, Tullamore
6.8	CDP/D/68a	Church Street, Clara
6.9	CDP/D/68a	Main Street, Clara
6.10	CDP/D/71a	Garrymona Small structure, Garrymona, Walsh Island, Edenderry
6.11	CDP/D/71b	Garrymona, Walsh Island, Edenderry
6.12a	CDP/D/83	1 Rosse Row, Townparks, Birr
6.12b	CDP/D/83	2 Rosse Row, Townparks, Birr
6.13	CDP/D/83	3 Rosse Row, Townparks, Birr
6.14	CDP/D/95	Convent, Kilcormac
6.15	CDP/D/105	Inchmore House, Kilcoursey, Tullamore Road, Clara
6.16	CDP/D/109	Thornvale, Ballycormick, Moneygall, Birr
6.17	CDP/D/126	Marian Hostel
6.18	CDP/D/161	Banagher Corporation 1628 Plantation workers' cottage, Banagher
6.19	CDP/D/170	'Old Market House', Main Street, Banagher
6.20	CDP/D/175	Ballincarrig Mill, Cappagowlan, Ballyboy, Ferbane
6.21	CDP/D/178	Lugamarla, The Rectory, Blacklion, Blueball, Tullamore

6.1 (CDP/D/03, 04, 08, 16 RPS) Clonbrin House, Clonbrin, Bracknagh, Edenderry



Description:

Detached three-bay, three-storey section with flight of stairs to first floor front door access, adjacent two-bay, two-storey section forming front façade with blind wings to either side, built c1790. Extensions and outbuildings to the rear. Pitched slate roof with rendered chimney stacks, gable to the north finished with slate-hanging. Smooth rendered walls throughout, said to be built of locally-made yellow and red brick (in evidence in some outbuildings to rear), with painted saw-tooth brick detailing at cornice level to rear sections and sing walls. Replacement uPVC windows throughout, pair of windows flank stepped first floor access, pairs (different levels) flank entrance porch with pitch roof to first floor door. Six-panelled timber front door with central seam, finely carved timber brackets with slender moulded surround, large elliptical sunburst fanlight over, accessed by stone and concrete steps with rendered walls and deep stone capping.

Main house flanked by rendered wing walls to either side with slate and crested terracotta capping, floating sills to possible former openings and returns to rear, arched gated access to rear farmyard to southern side. Number of returns to the rear including behind both wing walls.

Large complex of single and two-storey outbuildings to the rear, many of which are shown on the OSI 6" 1838 map forming a large, working courtyard. Roughcast render finish over yellow brick, with square headed, block-and-start stone surrounds with central keystone to door openings.

Appraisal:

Clonbrin is an unusual house located southeast of Bracknagh close to the Kildare border. It has an interesting history, allegedly built by a sea captain Mr Gresson in the late 1790s, later owned by the Walker family who managed the surrounding estate. The Colgan family purchased the estate in 1887 and it is still owned and managed by their descendants. Fine craftsmanship is displayed in many details including the artistic slate-hanging to the high south gable wall, the decorative, painted brick, saw-tooth cornice to sections of external wall and the elaborate complex of outbuildings to the rear. The house and adjoining structures have been well maintained and form an important part of the architectural heritage of County Offaly.

Ref: CDP/D/03 (RPS) – Proposed RPS Number *47-01**Person / Body:****Mrs Catherine Burke – owner****Summary of submissions / observations:**

Mrs Catherine Burke – owner of Clonbrin House, Clonbrin, Bracknagh, Edenderry

Wishes to advise that she rejects to proposed inclusion to Record of Protected Structures. Mrs Catherine Burke is of the view that this building does not have any significant architectural, historical, archaeological, artistic, cultural, scientific, technical, and social significance. Mrs Catherine Burke is of an opinion that adding to the List of Protected Structures her house, along with its curtilage, that is currently been used as a working dairy farm which her son operates, would cause untold disruption, restrictions and financial loss to the current operation of the dairy farm. Mrs Catherine Burke wishes to advise that she does not have the financially means to maintain this house as a protected structure.

CE Response:

Clonbrin is an unusual house located southeast of Bracknagh close to the Kildare border. It has a history of social interest, allegedly built by a sea captain Mr Gresson in the late 1790s, later owned by the Walker family who managed the surrounding estate. The Colgan family purchased the estate in 1887 and it is still owned and managed by their descendants. Fine artistic craftsmanship is displayed in many details including the artistic slate-hanging to the high south gable wall, the decorative, painted brick, saw-tooth cornice to sections of external wall and the elaborate complex of outbuildings to the rear. The house and adjoining structure have been well maintained and form an important part of the architectural heritage of County Offaly.

It is acknowledged that a number of structures on the Offaly County Council's Record of Protected Structures (or within the curtilage of same), operate as farm houses / working farms. Proposals for the expansion of farm activities and farm buildings within these sites are not prohibited, subject to planning permission being obtained and due regard to the architectural integrity of the relevant protected structures, as appropriate.

Financial assistance is provided to assist with the conservation and restoration of protected structures. The Built Heritage Investment Scheme is for the repair and conservation of structures that are protected under the Planning and Development Acts, with grants ranging from €2,500 to maximum of €10,000, covering a maximum of 50% of the cost of approved repairs.

RECOMMENDATION: MERITS INCLUSION

Ref: CDP/D/04 (RPS) – Proposed RPS Number *47-01**Person / Body:****Mr Paul Burke****Summary of submissions / observations:**

Mr Paul Burke is the son of Mrs Catherine Burke – owner of Clonbrin House, Clonbrin, Bracknagh, Edenderry wishes to advise that he rejects to proposed inclusion to Record of Protected Structures. Mr Burke is of the view that this building does not have any significant architectural, historical, archaeological, artistic, cultural, scientific, technical, and social significance. Mr Paul Burke is of an opinion that adding to the List of Protected mentioned house, along with its curtilage, that is currently been used as a working dairy farm, would cause untold disruption, restrictions and financial loss to the current operation of the dairy farm. As the owner of the dairy farm he would be seeking financial compensation as a consequence.

CE Response:

Same response as that of CDP/D/03(RPS).

RECOMMENDATION: MERITS INCLUSION**Ref: CDP/D/08 (RPS) – Proposed RPS Number *47-01****Person / Body:****Councillor Eddie Fitzpatrick****Summary of submissions / observations:**

Supports request from Mrs Catherine Burke (Ref: CDP/D/03(RPS)) who wishes not to have her home included on the RPS.

CE Response:

Same response as that of CDP/D/03(RPS).

RECOMMENDATION: MERITS INCLUSION**Ref: CDP/D/16 (RPS) – Proposed RPS Number *47-01****Person / Body:****Barry Cowen TD****Summary of submissions / observations:**

Submission related to request from Paul Burke. Mr Barry Cowen TD would appreciate further research provided in relation to issues raised by Mr Paul Burke (Ref: CDP/D/04(RPS)) who wishes not to include Clonbrin House on the RPS. Issues relates to working dairy farm, potential restrictions and risk of farm being unworkable.

CE Response:

Same response as that of CDP/D/03(RPS).

RECOMMENDATION: MERITS INCLUSION

6.2 (CDP/D/13 RPS) Grove Cottage, Ballycumber Road, ERRY (ARMSTRONG), Clara



Description:

Semi-detached four-bay single-storey house, built c.1880, with adjoining garage. Set back from road. Shallow segmental felt roof with rendered chimneystacks and terracotta pots. Rendered walls with timber eaves board. Replacement timber casement windows with painted sills. Round-headed door opening with timber and glazed door and fanlight within segmental-roofed projecting porch. Site bounded to front by plinth wall with tooled limestone coping and cast-iron piers and gate. Ashlar gate piers with wrought-iron vehicular gates.

Appraisal:

One of a pair of experimental houses built by the Goodbody family as housing for their workforce. Over a period of a hundred years, an amount of worker's housing was constructed by the family but unlike the traditional pitched style utilised by them, these cottages have shallow segmental roofs covered with an experimental felt. This structure, along with its adjoining house, is unique in Clara and of technical interest. Together they contribute positively to the streetscape.



Ref: CDP/D/13 (RPS) - Former RPS number 12-34, NIAH 14802030

Person / Body:

Alan and Anna Orman

Summary of submissions / observations: Request for protected status of the following:

1. Built late 1860s (not 1880), linked to architect J.S. Mulvany
2. The Portlaw Roof / Belfast – truss curved roof with all chimney stacks, spanning Grove Cottage Clashawaun, Ballycumber Road, Clara and Rosslyn Clashawaun, Ballycumber Road, Clara
3. The 19th century “Faux” stain glass windows with diamond wrought iron grid, on the back wall of Grove Cottage Clashawaun, Ballycumber Road, Clara
4. Grove Cottage’s original intact front boundary wall, gate posts, wrought iron vehicle gate, wrought iron pedestrian gate, as well as the wrought iron gate arch and fence which were relocated by the previous owners to the back garden of Grove Cottage.

CE Response:

Grove Cottage is listed on National Inventory of Architectural Heritage of Regional importance, number: 14802030. *This structure, along with its adjoining house, is unique in Clara and of technical interest, while containing many architectural features of note. Together they contribute positively to the streetscape.*

Both this property and the adjoining properties form part of the NIAH survey. Those structures which have been attributed a rating value regional importance in the inventory are recommended by the Minister to the planning authority for inclusion. Both properties were removed from the RPS by the Members as part of the CDP 2009-2015 process.

Include on RPS, amend text as required and notify NIAH of agreed changes.

RECOMMENDATION: BOTH PROPERTIES MERIT INCLUSION



6.3 (CDP/D/15 RPS) Dick Conroy Tyre Service, Columcille Street, Tullamore

Description:

End-of-terrace three-bay two-storey former house, built c.1850 and altered c.1950. Fronting directly onto street, now in use as a garage. Pitched slate roof with terracotta ridge tiles, yellow brick chimneystacks and cast-iron rainwater goods. Roof hidden by parapet. Smooth rendered walls with concrete coping to parapet. Square-headed window openings with painted sills and replacement timber casement windows. Large square-headed vehicular opening to façade with timber battened doors. Square-headed door opening with double overlight and glazed timber battened door. Petrol pumps to front site. Garage to rear with corrugated-iron roof.

Appraisal:

Dick Conroy's Garage stands on the main road of Tullamore, providing a view that is fast disappearing throughout Ireland. Small-scale urban garage and mechanics are now under threat from generic multi-national forecourts. The structure itself has been adapted to be used as a garage with the large square-headed entrance allowing access for cars. The form and proportion of the structure indicates an original domestic use, though this has now been changed.



Ref: [CDP/D/15 \(RPS\) – RPS Number 23-207, NIAH 14807009](#)

Person / Body:

Gerry McGlinchey

Summary of submissions / observations:

Submission that relates to protected structure under RPS 23-207 and NIAH 14807009. Submission in favour to remove this structure from Record of Protected Structures.

CE Response:

'Dick Conroy's Garage stands on the main road of Tullamore, providing a view that is fast disappearing throughout Ireland.' No information provided for proposed removal.

Financial assistance is provided to assist with the conservation and restoration of protected structures. The Built Heritage Investment Scheme is for the repair and conservation of structures that are protected under the Planning and Development Acts, with grants ranging from €2,500 to maximum of €10,000, covering a maximum of 50% of the cost of approved repairs.

RECOMMENDATION: [KEEP ON LIST](#)

6.4 (CDP/D/30 RPS) The Spinning Wheel, Clonsast Lower, Bracknagh, Edenderry



Description:

Five-bay single-storey thatched house. Altered lobby-entry plan. Rendered clay walls. Gabled oaten straw roof. uPVC windows. Timber panelled and glazed door in porch with gabled corrugated iron roof. Two rendered doorways. Outbuildings associated with house being incorporated into the house. Main roof and porch now has reed thatch with 'blocked' ridges.



Appraisal:

While the building has undergone recent alterations, it maintains its overall form and as such contributes to the vernacular architecture of County Offaly.

Ref: CDP/D/30 (RPS) - Proposed RPS Number *36-06

Person / Body:

Laura Lindholm

Summary of submissions / observations:

Objection to proposed addition to the record of protected structures. Laura Lindholm is of an opinion that the changes made to the property during the years has altered the property to that extent that there is no reason to add it to the record, as well, she has no funds to maintain the house as a protected structure.

CE Response:

While the building has undergone recent alterations, it maintains its overall form and as such contributes to the vernacular architecture of County Offaly.

Financial assistance is provided to assist with the conservation and restoration of protected structures. The Built Heritage Investment Scheme is for the repair and conservation of structures that are protected under the Planning and Development Acts, with grants ranging from €2,500 to maximum of €10,000, covering a maximum of 50% of the cost of approved repairs.

RECOMMENDATION: [MERITS INCLUSION](#)

6.5 (CDP/D/41 RPS) War Memorial, O'Connor Square, Tullamore

**Description:**

Freestanding limestone obelisk, erected c.1926. Tooled limestone stepped base to obelisk with carved limestone plaque and sword with wreath to western elevation.

Appraisal:

This simple stone monument was 'Erected to the glorious memory of the men of Offaly (Kings County) who gave their lives in the great wars of 1914-1919, 1939-1945'. Situated in the heart of the busy town the monument with its sombre form is a fitting memory to those men. It was designed by architect E.W. Doyle Jones. (Note photos above show existing setting and former to RHS)

Ref: [CDP/D/41 \(RPS\) – RPS Number 23-211, NIAH 14807025](#)

Person / Body:

Fergal MacCabe

Summary of submissions / observations:

Submission states that the description of the war memorial has inaccuracies and provides suggested input.

CE Response:

The submission is noted and information appreciated to further augment the Record of Protected Structures. Amend text as required and notify NIAH of agreed changes.

RECOMMENDATION: [AMEND TEXT](#)

6.6 (CDP/D/42 RPS) Swag Street, Crinkill, County Offaly



Description:

Terrace of three three-bay single-storey houses, built c.1820, with abutting two-storey outbuilding to north. Set back from road. Pitched slate roofs with red brick chimneys and some cast-iron rainwater goods. Lime-washed walls with exposed stone walls in places. Roughcast rendered wall to outbuilding. Timber sash windows with painted sills, rectangular slit openings to outbuilding. Square-headed door openings with timber battened doors. Grass verge to front of site.

Appraisal:

Though modest in design and small in stature, these cottages create a terrace of similar structures that contribute to Crinkill's streetscape. Their façades are enlivened by their timber sash windows and battened doors.



[Ref: CDP/D/42\(RPS\) - RPS number 53-05, NIAH 14820016](#)

Person / Body:

Frances O'Donovan

Summary of submissions / observations:

Applicant relates to preservation order highlighting windows. According to Frances O'Donovan this should not be subject of preservation order because the windows rotted and fell out long before the original making of the preservation order. Currently there is simply a painting of windows onto a flat sheet of wood (this was done at the instigation of the local tidy town committee).



CE Response:

The structures were added to Record of Protected Structures following a Ministerial recommendation based on the NIAH and their accompanying photographs of 2004.

Terrace of three three-bay single-storey houses, built c.1820, with abutting two-storey outbuilding to north. Set back from road. Pitched slate roofs with red brick chimneystacks and some cast-iron rainwater goods. Lime-washed walls with exposed stone walls in places. Roughcast rendered wall to outbuilding. Timber sash windows with painted sills, rectangular slit openings to outbuilding. Square-headed door openings with timber battened doors. Grass verge to front of site.

While elements have been altered and render removed from the front façade, the three-house terrace contributes to the existing streetscape, which suffers from vacant sites on either side. Current photo showing houses with adjoining property and roof removed.



Financial assistance is provided to assist with the conservation and restoration of protected structures. The Built Heritage Investment Scheme is for the repair and conservation of structures that are protected under the Planning and Development Acts, with grants ranging from €2,500 to maximum of €10,000, covering a maximum of 50% of the cost of approved repairs.

RECOMMENDATION: [KEEP ON LIST](#)

6.7 (CDP/D/50 RPS) Kilroy's, High Street, Tullamore

Description:

Detached H-plan three-bay two-storey house, built c.1730, with projecting end bays to front and shopfront added to ground floor in 1959. Hipped slate roof with terracotta ridge tiles, ruled-and-lined rendered chimneystacks with cast-iron rainwater goods. Smooth render to walls with rendered stone quoins. Timber sash windows to first floor of façade with painted sills, painted moulded surround and keystones. Semi-circular windows to end bays with painted sills, painted moulded



surround and timber spokes. Arcaded timber shopfront to rendered stone stallriser. Timber fluted Doric pilasters flanking segmental-headed display windows, with timber spoked fanlight with segmental-headed entrance opening leading into recessed double timber doors with glass panes. Wrought-iron double gates to recessed entrance. Timber fascia pediment with timber lettering reads: Kilroys Estd. 1908.

Appraisal:

Kilroy's shopfront, though attractive, masks the notable façade that originally had a central block-and-start doorcase with triangular pediment and Venetian windows to the ground floor's outer bays. The 1959 shopfront itself is appealing with its arcaded timber pilasters and recessed round-headed doorway with double wrought-iron security gates. The intact first floor with spoked windows and surmounting hipped roof are of a discernible architectural design.

Ref: CDP/D/50 (RPS) – RPS Number 23-257, NIAH 14807061

Person / Body:

Fergal MacCabe

Summary of submissions / observations:

Submission provides extensive description of this protected structure, with significant historical and architectural information. Mr MacCabe notes concern about the future of the structure and recommends a full survey of the building.

CE Response:

The submission is noted and information appreciated to further augment the Record of Protected Structures. With regard to the request for a survey, it is noted that the property is in private ownership. Amend text as required and notify NIAH of agreed changes.

RECOMMENDATION: AMEND TEXT

6.8 (CDP/D/68a) Church Street, Clara

Description:

Semi-detached five-bay single-storey vernacular house, built c.1750, with extension to rear. Fronts directly onto street. Pitched corrugated-iron roof with ruled-and-lined chimneystack. Roughcast render to wall with smooth plinth. Timber sash windows with painted sills. Replacement casement window to south-east. Square-headed door opening with replacement timber panelled door. Rear site bounded by stone wall to south-east with corrugated-iron gate.



Appraisal:

Modest in design and small in stature, this house exhibits the simple and functional form of vernacular building in Ireland. Its steeply pitched roof with substantial chimneystack and small window openings all indicate an early date. Probably originally thatched, this house reflects a type of architecture becoming increasingly rare in both urban and rural settings in Ireland.

Ref: [CDP/D/68 – Former RPS Number 12-58, NIAH 14802054](#)

Person / Body:

James Gibbons

Summary of submissions / observations:

Part of this submission relates to this vernacular house. The applicant is concerned about a draft Part VIII proposal, (no longer progressing, not purchased by Housing Section). He notes 'Council policy to support proposals to refurbish vernacular structures that are in a run down or derelict condition'.



CE Response:

This property is not in council ownership. The council have supported similar projects when owners wished to renovate and return such a structure to a viable use, through the BHIS. Financial assistance is provided to assist with the conservation and restoration of protected structures. The Built Heritage Investment Scheme (BHIS) is for the repair and conservation of structures that are protected under the Planning and Development Acts, with grants ranging from €2,500 to maximum of €10,000, covering a maximum of 50% of the cost of approved repairs.

Both this property and the adjoining properties form part of the NIAH survey. Those structures which have been attributed a rating value regional importance in the inventory are recommended by the Minister to the planning authority for inclusion. Both properties were removed from the RPS by the Members as part of the CDP 2009-2015 process.

RECOMMENDATION: [MERITS INCLUSION](#)

6.9 (CDP/D/68a) Main Street, Clara

Description:

Detached four-bay two-storey house, built c.1830, with return to rear. Pitched slate roof with red brick chimneystacks. Rendered walls with continuous sill course at ground floor level and channelled quoins. Ruled-and-lined render to plinth. uPVC windows with tooled stone sills and stucco surrounds. Round-headed door opening with stucco surround and replacement timber panelled door with overlight. Front site with concrete pathway to entrance.



Appraisal:

This house, situated in the very centre of Clara, is a fine example of domestic town architecture. Though altered over the passing of time, the varied render finishes and stucco detailing that surround the openings heightens the building's aesthetic appeal, creating an attractive house, which makes a positive addition to the architectural heritage within the town of Clara.

Ref: CDP/D/68 – RPS Number 12-50, NIAH 14802046

Person / Body:

James Gibbons

Summary of submissions / observations:

The applicant provides information in relation to the development of the building, noting that the 'detached four-bay two-storey house' was originally built as a series of houses and became semi-detached in late 1920s, with historic photograph provided.

CE Response:

Cartographic references show the earlier semi-detached houses. Amend text as required and notify NIAH of agreed changes.



RECOMMENDATION: AMEND TEXT

6.10 (CDP/D/71a RPS) Garrymona Small structure, Garrymona, Walsh Island, Edenderry

Description:

Detached two-bay single-storey thatched house. Rendered stone walls. Gabled reed roof with raised ridge. Timber top-opening windows. Board halved door in exposed stone porch with gabled slated roof. Decorative timber bargeboards to half-hip gables.



Appraisal:

Well-kept thatched house. The smallest thatched house in Offaly. Set within its own grounds with main thatch (Site no.25). Ruin of earlier building to the rear of the main thatch.

Ref: CDP/D/71 (RPS) – Proposed RPS Number *36-07

Person / Body:

Ivan Conway and Roisin Barry

Summary of submissions / observations:

Owners do not want their property included in the Record of Protected Structures. They do not envision returning to Ireland and the property is currently leased out. They will look to eventually sell the property and feel registration in this record will hamper the ability to sell the property.

CE Response:

Financial assistance is provided to assist with the conservation and restoration of protected structures. The **Built Heritage Investment Scheme** is for the repair and conservation of structures that are protected under the Planning and Development Acts, with grants ranging from €2,500 to maximum of €10,000, covering a maximum of 50% of the cost of approved repairs.



RECOMMENDATION: MERITS INCLUSION

6.11 (CDP/D/71b RPS) Garrymona, Walsh Island, Edenderry

Description:

Detached three-bay single-storey thatched house. Direct-entry plan. Rendered stone walls. Half-hipped reed roof with raised ridge. Timber top-opening windows. Timber board door and half-door in windbreak with exposed stone walls and gabled thatched roof. Rendered chimney. Extension built 1999 forming L-plan with original portion has concrete walls and half-hipped thatched roof. Decorative timber bargeboards to half-hip gables.



Appraisal:

Well-kept thatched house. Set within its own grounds with small thatch (Site no.26). Ruin of earlier building to the rear of the main thatch.

Ref: CDP/D/71 (RPS) – Proposed RPS Number *36-08

Person / Body:

Ivan Conway and Roisin Barry

Summary of submissions / observations:

Owners do not want their property included in the Record of Protected Structures. They do not envision returning to Ireland and the property is currently leased out. They will look to eventually sell the property and feel registration in this record will hamper the ability to sell the property.

CE Response:

Financial assistance is provided to assist with the conservation and restoration of protected structures. The Built Heritage Investment Scheme is for the repair and conservation of structures that are protected under the Planning and Development Acts, with grants ranging from €2,500 to maximum of €10,000, covering a maximum of 50% of the cost of approved repairs.



RECOMMENDATION: MERITS INCLUSION

6.12a (CDP/D/83) 1 Rosse Row, Townparks, Birr

Description:

End-of-terrace three-bay two-storey house, built c.1840, with extensions to rear. Fronts directly onto street. Pitched slate roof with terracotta ridge tiles, rendered chimneystacks and cast-iron rainwater goods. Pebbledashed walls. Timber sash windows with tooled stone sills. Segmental-headed door opening with timber battened door surmounted by fanlight and concrete step. Extension to rear with pitched roof and concrete block walls (now forms part of adjoining property). Outdoor toilet to yard with pitched slate roof, stone walls and timber battened door. 2019 Owner photo provided - added to form. NIAH 2004 image



Appraisal:

Though modest in design and small in stature, this house forms one of a group of similar structures. The house, like its neighbours, is enhanced by the retention of its timber sash windows and early materials, such as its slate roof. Along with its neighbours, this house forms an aesthetically pleasing group within the streetscape, facing onto the high stone walls which surround Birr Castle Demesne. Rosse Row forms part of a streetscape of a photograph taken by the 4th Earl of Rosse in the 1870's which is on display in the Historic Science Centre.

Ref: [CDP/D/83 - RPS Numbers 49-280, 49-281, 49-282, NIAH Numbers 14819084, 14819085, 14819086,](#)

Person / Body:

Oxmantown Settlement Trust

Summary of submissions / observations:

Detailed request for delisting stating that; changes have been made along the terrace, noting the first house was knocked and replaced with a new house. Feels that modern double glazed windows should be permitted in certain protected structures. Notes the issues relating to roof and chimney, SAEI energy grants, many not suitable for protected structures and provides a conclusion regarding removing 1-3 Rosse Row from RPS.

CE Response to 1, 2 and 3 Rosse Row:

Where an NIAH survey has been carried out, those structures which have been attributed a rating value of international, national or regional importance in the inventory will be recommended by the Minister to the planning authority for inclusion.

Structures are deleted from the RPS by similar procedures to those laid down for making additions. Deletions will take place where the planning authority considers that the protection of a structure, or part of a structure, is no longer warranted. This will generally take place only when the structure has

entirely lost its special interest value through major accident or where new information has come to light which proves that the special interest value was mistakenly attributed. There have been alterations to the existing row, most prior to listing. The town map for Birr shows a former national school in the location of the current modern house with adjacent 1-3 shown.



It is noted that the applicant removed six of the original 6/6 timber sash windows and replaced them with unsuitable 2/2 double glazed units. Original and replacement photo attached.

It should be the aim of good conservation practice to preserve the authentic fabric which contributes to the special interest of the structure. Good repair will arrest the process of decay of a structure and prolong its life without damaging its character and special interest. Where a damaged or deteriorated feature could reasonably be repaired, its replacement should not be permitted.



Alterations and additions to a structure can themselves be an irreplaceable part of a unique history. Different periods of alteration can inform the social and architectural history of the built heritage. In order to appreciate the integrity of a structure, it is important to respect the contribution of different stages of its historical development.



Financial assistance is provided to assist with the conservation and restoration of protected structures. The Built Heritage Investment Scheme is for the repair and conservation of structures that are protected under the Planning and Development Acts, with grants ranging from €2,500 to maximum of €10,000, covering a maximum of 50% of the cost of approved repairs. Such schemes have been availed of many times by the Birr Estate for the maintenance of their protected structures.

The Department Advice Series Windows states: 'Fitting double glazing to historic windows is never recommended'. Owners should discuss options with the local authority, regarding repairs of existing windows, double-glazed internal casement panels. Several instances of inappropriate double glazed units in Birr have been successfully replaced with either the original repaired or historically accurate timber sliding sash. It is noted that the original sash windows are still on site at 1-3 Ross Row and should be repaired and reinstated. Note also all protected structures receive the same level of protection under the Planning Acts. Refer to

<https://www.buildingsofireland.ie/app/uploads/2019/10/Windows-A-Guide-to-the-Repair-of-Historic-Windows-2007.pdf>

Refer to Department Energy Efficiency in Traditional Building:

<https://www.buildingsofireland.ie/app/uploads/2019/10/Energy-Efficiency-in-Traditional-Buildings-2010.pdf>

1, 2 and 3 Rosse Row are deemed of Architectural interest and have Regional rating on the NIAH, as such a Ministerial recommendation for them and other regionally rated structures, to be kept on the OCC Record of Protected Structures.

RECOMMENDATION: KEEP ON LIST

6.12b (CDP/D/83) 2 Rosse Row, Townparks, Birr

Description:

Terraced three-bay two-storey house, built c.1840, with extension to rear. Fronts directly onto street. Pitched slate roof with terracotta ridge tiles, rendered chimneystacks and cast-iron rainwater goods. Lean-to roof to extension. Pebbledashed walls. Timber sash windows with stone sills. Timber casement windows to extension. Segmental-headed door opening with fanlight and timber panelled door. (NIAH 2004 image)



Appraisal:

Though modest in design and small in stature, this house forms one of a group of similar structures. The house, like its neighbours, is enhanced by the retention of its timber sash windows and early materials, such as its slate roof. Along with its neighbours, this house forms an aesthetically pleasing group within the streetscape, facing onto the high stone walls which surround Birr Castle Demesne. Rosse Row forms part of a streetscape of a photograph taken by the 4th Earl of Rosse in the 1870's which is on display in the Historic Science Centre.

Ref: [CDP/D/83](#)

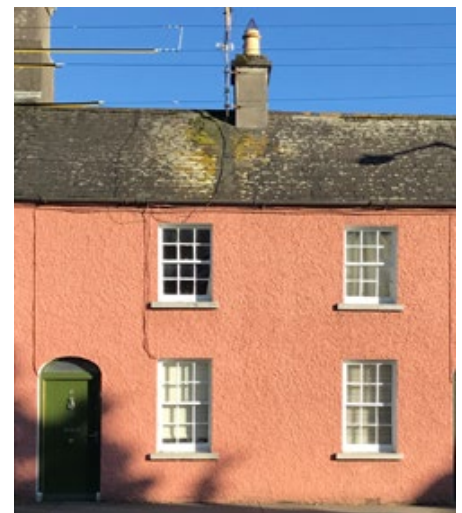
CE Response 1-3 Rosse Row: Same response as that of CDP/D/83(RPS).

RECOMMENDATION: [KEEP ON LIST](#)

6.13 (CDP/D/83) 3 Rosse Row, Townparks, Birr

Description:

Terraced two-bay two-storey house, built c.1840, with extension to rear. Fronting directly onto street. Pitched slate roof with terracotta ridge tiles, rendered chimneystacks and cast-iron rainwater goods. Lean-to roof to extension. Pebbledashed walls. Timber sash windows with stone sills. Timber casement windows to rear extension. Segmental-headed door opening with fanlight and timber panelled door. (NIAH 2004 image)



Appraisal:

Though modest in design and small in stature, this house forms one of a group of similar structures. The house, like its neighbours, is enhanced by the retention of its timber sash windows and early materials, such as its slate roof. Along with its neighbours, this house forms an aesthetically pleasing group within the streetscape, facing onto the high stone walls which surround Birr Castle Demesne. Rosse Row forms part of a streetscape of a photograph taken by the 4th Earl of Rosse in the 1870's which is on display in the Historic Science Centre.

Ref: [CDP/D/83](#)

CE Response 1-3 Rosse Row: Same response as that of CDP/D/83(RPS).

RECOMMENDATION: [KEEP ON LIST](#)

6.14 (CDP/D/95 RPS) Convent, Kilcormac

Description:

Detached eight-bay two-storey convent, built c.1885, with advanced gabled end bays, and return and extensions to rear. Set within its own grounds. Hipped slate roof with rendered and yellow brick chimneystacks. Modillions to timber eaves course. Pebbledash render to walls with smooth plinth, limestone string course and quoins to corners. Segmental-headed window openings with moulded brick surrounds, replacement aluminium windows and tooled limestone sills. Pointed-arched block-and-start ashlar limestone door surround with brick arch above, enclosing limestone panel with stained glass quatrefoil above square-headed timber panelled door. Concrete step to door with tooled limestone threshold. Cast-iron bootscraper. Walled orchard and ornamental garden to rear. Front site bounded by smooth-rendered wall with coping and cast- and wrought-iron gates.



Appraisal: Located on the main street of Kilcormac, this once busy convent played a significant social role in the town. Its exterior is well designed and attractive with fine decoration. The highly decorative carved limestone entrance with stained glass quatrefoil is of artistic note and indicates the high level of craftsmanship.

Ref: [CDP/D/95\(RPS\)](#)

Person / Body:

Pat Donaghy

Summary of submissions / observations:

The recent owner wishes to delist the property as he feels it is financially prohibitive for carrying out repairs and upgrading the building to make it energy efficient.

CE Response:

'Located on the main street of Kilcormac, this once busy convent played a significant social role in the town. Its exterior is well designed and attractive with fine decoration. The highly decorative carved limestone entrance with stained glass quatrefoil is of artistic note and indicates the high level of craftsmanship.'

Financial assistance is provided to assist with the conservation and restoration of protected structures. The Built Heritage Investment Scheme (BHIS) is for the repair and conservation of structures that are protected under the Planning and Development Acts, with grants ranging from €2,500 to maximum of €10,000, covering a maximum of 50% of the cost of approved repairs.

Refer to Department Energy Efficiency in Traditional Building:

<https://www.buildingsofireland.ie/app/uploads/2019/10/Energy-Efficiency-in-Traditional-Buildings-2010.pdf>

Structures are deleted from the RPS by similar procedures to those laid down for making additions. Deletions will take place where the planning authority considers that the protection of a structure, or part of a structure, is no longer warranted. This will generally take place only when the structure has entirely lost its special interest value through major accident or where new information has come to light which proves that the special interest value was mistakenly attributed.

RECOMMENDATION: [KEEP ON LIST](#)

6.15 (CDP/D/105) Inchmore House, Kilcoursey, Tullamore Road, Clara

Description:

Detached T-plan multiple-bay two-storey over basement house, built c.1860, with bows to gable ends surmounted by limestone balustrades, portico to façade and three-stage tower to north. Modern conservatory to southern elevation and former church building connected to rear. Set within its own grounds. Pitched slate roof with terracotta ridge tiles, rendered chimneystacks, terracotta pots, open-bed pediments to gables, timber eaves brackets and bellcote to west. Rendered walls with limestone quoins and continuous sill courses to ground and first floors. Timber sash and Wyatt windows with moulded surrounds and limestone sills. Square-headed door opening with fanlight and sidelights and timber and glazed door set in flat-roofed limestone portico, accessed by limestone steps. Square-headed door openings to north elevation giving access to basement and first floor with wrought- and cast-iron railings. Former double-height church with six-bay nave to rear with bow to side elevation. Pitched slate roof with terracotta ridge tiles, round and square-headed window openings and round-headed entrance porch to east elevation. Plaque to north elevation. Former multiple-bay two-storey dormitory building to north-west of site. Garden buildings to west with octagonal bay to south with pointed-arched lattice windows. Single-arched bridge to site.



Appraisal:

Formerly owned by a religious institution, Inchmore House is one of the houses built by J. S. Mulvany for the Goodbody family of Clara. Built from limestone set against rendered walls, the physical history of this house is apparent through its modern additions and collection of buildings to the rear. The two-storied façade with columned portico and bows to gable ends are characteristics of Mulvany's abbreviated classicism.

[Ref: CDP/D/105 \(RPS\) – RPS Number 12-23, NIAH 14802018](#)

Person / Body:

Aiden Leonard

Summary of submissions / observations:

The current owner wishes to delist the property due to the cost involved in repairing a protected structure and the restriction to selling the property. Notes issues with vandalism.



CE Response:

This significant property, one of several fine homes built for the Goodbody family in Clara and as such form an integrated collection (including Clara House, Drayton Villa, Kilcoursey House, Cork Hill House etc.).

It should be noted that the NIAH images shown were taken in 2004, and that the property has altered since. Through both vandalism and certain works carried out without planning permission. Comparison of one façade shown below.



2004



2019

Planning permission may be sought for protected structures where material changes are proposed.

Financial assistance is provided to assist with the conservation and restoration of protected structures. The Built Heritage Investment Scheme (BHIS) is for the repair and conservation of structures that are

protected under the Planning and Development Acts, with grants ranging from €2,500 to maximum of €10,000, covering a maximum of 50% of the cost of approved repairs.

For large scale projects such as Inchmore House, owners may also consider the **Historic Structures Fund** which was established for conservation works to heritage structures, in both private and public ownership. The primary focus of the Historic Structures Fund is on conservation and enhancement of historic structures and buildings for the benefit of communities and the public.

RECOMMENDATION: [KEEP ON LIST](#)

6.16 (CDP/D/109 RPS) Thornvale, Ballycormick, Moneygall, Birr

Description:

Thornvale is a detached eight-bay, two-storey house country house built L18c, set within its own grounds, with a canted bow to the west elevation and a canted bow to the front elevation (eastern end). Central, two-storey protruding bay with further ground floor porch. Hipped slate roof with oversailing eaves and rendered chimneys with brick and stone capping. Roughcast rendered walls with smooth plinth, limestone steps, quoins and capping to flat roofed entrance porch. Replacement uPVC windows throughout, timber front door with glazed fanlight over and tooled limestone surround. Multiple stable/office buildings forming parallel courtyards to the rear. Walled gardens to the east.



Appraisal:

Thornvale, from the Irish, Glenuath, meaning the Vale of the White-thorn. It was purchased by Captain George Garvey c.1830, on his retirement from the Royal Navy. His wife's uncle, Major Pepper lived at the adjacent Loughton House. It was described in 'Offaly one hundred years ago', by John Wright (p277) as originally, 'little more than a plain, roomy cottage; but by judicious additions from time to time it became, under his tasteful hand and eye, a very picturesque and comfortable dwelling'. On his death, in 1879, Thornvale passed into the hands of his son, Toler R. Garvey, J.P., who made further alterations and additions to the house 'which now presents the appearance shown in our illustration' (dated 1890). The illustration is from a photograph taken by F.W. Lambert, Parsonstown.



Ref: CDP/D/109 (RPS) – Proposed RPS Number *65-09**Person / Body:****Colm Costigan****Summary of submissions / observations:** Request for protected status of the following:

The owner is concerned about potential changes to their family home which relate to his ongoing disability. Other concern relates to outbuildings that were added to the property in modern times and therefore the owner would like to make sure that those buildings are not part of the proposed addition. No objections to proposed addition.

CE Response:

A Section 57 Declaration may be provided for owners of protected structures, where minor alterations are proposed.

Where a structure is protected, the protection automatically includes the structure, its interior and the land within its curtilage and other structures within that curtilage. A Section 57 Declaration may also assist specific requested relating to recent farm sheds as noted in the submission, should the current owner wish to remove them.

RECOMMENDATION: MERITS INCLUSION**6.17 (CDP/D/126 RPS) Marian Hostel****Description:**

Originally a 7 bay 2 storey house with added 3rd storey. Now combined with house - 2 bay 3 storey house.

**Ref: CDP/D/126(RPS)****Person / Body:****Patrick Little AXIS architecture****Summary of submissions / observations:**

On behalf of their clients, Bridgestock Care Ltd, they wish to make submission to remove this structure from the Record of Protected Structures. They feel the structure holds very little historic architectural value worthy of protection, with the exception of the front façade and the iron railings to the High Street there is very little features of historic value worthy of protection.

CE Response:

Some of the architectural features highlighted above including fine moulded entrance door case with decorative fanlight, wrought and cast-iron railings set on cut stone plinth wall and ornate garden gate. The combination of both properties (23-384 and 23-385) provides a significant contribution to the streetscape.

There are no categories or grades of protected structures under the Act. A structure is either a protected structure or it is not. Where a structure is protected, the protection automatically includes the structure, its interior and the land within its curtilage and other structures within that curtilage.

Financial assistance is provided to assist with the conservation and restoration of protected structures. **The Built Heritage Investment Scheme (BHIS)** is for the repair and conservation of structures that are protected under the Planning and Development Acts, with grants ranging from €2,500 to maximum of €10,000, covering a maximum of 50% of the cost of approved repairs.

RECOMMENDATION: [KEEP ON LIST](#)

6.18 (CDP/D/161 RPS) Banagher Corporation 1628 Plantation workers' cottage, Banagher

Description:

A possible surviving example of a seventeenth-century workers' cottage, can be found on the south aspect of Queen Street (Puckagh Row) approximately 80m from Main Street. It is consistent with the Logan map c.1828 below, First and Second Edition OS maps and is situated very close to the roadside. It is a modest single storey cottage structure of random rubble, with traditional half door, and two window openings, the smallest of which appears to be original. It stands alone today, however the rubble stonewall of the front elevation is jagged in profile, suggesting it was formerly part of a terrace. The gable wall is of rubble stone to the eaves level, and has been built up in concrete blockwork to enclose the attic gable. The pitched roof is of modern concrete tiles, which most likely replaced traditional thatch.



[Ref: CDP/D/161\(RPS\) – Proposed inclusion](#)

Person / Body:

Eoghan Broderick (with support of building owner)

Summary of submissions / observations: Request for protected status of the following:

The Urban Archaeological Survey of County Offaly (1986), John Bradley identified Banagher as an important archaeological centre and recommended the need for further studies on the town's heritage and was included in the statutory Record of Monuments and Places (RMP) as a 'historic town'. Further study with the Plan prepared by Howley Hayes, identify this property as part of the creation of new street, Puckagh Row [Queen Street] with terraces of corporation workers' cottages and shared commonage to the rear. Applicant feels as the only known surviving early seventeenth-century worker's cottage, it should be included in the RPS, in the interest of preserving this important aspect of the town's cultural significance and as a means of enhancing public appreciation and understanding of Banagher as a historic town, and to help safeguard its preservation for future generations to enjoy.





Overlay of Logan c1828 map and OSI 25" c1910 map. Building in question just off the end of the 1828 terrace, but this is likely due to mapping inaccuracies.

CE Response:

This detailed submission that is based on the ‘Historic Banagher’ plan prepared by Howley Hayes, present broad description of the building and its history, along with photographs to complete the request. Additional investigation of the property may further strengthen the case.

RECOMMENDATION: MERITS INCLUSION

6.19 CDP/D/170 RPS) 'Old Market House', Main Street, Banagher



Description:

The building which is the subject of this recommendation for inclusion in the RPS of County Offaly, is associated with this native Irish settlement and a town market. The property is known locally as 'Kieran Donegan's shop', is located on the corner of Main Street and Crank Road and is composed of two bay two-storey structure with traditional pitched roof, and a flat roofed single storey element. Until recently, the former shop was located in the single storey element, while the two-storey element housed the living accommodation. The historic significance of this building is unrecorded to date, and has only come to light in early 2020, when renovation works uncovered significant historic building fabric.

The historic map record and recent photographs indicate that a masonry arch was connected to the structure, along the north aspect of the Crank Road, which lead to an internal courtyard, but has since been demolished. This masonry arch, now appears to have been part of the structure and also contained pre 1700s building fabric.

John Logan's survey of the town of Banagher (c1828) describes the building as 'Old Market House' and is evidence of its significance. A survey of the property, submitted with a recent retention planning application indicates a historic structure, with external masonry walls approximately 800mm thick, with existing historic masonry arched openings infilled and historic masonry rendered over with modern cement renders, thus concealing its historic fabric from the street front.



Ref: CDP/D/170 (RPS) – Proposed inclusion**Person / Body:****Eoghan Broderick****Summary of submissions / observations:**

Request for protected status of the following:

This submission concerns the proposal that this pre 1700's property is added to the Record of Protected Structures (RPS) for County Offaly on account of its historic, archaeological, architectural, social and economic significance.

As the only known standing remains of a historic building directly associated with the native Irish settlement of Banagher, pre-dating the seventeenth-century plantation town and possibly one of the oldest standing market houses in Ireland, Mr Broderick would like to ask that Offaly County Council strongly consider this proposal in the interest of preserving this important historic structure and its historic fabric, which is of significant heritage value for the town and for the wider region. Its protection will serve as a means to enhance public appreciation and understanding of Banagher as a historic town, to help safeguard its preservation for future generations to enjoy and to provide further scientific and archaeological understanding of the evolution of the town. As noted above, research and investigations of the building (subject to approval of the building owner) will be of special interest to the following research areas:

- The early architecture of native Irish market houses
- The early architecture and archaeology of native Irish urban settlements
- Studies relating to the interaction between the native Irish and the seventeenth-century planters.

CE Response:

This detailed submission that is based on the 'Historic Banagher' plan prepared by Howley Hayes, present broad description of the building and its history, along with maps and photographs to supplement the request. Additional investigation of the property may further strengthen the case.

RECOMMENDATION: MERITS INCLUSION

6.20 (CDP/D/175 RPS) Ballincarrig Mill, Cappagowlan, Ballyboy, Fermbane



Description:

Detached multi-bay two- and three-storey former corn mill, built c.1810, with former miller's house and outbuildings to south. Built into the side of the valley sweeping down to the Silver River. Pitched slate roof to former miller's house. Random rubble walls with sandstone quoins. Roughcast rendered walls to miller's house. Centrally located internal water wheel. Square-headed window openings with stone lintels. Timber sash and casement windows to miller's house. Square-headed door openings and carriage arch openings. Random coursed stone outbuildings with carriage arch openings adjacent to former miller's house with date 1868 to date stone. Remains of mill race survive. Separate access to mill and miller's house from road. Mill stones survive on site.

Appraisal:

Ballincarrig Mill survives as a reminder of the industrial heritage of the area and contributes to the architectural heritage of County Offaly. The mill forms part of an interesting group of related buildings with the associated outbuildings, mill race, Ballincarrig Bridge and the former miller's house which was lived in until recent years. The mill stones survive on site as decorative features and are important elements of the mill complex. Of particular note are the outbuildings adjacent to the miller's house. Though in poor condition they retain their roof and a carved date plaque over a doorway reveals their date of construction as 1868. The mill complex was built into the valley sloping down to the Silver River. This resulted in the miller's house and outbuildings being accessed from a height above the mill yard.



[Ref: CDP/D/175 \(RPS\) – RPS Number 42-07, NIAH 14932002](#)

Person / Body:

Cllr. Danny Owens

Summary of submissions / observations:

Request to remove Ballincarrig Mill from the Record of Protected Structures. Submission states that the building is in a dangerous condition structurally, the description needs to be amended in places (roof suffered storm damage, Mill Wheel is also no longer there (since 1958), only one millstone remains), public liability insurance becoming an issue.

CE Response:

Amend text and notify NIAH. Financial assistance is provided to assist with the conservation and restoration of protected structures. The Built Heritage Investment Scheme (BHIS) is for the repair and conservation of structures that are protected under the Planning and Development Acts, with grants ranging from €2,500 to maximum of €10,000, covering a maximum of 50% of the cost of approved repairs. For large scale projects, owners may also consider the Historic Structures Fund which was established for conservation works to heritage structures, in both private and public ownership. The primary focus of the Historic Structures Fund is on conservation and enhancement of historic structures and buildings for the benefit of communities and the public.

Note a similar mill has undergone a phased approach of stabilisation works over the past eight years, availing of the BHIS each year.

RECOMMENDATION: [KEEP ON LIST](#)

6.21 (CDP/D/178 RPS) Lugamarla, The Rectory, Blacklion, Blueball, Tullamore



Description: Detached L-plan multiple-bay three-storey former rectory, built in 1908, with lean-to bay to north adjoining hipped extension and advanced single-bay single-storey to south. Now in private domestic use. Set within its own grounds. Pitched tiled roof with oversailing eaves, terracotta ridge tiles, rendered chimneystacks, terracotta pots and cast-iron rainwater goods. Cat-slide roof to south. Timber bargeboards to gables. Half-dormer windows to east and west. Dormer window to south. Tooled limestone plinth with red brick to ground floor surmounted by cornice with pebbledashed render to first floor. Varied timber casement windows with red brick sills. Square-headed door opening with sidelight to north, timber panelled door and limestone step. Date stone with 'JB 1908' inscribed set in ground by door. Hipped pebbledashed garage to north with timber battened sliding doors. Splayed entrance with rendered piers and wrought-iron railings and gate.

Appraisal: Built in 1908, this striking Tudor Revival former rectory displays an interesting architectural design due to its irregular form. A variety of materials were employed in its design such as limestone, red brick and render, which creates an aesthetically pleasing structure, enhanced by the varied treatment to the windows. Together with the neighbouring former Church of Ireland church and parochial hall, it forms an attractive group of related structures in a rural setting.

Ref: [CDP/D/178 \(RPS\) – RPS Number 32-03, NIAH 14924003](#)

Person / Body:

Mr Tom Milne

Summary of submissions / observations:

Request to remove the Rectory from the Record of Protected Structures. The owner states that this year he was charged €471.41 more for the house insurance than any other year, this is impacted by the Protected Structure Status.

CE Response:

This is significant problem for many owners of listed buildings. Discussions should be undertaken at Department level with the Insurance Federation to review the discrepancies in costs between buildings which are protected and those that are not, while reviewing the vast difference in insurance costs between England and Ireland. In many cases the same company works in both countries with significantly higher quotes for Irish customers.

Financial assistance is provided to assist with the conservation and restoration of protected structures. The Built Heritage Investment Scheme (BHIS) is for the repair and conservation of structures that are protected under the Planning and Development Acts, with grants ranging from €2,500 to maximum of €10,000, covering a maximum of 50% of the cost of approved repairs.

RECOMMENDATION: [KEEP ON LIST](#)

7 Miscellaneous Changes

I proposed a number of changes in red as listed below:

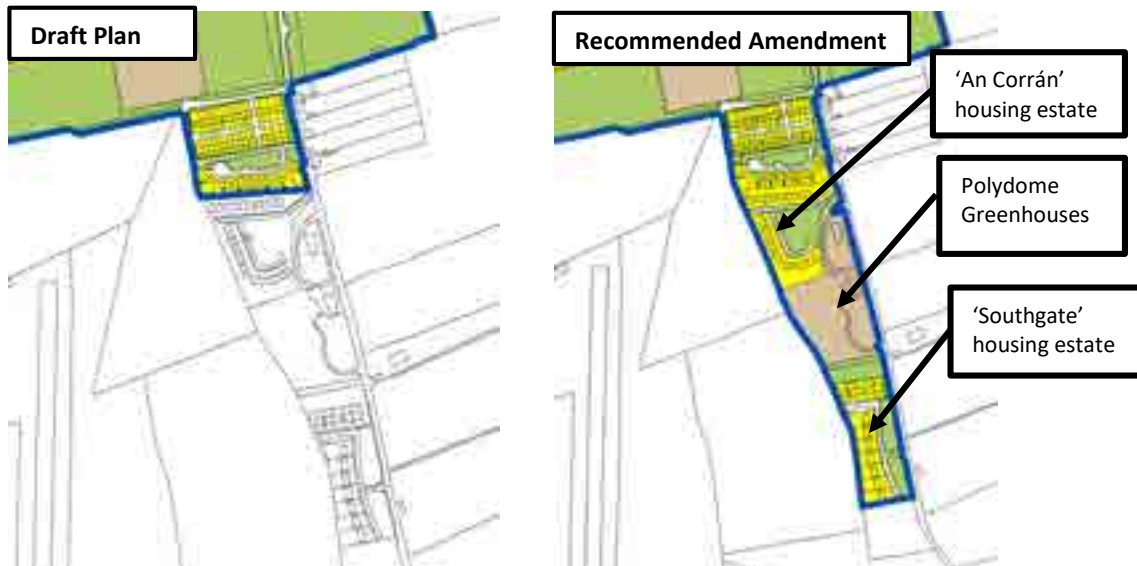
- a) Table 1.3 chapter 1 refer to 'Rhode **Green** Energy Park' instead of 'Rhode Energy Park' for consistency with remainder of the plan.
- b) Replace 'retail core areas' to 'core retail areas' for consistency purposes with remainder of the plan.

RTCP-06 It is Council policy to encourage retail development, including new forms of shopping which relates to the regeneration of existing town and village centres. Proposals, which would undermine the vitality and viability of **core retail areas** or town centres, as a whole shall not be permitted.

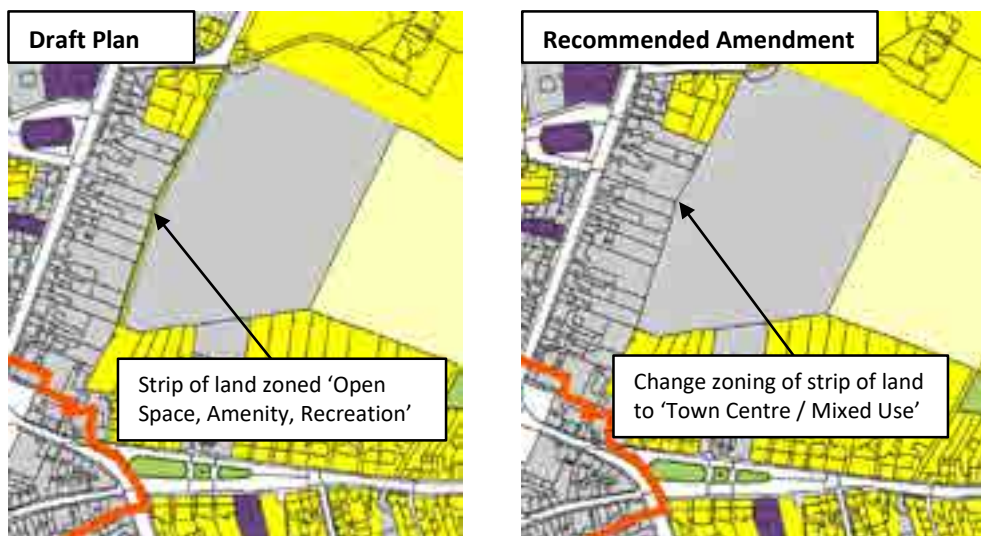
- c) Amend Objective KIO-01 of the Clara Town Plan as follows;

"KIO-01 Investigate the feasibility of providing a future relief road to the north ~~east~~ **west** of the town as indicated on the Clara Settlement Plan Objectives Map taking into account environmental sensitivities identified in the SEA Environmental Report and the policies and objectives of this County Development Plan relating to sustainable mobility, including Section 8.5.4 Corridor and Route Selection Process. The development of any relief road proposal shall be subject to the requirements of the EIA, Habitats, Water Framework and Flood Directives where relevant and appropriate."

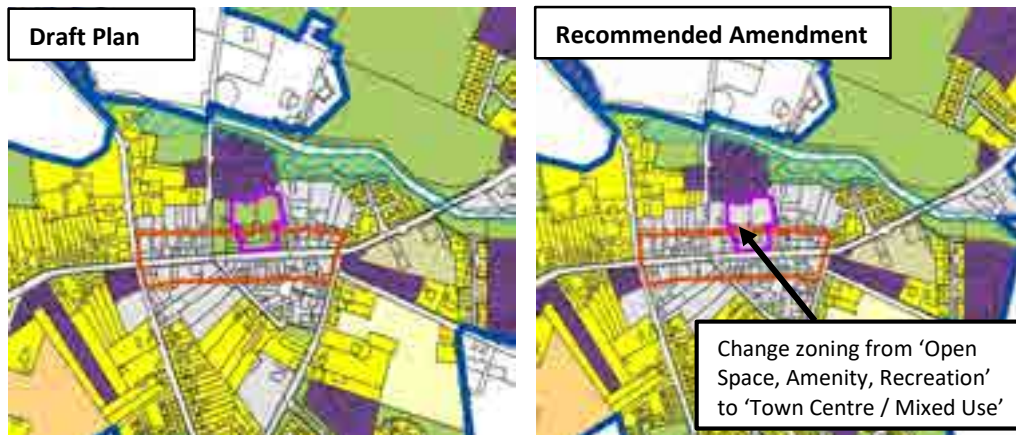
- d) In the table under Section 11.2 in Chapter 11 (Water Services & E), reference has been removed to the impending determination by the Commission for Regulation of Utilities on Irish Water's Capital Investment Plan 2020-2024 as the Commission for Regulation of Utilities has since approved the Capital Investment Plan 2020-2024.
- e) On the Birr & Crinkill zoning map, extend the development boundary to the southeast of Crinkill Village, as shown in the amended zoning map (extract below), and zone the land accordingly, to include the existing 'An Corrán' and 'Southgate' housing estates, and land in between those two housing estates, which comprises land occupied by an existing commercial business and a smaller area of land in agricultural use.



- f) On the Birr & Crinkill zoning map, change the zoning of a narrow strip of undeveloped land along the western boundary of the 'Rectory' site, from 'Open Space, Amenity & Recreation' to 'Town Centre/ Mixed Use'.



- g) On the Kilcormac Town Plan zoning map, the Convent Site on the north side of Main Street / N52 and land within the immediate environs, was, in error, zoned 'Open Space, Amenity and Recreation' in the draft Plan. It is recommended that the zoning be changed to 'Town Centre/ Mixed Use', as shown in the amended zoning map (extract below).v



- h) Under Section 2.1.3 of the draft Banagher Town Plan, remove the following text as it is a repeat of the previous paragraph.

~~Council will seek to continually improve the public realm in Banagher, identifying elements that contribute positively and maintaining them while seeking to identify and resolve issues that detract from the quality of the public realm.~~

- i) The 'Settlement Context' section for the Shannonbridge Village Plan is proposed to be amended, as follows, to recognise that the West Offaly Power Station is now closed.

Settlement Context: Shannonbridge is situated at a bridging point of the River Shannon in West Offaly on the border with County Roscommon. It is approximately 10km south of Clonmacnoise at the junction of the R357 and R444. The settlement is predominately linear in fashion and characterised by low density development and a traditional main street. Environmental and flood designations restrict development to the north and south along the River Shannon. Historically, the West Offaly Power Station, which closed in 2021, has been was a key employer in the area. Given its location on the River Shannon and proximity to Clonmacnoise, tourism also makes a significant contribution to the local economy. This tourism potential can be further developed by promoting Shannonbridge as a tourism hub for exploring Clonmacnoise and a node on the county's proposed greenway network.

- j) The Killina Sráid Plan is proposed to be amended to describe the water supply as being from the Rahan – Agall / Hollimshill Public Water Supply rather than a Grouped Water Scheme.
- k) The Ballycommon Sráid Plan is proposed to be amended to include reference to the coffee shop operating at Ballycommon House pub, and also to include a more up to date photo.
- l) The pre-draft Roscomroe Sráid map agreed by the elected members did not appear immediately into the draft plan due to a printing error. However, it was inserted within 3 weeks later. The correct map was uploaded online and notification of the change was issued to prescribed authorities, elected members, Oireachtas members and the Council management team.

- m) Insert the words 'birch water harvesting' into the list of potential peatland afteruses in Objective RDO-05 as follows:

RDO-05 *It is an objective of the Council to support the longer-term strategic planning for industrial peatland areas, which should include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure including workshops, office buildings and industrial sites, which addresses environmental, economic and social issues including employment and replacement enterprise reflecting the current transition from employment based around peat extraction. Examples of after use and re-purposing of workshops and production facilities could include outreach training centres, gravel extraction, bike-hire facilities, enterprise space / co-working facilities, aquaculture, **birch water harvesting**, herb growing, resource management / recycling centre, climate change mitigation (such as through renewable energy, carbon sink, data centres, battery energy storage, afforestation including native woodland, a Green Energy Hub, flood management), and tourism (such as through peatways, recreational forestry, wilderness, eco-tourism based on biodiversity, and a designation of a National Peatlands Heritage Park).*

- n) Omit Figure 6.6 below of Tullamore Dew Visitor Centre from the Tourism Chapter considering the visitor centre is expected to be moving to another location in Tullamore.



- o) It is recommended to insert 'campervan park' in to the following category of use listed in the Landuse Zoning matrix 'Caravan Park / **Campervan Park** / Camp Site/ Glamping (Tourism)' in Chapter 12 of the Plan. It is recommended to insert '**campervanning**' into policy TRP-06 in chapter 6 of the Plan as follows:

TRP-06 It is Council policy to support the provision and improvement of visitor facilities, infrastructure (including signage, bicycle stands, service facilities, seating and if necessary parking) and accommodation (including self-catering, hotels, hostels, guesthouses, B&Bs, caravanning, **campervanning**, camping, motorhome service areas and glamping) at appropriate locations, including rural areas in proximity to tourist attractions, in order to expand the visitor experience provided to serve tourist attractions within the county. In so doing, the Council will facilitate increased bed nights

supply in accordance with the 2025 targets set out in 'Tourism: An Industry Strategy for Growth to 2025' by The Irish Tourism Industry Federation.

- p) It is proposed to add a structure onto the Record of Protected Structures which was not included in the draft Record of Protected Structures nor was it the subject of a submission during public consultation. It is addressed in Section 6.2 of this CE's Report. The adjoining building is also addressed under Section 6.2 which was the subject of submission ref CDP/D/13(RPS). It is located at Ballycumber Road, Erry (Armstrong), Clara.

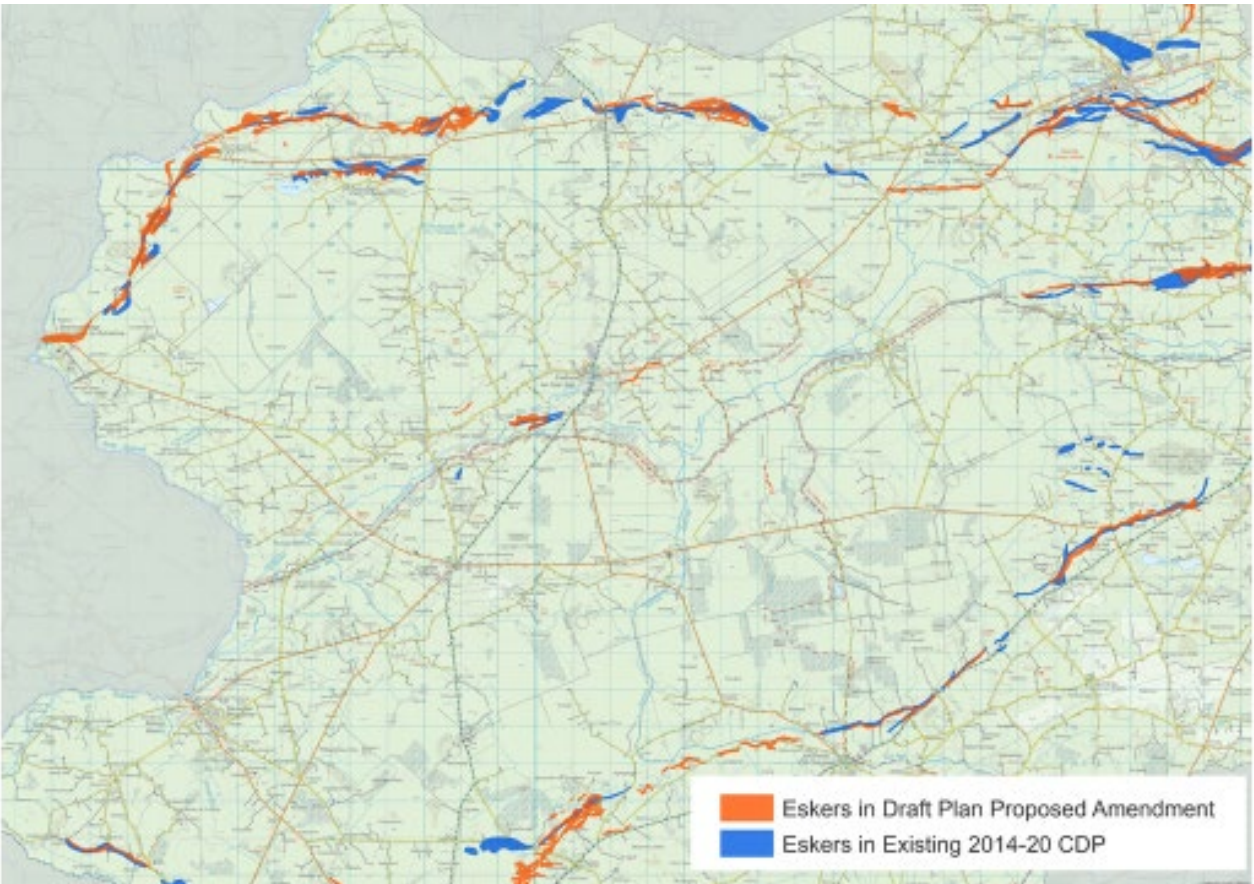
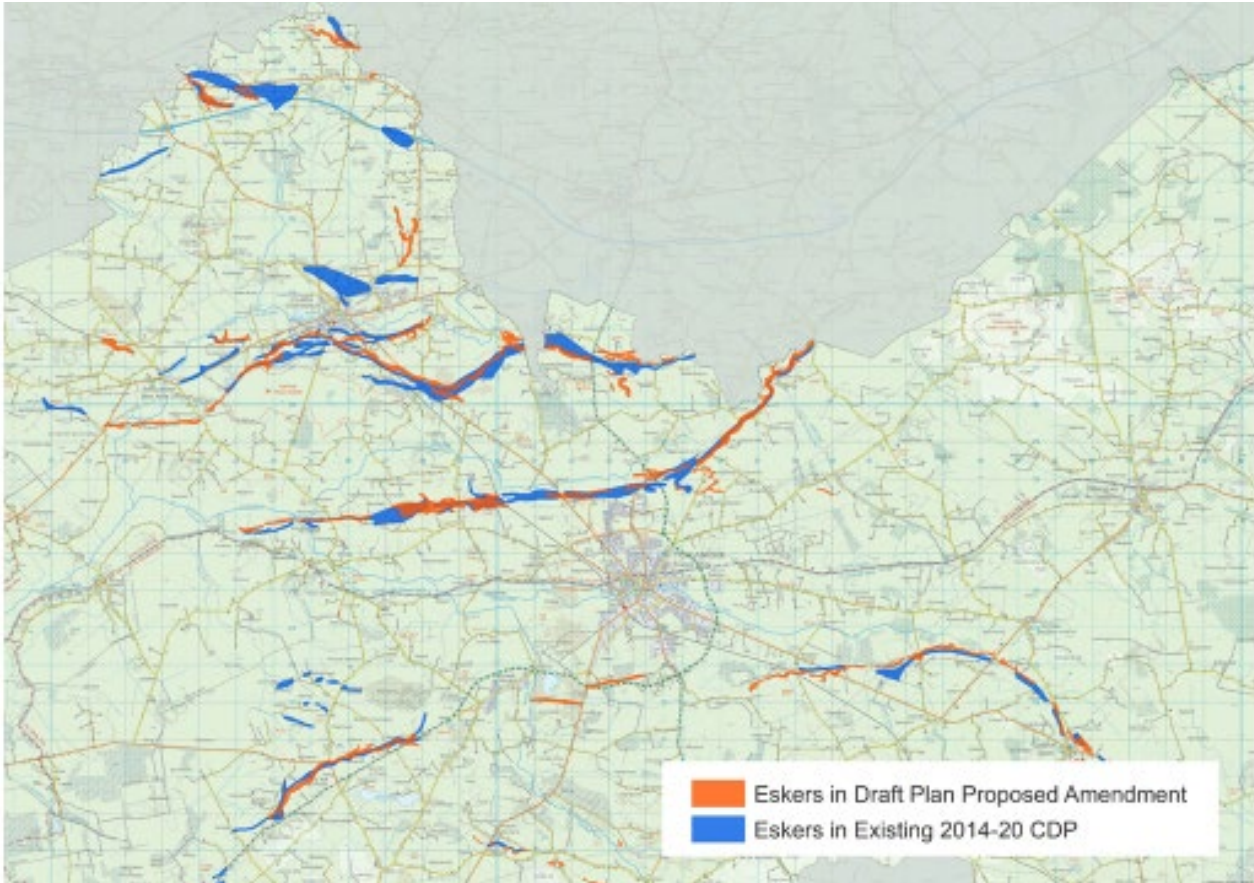
- p) In Section 8.9 of the Draft Plan SMAP-06 should have read as SMAO-06 (It is an objective of the Council to collaborate with Bord na Móna and Coillte in the development of the 'Major Cycling Destination in the Midlands of Ireland – Feasibility Study 2016' and to pursue the development of greenway links to adjoining counties).

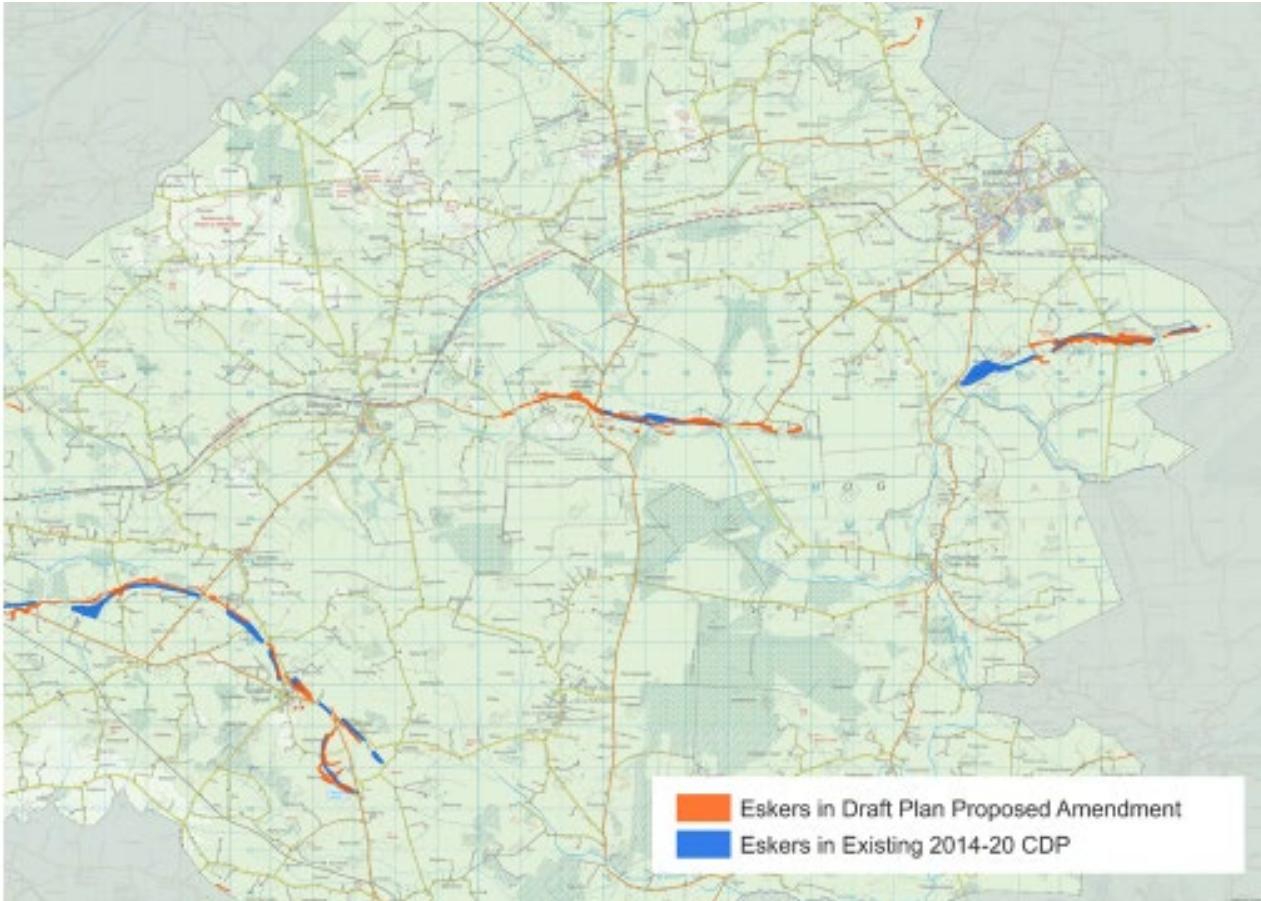
- q) **Updated GSI Esker Mapping and incorporation of same into revised Location of Esker Systems map in Figure 4.7 and revised Areas of High Amenity in County Offaly Map in Chapter 4 Biodiversity and Landscape**

The submission received from the GSI (Ref. No. CDP/D/75) stated that new geological mapping, groundwater vulnerability mapping, geohazard mapping, geothermal suitability mapping, aggregates and mineral mapping that have been developed by the GSI should be used in the Development Plan.

The revised Quaternary geological and geomorphological mapping prepared by the GSI is based on high resolution digital elevation models, high resolution aerial imagery, national subsoil permeability data, field mapping in certain low confidence areas and academic literature. The blue areas in the below mapping comes from earlier versions of Quaternary maps whilst the red areas come from more recently available GSI work and data in the area. The Quaternary map data for County Offaly reflects the GSI understanding of the geology of the region at the scale of 1:50,000.

It is proposed to update the esker mapping in the Draft Plan to reflect the updated mapping and data compiled by the GSI. The additional esker areas are shown in red in the below mapping.







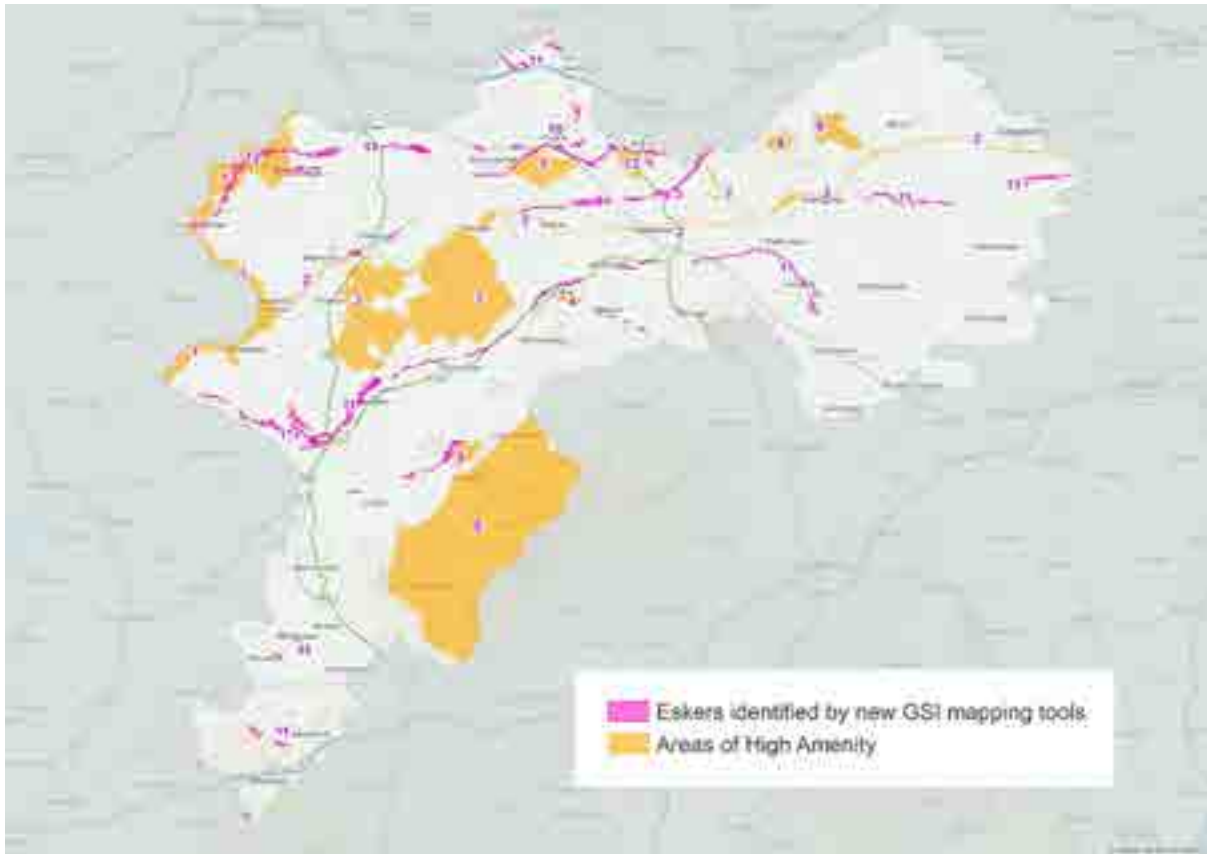


It is proposed to include the below addition to Section 4.6.2 Eskers in Chapter 4 to alongside the above esker mapping (additional text in red);

“Figure 4.7 below shows the location of the esker systems in the county. **This map is based on revised Quaternary geological and geomorphological mapping prepared by the GSI that is based on high resolution digital elevation models, high resolution aerial imagery, national subsoil permeability data, field mapping in certain low confidence areas and academic literature.**”

Whilst the **new esker mapping is recommended to be incorporated into the Plan** by amendment linked to the GSI submission, in order to be consistent with Table 4.18 Areas of High Amenity in County Offaly which includes Eiscir Riada, Clara Eskers and other Eskers in Chapter 4, it is proposed to incorporate the new esker locations as identified in the new GSI mapping as new Areas of High Amenity under the sub-heading ‘Other Eskers’ in the Plan.

The below map shows the location of the eskers proposed to be listed as Areas of High Amenity in Table 4.18 of the Draft Plan.

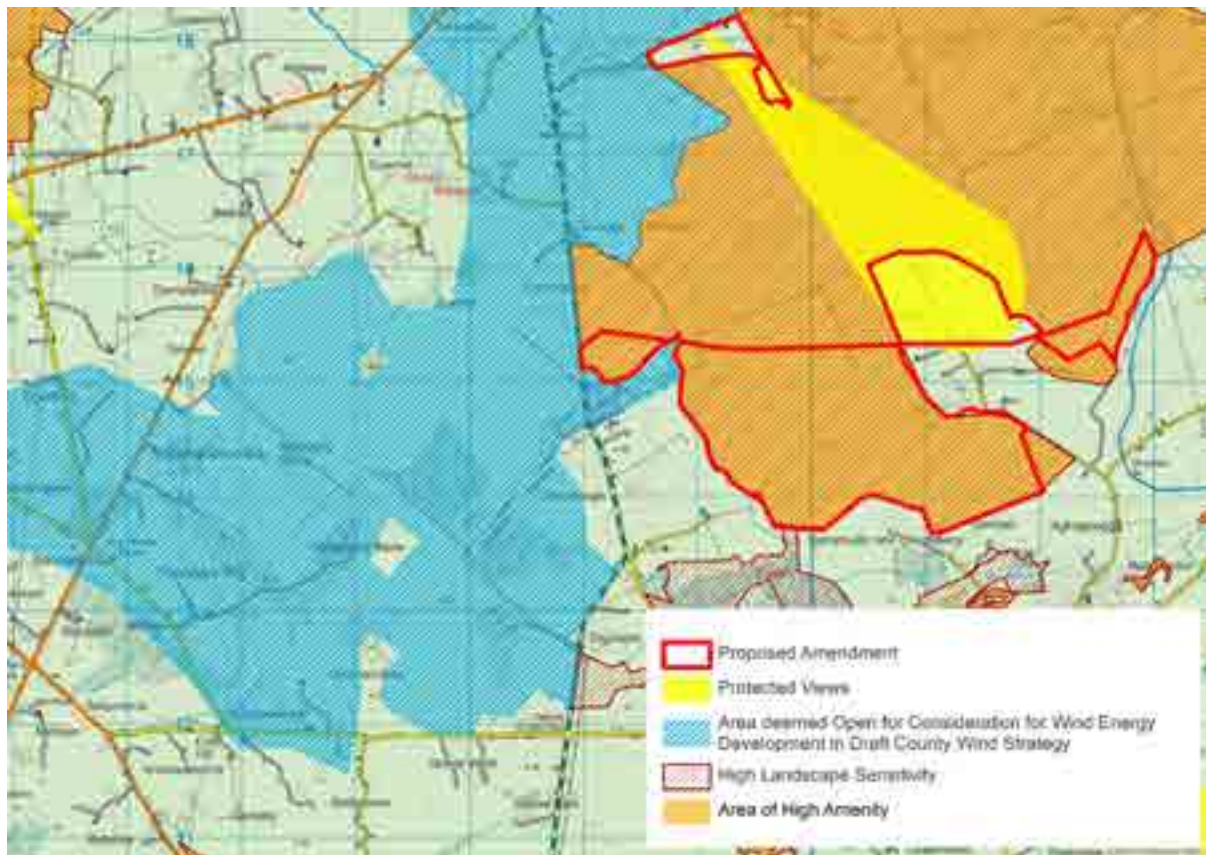


- r) **Remove section of Lough Boora Area of High Amenity and within the vicinity of a Protected View from Open for Consideration Wind Area south of Cloghan**

From the review of the submissions relating to the County Wind Energy Strategy in the Draft Plan, it was noted that the following areas were erroneously not excluded from the lands designated 'Areas Deemed Open for Consideration for Wind Energy Development' in Map No. 10;

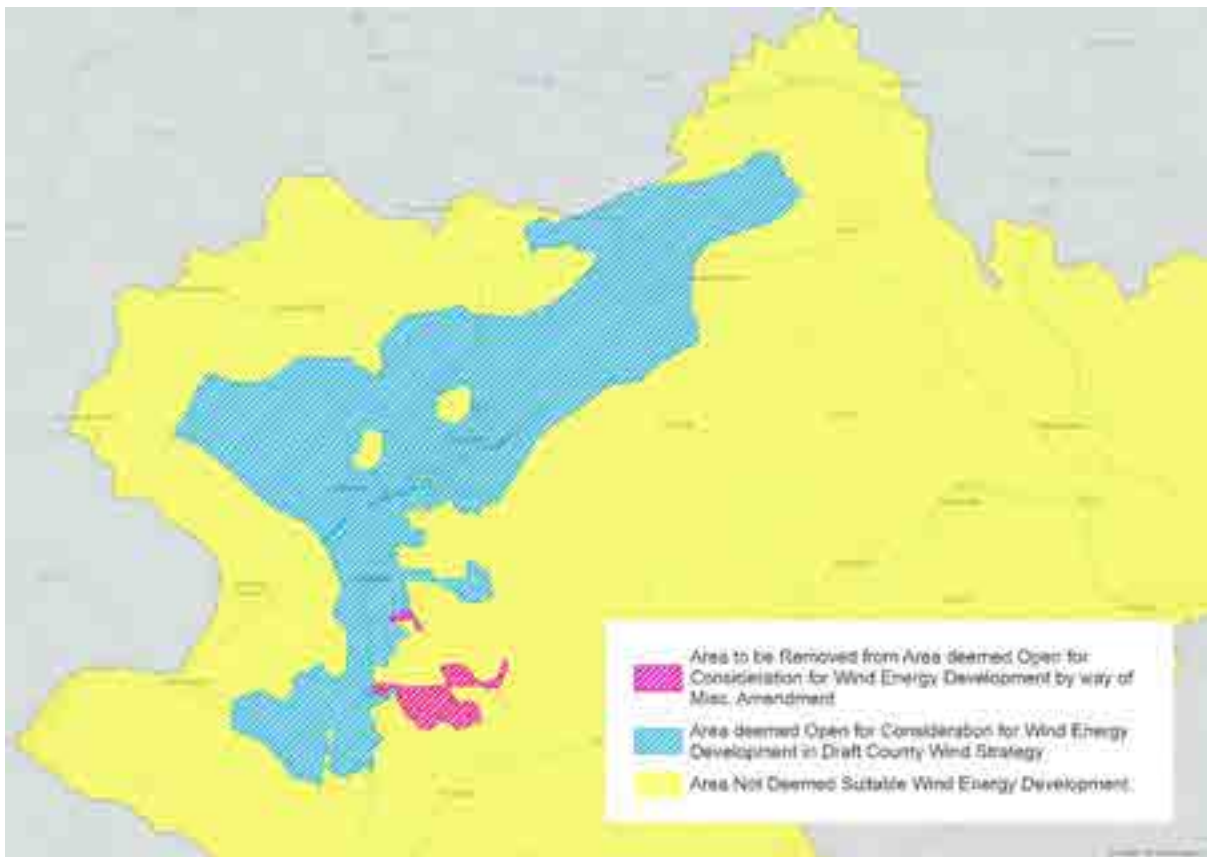
- part of the Lough Boora Area of High Amenity;
- an area within the vicinity of a Protected View over the boglands towards the Slieve Bloom Mountains, Ref. No. V12, from Road No. L-07009 in the townland of Stonestown.

These areas are shown in the below map.



This **These** areas should have been removed from consideration for Wind Energy Development in Step 3 of the sieve mapping analysis on account of ~~its~~ **their** landscape sensitivity due to its outstanding natural beauty and/or unique interest value which is generally sensitive to the impacts of development.

It is therefore proposed to exclude ~~this~~ **these** areas (shown in pink below) from the designation 'Areas Deemed Open for Consideration for Wind Energy Development' in Map No. 10 from the County Wind Energy Strategy in the Draft Plan.



s) **Amend Wind Potential Area 7 ‘Area generally south of Cloghan and Birr Environs’ in Table 3: Assessment of Wind Energy Potential Areas in the County Wind Energy Strategy in the Draft Plan**

Following a review of the Draft County Wind Strategy during the examination of submissions received, it is recommended to make the following amendments to Wind Potential Area 7 ‘Area generally south of Cloghan and Birr Environs’ in Table 3: Assessment of Wind Energy Potential Areas in the County Wind Energy Strategy in the Draft Plan (additions in red, deletions represented by strikethroughs);

~~There are a number of constraint areas within this area however which are not included in the areas deemed Open for Consideration for Wind Energy Development in principle as shown in the Map No. 10 below;~~

- ~~the Little Brosna River Callows and Dovegrove Callows on account of their landscape sensitivities and presence of protected views; and~~

“There are a number of constraints in this area relating the proximity of the following Special Protection Areas;

- The Dovegrove Callows Special Protection Area (SPA), a feeding site for an internationally important flock of Greenland White-fronted Goose, a species that is listed on Annex I of the E.U. Birds Directive.; and
- The River Little Brosna Callows (SPA) of special conservation interest for the following species: Whooper Swan, Greenland White-fronted Goose, Wigeon, Teal, Pintail, Shoveler, Golden Plover, Lapwing, BlackTailed Godwit and Black-Headed Gull. The site

is also of special conservation interest for holding an assemblage of over 20,000 wintering waterbirds; and

- All Saints Bog SPA, 3.5 km from the site, as it was known to be utilised in the past by part of an internationally important population of Greenland White-fronted Goose (It should be noted that NPWS site synopsis states that the last record of Greenland White-fronted Goose within the site was 75 individuals in 1993/94). Merlin has been seen on the bog during the breeding season and may breed there.”

t) **Update Section 4: Review of Wind Energy Development and Future Energy Requirements in Offaly**

Based on a review of the submissions received on the County Wind Energy Strategy in the Draft Plan and an examination of the Planning Register to take account of recent wind energy planning applications, it is recommended to amend Section 4: Review of Wind Energy Development and Future Energy Requirements in Offaly as follows (additions in red, deletions represented by strikethroughs);

Table 1 shows County Offaly’s current total installed wind capacity to date comprising 3 wind farms with a combined installed capacity of 98.5 MW and a total of ~~36~~ 35 turbines.

Table 2 shows in addition to the installed wind capacity in the county, that there are ~~four~~ 5 permissions in place for windfarms, with a total capacity of 287.3 MW.

Table 1: Installed Wind Capacity in County Offaly (Source: Offaly County Council Planning Register, ~~2019~~ 2020)

Location	Capacity MW	No. of Turbines
Leabeg	4.5	2
Meenwaun	10	5 4
Mount Lucas	84	29
Total	98.5	36 35

Table 2: Permitted and undeveloped Wind Farms in County Offaly (Source: Offaly County Council Planning Register, ~~2019~~ 2020)

Location	Capacity MW	No. of Turbines
Stonestown, Kilcamin, Crancreagh, Derrinlough and Ballindown	28.8	9
Cloncreen	63	21

Yellow River	96	29
Moanvane	50	12
Cloncant, Cushaling & Rathmore, Ballykillen, Shaen (south of Edenderry)	49.5	9 (1 in Kildare)
Total	287.3	80

Based on the national installed wind capacity of 3,748 MW from Quarter 2 of 2019⁶, the installed wind capacity in County Offaly represents 2.63% of the total installed wind capacity in the Republic of Ireland to date.

In line with the Climate Action Plan 2019, Ireland aims to increase reliance on renewables from 30% to 70% adding up to 8.2 GW of renewable onshore wind energy capacity by 2030. Using Offaly share of the national population from Census 2016, 1.63% as a proxy, as a minimum County Offaly is required to generate 133.66 MW of renewable energy by 2030.

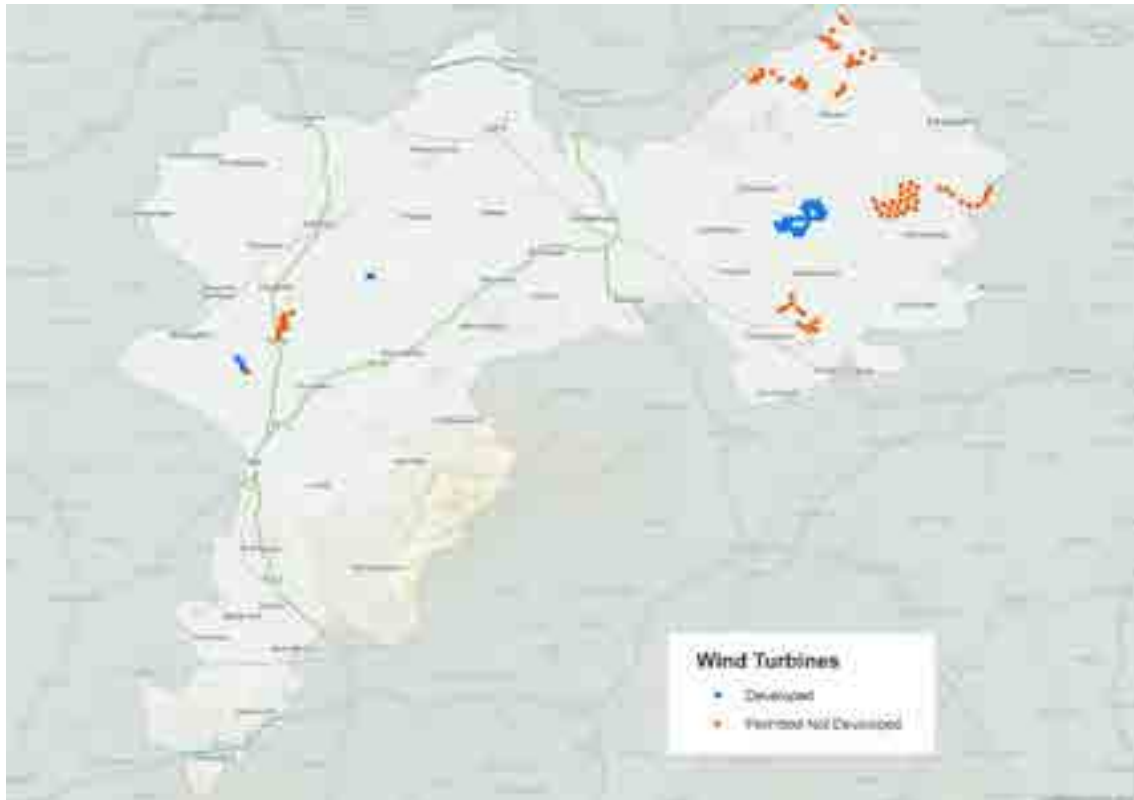
In addition, as Table 2 below shows, there are an additional 4 permissions in place for windfarms, which if constructed, will bring the total output in Offaly to 336.3 MW.

In line with the Climate Action Plan 2019, Ireland aims to increase reliance on renewables from 30% to 70% adding up to 8.2 GW of renewable onshore wind energy capacity by 2030. Offaly has to date contributed significantly to renewable wind energy generation;

- With its installed wind capacity representing 2.33% of the total installed wind capacity in the Republic of Ireland to date (based on the national installed wind capacity of 4,235 MW from Quarter 2 of 2020); and
- A potential additional 287.3 MW of energy to be generated for permissions granted for additional wind farms in the east and west of the county which if constructed combined with existing installed wind capacity in the county, will bring the total output in Offaly to 385.8 MW, which equates to 4.7 % of the national target for on shore wind capacity by 2030.

Map No. 1: Location of developed and permitted but not yet developed wind farms in County Offaly, 2020

⁶ Irish Wind Energy Association (IWEA) Quarter 2 Report 2019-2020 (covering April, May and June). The figures in the IWEA Quarterly Report are based on data provided by EirGrid, ESB Networks, the SEAI and its members. Some figures are provisional and may change as new data comes in.



Due to the absence of national guidance on how local authorities can set a target for wind energy generation within their functional area, it is not possible to set a specific target for renewable energy generation in the county during the plan period. However, as outlined in a specific objective in Chapter 4 Climate Action and Energy, the Council commits to working with key stakeholders in the carrying out of an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.

This County Wind Energy Strategy builds on the effectiveness of the previous County Wind Strategy in identifying areas of the county that have significant wind energy potential and fewer constraints through a sieve mapping analysis as outlined in Section 5 of the Wind Energy Strategy with the potential to accommodate a higher number of or larger turbines. This approach which is consistent with the approach of the Draft Wind Energy Guidelines 2019 which state in Section 2.3 (page 17) that *“These Guidelines focus mainly on commercial wind turbines, given the significant contribution they can make to meeting renewable energy targets and the potential wider impacts on the local environment and community, however microgeneration can also help to tackle climate change”*.

u) Revised wording in Section 7: Results of Methodological Step by Step Approach and Field Analysis of Potential Sites for Wind Energy Development

It is proposed to amend the following paragraph in Section 7 (deletions in strikethrough and additions in red);

“Map No. 10 shows the areas in the county designated ‘Open for Consideration for Wind Energy Development’. It should be noted that areas shown ‘Open for Consideration for Wind Energy Developments’;

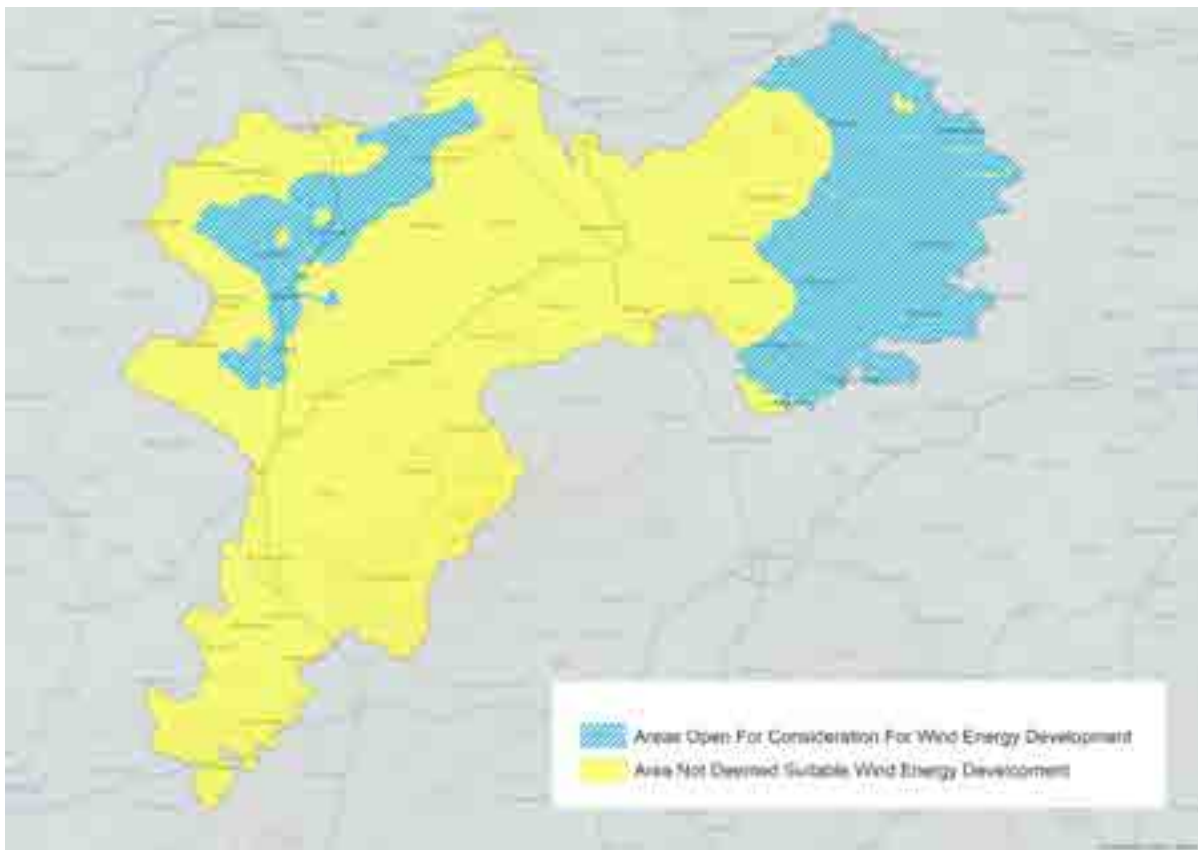
- have a viable wind speed and good access to the electricity grid;

- ~~are free from the~~ **have fewer** environmental and landscape constraints outlined in Section 5 above;
- are characterised by dispersed or sparse patterns of rural housing;
- are of a sufficient size to accommodate commercial wind farms and associated infrastructure rather than a smaller remote and dispersed area.”

These areas have been identified based on the sieve mapping analysis in Section 5, a field analysis and desk top survey in Section 6, and have been informed by the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) undertaken in relation to this County Wind Energy Strategy.

v) Revised Wind Strategy Map on account of Miscellaneous Amendments q) and r)

On account of the proposed Miscellaneous Amendments q) and r) which have fed into a revised sieve mapping analysis, it is proposed to include a revised Map 10: Wind Energy Strategy Designations Map as shown below which excludes all of the Lough Boora Area of High Amenity and eskers designated as Areas of High Amenity also.



w) Change zoning of Parcel of land in Ferbane from ‘Enterprise and Employment’ to part ‘Open Space’ and part ‘Existing Residential’

During the review of the OPW submission (Ref. CDP/D/58), it was noted that a parcel of land, shown in the below map, is zoned ‘Enterprise and Employment’ in the draft Ferbane Town Plan despite it being located on lands designated Constrained Land Use and not having been previously developed.

It is also noted that permission was granted this year, Ref. PL19/505 for a new dwelling along the roadside (Ballycumber Road) boundary of the subject landholding.



Zoning as proposed in draft Ferbane Town Plan

A precautionary approach has largely been employed to landuse zoning in the Draft Plan to avoid directing development towards areas at risk of flooding. Under the Plan, no highly or less vulnerable land uses are being proposed on undeveloped lands in Flood Zone A (high flood risk) and no highly vulnerable land uses are being proposed on undeveloped lands in Flood Zone B (moderate flood risk). This is because a Constrained Land Uses designation (see Section 12.6.1 of the draft Plan and the Strategic Flood Risk Assessment that accompanies the draft Plan) is being applied through the Plan across all undeveloped lands within Flood Zones A and B.

Therefore, to reflect the precautionary approach taken towards flooding in the draft Plan and the grant of planning permission for a dwelling on the landholding, it is accordingly recommended to change the zoning of the undeveloped parcels of land as shown in the below maps as follows:

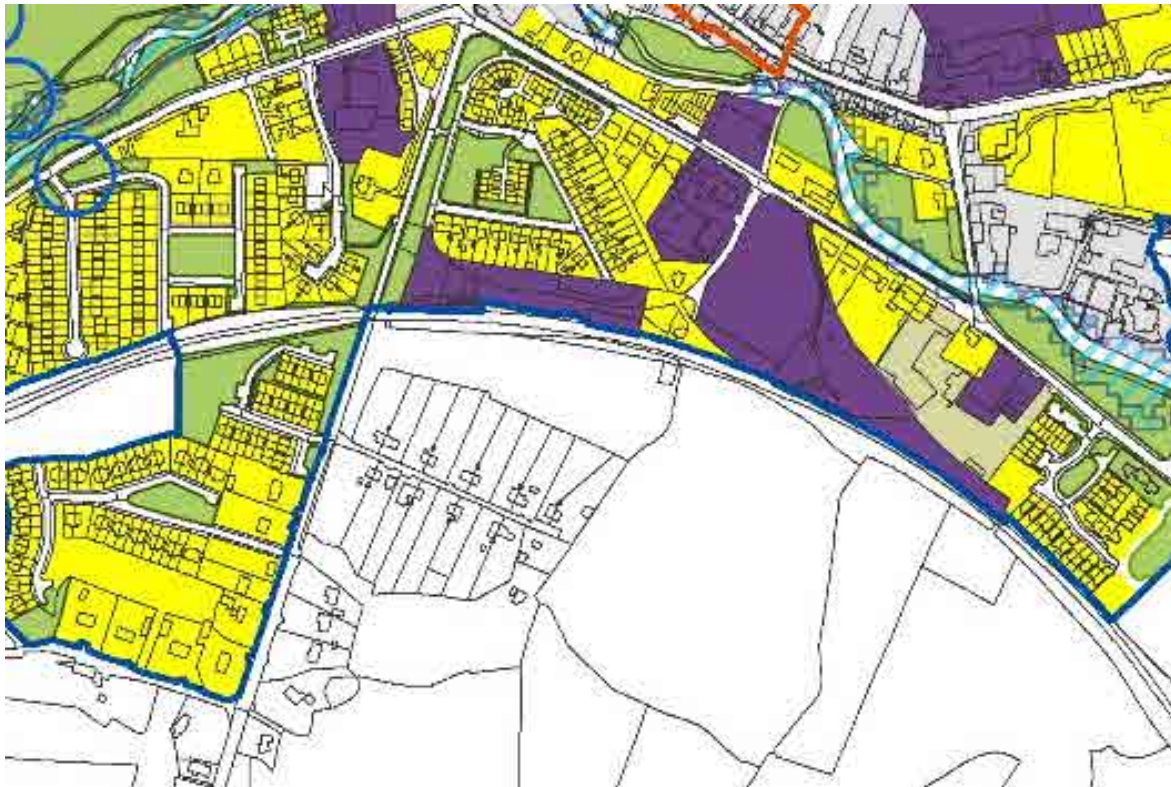
- (i) from 'Enterprise and Employment' to 'Open Space, Amenity and Recreation'; and
- (ii) from 'Enterprise and Employment' to 'Existing Residential'.



Proposed Amendment to draft Ferbane Town Plan

x) Additional 'Existing Residential' zoned areas in Clara Town Plan

During the review of submissions relating to the Clara Town Plan in the draft Plan and subsequent desk top and site visits, it was noted an area to the south of the town at Collinstown, shown in the below map, was not included within the plan boundary or zoned in the draft Plan which following re-examination is considered appropriate to include within the town boundary and assigned a zoning reflective of its current use as 'Existing Residential' in the Draft Plan.



Draft Clara Town Plan



Proposed Amendment to draft Clara Town Plan

- y) The Rural Economic Development Objectives in Chapter 5 of the Plan are recommended to commence with the reference letters 'REDO' rather than 'RDO' as currently exists in the draft Plan.
- z) It is recommended that reference in the draft Plan to the Sustainable Urban Housing: Design Standards for New Apartments shall refer to an issue year of '2020' rather than '2015 (as updated in 2018)', based on the publication of the 2020 Section 28 Guidelines issued 23rd December 2020.
- aa) The following Section 28 Guidelines is recommended to be inserted into Table 1.2 of Chapter 1 of the Plan titled:
'[Table 1.2 Compliance with applicable Ministerial Planning Guidelines issued under Section 28 of the Act](#)'

Section 28 Guidelines	Draft Offaly County Development Plan 2021-2027
Housing Supply Target Methodology for Development Planning (2020)	The Core Strategy Table in Chapter 2 and the Housing Strategy (including Housing Need and Demand Assessment) which forms part of the County Development Plan have been informed by these Guidelines in incorporating national and regional population and housing projections.

Also based on the making of the above Guidelines, amendments have been made to the *'County Offaly Housing Strategy and Housing Need Demand Assessment 2021-2027 - Draft'* which formed part of the draft Offaly County Development Plan. The recommended amended document forms part of this CE Report as a separate addendum document, and it is recommended as the up to date copy to form part of the County Development Plan.

ab) The National Transport Authority are currently undertaking the making of 'Connecting Ireland – Rural Mobility Plan' which is a public transport initiative with the aim of improving public transport services and increasing connectivity between cities, towns and their surrounding villages and rural areas. In light of this it is recommended to insert the following red text into policy SMAP-15 below:

SMAP-15 It is Council policy to support and facilitate the operation **and improvement** of existing bus services **and connections**, and to facilitate the provisions of improved facilities and services for bus users in towns and villages including the provision of set down areas for coaches and bus shelters at all bus stops where feasible.

ac) The Council has commissioned the preparation of a Draft Blundell Masterplan which sets out an urban design and economic development framework for the Old Tesco site and the back lands area to JKL Street in Edenderry. The masterplan sets out important placemaking and urban design principles to guide the development of the overall site (see Map No. 1 below) and individual development blocks (see Map No. 2 below) within the site.



Map A: Blundell Masterplan Area showing proposed connections through the site and with other areas in Edenderry.



Map B: Individual development blocks within the Blundell Masterplan area

Notwithstanding policies within the existing Edenderry Local Area Plan requiring proposals within opportunity sites such as the Blundell Masterplan area to prepare a masterplan and to develop in a coherent manner, the Chief Executive considers it necessary to include an objective in Chapter 5: Economic Development of Volume 1 of the Draft Plan requiring all developments within and in close vicinity to the Blundell Masterplan area adhere to the urban design, place making and connectivity principles as set down in the masterplan. The following objective is accordingly proposed in this regard;

“To require that developments within or adjacent to the area of the Blundell Masterplan, Edenderry, 2020 demonstrate adherence to the urban design, place making and connectivity principles for the masterplan area.”

ad) Having regard to Circular Letter LGSM01-2021 issued by the Department of Housing, Local Government and Heritage on 10 February, 2021, it is proposed to amend Section 3.13 Decarbonisation Actions and Projects as follows (additional text in red);

3.13 Decarbonisation Actions and Projects

This Plan recognises that local Authorities have an important role in leading a bottom up approach contributing to the national climate action agenda. Action 165 of the Climate Action Plan requires each Local Authority to identify one location or area that would be subject to a plan for a Decarbonising Zone (DZ). It is intended over the lifetime of this Plan to develop and implement a Decarbonising Plan for a Decarbonising Zone within county Offaly in conjunction with relevant stakeholder(s).

A DZ is a spatial area identified by the local authority, in which a range of climate mitigation, adaptation and biodiversity measures and actions are identified to address local low carbon energy, greenhouse gas emissions and climate needs to contribute to national climate action targets.

Table 3.1 below lists all actions and specific projects that that can be undertaken in County Offaly in the lifetime of this County Development Plan to help achieve a low carbon, climate resilient and environmentally sustainable economy.

It should be noted in this regard that reference is made to developing a Decarbonising Zone within County Offaly as an action to help achieve the aim of a ‘Transition to a Low Carbon and Climate Resilient Society’ (See Section 5 Summary of Eastern and Midland Regional Authority Submission, point 6(e)).

ae) As the Office of Public Works are set to release new “National Indicative Fluvial Mapping” mapping that will supersede the existing PFRA fluvial mapping for catchments greater than 5km² in the coming months, it is considered necessary to amend policy CAEP-50 from Chapter 3 and DMS-106 in relation to Site Specific Flood Risk assessments as follows (additional text in red);

CAEP-50

“It is Council policy to protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in Development Management Standard DMS-106. Where a development/land use is proposed that is inappropriate within the Flood Zone, then the development proposal will need to be accompanied by a Development Management Justification Test and site-specific Flood Risk Assessment in accordance with the criteria set out under with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 and Circular PL2/2014 (as updated/superseded). In Flood Zone C, (See DMS-106 where the probability of flooding is low (less than 0.1%, Flood Zone C), **site-specific Flood Risk Assessment may be required and** the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed. **The County Plan SFRA datasets (including Benefitting Lands mapping), emerging CFRAMS mapping (including National Indicative Fluvial mapping), and the most up to date CFRAM Programme climate scenario mapping should be consulted by prospective planning applicants and the planning authority in determining planning applications.”**

DMS-106

Site-Specific Flood Risk Assessments

“The detail of these site-specific FRAs will depend on the level of risk and scale of development but it is advised that The Planning System and Flood Risk Management, Guidelines for Planning Authorities (DEHLG and OPW, 2009) (or any superseding document) and available information from CFRAM Studies, **including existing and emerging CFRAMS mapping (including National Indicative Fluvial mapping) and the most up to date CFRAM Programme climate scenario mapping,** shall be consulted with to this effect. A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations.”

af) The Strategic Environmental Assessment (SEA), Strategic Flood Risk Assessment (SFRA), Natura Impact Report (NIR), Housing Strategy and Housing Need Demand Assessment (HNDA) are recommended to be updated where necessary to reflect changes made to the draft County Development Plan on foot of this CE Report, during the material alteration stage of the Development Plan –making process.

ag) Having regard to the Iarnród Éireann Strategy launched in February 2021 it is recommended to include the additional red text to Section 8.4.2 of the Plan:

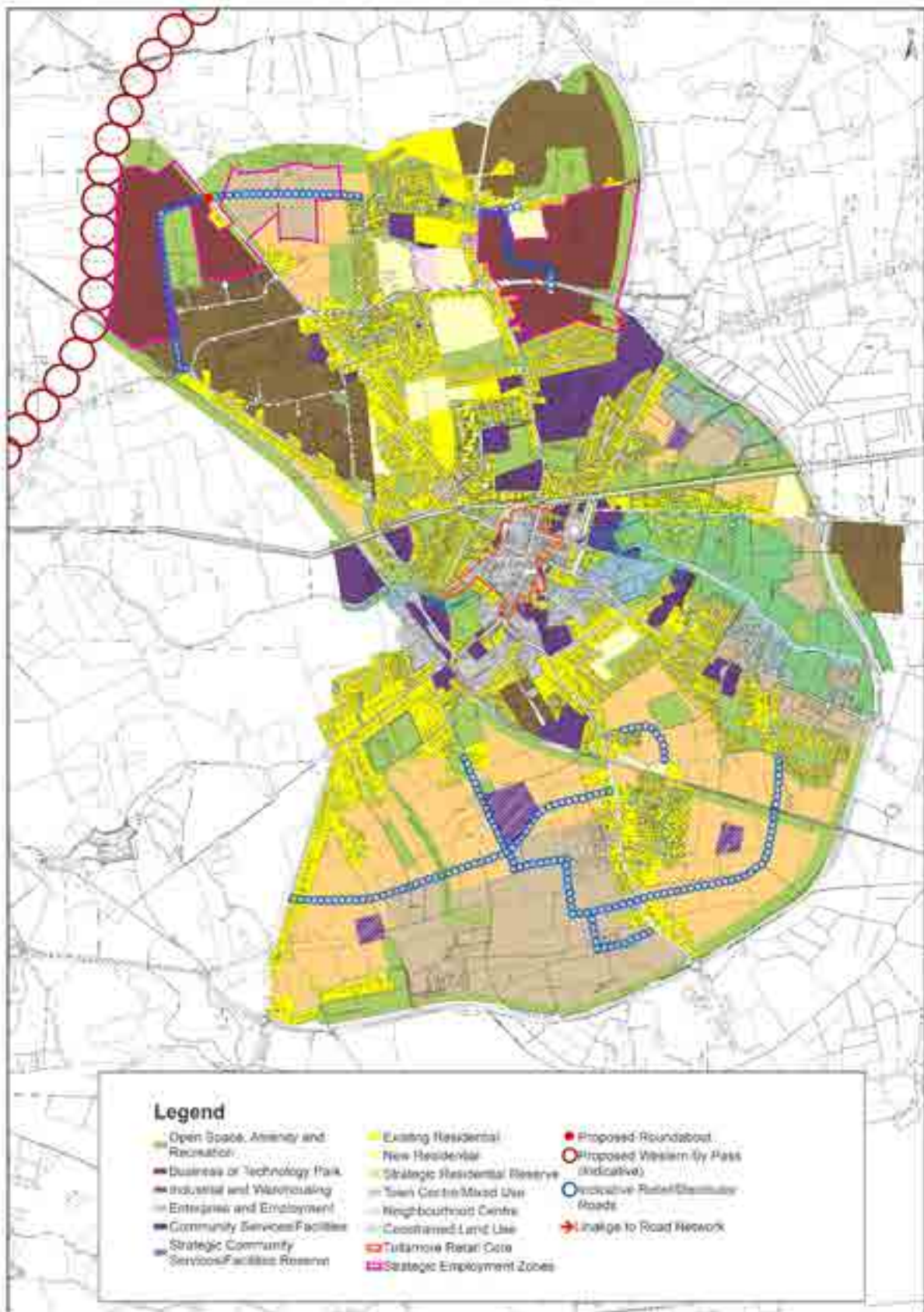
Rail Infrastructure

County Offaly is centrally located along national interconnecting strategic rail corridors. The 2030 Rail Network Strategy Review was published in 2011 and its purpose is to provide the Government with a basis for establishing a strategic policy framework for the future development of the rail passenger and rail freight sectors in Ireland.

The Review informs the strategic priorities and future investment strategy up to 2030 and the outstanding improvements in rail services to County Offaly include double tracking from Portarlinton to Athlone (2020-2025) and the Electrification of Dublin to Galway line (2025-2030).

The Iarnród Éireann Strategy 2027 aligns Iarnród Éireann with the National Development Plan 2018-2027 and retains the objective for Dual Tracking between Athlone and Portarlinton, albeit it is pushed out to the 2040 timeline as a long-term strategic objective.

ah) Recommended inclusion of strategic indicative Relief/Distributor Routes on the Tullamore Zoning Plan as follows:



Based on the recommended indicative routes above, it is recommended to amend Objectove SMAO-14 as follows:

SMAO-14 It is an objective of the Council to examine the feasibility of providing future relief / distributor roads adjacent to / within the following towns and villages, taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, including section 8.5.4 Corridor and Route Selection Process. Where lines are shown on the maps in Volume 2, they are indicative only.

- Tullamore
- Birr
- Clara
- Ferbane
- Portarlinton
- Cloghan
- Killeigh
- Geashill
- Cloneygowan
- Edenderry
- Kilcormac

8 Procedure Following CE's Report

The consideration of the draft Development Plan and this CE's report shall be completed by the members of the planning authority⁷.

Where, following the consideration of the draft Development Plan and this CE's report, it appears to the members of the planning authority that the draft should be accepted or amended, the members may by resolution, accept or amend the draft and make the development plan accordingly. If the proposed amendment would, if made, be a **material alteration** of the draft concerned, the planning authority shall, not later than 3 weeks after the passing of a resolution, publish notice of the proposed **amendment** in at least one newspaper circulating in its area and send notice and a copy of the proposed amendment to the prescribed authorities. The planning authority shall determine if a strategic environmental assessment (SEA) or an appropriate assessment (AA) or both such assessments are required to be carried out in respect of the proposed material alteration(s). No later than 2 weeks after this determination, the CE shall specify a period as considered necessary following the passing of the resolution to facilitate the SEA and / or AA. The planning authority shall publish notice of the proposed material alteration, and where appropriate in the circumstances, the making of a determination that an SEA and / or AA is required, in at least one newspaper circulating in its area. Not later than 8 weeks after giving notice of the proposed amendment the CE shall prepare a report on any submissions or observation received and submit the report to the members for their consideration⁸.

⁷ Section 12(5)(b) of the Planning and Development Act 2000 as amended.

⁸ Sections 12(6) and 12 (7) and 12(8)(a) of the Planning and Development Act 2000 as amended.

Appendix A: Copy of Public Notice

Copy of the Public Notice published under section 12(b) of the Planning & Development Act 2000 (as amended).

OFFALY COUNTY COUNCIL

COMHAIRLE CONTAE UÍBH FHAILÍ

NOTICE OF PREPARATION OF THE DRAFT OFFALY COUNTY DEVELOPMENT PLAN 2021-2027

in accordance with:

Planning and Development Act 2000, as amended

Planning and Development Regulations 2001, as amended

Planning and Development (Strategic Environment Assessment) Regulations 2004, as amended

European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004, as amended.

Notice is hereby given pursuant to Section 12(1)(b) of the Planning and Development Act 2000, as amended, that Offaly County Council, being the Planning Authority for County Offaly, has prepared, in accordance with the provisions of the above act, a Draft Offaly County Development Plan for the County of Offaly.

The draft plan comprises the following:

- Volume 1: Written Statement
- Volume 2: Settlement Plans
- SEA Environmental Report
- Natura Impact Report
- Strategic Flood Risk Assessment
- Wind Energy Strategy
- Housing Strategy including Housing Need and Demand Assessment
- Record of Protected Structures

Offaly County Council has prepared a Draft SEA Environmental Report accompanied by a Non-Technical Summary as required under the Planning and Development (Strategic Environmental Assessment) Regulations 2004, S.I. No. 436, as amended, setting out the likely significant environmental effects of implementing the Plan and these can be inspected with the Draft Offaly County Development Plan. The Draft Plan is also accompanied by a Natura Impact Report pursuant to Article 6 of the Habitats Directive 92/43/EEC.

Submission Dates and Viewing Locations

A copy of the Draft Offaly County Development Plan 2021-2027 and all accompanying reports will be available for public inspection from **Monday 27th July 2020 - Wednesday 7th October 2020 (both dates inclusive)** at the following locations, during normal opening hours and excluding public holidays:

- Offaly County Council, Áras an Chontae, Charleville Road, County Offaly.
- Birr Municipal District, Wilmer Road, Birr, County Offaly.
- Tullamore Municipal District, Cormac Street, Tullamore, County Offaly.
- Edenderry Municipal District, Town Hall, Edenderry, County Offaly.
- Branch Libraries at Birr, Clara, Edenderry and Tullamore (during branch opening hours).

Visiting members of the public should be advised that the operation of Local Authority public counters and interaction with the public, in the context of ongoing COVID-19 public health requirements, is governed by Standard Operating Guidance (SOG) protocols applying in the local government sector. Please be advised that all visitors will be required to adhere to these protocols.

The Draft Plan can also be viewed on Offaly County Council's website:

<https://www.offaly.ie/cdp2021-2027>

Submissions/Observations

Written submissions or observations with respect to the Draft Plan and/or the accompanying reports are invited from members of the public and other interest parties. Submissions or observations must state the name and address of the person or relevant body or agency making it, and should be clearly marked "*Draft Offaly County Development Plan 2021-2027*".

Please make your submission or observation by one medium only to avoid the duplication of submission reference numbers and to streamline the process i.e.:

- On-line at: <https://www.offaly.ie/cdp2021-2027> or,
- Hard Copy at: Forward Planning Section, Offaly County Council, Áras an Chontae, Charleville Road, Tullamore, County Offaly

Submissions or observations shall be made between **Monday 27th July 2020 – Wednesday 7th October 2020 (both dates inclusive)**. **Please note submissions will be accepted up to 4pm on the 7th October 2020. Late submissions will not be accepted.**

Please include your name and address on a separate page to the content of your submission. This is to assist Offaly County Council in complying with the provisions of the Data Protection Act. Your assistance on these issues is appreciated. Emailed submissions will not be accepted. Please note that observations or submissions will be made public on the website.

All submissions or observations received during the above time period will be taken into consideration before the making of the Offaly County Development Plan 2021-2021.

Signed: Ann Dillon

A/Director of Services

Planning, Economic and Rural Development

27th July 2020

Appendix B: List of Persons / Bodies who made submission / observation received within the statutory timeframe for public consultation under section 12(2)(b) of the Planning & Development Act 2000 as amended. (196 no.)

Submissions solely relating to the Record of Protected Structures (RPS) have the addition of RPS in their reference number.

Ref. No.	Name of Persons / Bodies
CDP/D/01	Paul Flint
CDP/D/02	DCCAIE – Waste Policy & Resource Efficiency
CDP/D/03 (RPS)	Catherine Burke
CDP/D/04 (RPS)	Paul Burke
CDP/D/05	Justin & Gerard Heffernan
CDP/D/06	Kathleen Flanagan
CDP/D/07	Carmel Tierney
CDP/D/08 (RPS)	Cllr. Eddie Fitzpatrick
CDP/D/09 (RPS)	Alan & Anna Orman
CDP/D/10	Brendan & Maeve Garry
CDP/D/11	Sean Earley
CDP/D/12	Gerard & Justin Heffernan
CDP/D/13 (RPS)	Alan & Anna Orman
CDP/D/14	Sean Garry
CDP/D/15 (RPS)	Gerry McGlinchey
CDP/D/16 (RPS)	Barry Cowen T.D.
CDP/D/17	Joe Lawless
CDP/D/18	CNN Construction
CDP/D/19	Shannonbridge Action Group
CDP/D/20	Ken Matthews
CDP/D/21	Ray Carroll
CDP/D/22	Patrick Gilson
CDP/D/23	Cllr. Aidan Mullins (Laois County Council)
CDP/D/24	Portarlington Community Development Association
CDP/D/25	West End Properties Ltd
CDP/D/26	Eastern Midland Regional Authority
CDP/D/27	Portarlington Enterprise Centre Ltd
CDP/D/28	Diarmuid Mollin
CDP/D/29	Daniel Scally
CDP/D/30 (RPS)	Laura Lindholm

CDP/D/31	Fergal MacCabe
CDP/D/32	Neasan Rowan
CDP/D/33	Stephanie Rowan
CDP/D/34	Steven Wynne
CDP/D/35	Carla Carey
CDP/D/36	Bernie Henry (Clara Heritage)
CDP/D/37	Paul Maher MRIA
CDP/D/38	Stephen Lynam (Tullamore Rugby Football Club)
CDP/D/39	Niamh Ni Bhroin
CDP/D/40	Ian McLoughlin
CDP/D/41 (RPS)	Fergal MacCabe
CDP/D/42 (RPS)	Frances O'Donovan
CDP/D/43	Inland Fisheries Ireland
CDP/D/44	Peadar Coyle
CDP/D/45	Sean Keohane
CDP/D/46	Transport Infrastructure Ireland
CDP/D/47	Gearoid McHugh & Nicola Corbet
CDP/D/48	James Dilleen
CDP/D/49	Murtagh & Theresa Brennan
CDP/D/50 (RPS)	Fergal MacCabe
CDP/D/51	David Allen
CDP/D/52	Cllr. Eddie Fitzpatrick
CDP/D/53	Cllr. Eddie Fitzpatrick
CDP/D/54	Cllr. Eddie Fitzpatrick
CDP/D/55	Cllr. Eddie Fitzpatrick
CDP/D/56	Ronan Corcoran
CDP/D/57	Josephine Killeen
CDP/D/58	Office of Public Works (OPW)
CDP/D/59	Clara Community School
CDP/D/60	Brian Sheridan
CDP/D/61	John Mollin
CDP/D/62	Killina Presentation Resource Centre
CDP/D/63	Meath County Council
CDP/D/64	Michele Hallahan
CDP/D/65	Selene Aswell
CDP/D/66	Wendy Stephens
CDP/D/67	Cllr. Neil Feighery
CDP/D/68	James Gibbons
CDP/D/69	Mucklagh Tidy Villages Group
CDP/D/70	Cllr. Eddie Fitzpatrick
CDP/D/71 (RPS)	Ivan Conway & Roisin Barry
CDP/D/72	Siobhan Lavelle
CDP/D/73	Cllr. Noel Cribbin
CDP/D/74	National Transport Authority
CDP/D/75	Geological Survey Ireland
CDP/D/76	Michelle Heery

CDP/D/77	Sean Nolan
CDP/D/78	Rebecca & Micheal Cuddihy
CDP/D/79	Colin Brady
CDP/D/80	Desmond Kampff
CDP/D/81	Clara Heritage Committee
CDP/D/82	Laois County Council
CDP/D/83	Oxmantown Settlement Trust (partly refers to the RPS)
CDP/D/84	Brendan Lynam
CDP/D/85	Killeigh Residents/Development Association
CDP/D/86	Claire Collins
CDP/D/87	Noelle Spollen
CDP/D/88	Eirgrid
CDP/D/89	Steinfort Investments Fund
CDP/D/90	Fiona Breen
CDP/D/91	Vincent Hussey
CDP/D/92	Pat Keating
CDP/D/93	Birr 20:20 Vision CLG
CDP/D/94	David Flaherty
CDP/D/95 (RPS)	Pat Donaghy
CDP/D/96	Birr Rugby Club Executive Committee and Trustees
CDP/D/97	Birr Tidy Towns
CDP/D/98	Shaun & Aoife Martin
CDP/D/99	Michal Masar
CDP/D/100	Midlands Airport Developments Ltd
CDP/D/101	Tullamore & District Chamber of Commerce
CDP/D/102	Michal Masar
CDP/D/103	Laois Offaly Social Democrats
CDP/D/104	Flanagan Properties
CDP/D/105	Aidan Leonard (partly refers to the RPS)
CDP/D/106	Pierre Greijmans
CDP/D/107	Andrew Lally
CDP/D/108	Tesco Ireland Ltd
CDP/D/109 (RPS)	Colm Costigan
CDP/D/110	Tommy Kennedy
CDP/D/111	An Post
CDP/D/112	Flanagan Properties
CDP/D/113	Weavermay Ltd
CDP/D/114	Grapemont Ltd
CDP/D/115	Derryarkin Sand & Gravel Ltd
CDP/D/116	Roadstone Limited
CDP/D/117	Cronan Kennedy
CDP/D/118	Inclusion Ireland Tullamore office
CDP/D/119	Coole Eco-Community
CDP/D/120	Colum Kennedy
CDP/D/121	Sean Garry
CDP/D/122	Ferbane Tidy Towns
CDP/D/123	Nessa Darcy
CDP/D/124	Coillte

CDP/D/125	Flanagan Properties
CDP/D/126 (RPS)	Bridgestock Care Ltd
CDP/D/127	Mark Gilligan
CDP/D/128	SSE
CDP/D/129	John Flanagan Developments Ltd
CDP/D/130	Declan Lally
CDP/D/131	Gordon McDonnell
CDP/D/132	Holly Breen/Barry Dwyer
CDP/D/133	EPA
CDP/D/134	DAA
CDP/D/135	John McElduff & Rory Phelan
CDP/D/136	Samleigh Properties Ltd
CDP/D/137	Barry Gorman
CDP/D/138	Destrina Ltd
CDP/D/139	ECAN Ltd
CDP/D/140	Eileen Devery
CDP/D/141	Statkraft Ltd
CDP/D/142	ESB
CDP/D/143	Phil & Suzanne O'Reilly
CDP/D/144	Mucklagh Community Development CLG
CDP/D/145	Department of Education
CDP/D/146	Tom McNamara
CDP/D/147	Irish Water
CDP/D/148	Laurence & Karen Feeney
CDP/D/149	Cllr. Eamon Dooley
CDP/D/150	Midland Town & Country Stores Ltd
CDP/D/151	Bridgestock Care Ltd
CDP/D/152	Development Applications Unit – DTCAGSM
CDP/D/153	Ballycommon Canal Renewal Group
CDP/D/154	Joe Doorley & the Doorley family
CDP/D/155	Gas Networks Ireland
CDP/D/156	RWE Renewables Ireland Limited
CDP/D/157	Bord Na Móna
CDP/D/158	Brendan Kenny
CDP/D/159	I-LOFAR Consortium
CDP/D/160	Independent Trustee Company (ITC) (Delta 77)
CDP/D/161 (RPS)	Eoghan Broderick
CDP/D/162	The Spain family
CDP/D/163	Mental Health Day Hospital, Our Lady's Hospital (HSE)
CDP/D/164	Irish Wind Energy Association
CDP/D/165	Mark Mahon – Edenderry Municipal District
CDP/D/166	Mark Mahon – Edenderry Municipal District
CDP/D/167	David Spain
CDP/D/168	Cllr. Liam Quinn
CDP/D/169	Destrina Ltd
CDP/D/170 (RPS)	Eoghan Broderick
CDP/D/171	Myles Shortall

CDP/D/172	Office of the Planning Regulator
CDP/D/173	David Spain
CDP/D/174	Keep Ireland Open
CDP/D/175 (RPS)	Cllr. Danny Owens
CDP/D/176	Cllr. Tony McCormack
CDP/D/177	Durrow High Cross Committee
CDP/D/178 (RPS)	Tom Milne
CDP/D/179	Jim Guilfoyle
CDP/D/180	Barry Cowen TD
CDP/D/181	Denis Guilfoyle
CDP/D/182	Aideen Madden
CDP/D/183	Galetech Energy Developments Limited
CDP/D/184	Columb Kane
CDP/D/185	John Mangan
CDP/D/186	Agnes Doolan
CDP/D/187	Cllr. Eddie Fitzpatrick
CDP/D/188	Cllr. Eddie Fitzpatrick
CDP/D/189	Andrew & Marion Lally
CDP/D/190	Jim Madden
CDP/D/191	Bernard Heavey
CDP/D/192	James Choiseul
CDP/D/193	Darrell Hooper
CDP/D/194	Nicholas & Catherine Ann O'Neill
CDP/D/195	Hand Family
CDP/D/196	James Moyles

Appendix C: Prescribed Authorities required to be notified under section 12(1)(a) of the Planning & Development Act 2000 (as amended) (38 no.)

Prescribed Authorities
Minister for Housing, Local Government and Heritage
Office of the Planning Regulator
Irish Water
Electricity Supply Board (ESB)
Inland Fisheries Ireland
Eirgrid PLC
Fáilte Ireland
Health & Safety Authority
Arts Council
Health Services Executive
The Heritage Council
Transport Infrastructure Ireland
Office of Public Works
An Taisce
Shannon Group
Enterprise Ireland
Industrial Development Authority (IDA)Ireland
Minister for Enterprise, Trade and Employment
Environmental Protection Agency (EPA)
An Bord Pleanála
Dublin Airport Authority
Minister for Climate Action, Communication Networks and Transport
Minister for Social Protection, Community and Rural Development and the Islands
Minister for Defence
Minister for Agriculture and the Marine
Minister for Media, Tourism, Arts, Culture, Sports and the Gaeltacht
Minister for Education
Galway County Council
Roscommon County Council
Tipperary County Council
Westmeath County Council
Laois County Council
Kildare County Council
Meath County Council
Eastern & Midland Regional Assembly
Northern & Western Regional Assembly
Southern Regional Assembly
Offaly Local Community Development Committee (OLCDC)

Appendix D: List of Late Submissions Received which could not be considered (10 no.)

Ref No.	Name of Persons / Bodies
CDP/D/L01	Cllr. John Carroll
CDP/D/L02	Joe Breen
CDP/D/L03	Fáilte Ireland
CDP/D/L04	Keith Simpson BLC Developments
CDP/D/L05	Carol Nolan T.D.
CDP/D/L06	Grainne Malone
CDP/D/L07	Cllr. Eddie Fitzpatrick
CDP/D/L08	Windfall (CD format)
CDP/D/L09	Johanna Krois
CDP/D/L10	Sergeant Graham Kavanagh