



Offaly County Development Plan 2021 - 2027

Chief Executive's Report on Pre-Draft Consultation Stage



November 2019



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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 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 will comprise Two volumes (Volume I written statement and Volume 2 settlement Plans).

This report is a requirement of section 11 (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 as well as any matters arising from any consultations held under the remit of public consultation. Not later than 16 weeks after publishing notice of the planning authority's intention to review of the existing development plan & prepare a new development plan (published 31st July 2019), 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 on or by the 20th November 2019.

The CE report is required to be published on the website of the planning authority as soon as practicable followings its preparation.

The CE's Report is required to:

- List the persons or bodies who made submissions or observations, as well as any persons or bodies consulted by the planning authority.
- Summarise the issues raised in the submissions and during the consultations, where appropriate, but shall not refer to a submission relating to a request or a proposal for zoning of particular land for any purpose.
- Give the opinion of the CE on the issues raised. In this regard the CE's opinion shall take into account (a) the proper planning and sustainable development of the area, (b) the statutory obligations of any local authority in the area, and (c) any relevant policies or objectives of the Government or of any Minister of the Government.
- State the CE's Recommendations on the policies to be included in the Draft Development Plan.
- Summarise the issues raised and recommendations made by the relevant regional assembly (Eastern & Midland Regional Assembly) and outline the recommendations of the CE in relation to the manner in which those issues and recommendations should be addressed in the draft development plan.

2 Pre-Draft Consultation Undertaken

Methods of Consultation

The pre-draft public consultation stage for the review of the Offaly County Development Plan 2014-2020 and the preparation of the new Offaly County Development Plan 2021-2027 took place from the 31st July 2019 to the 26th September 2019 (inclusive).

A Public Consultation Issues Paper was prepared for the purposes of raising awareness of the nature of both the development plan and process of the review. The Public Consultation Issues Paper was intended to stimulate discussion and to encourage and facilitate the involvement of individuals and groups in the development plan making process from an early stage. It outlined the key steps along the development plan process, the context of the development plan, and issues to consider in making development plan policy.

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

- The Public Consultation Issues Paper which was uploaded onto a dedicated webpage and hard copies were available at the planning authority & at the atrium of Áras an Chontae.
- The statutory public notice was advertised in locally circulating newspapers, a copy of which is provided in Appendix A;

Local Papers	Date appeared in newspaper
Leinster Express	Tuesday 30 th July
Midlands Tribune	Wednesday 31 st July
Offaly Topic	Thursday 25 th July
Tullamore Tribune	Thursday 25 th July
Offaly Independent	Saturday 27 th July

- Notification was placed on the Offaly County Council website.
- Notification of intention to review the existing Plan and prepare the new plan in conjunction with sending a copy of the Public Consultation Issues Paper and notifying of the dedicated Co. Development Plan website was issued to:
 - Persons and bodies listed in Appendix C (statutorily required).
 - 34 no. interest bodies such as infrastructural providers in order to obtain necessary information for the purposes of inputting into the specific areas of the plan. The list of Interested Bodies is provided in Appendix D.
 - the Public Participation Network (PPN) who distributed them to 517 community & voluntary groups.
 - Offaly's elected members and Oireachtas members. The SPC's were disbanded during the public consultation process.
- Three number public consultation sessions were held in order to provide an opportunity for members of the public to learn about the review process, to highlight some of the strategic issues

facing the county and to facilitate feedback from the public about issues they felt should be taken into account in the preparation of the draft development plan. 18 no. persons in total attended the public consultation sessions. A report on these sessions is included in Section 4 of this report.

Public consultation sessions were held in the county as follows:

Public Consultation Sessions	Date	Time
<u>Tullamore</u> Offaly County Council, Áras an Chontae, Charleville Road, Tullamore, Co. Offaly	Monday 19 th August 2019	4-7pm
<u>Edenderry</u> Edenderry Municipal District, Market Square, Edenderry, Co. Offaly	Tuesday 20 th August 2019	4-7pm
<u>Birr</u> Birr Municipal District, Civic Offices & Library, Wilmer Road, Birr, Co. Offaly	Monday 26 th August 2019	4-7pm

- An exhibition area was established within the atrium of Áras an Chontae. The exhibition area comprised a display area with information on the review process, details on how and when to make a written submission, and issues to consider in making recommendations for the future development of Co. Offaly. Public Consultation Issues Papers were available to take away.
- Notification of the review of the existing Co. Development Plan and the making of a new County Development Plan were advertised on the Council's Twitter, Facebook, Instagram accounts and dedicated webpage (www.offaly.ie/cdp2021-2027), which were kept up to date with progress on the preparation of the new Co. Development Plan.

Submissions

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

46 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 6 no. late submissions received outside the statutory timeframe for accepting submissions/observations which cannot be considered. They are listed in Appendix E.

4 no. submissions received within the statutory timeframe related to a request or proposal for zoning of particular land for a particular purpose. In accordance with section 11(4) (b) (ii) of the Planning and Development Act 2000 (as amended) these submissions cannot be accepted / considered at the pre-draft stage. The zoning related submissions are listed in Appendix F.

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

This section contains a summary under topic headings of the 46 no. written submissions received as part of the pre-draft consultation process, and the opinions of the CE to the issues raised therein, in addition to the recommendations of the CE on the policies to be contained in the draft plan. All points raised in each submission are summarised below.

In accordance with the provisions of section 11 (4) (b) (iv) of the Planning & Development Act 2000 (as amended), this section of the report includes the CE's recommendations on the policies to be included in the draft development plan under the various topics. The recommendations contained herein are a representative indication of the policies that will be dealt with in the draft development plan. The recommendations take cognisance of the fact that there must be consistency with objectives stemming from National and Regional Policy (National Planning Framework, and the Eastern & Midland Regional Strategy), and an acknowledgement of the statutory obligations of the local authority. The Planning and Development Act 2000 (as amended) sets out the process of making a development plan as well as information to be contained within a development plan including mandatory and discretionary objectives.

Topics:

- (i) **Vision, Core Strategy, Settlement Strategy, Housing**
- (ii) **Climate Action & Energy**
- (iii) **Biodiversity and Landscape**
- (iv) **Economic Development**
- (v) **Tourism & Recreational Development**
- (vi) **Retail & Town Centre, and Regeneration**
- (vii) **Sustainable Mobility & Accessibility**
- (viii) **Social Inclusion, Community and Cultural Development**
- (ix) **Built Heritage**
- (x) **Water Services and Environment**

(i) Vision, Core Strategy, Settlement Strategy, Housing

Submission Reference Numbers: CDP/PD: 02, 03, 07, 09, 15, 18, 20, 22, 23, 24, 32, 36, 37, 38, 41

The following is a summary of the main issues raised in the submissions received in this subject area:

1. A zoning request for housing was made.

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

2. Towns should be developed to a sufficient scale so as to be drivers of growth through rejuvenation, increased population, increased employment, enhanced amenity and quality design.

CE Opinion: The draft Plan will provide for the growth of Offaly's towns and villages to a scale appropriate to their role / function as set out in a Settlement Hierarchy & Core Strategy in the draft Plan, which will be created in accordance with the Regional Spatial & Economic Strategy and Government Guidance (e.g. Core Strategy Guidance).

3. Make available adequate infrastructure to ensure that the county is in a position to meet the objectives set out in the NPF, adequate supply of zoned land and serviced sites, and that the county develops in a sustainable and orderly manner.

CE Opinion: The draft Plan will include a Core Strategy which will set out the population targets for the county broken down into the settlements over the life-time of the plan. The Core Strategy will be prepared in the context of the section 10(2A) of the Planning & Development Act 2000 as amended, the Guidance Note on Core Strategies 2010, the National Planning Framework (NPF), the Implementation Roadmap for the NPF, the Regional Spatial & Economic Strategy, and Section 28 Ministerial Guidelines such as the Sustainable Rural Housing Guidelines, Sustainable Development in Urban Area Guidelines, Sustainable Urban Housing: Design Standards for New Apartments, and the Urban Development and Building Heights Guidelines. These documents set the basis for guiding future sustainable orderly growth within the county. Volume 2 of the draft Plan will include settlements plans in which zoning maps will be provided setting out the land use for specific sites. The zoning maps will be prepared having considered the Core Strategy. The quantum, location and distribution of new development will have regard to the capacity of existing and planned infrastructure and seek to make efficient use of and maximise the capacity of existing and planned infrastructure.

4. In accordance with the provisions of the Planning & Development Act 2000 (as amended), ensure that the entirety of the Co. Development Plan is consistent with the Regional Spatial & Economic Strategy (RSES) for the Eastern & Midland Regional Assembly (EMRA) area.

CE Opinion: It is proposed that the entirety of the plan will be in accordance with the provisions of the RSES.

5. Attention is brought by EMRA to the Growth Enablers stated in section 3.2. of the RSES which are:
- Promote regional accessibility & integrated landuse and transportation,
 - Support the future success of Dublin as Ireland’s leading global city of scale,
 - Target significant growth in the Regional Growth Centres (e.g. Athlone),
 - Promote compact urban growth to realise targets of at least 30% of the urban areas of Offaly (which is also addressed in Regional Policy Objective ref RPO 3.2 of RSES which states that the Core Strategy shall set out measures to achieve compact urban development targets of at least 30% for the urban areas in Co. Offaly),
 - Embed a network of Key Towns throughout the region (e.g. Tullamore), which have the capacity to deliver sustainable compact growth and employment in their catchments in tandem with enabling public transport, infrastructure and service.
 - Promote targeted ‘catch up’ 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 renewables, recreation and tourism opportunities including green infrastructure planning and the development of an integrated network of greenways, blueways and peatways.

CE Opinion: It is proposed to include in the plan the Key Enablers for growth for the region as they affect Co. Offaly and ensure compliance with RPO 3.2 of the RSES which relates to achieving compact urban development targets of at least 30% in Offaly’s urban areas. The county population target will accord with Appendix 2 of the RSES.

6. The Co. Development Plan shall ensure consistency with RPO 3.3 of the RSES which states that Core Strategies shall identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide increased densities as set out in the ‘*Sustainable Residential Development in Urban Areas Guidelines*’, the ‘*Sustainable Urban Housing: Design Standards for new Apartments Guidelines*’ and the ‘*Urban Development and Building Heights Guidelines for Planning Authorities*’.

CE Opinion: The Core Strategy will provide average densities for the settlement typologies in accordance with Government Guidelines. Regeneration / Opportunity sites will be identified in the plan.

7. A Settlement Hierarchy will be required as part of preparing the Core Strategy of the plan to ensure that towns grow at a sustainable and appropriate level in accordance with RPO 4.1 of the RSES. Tullamore is designated as a Key Town in the RSES and its role is described in the RSES which should be adhered to in the plan (Table 4.3, RPO 4.26 , RPO 4.68 to 4.70; which refer to it

being a large economically active county town, develop the town through compact growth with a focus on key sites for regeneration, support the town's role as a Tourism Destination Town, support the town as a service hub for the 'Midlands Cycle destination – Offaly', and the recognition of the town's potential as a conferencing and event hub, support its role as a major employment centre, and to examine the need for complementary third level outreach educational facilities at Tullamore.

CE Opinion: A Settlement Hierarchy will form part of the plan which is also required in accordance with the provisions of the Planning & Development Act 2000 as amended. It will utilise the format set out in Table 4.1 of the RSES; key town, self-sustaining growth towns, self-sustaining towns, towns, and rural which includes villages and the wider rural area. Recognition of Tullamore's role as a Key Town as set out in the RSES will be made in the plan.

8. Adherence with RPO 4.2 of the RSES is required in preparing the plan, by ensuring that infrastructure investment and priorities are aligned with the spatial planning strategy. It states that all residential and employment developments should be planned on a phased basis in collaboration with infrastructural providers so as to ensure adequate capacity for services is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.

CE Opinion: In preparing the plan, the capacity of services to meet demand will be investigated in order to ensure alignment with proposed growth.

9. The Asset-Based Approach to spatial development utilised in section 3.1 and Appendix A of the RSES would be useful in formulating a Settlement Strategy of the plan that secures the proper planning and sustainable development of the area.

CE Opinion: The Asset-Based Approach utilised in the RSES will be considered as a basis for compiling the Settlement Strategy of the plan.

10. The vision of the Co. Development Plan should consider the vision, key principles and RSO's stated in Chapter 2 of the RSES.

CE Opinion: The vision of the Co. Development Plan will consider the vision, key principles and Regional Strategic Outcomes (RSOs) stated in Chapter 2 of the RSES. It is noted that the Vision statement in the RSES states *'To create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all'*. The key principles are; healthy place-making, climate action, and economic opportunity. The Regional Strategic Outcomes (RSO's) of the RSES are;

- Sustainable settlement patterns
- Compact growth and urban regeneration
- Rural communities
- Healthy communities
- Creative places

- Integrated transport and land use
 - Sustainable management of water, waste and other environmental resources
 - Build climate resilience
 - Support the transition to low carbon and clean energy
 - Enhanced green infrastructure
 - Biodiversity and natural heritage
 - A strong economy supported by enterprise and innovation
 - Improve education skills and social inclusion
 - Global city region
 - Enhanced strategic connectivity
 - Collaboration platform.
11. Alignment will be required between the policies of the National Planning Framework and the RSES with the Core Strategy, Settlement Strategy and Housing Strategy of the Plan. Sections 9.3 and 4.8 of the RSES will provide further direction to assist in formulating policy for the plan. Section 9.3 relates to the Asset-Based Approach, Housing Need Demand Assessment, and Regeneration. It also states that housing quality is important in order to secure positive health outcomes. Section 4.8 relates to:
- The Challenges Facing Rural Places (e.g. *'In general, those rural places in proximity to large urban centres have experienced significant growth and urban generated pressures and require levels of growth to be managed in order to ensure that there is a requisite service level for the existing population'*), and
 - Planning for Future Growth of Rural Places [e.g. (i) *'Support for housing and population growth within rural towns and villages will help to act as a viable alternative to rural one-off housing, contributing to the principles of compact growth'*, (ii) *'The NPF and RSES make a distinction between areas under urban influence i.e. within the commuter catchment of cities and large towns and centres of employment, and rural areas outside these catchments'*, (iii) *'The NPF identified the need to strengthen and diversify rural towns to be a focus for local housing and employment growth'*, (iv) *'The countryside within the region provides for rural economies and rural communities, based on agriculture, forestry, tourism and rural enterprise. This should be facilitated while avoiding overspill development from urban areas and urban generated housing'*].
- CE Opinion:** It is proposed to align the Core Strategy, Settlement Strategy and Housing Strategy of the Plan with the policies of the National Planning Framework and the RSES.
12. The Council is obliged to make a Housing Need Demand Assessment (HNDA).

CE Opinion: A Housing Need Demand Assessment (HNDA) will be made which will feed into the Plan. A HNDA is a robust evidence base undertaken to correlate and accurately align future housing requirements which informs housing policies, the housing strategy in terms of the proportion of social and affordable housing required, and the Core Strategy through associated land requirements.

13. Within the new Core Strategy, the position of Portarlinton should be retained as a 'Key Service Town' given its population. Currently capacity exists in the Foul Sewer Network, Waste Water Treatment Plant (WWTP) and Public Water Supply.

CE Opinion: The Midland Regional Planning Guidelines (MRPG's) designated Portarlinton as a Key Service Town within the settlement hierarchy and this is reflected in the Core Strategies of the Laois County Development Plan 2017 – 2023 and the Offaly County Development Plan 2014 – 2020. The Regional Economic and Spatial Strategy (RSES) has replaced the MRPG's. The RSES sets out the settlement hierarchy / typology for the region. The top tiers of the settlement hierarchy (Dublin City and suburbs, Regional Growth Centres, Key Towns) are designated by the NPF and the RSES. The lower tiers of the hierarchy (Self-Sustaining Growth Towns, Self-Sustaining Towns, Towns & Villages, Rural) are to be designated by County Development Plans. As required by the RSES, an evidence based approach will be employed in the designation of the lower tiers of the county settlement hierarchy. It appears that Portarlinton should be designated as a Self-Sustaining Town in the Draft Plan based on the RSES. The function of Self-Sustaining Towns is to support the regional driver role of the Key Town, and act as regionally important local drivers providing a range of functions for their resident population and their surrounding catchments including housing, employment, services, retail and leisure opportunities. These towns have experienced rapid population growth with high levels of commuter focused residential expansion without equivalent increased in jobs and services. They require consolidation and targeted 'catch up' investment in services, infrastructure, suitable transport options, amenities and local employment to become more self-sustaining.

14. The potential to grow Portarlinton as an economic driver remains an objective of Laois County Council. The Council in conjunction with Tidy Towns has improved the appearance of Portarlinton and continues to work on initiatives to promote the town for its betterment.

CE Opinion: The Council's strategy for sustainable employment in the Draft Plan will be compatible with the Council's settlement hierarchy. It appears that Portarlinton will be designated as a 'Self-Sustaining Town' in the Draft Plan's Settlement Hierarchy based on the RSES. Among other things, these towns require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery and focusing on consolidation. Local economic development objectives for Portarlinton is a matter for the Portarlinton Local Area Plan, which includes the following objectives EE05: Facilitate the development of employment generating enterprises within existing employment areas such as the town centre, Botley Lane, Portarlinton Enterprise Centre and vacant commercial sites such as the former Avon Factory Site; and EEP4: Encourage appropriate development, works and supporting infrastructure that would contribute to a high quality and attractive built and social environment in Portarlinton to attract and sustain new business, residents and visitors.

15. Requests that the Plan be drafted having regard to the objectives of the Portarlinton Joint Local Area Plan 2018-2024 and the Core Strategy contained therein. Laois County Council will continue

to work in partnership with Offaly County Council to review the Portarlington LAP once both the Laois and Offaly County Development Plans have been reviewed and adopted.

CE Opinion: Section 19(2) of the Planning & Development Act 2000 as amended, requires that a Local Area Plan shall be consistent with the objectives of the development plan, its core strategy, and any regional spatial and economic strategy (RSES) that apply to the area of the plan. The current Portarlington LAP was prepared having regard to the current Laois and Offaly County Development Plans and the Midland Regional Planning Guidelines (MRPG's). A review of the Portarlington Local Area Plan will take place following the review and adoption of the Laois and Offaly County Development Plans to ensure compliance with these Development Plans and the RSES, which has replaced the MRPG's.

16. The Local Authority need resources to contribute to the alleviation of the housing shortage. The use of brownfield sites is commendable but some of these sites are too valuable to be diverted from town centre uses to housing. Similarly, additional surface car parking in Tullamore should be avoided.

CE Opinion: As a Housing Authority, the Council's role is to formulate policies offering a range of options regarding direct housing provision and assistance to persons unable to house themselves from their own resources. As a Planning Authority, the Council must ensure that sufficient lands are zoned to meet the projected housing demands and must consider applications for private housing. National Policy Objective 3c of the NPF requires the delivery of at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints. This means a focus on contained growth and reduced urban sprawl, encouraging more people, jobs and activity generally within existing cities, towns and villages rather than 'greenfield' development. The NPF also advises that in order to enable brownfield development, planning policies and standards need to be flexible, focusing on design led and performance-based outcomes, rather than specifying absolute requirements in all cases. This policy thinking is required to be reflected in the Draft Development Plan. It is envisaged that development objectives for the Opportunity Sites in Tullamore will be set out in the forthcoming Tullamore LAP, which will include among other criteria, a desired mix of uses.

17. Our open countryside is experiencing too much pressure to accommodate one-off housing, particularly on approach roads and on the outskirts of towns and villages. The majority of people building in the countryside have a desire to do so but not a need to do so. With each new one-off house large amounts of hedgerow are removed with a great loss to the local ecosystem. Planning applicants should demonstrate how they will negate habitat loss. Population increase is required in towns and villages to sustain them, in particular infill development. To be sustainable all our villages should have the ability to care for their young (crèche and national school) and older people (nursing home, primary care centre, post office).

CE Opinion: The plan will provide for the compact growth of our towns and villages, 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. One-off housing in the open countryside will be controlled where required in accordance with Government policy, the NPF and Guidelines and at an appropriate scale that does not detract from the capacity of our towns and villages to deliver homes more sustainably. The plan will 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. The plan will facilitate a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services in accordance with NPO 28 of the NPF.

18. There should be a high level of consistency between County Plans in adjoining authorities. The Draft Meath County Development Plan will be published in December 2019. It is anticipated that a number of rural nodes will be identified within the plan adjacent to the Offaly border at Castlejordan and Ballinabrackey.

CE Opinion: In accordance with Section 9(4) of the Planning & Development Act 2000 as amended, in the making of the development plan, Offaly County Council will have regard to the development plans of adjoining planning authorities including Meath County Council, and shall co-ordinate the objectives in the development plan with the objectives in the plans of those authorities except where the planning authority considers it to be inappropriate or not feasible to do so.

19. Put the NPF and RSES into practical effect in the preparation and making of the plan e.g. through the settlement strategy, recognising Tullamore designated as a Key Town, renewing our settlements to make them more attractive and so enhance quality of life, consolidating our settlements through compact growth whereby 30% of homes in settlements shall be within their existing built-up footprint, transitioning to a local carbon economy both in terms of mitigation and adaptation, and recognition that rural places contribute to the rural economy.

CE Opinion: The plan will recognise the hierarchy of plans / strategies that will feed into it e.g. the NPF and RSES and put into effect the objectives listed in the NPF and RSES.

20. Initiatives relating to the consolidation of housing areas to produce sustainable communities, reduction in urban sprawl into the countryside and the encouragement of living above the shop to invigorate town and village centres is welcomed.

CE Opinion: The plan will provide for the consolidation of settlements rather than their continual sprawl, as required in the NPF and RSES, and to support 'in principle' town and village improvement initiatives.

21. The plan should allow for developments of low-impact, natural build houses in the open countryside along the lines of the traditional clachan system, providing homes for those involved in food production, other land based enterprises, young families and older people. Planning permission for these clustered developments should be broadened to persons who are not from the locality and there should be a lowering of the minimum site size requirement to allow for 'Tiny' homes, that have minimal material and energy demand. Cluster developments should at a minimum be carbon neutral and self-sufficient in energy use and be allowed incorporate small scale wind turbines and solar panels.

CE Opinion: Similar to the traditional clachan system, the Draft Plan will promote the sustainable development of Sráids, which are small rural settlements (excluding towns and villages) to assist in satisfying rural generated housing needs within a structured but low density settlement, as a viable alternative to the development of "one-off" houses in the open countryside, remote from services etc. The Council will promote Sráids as limited opportunities for housing for urban

dwellers who would not satisfy “local need” criteria but who aspire to live in a rural environment. The Council will resist inappropriate suburban styles of developments in Sráid settlements. In line with Building Regulations Part L (2007- 2011) which prescribe that a reasonable proportion of the energy consumption to meet the energy performance of a dwelling is provided by renewable energy sources, the Draft Plan will promote energy efficient design and consideration of energy design at the earliest stage in the design process through careful site selection and the design of new buildings with regard to orientation so as to maximise solar gain. The Draft Plan will also encourage careful consideration to be given to the adaptability of buildings over time to enable the building stock to be retrofitted to meet higher efficiency standards in the future.

22. Development should be focused in Tullamore; and that the growth requirements of the resident and projected population and work-force of the County are concentrated in Tullamore.

CE Opinion: A Settlement Hierarchy will form part of the county development plan, required in accordance with Section 10(f) of the Planning & Development Act 2000 (as amended). As per the format set out in Table 4.2 of the *Eastern and Midland Regional Spatial and Economic Strategy (RSES)* the Settlement Hierarchy for County Offaly will comprise a key town (Tullamore), self-sustaining growth towns, self-sustaining towns, towns, and rural which includes villages and the wider open countryside.

23. The development needs of other towns and villages should be met by infill development and small scale rounding-off of existing built areas, thereby increasing the vitality of the town/village by way of increasing employment and population-related development.

CE Opinion: The draft Plan will provide for the growth of Offaly’s towns and villages to a scale appropriate to their role / function as set out in a Settlement Hierarchy & Core Strategy, which will be created in accordance with the guidance provided in the Eastern and Midlands Regional Spatial & Economic Strategy and other government guidance. In addition, policies in the draft plan will seek to support NPF National Policy Objective 11 which reads: *‘In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth’.*

24. Detailed town/village centre appraisals, including stakeholder / landowner consultation should be carried out to ensure the centres as currently defined are fit for purpose.

CE Opinion: The draft Plan will provide for the growth of Offaly’s towns and villages to a scale appropriate to their role / function as set out in a Settlement Hierarchy & Core Strategy in the draft Plan. The spatial development for each centre will be informed through the Asset-Based Approach in accordance with the guidance provided in the Eastern and Midlands Regional Spatial & Economic Strategy. An asset-based approach to spatial development identifies and builds on a combination of the social, economic and natural assets that are available within a settlement, in order to determine an overall growth strategy and settlement hierarchy. Central to this is the development of an evidence-led ‘asset base’, which can be used to identify settlements which have the greatest capacity and potential for growth, while ensuring that the future growth is sustainably managed within the capacity of those settlements.

25. Policies and investment should be concentrated on developing serviced sites, or sites capable of economic servicing, prior to embarking upon a programme of infrastructure and servicing of other, non-serviced and remote sites.

CE Opinion: The draft plan will adhere to RPO 4.2 of the RSES by ensuring that infrastructure investment and priorities are aligned with the spatial planning strategy, so as adequate capacity for services is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.

26. Higher density should be promoted on appropriate sites.

CE Opinion: The Council supports appropriate density of development relative to site context, site location and settlement hierarchy. Furthermore, the Council supports the NPF objective for compact growth and effective density in towns and villages rather than sprawl of urban development; and the RSES objective to deliver increased residential densities through the ongoing provision of infill, reduction in vacancy and re-use of underutilised lands and vacant buildings within urban areas. Policy in the draft Plan will also make reference to the *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* and the *Urban Development and Building Heights Guidelines 2018*, and future revisions thereto, which prescribe a range of residential densities dependent on location, context, scale and availability of public transport. The RSES states that higher densities in Core Strategies should be applied to higher order settlements or that there should be a gradual reduction in residential densities through the settlement typology. NPO 35 of the NPF states; ‘increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, areas and site-based regeneration and increased building heights’.

27. Policy should be flexible to allow innovative design to address particular site characteristics.

CE Opinion: NPO 13 of the NPF advocates that planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes. The draft Plan will adhere to this national policy objective in the formulation of development management standards.

28. Policies should recognise the importance of viability and market requirements to investment proposals.

CE Opinion: Through adherence to NPF and RSES policy, the Council will ensure more efficient and sustainable use of serviced land and allowing for greater integration with existing infrastructure. This is achieved through effective densities and type of development in response to site context.

29. Use methodical and evidence-based approaches to land-use zoning and settlement planning based on e.g. NPF, RSES, regional population targets, compact growth, the sequential approach, Core Strategy, flood risk assessment, infrastructural capacity, natural habitats and section 28 Guidelines, and be in accordance with proper planning & sustainable development.

CE Opinion: The Settlement Strategy and Core Strategy of the plan will be prepared in the context of the section 10(2A) of the Planning & Development Act 2000 as amended, the Guidance Note on Core Strategies 2010, the National Planning Framework (NPF), the Implementation Roadmap for the NPF, the Regional Spatial & Economic Strategy, and Section 28 Ministerial Guidelines such as the Sustainable Rural Housing Guidelines, Sustainable Development in Urban Area Guidelines, Sustainable Urban Housing: Design Standards for New Apartments, and the Urban Development and Building Heights Guidelines. These documents set the basis for guiding future growth within the county. The Core Strategy will provide 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.

30. Take into account An Bord Pleanála decisions in making the plan.

CE Opinion: An Bord Pleanála decisions will be taken into consideration in the making of the new plan.

31. Promote settlement nucleation and protect rural areas from car-dependent urban generated rural development. Provide alternatives to unsustainable one off housing e.g. a serviced site policy.

CE Opinion: The plan will include the following principles for growth upon which to encourage the focus of new development; compact growth by targeting at least 30% of all new homes that are proposed in settlements within their existing built-up footprints rather than continually sprawling outwards, move towards self-sustaining rather than commuter driven activity, and manage urban generated growth in rural areas. The plan will support housing taking place within Sraids to act only as a viable alternative to one-off housing in the open countryside. The plan will promote the provision of serviced sites supported by Irish Water in a number of small towns and villages.

32. Prohibit large-scale suburban type development.

CE Opinion: Development will take place in accordance with the settlement hierarchy and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

33. Reference is made to utilising the National Spatial Strategy.

CE Opinion: The National Spatial Strategy has been replaced by the National Planning Framework.

34. Provide a greenbelt policy in peri-urban areas in the vicinity of boundaries with strict restrictions on urban generated one-off housing to prevent sprawl.

CE Opinion: The plan will promote the consolidation of settlements rather than continually sprawling outwards.

35. Avoid zoning lands in Flood Zones or alternatively do the Justification Test in accordance with Flood Guidelines.

CE Opinion: The Settlement Plans will be prepared in the context of a Strategic Flood Risk Assessment.

36. It is vital that the Core Strategy implements and supports the Growth Strategy of the RSES and sustainable compact growth.

CE Opinion: The Core Strategy will adhere to upper tier plans / strategies such as the NPF and RSES for example in relation to compact growth.

37. Regeneration of brownfield sites in lieu of developing out of town greenfield sites.

CE Opinion: The plan will promote the regeneration of brownfield sites in lieu of continual urban sprawl.

38. Project Ireland 2040 and the Regional and Spatial Strategy espouse compact growth, to enable the effective provision of a range of accessible services, pursuant to the objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy. Tullamore as a “Key Growth Settlement” and economic engine for the entire County and region is a priority.

CE Opinion: The draft plan will emphasise the principles of compact growth and transition to a climate resilient society. The role of Tullamore should be in line with that established in the NPF and also the EMRA RSES as a Key Town.

CE Policy Recommendation:

The purpose of a Core Strategy is to articulate a medium to longer term quantitatively based strategy for the spatial development of the area of the planning authority and in so doing to demonstrate that the draft development plan and its objectives are consistent with national and regional development objectives set out in the National Planning Framework, the Regional Spatial and Economic Strategy, and specific planning policy requirements in section 28 Guidelines. The amount of land and / level of housing for the plan period that is identified in the Core Strategy must be in line with the amount of land / housing specified in the RSES. A settlement strategy is a spatial expression of sustainable population distribution, settlement hierarchy and settlement role.

In this regard, it is recommended that policies be included to:

- Implement the Core Strategy for Offaly in order to be consistent with policies at a national level and regional level, in particular population targets and distribution.
- 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.
- 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.
- Require at least 30% of future homes that are targeted in settlements to be located within the existing built-up footprint of the settlements in an effort to make settlements more compact and reduce unsustainable urban sprawl and ribbon development as is required by National Policy Objective 3c of the National Planning Framework.

- Strengthen the core of settlements and encourage the compact growth of settlements by way of the development of infill sites, brownfield lands, under-utilised land /buildings including vacant, derelict and under-occupied land / buildings, within the existing built-up footprint of the settlements, and develop outwards from the centre in a sequential manner.
- Arrest the decline and stagnation in areas that have experienced low population growth or decline in recent decades and manage the growth of areas that are under strong urban influence to avoid over-development, whilst sustaining vibrant urban communities.
- Promote densities and high quality design & layout for new residential development appropriate to its location and surrounding context and in accordance with section 28 Ministerial Guidelines, while recognising the need to protect existing residential communities and the established character of the area.
- Strategically prioritise the development of Tullamore to underpin its role as a designated Key Town and driver of economic development.
- 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 / brownfield sites, and encouraging regeneration of underutilised, vacant and derelict lands for residential development to facilitate population growth.
- Ensure that Birr, a Self-Sustaining Growth Town, should continue to grow at a sustainable level and at a commensurate scale in an effort to become more self-sustaining.
- Provide for Edenderry and Portarlinton, Self –Sustaining Towns which have experienced high levels of commuter driven population growth and which have weak employment bases, to be developed to deliver population growth at a rate which achieves a sustainable balancing effect, and to deliver consolidation and targeted ‘catch up’ investment in services, infrastructure, amenities and local employment in order to become more self-sustaining.
- Support housing and repopulation taking place within towns & villages in a consolidated, sustainable and sequential manner at a scale appropriate to their settlement typology, including to act as a viable alternative to one-off housing in the open countryside, and to promote the provision of serviced sites supported by Irish Water, whilst also managing the levels of growth at an appropriate scale.
- Promote the regeneration and revitalisation of towns and villages and support local enterprise and employment opportunities ensuring their viability as service centres for the surrounding rural areas.
- Facilitate the expansion of and provision of new mixed-use and employment-generating development within towns and villages at an appropriate size and scale subject to normal planning requirements.
- Support housing taking place within Sraids to act only as a viable alternative to one-off housing in the open countryside rather than a multi-house estate type development.

- Encourage the sustainable, balanced development of the Sraids 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.
- Formulate a rural housing policy for the open countryside which will have regard to the need to protect County Offaly's natural resources, environment, landscape and infrastructure.
- Ensure that multiple residential schemes contain a mix of house types, heights 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. 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.
- Emphasise that development should always be of a size and scale relative to the location and to the extent of supporting facilities / infrastructure.
- Ensure that the provision of high quality housing and well-designed developments are important in order to make places more attractive and so contribute to healthy place-making and quality of life, which in turn enhances the public realm. Attractive places attract more inward investment, skills and talent, and increase the liveability factor of a place.
- Require that town and village centres deliver a high level of priority and permeability for walking, cycling and public transport modes to create accessible, attractive, vibrant and safe, places to work, live, shop and engage in community life. This can be achieved through new build and through retro-fitting.

(ii) Climate Action & Energy

Submission Reference Numbers: CDP/PD: 04, 09, 19, 20, 27, 28, 31, 33, 35, 37, 38, 40, 41, 46

The following is a summary of the main issues raised in the submissions received in this subject area:

1. Requests an objective inserted into the Development Plan stating that *'Offaly County Council will during the life time of the Plan, take steps to render all of its public offices carbon neutral'*.

CE Opinion: Goal no. 1 of the Offaly Climate Change Adaptation Strategy 2019 states that *'Climate Change adaptation considerations are mainstreamed and integrated successfully into all functions and activities of Offaly County Council ensuring operational protocols, procedures and policies implement an appropriate response in addressing the diversity of impacts associated with climate change'*. Goal no 2 states: *'Increased capacity for climate resilient structural infrastructure is centred around the effective management of climate risk, informed investment decisions and positive contribution towards a low carbon society'*. Within Goal no. 2, Objective 2.2.1 states: *'Increase the resilience of Offaly County Council owned building stock to climate change impacts. Assess the vulnerability of building stock to climate risks and identify, prioritise and implement alleviation measures'*, and Objective 2.2.2. states: *'Promote renewable heating in Offaly County Council housing stock & office buildings'*. The Offaly County Development Plan will include an objective to implement the Offaly Climate Change Adaptation Strategy.

2. In achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy, there is a requirement for more compact towns and villages, new movement options and local energy sources, as well as better insulation, waste & water management.

CE Opinion: The draft Development Plan will include policies & objectives to promote and support the *'transition to low carbon & climate-resilient society'* which is a National Policy Outcome of the NPF. In addition, the draft Plan will provide policies & objectives to promote and support *'Compact Growth'* which is a National Policy Objective of the NPF, as is the *'sustainable management of water, waste and other environmental resources'*.

3. Information contained in chapters 7, 8 and 10 of the RSES will assist in developing policy in the plan relating to climate action and energy.

CE Opinion: Climate Action is one of the cross cutting key principles of the Eastern and Midland Regional Spatial & Economic Strategy (RSES) which seeks to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure. The Draft Plan reflects the importance given to Climate Action in the RSES and indeed the Project Ireland 2040 National Planning Framework by including consistent policies and objectives that integrate climate action at a local level.

4. The proposed Plan shall be in compliance with a 1995 agreement between the EC and the Minister for Energy and Enterprise as Irelands commitment to Kyoto (1997) for the rehabilitation of the

cutaway bogs in Offaly and the Midland Region in general, where cutaway bogs were to be planted, landscaped and flooded for tourist and amenity benefit. States that Offaly County Council in granting permission to Edenderry Power was in full knowledge of this long term plan for the cutaway bogs. There currently is a complaint lodged with the EU pertaining to this agreement. We are now in a climate and biodiversity crisis.

CE Opinion: The Council recognises the importance of the sustainable after use of cutaway bogs in the county and acknowledges and promotes the potential for the utilisation of protected and post-industrial peatland areas for tourist, amenity, educational and research purposes in policies relating to Biodiversity and Landscape in the draft plan.

5. Any pilot schemes or commercial applications for anaerobic digesters to produce biogas from local sources such as slurry, grasses and silage should be encouraged. This would be a good fit for mixed farming enterprises and as a renewable energy source.

CE Opinion: This Draft Plan will recognise and promote the benefits of Anaerobic digestion in line with EU and national waste management legislation and policy. Anaerobic digestion is a biological process in which microorganisms break down organic biodegradable material in the absence of oxygen. One of the end products is biogas, which can be combusted to generate electricity and heat, or can be processed into renewable natural gas and transportation fuels. Anaerobic digestion of farm or other wastes and by-products, will be considered, as the process has the potential to combat greenhouse gas concerns and to provide alternative sources of incomes to farmers.

6. The Council should consider the role that renewable gas and compressed natural gas (CNG) can play in bringing economic growth and environmental benefits to Co. Offaly and includes both technologies in the plan. The transportation of energy through gas pipelines is the most efficient mode to transport energy and Gas Networks Ireland supports the expansion of the gas network to new areas or new towns in line with CRU approved Connections Policy for gas which ensures that any further expansion of the network is completed in an economically viable manner.

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

7. The transition to a low carbon and climate resilient society will require:
 - the phasing out of industrial and small scale peat harvesting for energy and horticultural use;
 - the creation of jobs to replace the jobs lost from cessation of industrial peat harvesting and the access of funding Central Government and the Platform for Coal and Other Carbon Intensive Regions in Transition, to help local communities;
 - the availability of incentives and retrofitting schemes for homeowners.

CE Opinion: The Council recognises that peat fired electricity generation will be phased out in the interests of climate action according to the Governments Climate Action Plan 2019 and that the draft development plan will highlight the potential of the peatlands to accommodate the needs of emerging and early deployment for renewable energy, and future energy storage and the significant potential to develop a Green Energy Hub in Co. Offaly, which focuses on the higher order aspects of the industry such as research, new technologies, financing, office and headquarter development, assembly and maintenance The Draft CDP will also actively encourage the redevelopment of sites with antecedent uses or disused sites which were formerly ESB plants and Bord na Móna works for enterprise and employment creation subject to subject to ecological impact assessment and appropriate assessment screening.

It is considered that issues relating to the availability of incentives and retrofitting schemes do not have a specific spatial or land use planning dimension and would be more appropriately addressed by plans and programmes of other Public Bodies such as the Sustainable Energy Authority of Ireland.

8. Small scale privately owned solar units can replace fossil fuels, supplement farm incomes and help sustain rural areas. Wind farms should not be clustered in one area.

CE Opinion: The Draft Plan will promote the development of solar energy infrastructure in the county, including solar PV, solar thermal and seasonal storage technologies. Such projects will be considered subject to environmental safeguards and the protection of natural or built heritage features, biodiversity views and prospects. The Draft Plan will also contain a Wind Energy Strategy which in line with the recommendations of the 'Wind Energy Development Guidelines' (2006) supports a plan led approach to wind energy development in County Offaly and sets out areas suitable for wind energy developments and considerations for the evaluation of wind energy planning applications.

9. Transforming our damaged bogs and cutaways from carbon producers to carbon sinks can make a very significant contribution to national emissions targets.

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

10. Seeks recognition in policy to the principle of the redevelopment and reuse of brownfield development sites within the county and their potential for additional employment in Offaly, the ongoing generation of electricity including the consideration of co-firing in the county, the development of solar renewables in the county, the protection of the county's future capacity for the development of energy generating, processing, transmission and transportation infrastructure whilst encouraging the sustainable development of the county's renewable energy resources, telecommunications policy that promotes co-location.

CE Opinion: The Draft Plan recognises the potential that brownfield sites in the county have in relation to mixed uses and identifies a number of 'Opportunity Sites' in our towns that are located in prominent locations and remain underutilised which have the potential for renewal, enhancement and regeneration of the towns in which they are located.

The Draft Plan will encourage the production of energy from renewable sources, such as from biomass, waste material, solar, hydro, geothermal and wind energy, subject to normal proper planning considerations, including in particular, the potential impact on areas of environmental or landscape sensitivity and Natura 2000 sites.

With regard to telecommunications and the co-locating of necessary infrastructure, the development management standards contained in the Draft Plan should require written evidence of site-specific consultations with other operators with regard to the sharing of sites and support structures. In addition, the applicants must satisfy the Council that a reasonable effort has been made to share installations. In situations where it not possible to share a support structure, the applicants will be encouraged to share a site or to locate adjacently so that masts and antennae may be clustered.

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

11. Seeks updated parking standards in the draft CDP which requires developments with (a) private car spaces (residential and non-residential) to provide at least one EV charging point and that the charging system should have the capability at a future date (e.g. by installing appropriate ducting now) so that up to 10% of all spaces can be fitted with a similar charging point, and (b) public accessible spaces (e.g. supermarket car park, cinema etc.) to provide at least one EV charging point, should have the capability at a future date (e.g. by installing appropriate ducting now) so that up to 10% of all spaces can be fitted with a similar charging point, Charge Point Parking spaces(s) should be clearly marked as suitable for EV charging, appropriate signage and all charge points should be capable of communicating usage data with the national charge point management system & use the latest version of the Open Charge Point Protocol (OCPP). They should support a user identification system such as RFID.

CE Opinion: The Draft Plan will support the growth in the use of Electric Vehicles, prioritising parking for electric vehicles in central locations in settlements and in new developments in accordance with car parking standards to be contained in the Development Management Section of the Plan.

12. Solar energy is best placed to assist the Council with the decarbonisation of its electricity network as low impact solar farms can be located close to demand centres and make use of existing electrical infrastructure. The Council can generate additional investment opportunities by attracting businesses that want their operations to be powered by renewable energy, such as data centres, while also offering farmers opportunities to diversify their income and provide local employment both during the installation time and on-going operations and maintenance.

CE Opinion: Renewable energy is an important consideration in the Draft Plan. The Draft Plan will include policies and objectives that are informed by EU and national energy targets. The importance of factoring climate change into the plan is recognised and the Draft Plan will have regard to the National Climate Change Adaptation framework, Building Resilience to Climate Change (2012) and the Climate Action Plan 2019 to Tackle Climate Breakdown. The Draft Plan will promote the development of solar energy infrastructure in the county, including solar PV, solar thermal and seasonal storage technologies. Such projects will be considered subject to

environmental safeguards and the protection of natural or built heritage features, biodiversity, views and prospects. In addition, the Draft Plan will promote PV Solar on rooftops of domestic dwellings, industrial, agriculture and public buildings. A benefit of this approach is that the Council may potentially generate additional investment opportunities by attracting businesses that want their operations to be powered by renewable energy, such as data centres, while also offering farmers opportunities to diversify their income and provide local employment both during the installation time and during on-going operations and maintenance.

13. The use of peatlands as carbon sinks and locations for windfarms, following the cessation of peat harvesting and production is important.

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

14. The draft Plan needs an increased spatial focus and a policy base to facilitate the identification of suitable locations at a regional level for larger generation (i.e. renewable energy) and demand centres (i.e. data centres), acknowledging that such large scale developments are a key consideration and importance in formulating energy scenarios into the future and in identifying the optimum grid development solutions.

CE Opinion: Regional Policy Objective RPO 7.35 of the RSES requires the Eastern and Midlands Regional Assembly, in conjunction with local authorities in the region, to identify Strategic Energy Zones as areas suitable for larger energy generating projects. The 'Climate Action and Energy' chapter in the draft Plan will contain suitable policy to ensure co-operation with the regional assembly and other stakeholders including Bord na Móna, to progress a strategy for identifying suitable locations for Strategic Energy Zones, and for strategic level thinking which assists EirGrid in grid development, as set out in the *Grid Development Strategy – Your Grid, Your Tomorrow, 2017* and *Tomorrow's Energy Scenarios 2017: Planning our Energy Future, 2017*.

15. Need to stop the county's contribution to greenhouse gases.

CE Opinion: The plan will include policies and objectives to reduce our county's greenhouse gas emissions in a Chapter titled Climate Action & Energy.

16. A strategy should be made to deal with climate change.

CE Opinion: Offaly County Council has adopted a Climate Change Adaptation Strategy which takes on the role as the primary instrument at local level to (i) ensure a proper comprehension of the key risks and vulnerabilities of climate change, (ii) bring forward the implementation of climate resilient actions in a planned and proactive manner and, (iii) ensure that climate adaptation considerations are mainstreamed into all plans and policies and integrated into all operations and functions of Offaly County Council.

17. Require commercial buildings to be partially covered in solar panels / green roofs.

CE Opinion: The plan will promote the use of solar panels and green roofs.

18. The Irish Low Frequency Array (I-LOFAR), which is used to measure radio waves in the frequency range of 10-270 MHz from faint astronomical objects that are at great distances from the Earth, is very sensitive to modern technologies, such as wind turbines and LED lights, which can cause radio frequency interference. In order that the Council take into account the potential damaging effects that Radio Frequency Interference (RFI) can have on the I-LOFAR telescope, the Consortium requests that the following two coordination zones be included in the plan;
- Protected Zone (<5 km): Special consideration given within this zone to protect the radio telescope from interference that could significantly impact telescope operations;
 - Consultation Zone (<10 km): Request that developments within this zone be the subject of consultation and agreement with the I-LOFAR Consortium for future coexistence.

CE Opinion: The draft plan will 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. In this regard, the Draft Plan will include in its Development Management Section, as part of the criteria that proposed wind energy developments meet, that all such developments within a 10 km radius of the I-LOFAR station demonstrate that the proposed wind energy development during construction and when operational will not cause Radio Frequency Interference (RFI) on the I-LOFAR telescope. A similar approach is proposed in relation to other LED lighting also.

19. Update wind and solar energy chapter in light of the recognition of the value and necessity for strengthening, improving and expanding energy infrastructure in the county and region.

CE Opinion: A Climate Action & Energy Chapter will include reference to wind and solar energy.

20. In the era of post-industrial peatland, the Council needs to recognise the potential and suitability of Bord na Móna lands for further renewable energy projects including wind and solar farms.

CE Opinion: The Council recognises that in accordance with the Government's Climate Action Plan 2019 peat-fired electricity generation will be phased out in the interests of climate action. The draft Plan will encourage the production of energy from renewable sources, such as from biomass, waste material, solar, hydro, geothermal and wind energy, subject to normal proper planning and environmental considerations; and will highlight the potential of the peatlands to amongst other things further accommodate renewable energy projects, including wind and solar farms, and the potential for Strategic Energy Zones to be considered at locations in the County as provided for under Regional Policy Objective RPO 7.35 of the Eastern and Midlands Regional Spatial and Economic Strategy.

21. The Council should support the transition from peat to biomass for the Edenderry and West Offaly power stations, and accommodate the development and installation of the required ancillary infrastructure that will be necessary to develop and expand a sustainable biomass industry and supply chain in the county.

CE Opinion: The draft Plan will encourage the production of energy from renewable sources, such as from biomass, waste material, solar, hydro, geothermal and wind energy, subject to normal proper planning and environmental considerations.

22. Community Shared ownership –schemes for energy projects should be considered for Offaly.

CE Opinion: The draft plan will provide policy to support the National Dialogue on Climate Action in an effort to increase awareness of climate change, behavioural change and adaptation actions and in doing so provide an ongoing platform for planning climate resilience with a focus on personal responsibility at all levels. In this regard, it is also a policy to support the creation of a Sustainable Development Trust, through Green Offaly a Public Participation Network Initiative, which facilitates, creates and assists in the delivery of Green Projects and Programmes by working in partnership with all sectors of the local community.

CE Policy Recommendation:

Ireland's climate is changing in terms of sea level rise, higher average temperatures, changes in precipitation patterns, more frequent weather extremes, the spread of invasive alien species and increased risk of wild fires, for example upland gorse fires.

Climate action will continue to be driven by the need to limit global temperatures, improve energy efficiency, increase energy consumption from renewable sources, and reduce greenhouse gas emissions, replacement of fossil fuels or high embedded carbon products with sustainable alternatives such as bio-based products, and also enhancing carbon sinks.

The impacts and risks of climate change can be reduced and managed through mitigation and adaptation actions. The aim of adaptation is to reduce the vulnerability of our environment, society and economy and increase resilience. Adaptation involves taking steps to adjust human and natural systems in response to existing and anticipated impacts and to take advantage of new opportunities that may arise. Adaptation also brings opportunity through green growth, innovation, jobs and ecosystem enhancement as well as improvements in areas such as water and air quality. Mitigation involves any human intervention aimed at reducing greenhouse gases emissions and creating / enhancing carbon sinks.

In this regard, it is recommended that policies be included to:

- Support the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency.
- Co-operate and liaise with statutory and other energy providers in relation to power generation in order to ensure adequate power capacity for the existing and future needs of the county.
- Support the National Dialogue on Climate Action in an effort to increase awareness of climate change, behavioural change and adaptation actions and in doing so provide an ongoing platform for planning climate resilience with a focus on personal responsibility at all levels. In this regard, it is also a policy to support the creation of a 'Sustainable Development Trust', through 'Green Offaly' a Public Participation Network initiative, which facilitates, creates and assists in the delivery of Green Projects and Programmes by working in partnership with all sectors of the local community.
- Support the enhancement of carbon sinks such as peatlands, forestry, and permanent grasslands.

- 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 which meets the environmental, economic and social needs of communities in these areas, also demonstrating leadership in climate change mitigation and land stewardship.
- 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.
- Support the fulfilment of the vision of carbon neutrality in the agriculture, forest and land use sector through better sustainable agricultural, land management and resource efficiency.
- Proactively encourage decarbonisation of local journeys by;
 - focusing on contained compact growth and reduced sprawl by targeting infill and brownfield lands in existing built-up areas;
 - promoting higher densities and mixed land uses at appropriate locations;
 - concentrating appropriate development on transport corridors and linkages;
 - facilitating the integration of safe and convenient alternatives to the car into the design of all developments by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages;
 - ensuring that residential areas are located closer to places of work and schools, all of which will have positive spin offs in relation to local employment, thereby improving the resident workers to jobs ratio.
- Encourage the production of energy from renewable sources, such as from biomass, waste material, solar, hydro, geothermal and wind energy, subject to normal proper planning considerations, including in particular, the potential impact on areas of environmental or landscape sensitivity and Natura 2000 sites.
- Consider additional investment opportunities associated with renewable energy such as Strategy Energy Zones, Green Energy Hubs and Energy Parks, Data Centre, subject to normal proper planning considerations, including in particular, the potential impact on areas of environmental or landscape sensitivity and Natura 2000 sites, and the cumulative impact of the proposed land use with electricity transmission, renewable energy and broadband infrastructure in the area.
- Actively encourage the redevelopment of brownfield sites for enterprise and employment creation throughout the county, in particular, sites with antecedent uses or disused sites which were formerly ESB plants and Bord na Móna works.
- Support the growth of Electric Vehicles and E-Bikes and prioritise parking for electric vehicles.
- Have regard to the “Planning System and Flood Risk Management – Guidelines for Planning Authorities” (DoEHLG/OPW, 2009) through the use of the sequential approach and application of the Justification Tests for Development Management and Development Plans, during the period of this Plan.

- Require the use of sustainable urban drainage systems (SuDS) to minimise and limit the extent of hard surfacing and paving and require the use of sustainable drainage techniques where appropriate, for new developments or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risks.

(iii) Biodiversity and Landscape

Submission Reference Numbers: CDP/PD: 09, 21, 22, 24, 28, 32, 33, 37, 38, 46

The following is a summary of the main issues raised in the submissions received in this subject area:

1. Elements of chapter 7, 8, 9 and 10 of the RSES will aid OCC in developing policy relating to biodiversity, landscape, natural heritage, green infrastructure, protected structures and infrastructure.

CE Opinion: The plan will include policy relating to biodiversity, landscape, natural heritage, green infrastructure, protected structures and infrastructure.

2. Attention is drawn by EMRA to Guiding Principles for peatland areas as stated in the RSES as follows;
 - consideration of the potential contribution of peatlands to climate change mitigation and adaptation including renewable energy production,
 - consideration of habitats and species of environmental significance,
 - consideration of the potential contribution of peatlands to an existing or proposed greenway / blueway / peatway network,
 - consideration of the ecosystem services and tourism provided by peatlands,
 - development of peatlands shall ensure that there are no negative impacts on water quality.

CE Opinion: It is proposed that reference will be made in the draft plan to the Guiding Principles for Peatlands as set out in the RSES in terms of assessing development on peatlands. The Council recognises that peatlands can also have significant development potential if planned in a comprehensive manner.

3. The plan should be carried out in tandem with the required environmental processes, namely Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment.

CE Opinion: The plan will be carried out in tandem with the required environmental processes, namely Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. Consultants are engaged to carry out these assessments.

4. Comments that title for relevant section should be changed to 'Geology and Soils' or 'Soils and Geology'. Commends the inclusion of the 28 County Geological Sites and refers to Geological Survey Ireland site reports which could be mentioned in the Plan. Encourages the use of data contained in 'Landslide Events' layer on the Geological Survey Ireland Map Viewer.

CE Opinion: The Council notes all the points of the Geological Survey Ireland submission and will endeavour to make appropriate reference to same in Chapter 4: Biodiversity and Landscape in the draft plan.

5. Suggests that the Council keep up to date with the latest Geological Survey Ireland datasets, in particular, a new 'Flood Risk Map' to be shortly added, which is a collaboration between Geological Survey Ireland and the Environmental Protection Agency. Recommends that the Council use Groundwater Flooding and Karst data from the Geological Survey Ireland map viewer. Geological Survey Ireland 'Groundwater Drinking Water Protection Areas' and 'Groundwater Catchment and WFD Management Units' data on their map Viewer can be referred to the Plan.

CE Opinion: The Council notes all the points of the Geological Survey Ireland submission and will endeavour to make appropriate reference to same in Chapter 4: Biodiversity and Landscape in the draft plan.

6. Draws Councils attention to 'Active Quarries', 'Mineral Localities' and 'Aggregate Potential' layers on Geological Survey Ireland Map Viewer, which can be used to promote sustainable development and reduce the carbon footprint of buildings by using local stone to build. Data, maps, interpretations and advice on matters related to minerals, their use and their development can be found in the Minerals section of the Geological Survey Ireland website.

CE Opinion: The Council notes all the points of the Geological Survey Ireland submission and will endeavour to make appropriate reference to same in Chapter 4: Biodiversity and Landscape in the draft plan.

7. Recommends that Actions referenced in the draft plan refer to actions relating to the midlands from the Government of Ireland Climate Action Plan, in particular its geothermal potential. Ireland has widespread shallow geothermal resources for small and medium-scale heating applications for both domestic and commercial use. Geological Survey Ireland currently supports and funds research into geothermal resources and recommends that the Council keep up to date with Geological Survey Ireland data.

CE Opinion: The Council notes all the points of the Geological Survey Ireland submission and will endeavour to make appropriate reference to same in Chapter 4: Biodiversity and Landscape in the draft plan.

8. There is a cross-county dimension to many environmental issues such as energy, climate change, water quality, habitat and species loss and cross-county co-operation is vital to protect the environment across Meath and Offaly counties and wider region. It is important that both Local Authorities have the same high standards with regard the protection of the environment. Invasive species is a cross border environmental issue and co-operation on this issue, has been, and will continue to be necessary.

CE Opinion: The Strategic Environmental Assessment and the Appropriate Assessment processes undertaken as part of the plan-making process will facilitate the integration of environmental considerations into the Plan. It is intended that these considerations will include policies and objectives contributing towards environmental protection, management and sustainable development. Policies and objectives will be included in the Draft Plan in respect of energy,

climate change, water quality and habitats and species. A policy will also be included in the Draft Plan for the prevention, control and eradication of invasive species in the county.

9. The Ferbane Tidy Town group have developed a Draft Ferbane Community Action plan as well as Green Infrastructure (G.I.) Strategy for the town. The G.I. Strategy evolved through public consultation has four strands:

- Access, health and well-being;
- Natural Heritage;
- Sustainable Drainage;
- Cultural Heritage.

The incorporation of the GI Strategy into the Ferbane Town Plan would be welcomed and the Council is encouraged to implement a county wide GI Strategy for Offaly.

CE Opinion: The Settlement Plan for Ferbane that will be contained in the draft plan will seek to build on existing policies and will identify the potential to improve the accessibility to natural heritage and amenities and the connections between same, which form part of the towns 'Green Infrastructure' and to promote their value for leisure and related purposes, while continuing to ensure adequate levels of protection.

10. The review of the plan should acknowledge the deterioration of the Shannon Callows and protect important habitats such as Mongan Bog, orchid rich eskers, Clorhane Wood and the Callows.

A code of best practice in hedgerow management should be drawn up by stakeholders, including Offaly County Council, to protect important landscape and boundary features which provide habitat for biodiversity, prevent run off from agricultural land, allow water to penetrate the soil and store carbon.

As in the rest of Ireland, there has been a serious decline in bird species such as the Red Grouse and the White-fronted Geese, on the positive side, work on halting the decline of the grey partridge at Boora and the Breeding Wader project in the Shannon Callows have been very successful. The Swift Survey, an initiative of the Heritage Officer of Offaly County Council, has been very beneficial in bringing experts and amateurs together to record and protect a declining swift population.

CE Opinion: In line with Regional Policy Objective (RPO) 7.21 of the Eastern and Midland Regional Spatial and Economic Strategy (RSES), the Council will adopt an ecosystems services approach in the preparation of the Draft Plan. The RSES defines an 'ecosystems services approach' as comprising a set of principles that can be applied to any plan or decision that may positively or negatively affect the environment, whether directly or indirectly. It is about recognising and sustaining the benefits provided by the environment whilst delivering other economic and social goals. As such, and in accordance with Section 10(5a) of the Planning and Development Act 2000 (as amended), all proposed policies and objectives of the Draft Plan will be subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), with the objectives of SEA being to provide for a high level of protection to the environment and to promote sustainable development, and with the purpose of AA being to provide an assessment of the potential

adverse effects of the Draft Plan on Special Areas of Conservation (e.g. River Shannon Callows SAC) and Special Protection Areas (e.g. Mongan Bog SPA). The County Development Plan 2014-2020 includes Natural Heritage Policy NHP-07, which seeks to protect the landscape associated with the River Shannon, including the Callows. It is recommended that similar policy be carried through to the draft plan.

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

In addition, and carrying forward from Natural Heritage Policy NHP-02 of the County Development Plan 2014-2020, the draft plan will contain an objective to ensure Stage 1 Appropriate Assessment, and where required, a Natura Impact Statement, is carried out on any planning applications, plans or projects, in accordance with Article 6(3) and Article 6(4) of the Habitats Directive.

In relation to hedgerow and trees specifically, the Council recognises the heritage and amenity importance of the county's hedgerow resource that woodlands contribute to the landscape and scenic amenity of the county. The Draft Plan will contain policy that encourages the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the County and by protecting individual trees, groups of trees or woodland, which are of environmental and/or amenity value, through Tree Preservation Orders (TPOs) and by protecting specified groups of trees in the county that contribute to amenity.

11. Where peat production has uncovered gravel deposits these should be exploited in order to save what remains of our eskers. Following extraction, these quarries and bare gravel are quickly recolonised by aquatic and plant life providing biodiversity opportunities. In addition, locally important wetlands such as Pallas lake should have a management plan in place so that sustainable agriculture, amenity use including fishing, water quality and the protection of species. Wetlands support insect life that are a vital part of the food chain which sustains other species.

CE Opinion: The examination of the potential for extraction of uncovered gravel deposits beneath our peatlands forms part of Government of Ireland's Climate Action Plan 2019 in terms of assessing and implementing mitigation options on post-production, peat extraction sites. 'Action 133' of the Government of Ireland's Climate Action Plan 2019 seeks to evaluate natural resources concealed by peat cover in the Midland counties and seeks to outline potential for communities and industry to utilise available sand and gravel deposits, minerals, groundwater and deeper geothermal energy resources as part of a Just Transition for these areas.

The idea relating to the extraction of uncovered gravel deposits beneath our peatlands in order to save the existing eskers is noted but may not be appropriate in every peatland location. The Draft Plan will include a policy and related development management standard that ensures development of quarries / sand and gravel pits will not be permitted if they would result in a reduction of the visual amenity of areas of high amenity or damage to designated sites, habitat types or species.

12. The plan should allow for upscaling supports to Tidy Towns and other community groups in relation to protecting eco systems and biodiversity. Tree preservation orders should be widely enforced and public consultation should be carried out where state agencies are proposing felling or topping trees.

CE Opinion: As per Point 10 above, in line with Regional Policy Objective (RPO) 7.21 of the Eastern and Midland Regional Spatial and Economic Strategy (RSES), the Council will adopt an ecosystems services approach in the preparation of the Draft Plan, recognising and sustaining the benefits provided by the environment whilst delivering other economic and social goals, with all draft plan policies and objectives being subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA).

The Draft Plan will include policies and objectives that encourage the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the County and by protecting individual trees, groups of trees or woodland, which are of environmental and/or amenity value, through Tree Preservation Orders (TPOs) and by protecting specified groups of trees in the county that contribute to amenity.

13. Biodiversity enhancement measures such as retention of existing and proposed planting of new hedgerows/woodlands, introduction of wildflower mix and in some cases introduction of beehives/insect hotels, species-rich grassland naturally developing under PV panels once operational, can all form part of solar farm developments.

CE Opinion: The Draft Plan acknowledges the importance of conserving biodiversity in the county. The Draft Plan will encourage the retention, wherever possible, of hedgerows and other distinctive boundary treatment, individual trees, groups of trees or woodland and also supports the aims and objectives of the All Ireland Pollinator Plan 2015-20 by encouraging management options to improve pollinator populations within;

- Natura 2000 and nationally designated sites
- State and public owned land
- Peatlands
- River, Canal and railway corridors
- Grass verges along public roads and existing and future greenways
- Hedgerows
- Public parks
- Public open spaces in towns and villages, including part of mixed use and residential developments.

14. Include a Green Infrastructure section in the plan.

CE Opinion: The Council recognises the economic, social, environmental and physical value of Green Infrastructure. The current County Development Plan 2014-2020 includes a section on

Green Infrastructure and a range of policies and objectives that seek to deliver ecosystem services and quality of life benefits to people. This recognition and promotion of Green Infrastructure will continue through to the Draft Plan, seeking to protect existing green infrastructure within the county and to provide additional Green Infrastructure where possible.

15. Be in accordance with Habitats and Birds Directives.

CE Opinion: An Appropriate Assessment will accompany the new plan in accordance with the Habitat and Birds Directives.

16. Prepare a Strategic Environmental Assessment and Habitats Directive Assessment of the new plan.

CE Opinion: A Strategic Environmental Assessment will accompany the new plan.

17. Recognise our landscape in the new plan. Protect important views and prospects.

CE Opinion: A landscape and biodiversity chapter will be included in the new plan which will include protected views.

18. The Council should support the implementation of the Bord na Móna Biodiversity Action Plan 2016-2021, which includes developing methods to rehabilitate and restore peatland areas in the post-production use phase, and also to support the potential for integration of green infrastructure and ecological rehabilitation with commercial land uses, including renewable energy.

CE Opinion: The Council is supportive of the collaborative approach to a Just transition that incorporates the management, rehabilitation and restoration / re-wetting of significant tracts of peatlands. Considering that this Just Transition will be planned and managed collaboratively, the Council is also supportive of integration of commercial development, including windfarms and solar farms, subject to normal planning and environmental considerations.

19. Rewilding of much of Offaly's publicly owned lands.

CE Opinion: The draft plan will contain policy relating to afforestation, wilderness, and green infrastructure, which will support the rewilding of Bord na Móna and other state-owned lands, as appropriate.

20. Urban greening should be promoted.

CE Opinion: The draft plan will contain policy relating to the greening of urban areas e.g. green roofs, green walls and other green infrastructure.

CE Policy Recommendation:

Biodiversity or biological diversity simply refers to all living things on earth; people, plants, animals, fungi and micro-organisms, the eco-systems and habitats which they form part of and their interdependence and interconnectedness with each other. The conservation of biodiversity is an integral part of good environmental management.

Offaly, has a rich biodiversity and range of ecosystems, including the geology such as the Slieve Bloom Mountains and Croghan Hill, extensive peatlands, wetlands, rivers, Grand Canal, woodlands, grasslands, eskers, trees and hedgerows. Protecting and enhancing our biodiversity and eco systems is vital not only for our health, well-being, tourism, attractiveness of place, and quality of life of our communities and but is also crucially important in adapting to climate change.

Continuing in a similar vein as the current County Development Plan 2014-2020, it is recommended that policies in the next Development Plan should seek to:

- Protect, conserve, and seek to enhance the County's biodiversity.
- Support the implementation of the National Biodiversity Action Plan 2017-21 and Offaly Heritage Plan Key Actions 2017-21 and future editions in partnership with relevant stakeholders' subject to available resources.
- Maintain the conservation value and seek the sustainable management of the county's geological heritage resources.
- Continue to protect and conserve the landscape, natural heritage and geodiversity value of esker systems in the county.
- Support the provision of walking and cycling routes through the county's peatlands linking the River Shannon Blueway, Royal canal, Grand Canal and Barrow Blueway across the midlands as outlined in the 'Midlands Cycling Destination – Offaly', which is a priority of the 'Outdoor Recreation Plan for State Lands and Waters' (2017).
- Support collaboration between Offaly County Council, Coillte, the Bord na Móna Regional Transition Team and relevant stakeholders of a partnership approach to integrated peatland management for a Just Transition that incorporates the management, rehabilitation and restoration / re-wetting of significant tracts of peatlands; and in the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the county.
- Protect the recreational, educational and amenity potential of navigational and non-navigational waterways with the County, towpaths and adjacent wetlands.
- Continue to 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.
- Protect existing green infrastructure within the county and provide additional green infrastructure where possible. Further build on the existing green infrastructure network including the integrated network of greenways, blueways and peatways, infrastructure which directly underpins the creation of new recreation and tourism opportunities in the County.
- Support the aims and objectives of the All Ireland Pollinator Plan 2015-20.
- Continue to deliver and support measures for the prevention, control and/or eradication of invasive species within the county.

- Protect and enhance the county's landscape, by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the county's existing landscape.
- Continue to recognise the extractive industry as an important economic driver and a valuable source of employment for the county, while also balancing this support with policy and objectives that seek to protect landscape, heritage and other environmentally sensitive areas, including Natura 2000 designated sites.
- Ensure that any planning application which proposes to extract sand or gravel from beneath peatland will be assessed on a case-by-case basis, with any application to include an after-use proposal, and for assessment criteria to include the impacts of the extraction phase and after-use plan on biodiversity, landscape and natural heritage.
- Support collaboration between Offaly County Council, Geological Survey Ireland, Department of Communications, Climate Action and Environment, Bord na Móna Regional Transition Team and other relevant stakeholders to implement Government of Ireland's Climate Action Plan 2019 to encourage research into the potential for further renewable energy opportunities including geothermal energy resources on post-industrial peat lands as part of Just Transition for affected communities.

(iv) Economic Development

Submission Reference Numbers: CDP/PD: 01, 09, 15, 18, 20, 24, 26, 32, 35, 36, 37, 38, 41, 42, 46
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The following is a summary of the main issues raised in the submissions received in this subject area:

1. There is a lack of interest in promoting Edenderry and that there should be more investment by IDA in Edenderry. Utilise vacant property and land within Edenderry to attract IKEA / Amazon data centres considering the high unemployment rate.

CE Opinion: As required by the Regional Economic & Spatial Strategy (RSES), an evidence based approach will be employed in the designation of settlements in the county settlement hierarchy. It appears that Edenderry will be designated as a Self-Sustaining Town in the Draft Plan based on the RSES. The function of Self-Sustaining Towns is to support the regional driver role of the Key Town, and act as regionally important local drivers providing a range of functions for their resident population and their surrounding catchments including housing, employment, services, retail and leisure opportunities. These towns have experienced rapid population growth with high levels of commuter focused residential expansion without equivalent increases in jobs and services. They require consolidation and targeted ‘catch up’ investment in services, infrastructure, suitable transport options, amenities and local employment to become more self-sustaining. A Local Area Plan for Edenderry exists which states in policy ref EEP2 that *‘there is a positive presumption towards employment and enterprise opportunities and development in appropriately zoned locations in Edenderry to create sustainable jobs and a strong and diversified local economy’*. Also Objective EE04 states that it is an objective of the Council to *‘facilitate the development of employment generating enterprises within existing employment areas such as the town centre, the Edenderry Business Campus and vacant commercial premises’*. The Local Enterprise Office (LEO) has a lead role in implementing the economic dimension of the Offaly Local Economic and Community Plan 2016-2021 and delivering local and regional initiatives within the Midland Action Plan for Jobs.

2. Attention is drawn by EMRA to Regional Policy Objective RPO 7.9 of the RSES. This states that it is an objective to *‘support collaboration between local authorities, the Bord na Móna Transition Team and relevant stakeholders and the development of partnership approaches to integrated peatland management that incorporate any relevant policies and strategies such as Bord na Móna Biodiversity Plan 2016-2021 and the national Climate Mitigation and Adaptation Plans. This shall include support for the rehabilitation and / or re-wetting of suitable peatland habitats’*.

CE Opinion: It is proposed that reference will be made in the plan to Offaly County Council working in will collaboration with other local authorities, the Bord na Móna Transition Team and relevant stakeholders and the development of partnership approaches to integrated peatland management.

3. Chapter 6 of the RSES will be of assistance in developing policy relating to Economy & Employment. In particular reference is made by EMRA to section 6.4 (sectoral opportunities), section 6.4 (retail), Regional Policy Objectives RPOs 6.4-6.9, 6.19-6.20, and 4.84. These relate to:

- Provision of regeneration of rural towns and villages.
- Support local authorities to develop sustainable and economically efficient economies through initiatives to enhance sectors such as agricultural and food, forestry, fishing and aquaculture, energy and extractive industries, the bioeconomy, tourism, and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage.
- EMRA supports Regional Enterprise Plans to focus on:
 - o Advanced manufacturing
 - o Leverage opportunities in Big data and data analytics from iLOFAR
 - o Transition to a low carbon economy and renewable energy
 - o Develop a network of innovative co-working spaces in the Midlands to mitigate long commuting, promote remote working opportunities and life-style benefits.
- Link the River Shannon Blueway, the Royal and Grand Canal Greenways and the proposed Barrow Blueway.
- Develop the 'Midlands Cycling Destination – Offaly'
- 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. Support the longer term strategic planning for industrial peatland areas which may involve the putting in place of a Transition Team, preparation of a comprehensive after-use framework plan for the peatlands which addresses environmental, economic and social issues, including employment and replacement enterprise.

CE Opinion: The draft plan will include policy relating to economy & employment, regeneration, supporting the rural economy (e.g. tourism, renewable energy, agri-business, strategic after-use of industrial peatland areas), supporting advanced manufacturing, big data and data analytics, iLOFAR, transition to a low carbon economy and renewable energy, the development of innovative co-working spaces, promotion of remote working, linking of the various Greenways i.e. River Shannon Blueway, the Royal and Grand Canal Greenways and the proposed Barrow Blueway, and development of 'Midlands Cycling Destination – Offaly'.

4. The Eastern & Midland Regional Assembly (EMRA) state that the RSES recognises the contribution that rural places make towards regional and national development in economic, social and environmental terms. Reference is made to section 4.8, section 6.4 and Regional Policy Objective RPO 4.84 of the RSES. Section 4.8 relates to:
 - a. The Challenges Facing Rural Places (e.g. *'In general, those rural places in proximity to large urban centres have experienced significant growth and urban generated pressures and require levels of growth to be managed in order to ensure that there is a requisite service level for the existing population'*), and

- b. Planning for Future Growth of Rural Places [e.g. (i) 'Support for housing and population growth within rural towns and villages will help to act as a viable alternative to rural one-off housing, contributing to the principles of compact growth', (ii) 'The NPF and RSES make a distinction between areas under urban influence i.e. within the commuter catchment of cities and large towns and centres of employment, and rural areas outside these catchments', (iii) 'The NPF identified the need to strengthen and diversify rural towns to be a focus for local housing and employment growth', (iv) 'The countryside within the region provides for rural economies and rural communities, based on agriculture, forestry, tourism and rural enterprise. This should be facilities while avoiding overspill development from urban areas and urban generated housing'].

Section 6.4 relates to the role of the various settlement typologies e.g. key town. RPO 4.84 refers to the support of 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. Support the longer term strategic planning for industrial peatland areas which may involve the putting in place of a Transition Team, preparation of a comprehensive after-use framework plan for the peatlands which addresses environmental, economic and social issues, including employment and replacement enterprise.

CE Opinion: The plan will recognise the contribution that rural places make economically, socially and environmentally. This will be dispersed through many chapters of the plan.

5. Laois County Council welcomes the opportunity to work with Offaly County Council on further joint rural development initiatives and suggests an objective to support this be included in the Development Plan.

CE Opinion: Offaly County Council acknowledges that cross-county collaboration with Laois County Council can be mutually beneficial to both counties and the wider Midlands region. Offaly County Council welcomes the opportunity to work with Laois County Council and other stakeholders on rural development initiatives and this will be provided for in the Draft Plan.

6. Connectivity with broadband and third level education need to be priority objectives of the plan. The initiation of a task force strategy mobilising the resources of other agencies and the Offaly Diaspora needs to be pursued. A linkage between the Midland School of Nursing, University of Limerick, and The Midland Regional Hospital at Tullamore already exists. Trinity College Dublin is leading the development of the ILOFAR project in Birr with the provision of a post-graduate research centre there. Many universities currently use midland sites for research purposes. This activity could lead to the foundation of a University in Tullamore.

CE Opinion: Regional Policy Objective RPO 4.70 of the RSES will be reflected in the Draft Plan which states '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.' A policy will also be included in the Draft Plan to support and facilitate the delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment education, innovation and skills development, in accordance with National Policy Objective NPO 24 of the NPF and Regional Policy Objective RPO 8.25 of the RSES.

7. Since the 1940's the County has been sustained by Bord na Móna and the threatened demise of this activity needs an urgent response. The County has significant resources including its people and a large amount of state and semi-state land. The Council needs to lead the preparation of a strategy for the future regeneration of the County.

CE Opinion: In accordance with Regional Policy Objective RPO 4.84 of the RSES, the Draft Plan will support the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the county, which addresses environmental, economic and social issues, including employment and replacement enterprise reflecting the current transition from employment based around peat extraction.

8. The people of Offaly and the region are entitled to the benefit of the once in several generations opportunity to implement the long term plan for the cutaway bogs which was agreed with the European Commission in 1994. The Operational Programme for Economic Infrastructure 1994-1999 (Updated 26 March 2003) is included as part of the submission and the submission directs the Council to Appendix 8 which deals specifically with the 26,000 hectares which was secured by the Commission for the benefit of the public when they paid €26 million.

CE Opinion: It is noted that the memorandum submitted states in relation to Cutaway Bogs that the Minister will impose a condition on Bord Na Móna to implement a development plan for the bogs supplying the new station after the peat is extracted, dividing areas between coniferous forestry, deciduous forestry, grassland and wetlands. Whilst the Memorandum originates from 2003, the principles regarding the significance of the appropriate transition of the peatlands in the Midlands area are acknowledged and accepted. The Draft Plan will support future collaboration between Offaly County Council, Coillte, the Bord na Móna 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 regards to the economic development of the peatlands post transition, the Draft Plan will, subject to ecological impact assessment and appropriate assessment screening, actively encourage the redevelopment of sites with antecedent uses or disused sites which were formerly ESB plants and Bord na Móna works for enterprise and employment creation.

9. With regard to the peatlands of West Offaly, the council is encouraged to implement policies of landscape protection and enhancement in this transition while facilitating job creation and energy initiatives.

CE Opinion: As detailed in Point 7 above, the Draft Plan will support the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the county, which addresses environmental, economic and social issues, including employment and replacement enterprise reflecting the current transition from employment based around peat extraction.

10. The edges of Bord na Móna's ceased peatlands should be used for a model of environmental management by private citizens, and allow turf cutting for domestic consumption on SAC's provided it does not threaten the integrity of the sites.

CE Opinion: As detailed in Point 7 and 8 above, the Draft Plan will the support the preparation of a comprehensive after use framework plan for the industrial peatlands and 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.

11. There is a requirement to move away from production of export commodities such as dairy and beef and a return to small scale mixed farming with a greater focus on organic, agro-ecological vegetable, fruit and grain (as well as dairy and meat) production. This transition will require new entrants to farming with suitable training that can avail of land trusts, share-farming and co-operative farming.

CE Opinion: Issues relating to agricultural products as referred to in the submission are outside the scope of the County Development Plan as they do not have a spatial or land use planning dimension and would be more appropriately addressed by other plans and programmes of Government Departments or of other Public Bodies. Notwithstanding this, the Council is positive towards agriculture including agricultural diversification.

12. Growing demand for local products and services and associated development of enterprise units, markets, community kitchens, food hubs, community event spaces in addition to eco-tourism and development of the greenways will increase employment in local areas.

CE Opinion: An Economic Development Chapter will be included in the draft Plan which will encourage expansion and employment in industries such as agriculture, horticulture, forestry, food, crafts, agri-business, rural tourism and renewable energy, it will also support food and beverage enterprises with the Origin Green accreditation in view of their sustainable food production, and it will also support co-operating with statutory, local development, sectoral and community / voluntary agencies and groups to develop economic benefits for the rural community and its service base.

13. Policies and objectives in the draft Plan relevant to electricity grid development should be informed by national plans, including the NPF and RSES, and also informed by various Government (and State Agency) policy documents, namely:

- Department of Communications, Energy and Natural Resources (2015) White Paper on Energy: Ireland's Transition to a Low Carbon Energy Future 2015-2030;
- Department of Communications, Energy and Natural Resources (2019) Climate Action Plan;
- EirGrid's (2017) Grid Development Strategy – Your Grid, Your Tomorrow;
- EirGrid's (2017) Tomorrow's Energy Scenarios 2017: Planning our Energy Future.

CE Opinion: In accordance with Section 12(18) of the Planning and Development Act 2000 (as amended), in preparing the development plan, it is a statutory obligation of the Council to ensure that the development plan is consistent with national and regional development objectives specified in the National Planning Framework and the Regional Spatial and Economic Strategy and also the specific planning policy requirements specified in guidelines published pursuant to Section 28 of the Planning and Development Act 2000 (as amended). Section 28 guidelines relevant to energy supply include the Department of Housing, Planning, Community and Local Government's (2017) *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change*, which requires Council to have regard to various

national plans, policies and strategies when making a development plan that relate to renewable energy, including the Department of Communications, Energy and Natural Resources (2015) *White Paper on Energy: Ireland's Transition to a Low Carbon Energy Future 2015-2030*. The draft plan will include a specific 'Climate Action and Energy' chapter which will contain robust policies and objectives to support the energy industry and grid development in the context of sustaining social and economic development in the County and which will be consistent with the NPF and RSES. It is noted that the existing County Development Plan already takes a positive stance towards renewable energy.

14. Policies and objectives which support a safe, secure and reliable supply of electricity need to be explicit in the draft Plan in order to assist EirGrid in the successful implementation of the Eirgrid's *Grid Development Strategy - Your Grid, Your Tomorrow (2017)*, this being imperative to meeting national targets for electricity generation, climate change targets and security of energy supplies.

CE Opinion: The draft Plan will contain specific policy to support a safe, secure and reliable supply of electricity throughout the county, subject to normal planning and environmental considerations, in order to assist EirGrid in the successful implementation of its strategic goals and objectives, including those contained in its *Ireland's Grid Development Strategy - Your Grid, Your Tomorrow (2017)*.

15. The draft Plan should facilitate the development of grid reinforcements including grid connections and a transboundary network into and through the county and between all adjacent counties and to support the development of international connections.

CE Opinion: Development of grid reinforcements including grid connections, both nationally and internationally, are specifically referred to under Regional Policy Objective RPO 10.22 of the RSES. The 'Climate Action and Energy' chapter in the draft Plan will contain suitable policy and objectives in this regard.

16. Policy should be included which:
- places priority in determining planning applications to economic-related development and those within Tullamore.
 - recognises the economic, market and viability issues associated with delays to determination and the Council's lack of understanding of viability issues.
 - places job creation as the major priority and main consideration when determining applications for employment-related applications.

CE Opinion: The draft Plan will include an Economic Development chapter, which will contain policies and objectives to support economic development and employment growth in the county. It will be a priority of Council to strengthen and channel development into Tullamore, being the primary driver for economic development within the county, designated as a Key Town in the RSES. In terms of decision making, the draft plan will comprise a chapter setting out development management standards, to be read in conjunction with the policies and objectives across the whole of the draft plan, including the chapter on economic development. 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). Planning decisions are made having regard to social and economic considerations as well as economic.

17. Protect Offaly's bogs whilst also promoting a just transition for those employed in peat extraction.

CE Opinion: The plan will support the longer-term strategic planning for industrial peatland areas including 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.

18. Support the development of transmission infrastructure and the associated economic benefits, however potential impacts on the environment must be considered.

CE Opinion: Electricity transmission will form part of the Climate Action & Energy Chapter.

19. The Council should support reuse and re-purposing of workshops and production facilities for new sustainable industries.

CE Opinion: The Council recognises the potential for the reuse and repurposing of existing Bord na Móna buildings and sites across the county following the ending of industrial peat extraction. In accordance with Regional Policy Objective RPO 4.84 of the RSES, the draft Plan will support the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the county, which addresses environmental, economic and social issues, including employment and replacement enterprise reflecting the current transition from employment based around peat extraction.

20. The Council should recognise the potential of post-industrial uses for Bord na Móna land in terms in terms of strengthening local communities by way of employment and also by way of community benefit schemes including the Renewable Electricity Support Scheme (RESS).

CE Opinion: The Council acknowledges the role of community benefit schemes in strengthening local communities and seeks to ensure that whenever possible community benefits are derived from all renewable energy development in the county. However, application of schemes such as the Renewable Electricity Support Scheme (RESS) are outside the scope of the County Development Plan as they do not have a spatial or land use planning dimension.

21. Promote and develop links to third level institutions; supporting campus outreach, innovation, lifelong learning, and employment creation (link to heritage, Bord na Móna pilot projects, deep-retrofit skills, re-wetting of boglands, etc.).

CE Opinion: The draft plan will include policies and objectives in relation to Education Facilities, including a policy to liaise with and to facilitate the Department of Education and Skills in the provision of education facilities, as appropriate. The draft plan will include policies to encourage and establish links between County Offaly and National University of Ireland Maynooth, (NUIM) and Athlone Institute of Technology (AIT) and other higher level colleges as appropriate, which will improve the skills base/education of inhabitants within County Offaly. The plan will also support the examination of a need for complementary third level outreach 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.

22. A statement is needed to ensure land/campus availability (that will support activities such as brewing and distilling).

CE Opinion: One of the key principles of growth in the Draft Plan will be to promote economic development and enterprise activity. Zoned land for the towns and villages will be in a manner to accommodate industry, business, mixed use etc. commensurate with the settlements size and position on the County Settlement Hierarchy.

23. The effect of the winding up of Bord na Móna and ESB Plants in Offaly will have a catastrophic effect on the level of rates income to Offaly.

CE Opinion: The challenges of *Post Peat Offaly* will be recognised within the draft plan. The Council will support the redeployment of Bord na Móna staff in alternative employment. The issue of rates specifically, is outside the remit of the plan.

24. Tullamore Chamber has previously called on Offaly County Council to develop a 100-acre business park facility, and will continue to do so. The IDA business and technology park at Srah is almost full. Serviced sites and advance facilities need to be made available. Offaly County Council should also target major investments such as centralised distribution centres or data centres.

CE Opinion: All town plans including Tullamore contain Land Use Zoning objectives for Industrial development and Offaly County Council will continue to work with relevant stakeholders such as IDA and Enterprise Ireland and the SME sector to assist with employment creation and business expansion, on appropriately zoned and serviceable sites. The Council will be proactive in facilitating the provision of strategic employment sites throughout the settlement hierarchy, commensurate with the settlements size and position on the County's Settlement Hierarchy.

25. Upgrade of Tullamore Hospital as a University Hospital and designated Trauma centre.

CE Opinion: Regional Policy Objective RPO 4.70 of the RSES will be reflected in the Draft Plan which states *'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.'*

CE Policy Recommendation:

Offaly County Council, within its capacity, will positively contribute towards the promotion of the maintenance and growth of employment across every sector in County Offaly that is sustainable, competitive, inclusive and resilient, so that the people of Offaly will have access to a range of quality employment opportunities enabling them to live and work in the county, if they so choose.

In order to achieve this, it is recommended that policies be included to:

- Co-operate with local, regional and national enterprise authorities, most notably the IDA and Enterprise Ireland, in the attraction of investment into the county, including both overseas investment and local investment and the provision of employment / enterprise within Offaly.

- 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 & Economic Strategy (RSES).
- Support remote working opportunities from home, and an innovative designated hub/ co-working spaces, in the interests of mitigating long commuting times.
- Actively encourage, facilitate and provide for the location and development of knowledge-intensive and technology based specialisation companies within the county, as appropriate, in accordance with development / environmental standards.
- Actively encourage the redevelopment of sites with antecedent uses or disused sites which were formerly ESB plants and Bord na Móna works for enterprise and employment creation.
- Encourage the provision of incubator units at a scale appropriate to their location, in accordance with the county's settlement hierarchy and to ensure that an appropriate programme of support is in place across the county that will both provide education and networking opportunities for new businesses.
- Encourage the building of a resilient economic base by means of supporting investment in exporting, innovation, productivity, competitiveness, developing and enhancing accessibility & connectivity, development of talent / skills, and the creation of attractive places and suitable infrastructure.
- Encourage foreign direct investment through greater levels of enterprise collaboration, clustering, and global connectivity.
- Support digital technologies in the interests of efficiency and competitiveness such as robotics, artificial intelligence, the Internet of Things, digital fabrication, augmented / virtual reality, blockchain, and autonomous mobility.
- Support job creation particular quality green jobs which are sustainable over the longer-term and 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.
- Encourage collaboration in science, technology and innovation with a view to increasing Offaly's innovation capacity. This can be supported by the Disruptive Technologies Innovation Fund under the NPF.
- Encourage and establish links between County Offaly and National University of Maynooth (NUIM) and Athlone Institute of Technology (AIT) and other higher level colleges as appropriate, which will improve the skills base/education of inhabitants within County Offaly. In addition, I recommend supporting the examination of a need for complementary third level outreach 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.

- Support the design, development and roll-out of social enterprise practices, with a strong emphasis on collaboration. [Note: As detailed in the National Social Enterprise Policy for Ireland 2019-2022, a Social Enterprise is an enterprise whose objective is to achieve a social, societal or environmental impact, rather than maximising profit for its owners or shareholders. It pursues its objectives by trading on an ongoing basis through the provision of goods and/or services, and by reinvesting surpluses into achieving social objectives].
- Support and promote the development of economic and enterprise development and activity in a manner which contributes to the transition to a low carbon, climate resilient and environmentally sustainable county.
- Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, horticulture, waste management, rural tourism, energy suppliers, agri-business, crafts, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism and recognising that environmental sustainability and economic sustainability are equal and complementary.
- Facilitate and encourage the reuse of redundant farm buildings of vernacular importance for appropriate agri-tourism enterprises.
- Support the development of the peatlands within the county for appropriate alternative uses and support the longer term strategic planning for industrial peatland areas, including the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the county, which addresses environmental, economic and social issues, including employment and replacement enterprise reflecting the current transition from employment based around peat extraction.
- Support food and beverage enterprises with the Origin Green accreditation in view of their sustainable food production.
- 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.
- Facilitate and work pro-actively with other interest groups (both public and private sector) in the location of industry, business and enterprise in particular by zoning of lands within an adequate range of locations for enterprise development and activity which can facilitate the provision of large-scale and small-scale development, as appropriate. This includes the identification and possible reservation of lands at suitable locations which will accommodate, where appropriate – business / commercial activity, industry, enterprise, retail etc. having regard to proper planning and sustainable development. The Council will protect zoned lands from inappropriate development that would undermine future economic activity or the unsustainable development of such areas.
- Prioritise, facilitate and promote the development of targeted ‘catch-up’ investment in infrastructure, services and local employment in Self-Sustaining towns in order to for these towns to become more self-sustaining. These towns have experienced rapid population growth with

high levels of commuter focused residential expansion without equivalent increase in jobs and services.

- Support the development, reinforcement and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required to provide for the future physical and economic development of Offaly.
- The draft plan will recognise the strategic objectives provided in the Midlands Regional Enterprise Plan 2019-2020, namely:
 - Ensure that the Midlands is well positioned to address the challenges posed by the transition to a low carbon economy and renewable energy
 - Leverage opportunities in big data and data analytics from iLofar
 - Position and support the Midlands as an advanced manufacturing centre of excellence
 - Enhance the collective offering of the Midlands as a place to live, work and invest in
 - Strengthen the attractiveness of the Midlands as destination to visit
 - Harness the potential of the food and beverage industry in the Midlands
 - Ensure the availability of skills and talent to realise the region's economic potential and address upskilling requirements

(v) Tourism & Recreational Development

Submission Reference Numbers: CDP/PD: 04, 15, 18, 24, 28, 36, 38, 41, 42, 43, 45, 46

The following is a summary of the main issues raised in the submissions received in this subject area:

1. Suggests that Offaly County Council continue to include objectives supporting the principle of promoting the Slieve Bloom Mountains, Derrycastle Lakes and Trails, and further upgrading of the amenities (e.g. walks, etc.), and linkages with other key tourism assets within the County.

CE Opinion: Offaly County Council has a robust Tourism Strategy and a dedicated tourist office in the heart of Tullamore, which focuses on the Big 6; and developing linkages between them and supporting Infrastructure. The Big 6 are as follows:

- Clonmacnoise,
- Birr Castle, Gardens and Science Centre
- Tullamore DEW Visitor Centre
- Lough Boora Discovery Park
- Slieve Bloom Mountains
- River Shannon

The Council acknowledges the value of natural amenities such as the Slieve Bloom Mountains and the Derrycastle Lakes and Trails as a resource for the county and will seek to encourage the further promotion of such areas in order to maximise their role within the tourism economy of Offaly. A policy will be included in the Draft Plan to further investigate the potential of and opportunities for the development of existing and new trails in County Offaly and for the development of linkages between these trails and key tourism assets both within Offaly and adjoining counties.

2. Support the continued development of the cross boundary Slieve Bloom Mountain Biking Trail being carried out in conjunction with Coillte, subject to proper planning and development and compliance with SAC/SPA conservation objectives.

CE Opinion: Offaly County Council recognises the potential value of the Slieve Bloom Mountain Biking Trail to the tourist economy in Offaly and the Draft Plan will continue to promote and facilitate the further development of this trail.

3. Monastic and bog sites can be presented as elements of heritage and tourist trails. The Tullamore Dew Visitor Centre and Kilbeggan Distillery can be linked into a national whiskey trail. Ancient routes like the Sli Mor should be developed as an alternative route to the M4/M6. Sites like Durrow Abbey, Daingean, Croghan, Seir Kieran, Lemonaghan, Birr and Banagher need to be developed and made accessible. Key sites such as Durrow, Daingean and Croghan Hill need development as a priority to demonstrate what is achievable. Cycling and walking routes need

investment and promotion. Continued investment in the Grand Canal, Slieve Blooms, Shannon Corridor and Bogland Sites and connections between these sites.

CE Opinion: The Council recognises that Offaly has a rich natural, built and cultural heritage which plays an important role in tourism development in the County. Policies and objectives will be included in the Draft Plan to promote Birr and Tullamore as tourism hubs; to explore the potential of Tullamore becoming a destination for whiskey tourism and part of a national 'Whiskey Trail'; to recognise some towns and villages in the County as important attractions in their own right; to promote the Slieve Blooms and the Durrow Abbey and Monastic Site; to support enhanced access to waterways, monuments and historic properties; and 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 the county. This includes the full development of the Grand Canal Greenway and linkage to and integration with the River Shannon Blueway, Royal Canal Greenway, the Barrow Blueway, the Slieve Bloom Mountains, Lough Boora Discovery Park and other routes / trails.

4. The connectivity of Ferbane to the proposed Grand Canal Greenway is highlighted as important and should be supported by tourism initiatives in the area.

CE Opinion: Ferbane's links with the Grand Canal Greenway and the general transition of the peatlands in West Offaly are considered important issues and will be brought forward into the Draft Plan.

5. Offaly's high concentrations of early Christian sites should be developed for tourism and linked to a tourist trail to other early Christian sites and other heritage attractions in the county. Offaly needs to capitalise on its tourist potential by promoting attractions that offer visitors a different experience from other counties, such as built heritage, natural heritage and eco-tourism.

CE Opinion: The Draft Plan will recognise and encourage the sensitive development of the many tourist attractions in Co. Offaly; our natural sites which provide active/adventure tourism such as Slieve Bloom Mountains, the Grand Canal Greenway, trails, lakes, our many bogs, our monastic sites such as Clonmacnoise and Durrow, the built heritage and industrial heritage in our towns and villages, our castles such as Birr Castle and Charleville Castle. The council acknowledges the nomination by the Government of Ireland, of two Monastic sites, Clonmacnoise in its own right and Durrow, as a suite of potential sites, on the tentative list for inclusion to the UNESCO World Heritage sites list.

6. The draft plan should promote tourism-facilitated development, including retail, which extends the reasons for tourists to visit the County's existing cultural heritage and natural landscape assets.

CE Opinion: The draft Plan will include a Tourism & Recreational Development Chapter which will include policies / objectives to improve / provide visitor facilities / infrastructure at appropriate locations in order to expand the visitor experience provided to serve tourist attractions within the county.

7. Offaly is well placed as a key part of both the Ireland's Hidden Heartlands and the Ireland's Ancient East brands to optimise the potential for tourism within Co. Offaly. The areas west of the N62 are

part of Ireland's Hidden Heartlands brand, and the east of the N62 is part of Ireland's Ancient East.

CE Opinion: It will be recognised in the plan that Offaly sits within both the Ireland's Hidden Heartlands and the Ireland's Ancient East brands.

8. A dedicated Tourism Chapter in the plan is sought which would include tourism policies, mapped tourism features, identify tourism activities / attractions, transport links (e.g. Greenways), principal towns be identified (e.g. Destination Towns), sensitive environments, tourism potential, use of tourism brand logos, provision of supporting infrastructure, views, acknowledgement of the economic potential of increased visitor revenue, provide information & interpretation.

CE Opinion: A Tourism & Recreational Development Chapter will exist in the plan. Recognition of the economic effect of tourism will feature in the Economic Development Chapter.

9. After use of peatlands should provide for recreation, access to nature and the use of peatways in forming a connected network of green infrastructure for leisure purposes.

CE Opinion: The Draft Plan will support the longer-term strategic planning for post-industrial peatland areas, which may include for a Transition Team to be put in place to prepare a comprehensive after-use framework plan for the peatlands and associated workshops, office buildings and other infrastructure.

10. Tourism is a key to rural development.

CE Opinion: Rural development will feature in the plan particularly in the tourism Chapter and Economic Chapter.

11. The cruising industry is important for tourism in Offaly, and so the facilitation of navigation infrastructure is required.

CE Opinion: The current County Development Plan acknowledges the importance of our waterways (the River Shannon and the Grand Canal) for a range of water based activities including boating, cruising, canoeing and angling. The draft plan will continue to recognise boating and cruising as important touristic activities.

12. Towns that should act as a hub/ base for tourism in Offaly are Tullamore, Birr and Kinnitty. Provision should be made for the expansion in accommodation and facilities within these towns along with supporting infrastructure including transport links, public realm works.

CE Opinion: The draft plan will continue to support the tourism roles of Tullamore and Birr and other towns and villages of the county, as appropriate.

13. There is a need for an integrated management approach to the Shannon Callows.

CE Opinion: Offaly County Council will work with the relevant stakeholders, landowners, Waterways Ireland and NPWS and other government agencies to achieve an integrated management approach to the Shannon Callows which may be provided for within Waterway Irelands Shannon Masterplan.

14. A leaflet titled 'Developing Tourism in Offaly' was submitted (which was meant to form part of an earlier Fáilte Ireland submission Ref CDP PD41) and which includes detail on the Outdoor Recreation Infrastructure Fund, Rural Regeneration & Development Fund, festival supports, the making of an '*Offaly Great Houses & Gardens Experience Development Programme*' as part of Ireland's Ancient East '*Tales of Two World's Visitor Experience Development Plan*', the making of Ireland's Hidden Heartland's '*Tourism Masterplan for the Shannon River*', the making the '*Beara Breifne Way Tourism Activation Plan*', '*Web Improvement Programme*' fund for Ireland's Hidden Heartlands, and '*Destination Towns*' funding.

CE Opinion: The plan will include a Tourism & Recreational Development Chapter which will include policies / objectives relating to Ireland's Ancient East and Ireland's Hidden Heartlands; two of Fáilte Ireland's regional tourism brands and relevant tourism plans. The Council has and will continue to make applications to Fáilte Ireland and other government departments.

15. The plan should take account of the strategic tourism location of Offaly for inland navigation linked to other waterways outside the county.

CE Opinion: The draft plan will continue to recognise the strategic location and tourism benefit and further potential of Offaly's inland waterways. The current County Development Plan 2014-2020, Section 2.11.2 identifies the importance of our Waterways, in the context of tourism related activity.

16. While some boating traffic is benefitting the west of the county in Banagher, Shannon Harbour and Shannon Bridge, the plan should identify several key stopping points for boats in specific towns and villages for access to wider tourism services and local economic gain. Recognise key harbours in Tullamore and Edenderry as drivers of boating tourism and develop policies & practices to encourage this.

CE Opinion: The plan will continue to recognise the role towns along the Grand Canal play as a service provider to Canal users. The current County Development Plan 2014-2020, Section 2.11.2 identifies the importance of our Waterways, in the context of tourism related activity and makes reference to Shannon Harbour, Tullamore, Daingean and Edenderry along the Grand Canal. The Edenderry LAP 2017-2023 Section G4.4.4, addresses the Recreational Potential of the Grand Canal. The future Tullamore Local Area Plan will address the Grand Canal and harbour facilities with specific relevance to Tullamore. In terms of the Grand Canal Greenway, it is proposed to engage with communities along the route as the cycle track is developed. The town and village plans will also identify opportunities.

17. Develop a strategic boating tourism plan for the Grand Canal in Offaly.

CE Opinion: Offaly County Council will work with the relevant stakeholders, landowners, Waterways Ireland and Fáilte Ireland, as resources allow to develop a strategic boating tourism plan for the Grand Canal in Offaly.

18. Ensure the integrity of the actual Grand Canal navigation and its supports are kept in place during planning and council operational works.

CE Opinion: The council will work in conjunction with Waterways Ireland and any other relevant stakeholders in future development proposals concerning the Grand Canal and with environmental sensitivity.

19. Develop multi-use services such as shower and WC service blocks in Tullamore and Edenderry for use by boaters.

CE Opinion: The plan will support the provision of infrastructure to facilitate users of waterways in the county subject to environmental assessment.

20. A policy should be included that the Grand Canal waterway navigation should be maintained instead of becoming a habitat for fast growing weed species.

CE Opinion: Responsibility for the maintenance of the Grand Canal is that of Waterways Ireland.

21. Include re-watering and re-opening of the Ballycommon-Kilbeggan line of the Grand Canal as an objective in the plan.

CE Opinion: Any future decision to re-water the Ballycommon – Kilbeggan line of the Grand Canal would be a function of Waterways Ireland, however the current Co. Development Plan 2014-2020 contains an objective to work with the relevant stakeholders to examine the feasibility of developing the Kilbeggan to Ballycommon link of the Grand Canal, as a potential cycle and/or walking route and a navigational route. The future draft plan will also include a similar objective.

22. The plan should identify appropriate mooring points in towns consider facilitating live-aboard communities.

CE Opinion: The identification of mooring points is not a function of the plan but rather the responsibility of Waterways Ireland.

23. The Council should support further development and accessibility / connectivity of Lough Boora Discovery Park and support opportunities to enhance the visitor experience at the park to ensure the retention and promotion of the expansion of visitor numbers; and to support initiatives to improve connectivity with neighbouring communities and facilities through the development and extension of greenways and other infrastructure.

CE Opinion: The draft Plan will support the development of further educational, amenity and associated facilities at Lough Boora Discovery Park and the development of further strategic linkages with the local and regional green infrastructure network to ensure that the potential of the centre is maximised in terms of tourist numbers, facilities and local / regional connectivity. In accordance with RSES Regional Policy Objective RPO 7.18, Council will also support the consideration of designating a National Park for the peatlands area in the Midlands, a designation which would act as a key asset for heritage and nature based tourism.

24. The Council should support the further development of greenways, blueways and peatways.

CE Opinion: NPF National Policy Objective 22 seeks to facilitate a *National Greenways, Blueways and Peatways Strategy*, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level, and building on this RSES Regional Policy Objective RPO 7.24 seeks to promote the development of a sustainable *Strategic Greenway Network* of

national and regional routes, with a number of high capacity flagship routes that can be extended and /or linked with local greenways and other cycling and walking infrastructure. The draft Plan will contain policies and objectives to support the development of the greenways, blueways and peatways network across the county.

25. Requests the following objective *‘that Offaly County Council collaborate with Westmeath and Laois County Councils to investigate the feasibility of providing a tourism cycling route linking the Old Rail Trail to the Slieve Bloom BMX Loop via Tullamore’.*

CE Opinion: Offaly County Council is currently working with Westmeath County Council and Waterways Ireland to develop a cycling/walking connection between The Old Rail Trail and the Grand Canal Greenway via Kilbeggan and Ballycommon with construction on the initial phase of this to commence in November 2019. In 2016, *‘A Feasibility Study on the Development of a Major Cycling Destination in the Midlands of Ireland’* in partnership with Offaly County Council, Bord na Móna and Coillte was concluded. This identified extensive cycling and walking objectives for County Offaly with prioritisation and phasing outlined. Within this feasibility study a connection from Kilbeggan to Slieve Blooms via Tullamore and Lough Boora is outlined and it is expected that this will be substantially completed in the next 3-5years. The submission proposes a more direct tourism cycling route from Kilbeggan to Tullamore via Durrow and onto the Slieve Bloom Mountains via Clonaslee or Kilcormac. This route maybe identified in future feasibility studies.

26. Promote the development of Tullamore as a heritage hub (linking to ancient east/hidden heartlands, and promote the development of amenities and visitor experiences for biodiversity, brewing and distilling.

CE Opinion: In relation to tourism promotion the Tourism Chapter 6, of the draft plan will reference both the Irelands Hidden Heartlands Brand and Irelands Ancient East brand. The Council’s tourism website VisitOffaly.ie has both of the Fáilte Ireland brands stitched in to it.

27. Tullamore town needs a high quality monument or artistic installation to serve as the unique Instagram shot or selfie moment.

CE Opinion: The suggestion of a monument / artistic installation in Tullamore will be forwarded to the tourism section of the Council.

CE Policy Recommendation:

The Council recognises its role in ensuring a coordinated approach to tourism development and, by providing amenities and maintaining the quality of our built and natural environment throughout the county, will seek to both enhance the quality of life for those living here and the experience for visitors.

In this regard, it is recommended that policies be included to:

- Facilitate Fáilte Ireland initiatives for the development of tourism experiences in the county and deliver on the Ireland’s Ancient East and Ireland’s Hidden Heartland’s brand promises, within the context of land use management and infrastructural provision.
- Promote and foster a growing sense of innovation and entrepreneurial activity in the tourism sector throughout County Offaly.

- Continue to support and encourage increased co-ordination, cohesion and linkages between agencies involved in tourism development e.g. Fáilte Ireland, Waterways Ireland, Bord na Móna, Coillte, National Parks and Wildlife Service and Offaly County Council.
- Encourage clustering of products to increase linkages within and reduce leakage from the local economy e.g. linkages between providers of accommodation and local farmers /niche food producers, across County Offaly and the wider region.
- Protect natural resources on which tourism is based through the enforcement of policies and relevant legislation in relation to protection of resources, architectural conservation areas, peatlands, water quality, species and populations of conservation concern and biodiversity, rural housing and holiday home development.
- Liaise with strategic partners such as Bord na Móna, The 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.
- Promote and facilitate conferencing facilities in the county and in particular recognise Tullamore's role as a conferencing and event hub, given its location, accessibility and experience.
- Promote the Monastic Sites of Offaly in conjunction with Fáilte Ireland, OPW and relevant stakeholders.
- 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 Co. Offaly and outside Co. Offaly, in an environmentally sustainable manner, and in collaboration with land owners, local communities, state agencies, other local authorities, and other key stake holders and interested bodies. This includes the full development of the Grand Canal Greenway and linkage to and integration with the River Shannon Blueway, Royal Canal Greenway, the Barrow Blueway, the Slieve Bloom Mountains, Lough Boora Discovery Park and other routes / trails. Continue to implement 'Connecting People Connecting Places Walking and Cycling Strategy for Offaly'.
- Promote and facilitate the role of arts and culture in recognition of its importance to people's identity and the potential for economic development through a unique cultural tourism offering.
- Promote and facilitate the further development of the Slieve Bloom mountain bike trail in addition to links to / from other attractions.
- Support the provision of public Wi-Fi in proximity to tourist attractions, in Co. Offaly.
- Support in conjunction with relevant landowners and recreational / tourism agencies, the maintenance of, and enhanced access to 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.
- Support Birr's role as a tourism hub and its development as a Tourism Destination Town having particular regard to its built heritage including Birr Castle, Gardens and Science Centre,

accessibility & 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.

- 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 & proximity to key tourism destinations including natural amenities, and recreational opportunities including the Grand Canal & adjoining greenway, Lough Boora Discovery Park, Slieve Bloom Mountains, Durrow Monastic Site and Clara Bog Visitor Centre.
- The plan will include a section on public rights of way as is requested by planning legislation.
- Promote the development of the Derryounce Experience Lakes and Trails, its linkages to the Peoples Park in Portarlinton and wider linkage's to the Mount Lucas, Grand Canal Greenway and the Barrow Blueway.
- Promote the continued development of Lough Boora Discovery Park as a tourist and ecological amenity and its linkages with the Grand Canal Greenway and surrounding towns and villages, subject to proper planning, environmental protection and sustainable development.
- Promote tourism infrastructure development related to sport, recreation and information including boating, cruising angling, walking and pony trekking routes, golf courses, adventure centres, and interpretive centres etc. subject to proper planning, environmental protection and sustainable development.
- Promote the touristic development potential of 'after use' quarries and peatlands, subject to appropriate reinstatement for their recreational amenity value and potential for habitat, nesting sites, subject to proper planning, environmental protection and sustainable development.
- Continue to recognise the role towns and villages play in tourism.

(vi) Retail & Town Centre, and Regeneration

Submission Reference Numbers: CDP/PD: 02, 13, 17, 18, 29, 36, 37, 38, 41, 42

The following is a summary of the main issues raised in the submissions received in this subject area:

1. The identification of Grand Canal Harbour in Tullamore as an Opportunity Site for renewal is sought.

CE Opinion: As part of enhancing Offaly's settlements, and in a similar vein to the current development plan, a number of Opportunity Sites are proposed to be identified for regeneration purposes, one being Grand Canal Harbour in Tullamore. It is considered that their appropriate redevelopment would provide significant improvements in the overall local environment and prompt local economic growth. It is considered that their redevelopment would contribute greatly to the renewal, enhancement and regeneration of the settlements in which they are located.

2. Tullamore has a number of key sites ripe for re-development. The towns of Birr, Clara, Portarlinton, and Edenderry need investment. Smaller settlements like Banagher, Daingean, Ferbane, Kinnitty, Kilcormac and Shannonbridge are significant service and education centres.

CE Opinion: It is acknowledged that Tullamore has a number of key re-development sites which will be identified as 'Opportunity Sites' in the Draft Plan. Town plans and village plans will be prepared for the towns and villages in the County to include Opportunity Sites where appropriate, and will form part of the Draft Plan to guide growth and encourage investment in these settlements.

3. The Council should recognise that regeneration or development of the urban environment is a creative act that requires artistic imagination to be interwoven into the County vision.

CE Opinion: The Council recognises that Arts and Culture is a vibrant element of social life in Offaly and provides positives across a wide range of areas from tourism to cultural development. Offaly County Council has adopted and published a Culture and Creative Strategy 2018-2022, which brings coherence and promotes collaboration between the individual culture based strategies; namely the Offaly Heritage Plan, the Offaly Arts Plan and the Offaly Libraries Plan, all of which relate to the Offaly Local Economic and Community Development Plan, 2016-2021. Policies and objectives will be included in the draft Plan which will seek to assist and facilitate in the improvement of existing social, community and cultural facilities, as appropriate, within the county, including implementation of the Council's Arts Strategy 2018-2022 and the Offaly Culture and Creative Strategy 2018-2021.

4. Anam Beo would like to consult with the council regarding how our urban environment can be designed in terms of look and quality of experience, and can help inform the shape of the provision of facilities to enrich the quality of life and experience for all who live and visit there.

The Council should continue with the conscious design of public spaces and seating facilities that will enhance the environment, making it attractive and practical so that the needs of older people and others are met.

Spaces should be capable of being adapted for usage and fundamental freedoms, to ensure and enable inclusion and means of expression to all members of the community.

The Council needs to bring cultural literacy, critical and shared thinking into the development of the public realm, the learning and creative hubs, through cultural master planning, management of artists' commissioning, exhibitions and events with other activities which add value and distinctiveness to the area and its projects.

The Council should enable cultural engagement and artistic thinking in tandem with community ownership of spaces. Engagement through collaborative processes ensures community investment is relevant & informed.

CE Opinion: The Council acknowledges that place-making and quality of life is identified as a key differentiator in Enterprise 2025, Ireland's National Enterprise Policy 2015-2025 in attracting enterprise and employment to an area. RPO 6.12 of the RSES requires local authorities to include objectives in Development Plans to support emphasis on a Placemaking Strategy for towns and implementation of Town Centre Renewal Plans, while RPO 6.13 states that local authorities shall support the preparation of Design Guidelines to provide for improvements in the appearance of streetscapes and for revitalising vacant spaces. The draft Plan will have regard to the policy under the RSES in this regard and will include policies and objectives across a number of chapters to suppose and facilitate the improvement of the public realm and provision of community cultural facilities and uses. For the purpose of public realm improvements, the Council will continue to make applications for various grant programmes including the Urban / Rural Regeneration and Development Funds and Town & Village Renewal Schemes. In terms of engaging in or consulting on local level projects and initiatives to influence public realm improvements, etc. this could be achieved by way of engaging with the bodies and other local authority sections involved in the implementation of other subsequent plans and strategies including the following:

- County Offaly Arts Strategy 2018-2022
- Offaly Culture and Creative Strategy 2018-2022
- Offaly Local Economic and Community Plan, 2016-2021
- Offaly Social Inclusion and Community Activation Programme (SICAP) 2018-2022
- Offaly Age Friendly County Strategy, 2018-2021
- Healthy Offaly Plan 2018-2020
- Offaly Heritage Plan 2017-2022

In addition, many public realm improvement projects carried out by Council are pursued through Part 8 of the Planning and Development Regulations 2001-2019, a process which also requires public consultation including invitation to the public and interested bodies to make submissions.

Recent examples of projects which have been progressed through this process include the Arts Centre and O'Connor Square enhancement scheme.

5. Economic appraisals should be undertaken for a realistic understanding of options for town centre sites.

CE Opinion: As part of the strategy to enhance towns and villages in County Offaly, 'Opportunity Sites' will be identified in each centre for regeneration purposes. It is considered that the appropriate redevelopment of these sites would provide significant improvements in the overall local environment and prompt local economic growth. It is considered that the redevelopment of these sites would contribute greatly to the renewal, enhancement and regeneration of the settlements in which they are located.

6. Town centre boundaries should be modified as necessary in all settlements to seek a realistic focus on retail and employment related activities and encourage the re-use of redundant / empty shops to residential use.

CE Opinion: The Council seeks to improve the viability and vibrancy of all urban centres through consolidation, infill, reuse and regeneration, consistent with NPF and RSES policy and objectives, particularly noting Regional Policy Objectives RPO 6.12, RPO 6.13 and RPO 6.14. As part of this process, the town centre boundaries for each urban centre will be reviewed as part of the draft development plan, with any modification being informed by the core strategy and policy on urban consolidation and renewal. As noted above, 'Opportunity Sites' are proposed to be identified in each centre for regeneration purposes. It is considered that the appropriate redevelopment of these sites would provide significant improvements in the overall local environment and prompt local economic growth.

7. Tullamore should remain the key retail destination of the County within the development plan to contain positive policy to focus new retail development to within the defined town centre opportunity sites.

CE Opinion: The RSES designation of Tullamore as a 'Key Town' within the Settlement and Retail Hierarchy of the County will be reinforced in the draft plan. Tullamore will be the focus for all types of retail development and its role as a Key Town, can be strengthened through securing major retail development for the town, which will in turn benefit the county area and the wider region.

8. Policy should allow for flexible implementation of development standards and contributions for previously developed sites to ensure their more complex development issues do not result in a constraint to their development.

CE Opinion: The draft plan will comprise a chapter setting out development management standards, to be read in conjunction with the policies and objectives across the whole of the draft plan. 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). The assessment of any individual planning application, where relevant, must also have regard 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 the Development Plan, Local Area Plans or future variations. Flexibility of development management standards can be considered in accordance with the NPF which states *'to enable brownfield development, planning policies and standards need to be flexible, focusing on design-led and performance-based outcomes, rather than specifying absolute requirements in all cases'*. Opportunity sites in plan are likely to have key criteria attached, e.g. urban design, place making, mix, urban grain, vibrancy etc.

9. Major retail development should be targeted to Tullamore to ensure that it is a fully functioning, top-of-the-hierarchy county town centre. Retail development outside the town centre should be controlled so that only new retail development is permitted where it is demonstrated that it will have no impact on the existing and future vitality and viability of Tullamore town and centre, as defined in the current Tullamore Town & Environs Development Plan. Convenience and comparison retail-led development should be located on the opportunity sites of Tullamore, as demonstrated as viable and to meet market demand such that the associated planning permission will be implemented. Retail development within all other towns, village and sraids should only permitted to meet the needs of that settlement and providing it is demonstrated that the vitality and viability of Tullamore town centre will not be affected. No out-of-town retail development should be provided for.

CE Opinion: The RSES designation of Tullamore as a 'Key Town' within the Settlement and Retail Hierarchy of the County will be reinforced in the draft plan. Tullamore will be the focus for all types of retail development and its role as a Key Town, can be strengthened through securing major retail development for the town, which will in turn benefit the county area and the wider region.

The draft Plan will identify 'Opportunity Sites' in each centre for regeneration purposes. Such opportunity sites will be considered suitable for re-development for a range of different reasons but in the main are considered to contribute to the enhancement of the vitality and vibrancy of particular town or village centres and may provide for future retailing or commercial development in conjunction with residential and other uses. The development plan will comprise zoning maps for each centre, together with a zoning matrix setting out those uses which are 'Normally Permitted', 'Open for Consideration', or 'Not Normally Permitted'. In addition, the draft Plan will seek to implement the retail hierarchy, seeking to locate retail development in the designated settlements where the scale and size of retail development proposed matches the size and the defined function of the settlement as outlined in the Core Strategy. The Development Standards section of the draft Plan will require, where necessary, that planning applications for new retail developments to be considered against a range of criteria including the Sequential approach, Retail Impact Assessment, Traffic & Transport Assessment, Specific Categories of retail development, and Design & Place making.

10. Promote sustainable agriculture (e.g. vegetables) & local farmer markets (including locations).

CE Opinion: The plan will support the development of agriculture where it is compatible with the sustainable development of the county and commensurate with sustaining the farming community. The Retail Chapter will acknowledge that casual trading such as farmer's markets will be promoted in the retail centres of towns where it can create an ambiance which can contribute to the vitality and viability of such centres.

11. Prohibit out of town commercial and / or retail development.

CE Opinion: Only in exceptional circumstances where the applicant can demonstrate and the planning authority is satisfied that there are no sites or potential sites either within the centre of a town or designated district centre or on the edge of the town/district centre that are (a) suitable (b) available and (c) viable, can that out-of-centre site be considered for retail development, as per the Retail Planning Guidelines, 2012.

12. The Council needs to be active in site assembly for new development on brownfield and infill sites.

CE Opinion: The plan will promote a collaborative approach between itself, central government, semi-state bodies, the community, private sector and voluntary associations to successfully and actively assemble Opportunity Sites to achieve their regeneration.

13. Include a policy that the change of use of retail warehouses to non-bulky goods will not be permitted.

CE Opinion: The plan will recognise that the types of goods to be sold from retail parks shall be limited to truly bulky household goods or goods which are not portable by customers travelling by foot, cycle, or bus in accordance with the provisions of the Retail Planning Guidelines 2012.

14. The Rural Regeneration & Development Fund could support potential tourism opportunities.

CE Opinion: Offaly County Council has successfully leveraged significant funding from URDF an RRDF, 2018 for regeneration projects Tullamore (Greenway and Enhancement Plan) and Edenderry (Masterplan). The Tourism and Recreational Chapter as well as the Regeneration Chapter will provide policies / opportunities upon which further funding could be sought.

15. The 'opening up' of vacant premises to local charities, or business or community and turn them into open spaces could revitalise areas of vacant properties in town centre.

CE Opinion: The submission that suggested the 'opening up' of vacant premises to local charities, or business or community and turn them into open spaces has been referred to the Local Enterprise Office for their consideration.

16. Town Regeneration is required in the form of:

- Promote refurbishment of dated building stock.
- Identify further projects suitable for funding applications under the Urban Regeneration and Development Fund
- Consideration and exploration of forms of organisation for town centre regeneration.
- Rapid adoption of Living City Initiative or similar schemes if extended for towns.
- Promote continued development of more and better pedestrian, cycling and social infrastructure throughout the urban built environment. Create a link between Tullamore Train Station; 'transport corridor' (public or private) between Tullamore Train Station/Regional Hospital.

- Promote development of areas/quarters of distinct character
- Promote repurposing of disused public buildings to community ownership for sustainable community projects.

CE Opinion: The draft plan will include an entire chapter dedicated to Retail and Town Centre Strategy Regeneration across the county. It will refer to the Purple Flag accreditation and its potential. The plan will state the Council's intention to apply for funding to facilitate enhancement, revitalization, renewal and regeneration of communities and town /village centres under various schemes such as the Urban and Rural Regeneration Funds. The council will continue to promote walking and cycling and social infrastructure throughout the built environment of all towns and villages and policies and objectives in relation to this overarching goal will be intrinsic across many sections and chapters of the draft plan.

17. Supports sustainable retail development, Vibrant town centres, villages and communities and a diversity of shops that people can walk to.

CE Opinion: The draft plan will provide policy to support the vitality and viability of existing town and village centres and facilitate a competitive and healthy environment for the retailing sector into the future by ensuring that future growth in retail floorspace responds to the identified retail hierarchy, the sequential approach, and the needs of the projected population of the settlement areas.

18. In order to ensure sustainable development and promote the vibrancy and vitality of town centres in Offaly no new retail developments should be approved until Town Centre Health Checks are undertaken in key towns in the county. A town centre strategy should be undertaken by the local authority in consultation with stakeholders, retailers, customers, chambers of commerce and community groups.

CE Opinion: A Retail Strategy will form part of the draft plan. As per the requirements of the Retail Planning Guidelines 2012, the following matters are to be addressed in a Retail Strategy:

- Retail Hierarchy in line with Regional Spatial & Economic Strategy and 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 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 to support action initiatives to encourage the improvement of town centres.
- Identify development management criteria for assessment of retail development.

- Individual planning applications will be assessed on their merits.

Further RPO 6.10 of the Regional Spatial & Economic Strategy for the Eastern & Midland Region 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.

19. The Council should use its powers to tackle vacancy.

CE Opinion: The draft plan will include policy to promote and encourage the suitable redevelopment of derelict and vacant sites as an alternative to new build on new undeveloped sites. Furthermore, the Council supports the NPF objective for compact growth and effective density in towns and villages rather than sprawl of urban development; and the RSES objective to deliver increased residential densities through the ongoing provision of infill, reduction in vacancy and re-use of underutilised lands and vacant buildings within urban areas.

20. The importance of the Retail Hierarchy is emphasised.

CE Opinion: The Retail Hierarchy based on the RSES will be included in the Draft Plan and the council will seek to locate retail development in the designated settlements appropriately. The Council will consider the scale, type and location of retail developments within the county when determining their suitability.

21. Concerns raised relating to the over development of local neighbourhood centres would result in driving business away from nearby towns which are experiencing high levels of vacancy.

CE Opinion: Compliance with retail hierarchy and Retail Planning Guidelines, 2012, should guard against retail leakage. The draft plan should include a policy to implement the retail hierarchy. The Council will seek to locate retail development in the designated settlements where the scale and size of retail development proposed matches the size and the defined function of the settlement as outlined in the Core Strategy.

22. Parking fines and high fees for car parking can be prohibitive and a disincentive for customers to shop in town centres.

CE Opinion: Parking fees is not within the remit of the Co. Development Plan as it is not a land use zoning issue. The relevant legislation relating to the implementation of parking fees is set out in the Road Traffic (Traffic and Parking) Regulations, 1997.

23. Retail Parks should only be permitted in General Employment Lands.

CE Opinion: The Retail Planning Guidelines, 2012 provide guidance on retail parks and this will be carried through into the draft plan. Under the current Co. Development Plan 2014 -2020, Table 8.3 Zoning Matrix, Retail Warehousing is 'Normally Permitted' in Business Employment Lands, and 'Open for Consideration' in Town Centre, Industrial, Local Employment Services, and White lands.

24. Retail warehousing should be in compliance with the definitions of the Retail Planning Guidelines 2012, i.e. restricted to the sale of Bulky Goods.

CE Opinion: The assessment of retail warehousing applications will be made in accordance with Government Guidelines / policy including the Retail Planning Guidelines and the overall proper planning and sustainable development of the area. The new Development Plan will be influenced by the retail planning guidelines. The Retail Planning Guidelines give a definition for *Retail Warehousing*, and also guidance on location and types of goods to be sold and sizes of units.

25. Welcomes the URDF and RRDF funds associated with Project Ireland 2040.

CE Opinion: Policy will be provided within the draft plan which will outline the intention to apply for funding to facilitate enhancement, revitalization, renewal and regeneration of communities and town /village centres under various schemes such as Urban and Rural Regeneration Funds.

26. An accessibility strategy should be put in place to help deal with opportunity sites and brownfield and infill sites, such as the permeability/ linkages of the Tanyard- Roselawn and High Street Area & O'Connor Square- Church Street Market Square Area. Opportunity sites should be re-designated as Strategic Development Zones.

CE Opinion: Policy will be provided within the plan which will outline a detailed approach to the development of Opportunity Sites, incorporating site assembly, land use, design and layout and movement and access. Improving permeability and connections/ linkages will be intrinsic to the approach to Opportunity Sites. A Local Transport Plan for Tullamore (Key Town), as required under the RSES, will be made in conjunction with the future Tullamore Local Area Plan. Further, the National Transport Authority Guidance Document, *Permeability Best Practice Guide* will be included as a guidance /reference document in the draft plan.

27. A small grant scheme could be established for shop front renewal in line with design guidelines.

CE Opinion: Awarding of funding is not within the remit of the development plan. However, there will be an objective to support the preparation of Design Guidelines to provide for improvements in the appearance of streetscapes and for revitalising vacant spaces for example with cost effective, temporary uses that build on the longer-term vision for space, which is set out in the RSES. Also the council will facilitate other such schemes, subject to finance.

CE Policy Recommendation:

The retail sector plays a significant role in the economy of Offaly and in place-making and the vitality of town centres. The provisions of the Retail Planning Guidelines 2012, will inform the retail & town centre strategy for the plan. The retail & town centre strategy must therefore be consistent with the approach of the guidelines.

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

- 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.
- Support the vitality and viability of existing town and village centres and facilitate a competitive and healthy environment for the retailing sector into the future by ensuring that future growth in retail floorspace responds to the identified retail hierarchy, the sequential approach, and the needs of the projected population of the settlement areas.

- Require applicants to demonstrate a degree of flexibility by providing for adaptation of standard retail design / format to accommodate retail development which is centrally located or sensitively located in the context of the sequential approach. In addition to encourage high quality architectural design & high quality layout / urban design in retail development to support and promote healthy place-making and quality of life and public realm 'spill over' from private developments.
- Encourage (i) the repairing and retaining of historic shop fronts or historic features in a shop front; (ii) externally lit or illuminated signs on shop fronts and to resist internally illuminated or neon type signs; and (iii) facilitate schemes subject to finance.
- Promote the regeneration of settlements by making better use of under-utilised land and buildings to meet their full potential, particularly within the existing built-up areas where a transformational difference in the sustainability of a settlement can take place through compact growth.
- Promote and encourage the suitable redevelopment of derelict and vacant sites as an alternative to new build on new undeveloped sites.
- Promote the habitation of vacant homes in accordance with the council's Vacant Homes Action Plan.
- Support initiatives that promote the reuse, refurbishment and retrofitting of existing buildings within urban centres.
- Continue to facilitate, promote and encourage the re-development of brownfield /infill sites as Opportunity Sites to be identified in the new plan, with emphasis on key criteria; place making, mix, urban grain and vibrancy and vitality.
- Apply for funding under various funding streams to facilitate the enhancement, revitalisation, renewal and regeneration of communities and town / village centres, and the delivery of innovative and transformational regeneration proposals such as under the Urban and Rural Regeneration and Development Funds.
- Promote a collaborative approach between the local authority, central government, semi-state bodies, the community, private sector and voluntary associations to successfully achieve the regeneration of areas including site assembly where appropriate.
- Encourage a mixture of uses within the built up areas in order to promote the liveability and sustainability of our settlements.
- Be flexible in terms of enabling brownfield / infill development within settlements, focusing on design-led and performance-based outcomes, rather than specifying absolute requirements in all cases.
- Promote high standards for public realm, place making and quality of life considerations for both and private residential developments.

- Promote compact town and village centres across the settlement hierarchy for Offaly in line with the National Planning Framework and Eastern and Midland Regional Spatial and Economic Strategy.

(vii) Sustainable Mobility & Accessibility

Submission Reference Numbers: CDP/PD: 03, 08, 09, 11, 12, 15, 18, 32, 33, 34, 36, 37, 38, 41
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The following is a summary of the main issues raised in the submissions received in this subject area:

1. That speed limit signs, speed ramps be installed on Fr Paul Murphy St. Edenderry.

CE Opinion: The identification of locations for traffic calming measures is not the remit of the Co. Development Plan. Traffic calming measures require assessment and design in accordance with the Traffic Calming Policy adopted by the elected members and the Design Manual for Urban Roads and Streets in addition to consultation with An Garda Síochána. Objective SRI02 of the Edenderry Local Area Plan 2017-2023 lists a number of roads upon which it is an objective to provide traffic calming measures.

2. The use of land as a car park be provided in front of Scoil Brid / Gaelscoil Edenderry to serve the schools.

CE Opinion: The identification of lands for a car park in Edenderry is not the remit of a Co. Development Plan but rather a Local Area Plan (LAP). A LAP exists for Edenderry which contains policies and objectives relating to car parking. Policies CPP1 of the LAP states that it is Council policy to 'provide adequate car parking in the town commensurate with new developments at locations that are in proximity to the town centre'. Policy CPP2 states that it is Council policy to 'promote and encourage off street car parking at suitable locations'. Objective CPO1 of the LAP states that it is an objective of the Council to 'review the future location and provision of controlled car parking in areas other than the town centre'.

3. The use of land for the provision of a new road in Edenderry to link Fr. Paul Murphy St with the Dublin Road Edenderry to avoid perceived traffic congestion.

CE Opinion: The identification of lands for a new road in Edenderry is not the remit of a Co. Development Plan but rather a Local Area Plan (LAP). A LAP exists for Edenderry and it includes an indicative relief road to the south of the town which joins Fr. Murphy St with the Dublin Road. Objective Ref MT01 of the Edenderry Local Area Plan states that it is an objective of the Council to '*undertake a transportation study for Edenderry addressing issues relating to traffic congestion, car parking, movement and circulation and smarter travel including how best to support the National Mitigation Plan and National Policy Framework for Alternate Fuels Infrastructure for Transport*'.

4. Regional Policy Objective RPO 8.6 of the RSES outlines the requirement to make a Local Transport Plan for Tullamore and this should be addressed in the plan.

CE Opinion: An objective will be inserted in to the plan to make a Local Transport Plan for Tullamore.

5. Consolidate existing urban areas to complement the integration of land use and transport planning. The development of urban areas should be prioritised over development in less accessible locations. Safeguard the integrity of rural areas and support the accommodation of urban generated development within urban areas. Residential development in urban areas should be carried out sequentially, whereby lands which are or will be, most accessible by walking, cycling and public transport, including infill and brownfield sites, are prioritised.

CE Opinion: The relationship between transportation and land use is a key determinant in achieving sustainable development. Dispersal of land uses places an increase in demand for transportation because of greater travel distances, and this is unsustainable. Ensuring the places where people live are either close to, or are connected by public transport to, their places of work or education and providing for higher density development along public transport corridors, allows people to use the most sustainable modes of transport, namely walking, cycling and public transport. Within this context, higher densities and mixed uses will be encouraged to locate within walking distance of public transport nodes and at accessible locations such as town centres, in a compact format.

6. Trip intensive developments should primarily be focused into central locations.

CE Opinion: It is recognised that policy will be required to state 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.

7. Town centres should be permeable and be given priority for walking, cycling and public transport. Maximise the number of people living within walking and cycling distance of their neighbourhood / district centres / public transport services / other services such as schools. The density and location of employment development, schools, retail etc. should maximise the potential for the use of walking, cycling and public transport.

CE Opinion: The importance of prioritising pedestrianisation and permeability of towns and village centres where appropriate will be encouraged in order to create accessible, attractive, vibrant and safe places.

8. The strategic transport function of national roads should be maintained and protected in accordance with national policy. Reference is made to National Strategic Outcome no. 2 of the NPF which indicates the need for *'maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements'*.

CE Opinion: The council will continue to have policy to maintain and protect the safety, strategic transport function, capacity and efficiency of national roads and associated junction.

9. For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing NTA guidance.

CE Opinion: Mobility Management and Travel Plans are a management tool that brings together transport and other staff and site management issues in a coordinated manner to improve the attractiveness of public transport, cycling, walking, car sharing, flexible working as an alternative to drive-alone journeys to work; it is not a plan for physical transport infrastructure such as cycle

and pedestrian routes. The Dublin Transport Office (now called National Transport Authority) Advice document 'Mobility Management Plans, 2002 states that *'It is recognised that the preparation and submission of a detailed MMP in terms of measures, timescales and targets may not be possible as an integral element of an outline or detailed planning application...At the initial stage of submitting the planning application, certain information on employment, trip demand, distribution and trip patterns may not be possible to initially determine. However, the likely impact of the development can be assessed in a traffic impact assessment or an environmental impact statement, within which data pertaining to employment levels, access arrangements, proposed junction/road modifications, trip patterns, volume and distribution would be provided. The need to improve accessibility to the worksite for employees and customers, which may help in retaining staff and enhancing company image'*. Accordingly, mobility management and travel plans will not be sought for every planning application.

10. The plan should acknowledge the role transport services can perform in providing for social and economic connectivity.

CE Opinion: The plan will refer to the role of transport services within the county both private and public in terms of the social and economic function they play.

11. In order to protect the strategic transport function of the national roads, development objectives in the plan should be in accordance with the DoECLG Spatial Planning and National Roads Guidelines.

CE Opinion: The plan will continue to refer to the restriction of new accesses or the intensification of an existing access onto national roads in accordance with the provision of DoECLG Spatial Planning and National Roads Guidelines. Exceptional circumstances may be considered in accordance with criteria laid out in the Guidelines.

12. The National Transport Authority recommends that car parking provision for non-residential land uses should be stated as a maximum standard rather than as minimum standards.

CE Opinion: Clearly stated car parking requirements will be provided in the plan.

13. Cycle parking should be appropriately designed into the urban realm and new developments at an early stage to ensure adequate facilities are provided.

CE Opinion: The plan will support the provision of secure cycle-parking facilities in the public realm of towns and villages, at large scale development and at all public service destinations.

14. The Council should provide an objective in the plan to improve the road junction of the L2006 and N52 at Durrow.

CE Opinion: Regional Policy Objective RPO 8.10 of the Regional Spatial & Economic Strategy (RSES) states that the RSES supports appraisal and or delivery of the road projects such as the N52 Tullamore to Kilbeggan Road, subject to the outcome of appropriate environmental assessment and the planning process. The improvement of the road junction is a matter for the Municipal District (MD) and a copy of this submission is being referred to the MD for their consideration.

15. Recognises the need to facilitate public transport improvements and provide measures to help alleviate traffic congestion in the town centre and at the pinch point on Barrow Bridge and at the

Kilmalogue Crossroads in Portarlinton. The current Laois Co. Development Plan includes for a relief road; however, the environmental constraints in that regard must be recognised.

CE Opinion: Local traffic management measures for Portarlinton is a matter for the Portarlinton Local Area Plan. A Local Area Plan currently exists for Portarlinton and relevant objectives include TM O5: Improve junction/road realignment at the Kilmalogue Junction; TM O6: Carry out necessary strengthening works to the Barrow Bridge; and TM P7: Work with all relevant public transport providers including Bus Eireann and Iarnród Eireann to improve and expand public transport facilities and services in Portarlinton and to link such facilities with the town centre and other nearby settlements. The Portarlinton LAP includes an indicative northern outer relief road. Any such relief road would be subject to appropriate environmental assessment.

16. Suggests that the forthcoming Development Plan includes an objective to encourage and facilitate investment in the N80. Suggests that opportunities for the provision of cycle lanes along this route should be explored and recognised in the Plan.

CE Opinion: It is acknowledged that the strategic transport function of national roads needs to be maintained and supported. The Council will actively pursue the upgrading and improvement of the N80 and an objective to this effect will be included in the Draft Plan. The Council is supportive of exploring opportunities for the provision of cycle lanes along the N80 subject to meeting TII guidelines and a safety audit and where feasible off road cycle tracks separated from vehicular traffic. This will be supported in the Draft Plan.

17. Requests the inclusion of an objective to continue to support rural public transport initiatives such as Laois-Offaly Local Link.

CE Opinion: The Council recognises that the provision of a well-functioning, integrated public transport system is paramount to providing a viable sustainable alternative transport mode; to address rural social exclusion; and to achieve our climate action goals. A policy will be included in the Draft Plan to support the Local Link Rural Transport Programme 2018-2022 in County Offaly and subsequent programmes.

18. Urgent development of the N52 to the M6 at Kilbeggan and to allow access to Durrow Abbey Site; and the development of the N80 to the M7 at Portlaoise. If the road improvement between Tullamore and Kilbeggan is to be delayed, a temporary solution will be required.

CE Opinion: Objectives will be included in the Draft Plan to support the continued construction, upgrading and improvement of the national secondary roads in the county including the N52, N62 and N80 and specifically to construct a new link road between Tullamore and Kilbeggan. The temporary solution for the N52 between Kilbeggan and Tullamore outlined in the submission has been forwarded to the Tullamore Municipal District for its consideration outside the Development Plan review process.

19. Bus services from Birr, Tullamore and Edenderry to Dublin, Dublin Airport and elsewhere need urgent improvement. The Bus Service from Edenderry needs to be routed via Enfield to possibly link to rail service.

CE Opinion: In the Draft Plan, the Council will seek to facilitate the improvement and expansion of public bus services where they strengthen linkages to other areas of the county, the midlands and the rest of the country.

20. Rail service from Tullamore needs urgent improvement, particularly early morning services to Dublin and Galway. A bus / rail interchange needs to be developed at Tullamore Railway Station.

CE Opinion: The 2030 Rail Network Strategy Review (2011) informs the strategic priorities and future investment strategy up to 2030. The outstanding improvements in rail services to County Offaly include double tracking from Portarlinton to Athlone (2020-2025) and Electrification of Dublin to Galway line (2025-2030), which would improve rail services in Tullamore. This Strategy will be recognised and supported by policies in the Draft Plan. In conjunction with these rail improvements, there is an opportunity for Tullamore station and adjoining lands to be developed as a transport (bus/rail) node and this will be acknowledged and supported in the Draft Plan.

21. Bypasses are needed for Birr, Clara and Edenderry. New roads are required in Tullamore e.g. from Tanyard Lane to the High Street, Harbour Street to Kilbride Plaza and O'Neill's Place to O'Moore Street.

CE Opinion: It will be an objective of the Draft Plan to reserve land for and to construct relief roads for Birr, Clara and Edenderry. Objectives for local road improvements in Tullamore is a matter for the Tullamore Local Area Plan, which will be prepared following the review and adoption of the County Development Plan and will be subject to a separate consultation process.

22. Off-road cycle tracks, walking routes and extended footpaths as well as support for alternative transport models such as car-pooling and community bus schemes should be encouraged.

CE Opinion: Sustainable Mobility and accessibility will be promoted in the plan in the interests of climate action, recreation and as a form of transport.

23. Providing Electric Vehicle charging points in appropriate locations and providing secure and safe lanes will contribute to reduced carbon emissions.

CE Opinion: Policy will be provided in the new plan for the provision of charging infrastructure for electric vehicles.

24. Requests the re-opening of Geashill Railway Station which would provide access to jobs and increased wealth to a disadvantaged rural region which includes 6 villages – Geashill, Ballinagar, Daingean, Killeigh, Cloneygowan and Clonaghadoo. It provides a green, sustainable form of transport, reducing carbon emissions and stress for commuters going to work.

CE Opinion: The merits of rail as a sustainable form of transport is noted and supported by Council. A policy will be included in the Draft Plan to support the re-opening of Geashill Train Station. It should be noted however that the decision to re-open Geashill Railway Station lies with Central Government and Irish Rail.

25. The draft plan should concentrate infrastructure resources to improving the rail, footpath and cycle way provision in Tullamore.

CE Opinion: NPO 27 of the NPF ensures the integration of safe and convenient alternatives to the car into the design of our communities by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages. The Design Manual for Urban Roads and Streets (DMURS) was jointly published by the Department of Environment Community and Local Government and the Department of Transport, Tourism and Sport in 2013. DMURS provides guidance relating to the design of urban roads and streets, with the overall aim of making urban areas safer through a shift in dominance from motor vehicles to pedestrians. A key aim of the draft Plan will be to promote compact, connected neighbourhoods based on street patterns and forms of development that will make walking and cycling, especially for local trips, more attractive, promoting sustainable travel movements and encouraging people to find alternative ways to travel reducing car dependency.

Through policy in the draft Plan the Council will seek 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. The Council will also continue to make applications for various grant programmes including the Urban / Rural Regeneration and Development Funds and Town Renewal Schemes.

Specific policy on footpath and cycleway improvements in Tullamore will be considered as part of a Local Area Plan for the town, the preparation of which will commence following the making of the County Development Plan.

In respect of rail, the Council will continue to co-operate with Iarnród Éireann and encourage the company to secure the upgrading of the existing rail linkages between Offaly, particularly the Key Town of Tullamore, and other major centres, including Dublin, Galway and Athlone. Suitable policy will be included in the draft Plan.

26. The draft plan should introduce maximum car parking standards.

CE Opinion: Clearly stated car parking requirements will be provided in the draft Plan.

27. Need a permeable built environment that encourages walking and cycling to reverse our inactivity levels as opposed to car dependency. Avoid cul de sacs.

CE Opinion: The plan will 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.

28. A Local Transport Plan should be prepared.

CE Opinion: As is a requirement of the RSES a Local Transport Plan will be prepared for Tullamore a Key Town.

29. Mobility management plans should be required for all planning applications.

CE Opinion: You are referred to point 9 above.

30. There should be a shift to use sustainable modes of transports which will result in a significantly improved visitor experience.

CE Opinion: Sustainable modes of transport such as walking, cycling and public transport will form part of various chapters in the plan e.g. Tourism, and the Sustainable Mobility chapter.

31. Offaly is losing out on a lot of economic growth by not taking the bicycle seriously as a mode of transport. There are health concerns and related costs due to poor cycling infrastructure. Cost Benefit Analysis attests that investment in cycling is far more significant than other forms of infrastructural investment. The use of car based transport is being promoted by Offaly County Council.

CE Opinion: Offaly County Council in the life time of current plan, (2014 to present) has promoted and developed cycling infrastructure in the county significantly. The adoption of 'Connecting People, Connecting Places, A Strategy for Walking and Cycling, in 2014, which outlines objectives for cycling and walking in the county has been the catalyst for the development of the Grand Canal Greenway in conjunction with Waterways Ireland and other stakeholders in 2014. To date 15km of greenway has been constructed with over 80km in total planned in the short term. Offaly County Council has committed its own funds to construct the initial 4km of greenway in 2016 and subsequent construction was funded by DCRD, ORIS, and DTTAS, with match funding from the Council. In 2019, there is now a connected cycleway from Tullamore to Lough Boora Discovery Park in place. There has also been significant investment in cycling facilities in Edenderry, Birr and Ferbane over the past 6 years. Also in 2016 'A Feasibility Study on the Development of a Major Cycling Destination in the Midlands of Ireland' in partnership with the council, Bord na Móna and Coillte was concluded. This identified extensive cycling and walking objectives for County Offaly with prioritisation and phasing outlined. This feasibility study has recognised the potential economic benefits that cycling tourism would bring to the area. Offaly County Council will continue to promote recreational and commuter cycling in the county, in the acknowledgement of the economic, health and environmental gains it can bring to the county.

32. Sections of DMUR are being ignored- where priority should be given to walkers, then cyclists then public transport and finally the private car.

CE Opinion: DMURS is central to Offaly County Council's approach to road design in urban areas including the prioritisation of the pedestrian, cyclists and public transport ahead of the private car.

33. There is a problem of cycle lanes which disappear at roundabouts or car parking locations.

CE Opinion: The concerns raised regarding problems of cycle lanes which disappear at roundabouts or car parking locations will be addressed on a case by case basis as resources allow for.

34. There needs to be more joined up thinking in relation to the greenway and the town centre to address meaningful connections.

CE Opinion: The forthcoming Tullamore Local Area Plan will show the linkages between the Grand Canal Greenway and other future cycling / walking routes throughout the town.

35. Tullamore street enhancements works to date are not cycle friendly, with the absence of bicycle lanes and inadequate bicycle parking.

CE Opinion: The Tullamore Street Enhancement project include measures for cyclists such as traffic calming and additional cycle stands throughout the street enhancement area.

36. There should be a fundamental shift in policy to support cycling in the county, and there would be huge benefits in the area of

- Economic gain
- Public Health
- Environment

CE Opinion: The Council recognises the benefits of increased cycling and walking as modes of transport across the county, in particular in our towns and villages and the council has a proactive approach towards promotion of cycling across the county.

37. Upgrade of N52 Tullamore to Kilbeggan road.

CE Opinion: Regional Policy Objective RPO 8.10 of the Regional Spatial & Economic Strategy (RSES) states that the RSES supports appraisal and or delivery of the road projects such as the N52 Tullamore to Kilbeggan Road, subject to the outcome of appropriate environmental assessment and the planning process. This will be reflected in the draft plan.

38. Support for reopening of Geashill Train Station and improvements to Tullamore – Dublin commuter service.

CE Opinion: The merits of rail as a sustainable form of transport is supported. A policy will be included in the Draft Plan to support the re-opening of Geashill Train Station. It should be noted however that the decision to re-open Geashill Railway Station and /or the addition of extra services to the Tullamore Dublin service, lies with Central Government and Irish Rail.

CE Policy Recommendation:

It is recommended that Offaly County Council will strive to support (i) enhanced regional accessibility, (ii) the use of sustainable modes of transport, (iii) the integration of spatial planning with transport planning, (iv) the transition to a low carbon transport system, and (v) the development of a safer, more efficient, effective and connected transport system within Offaly.

In order to achieve this, it is recommended that policies be included to:

- Support sustainable mobility, enhanced regional accessibility & connectivity within Co. Offaly in accordance with the National Policy Outcomes of the National Planning Framework 2040.
- Facilitate the provision of battery charging infrastructure for electric vehicles where considered appropriate in private and public realm developments in private and public realm developments.
- Promote the transition to a low carbon integrated transport system by firstly 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 then to shift to environmentally sustainable modes of transport.

- Integrate landuse and transport planning to ensure a sustainable, safe, coherent, efficient, and effective approach to transport provision for development in County Offaly.
- 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.
- Promote more compact development forms that reduce overall demand for transport and transport infrastructure and support proposals that encourage modal shift towards sustainable travel modes.
- 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. This can be achieved through new build and through retro-fitting.
- Facilitate and support, subject to appropriate environmental assessments, the continued development of walking and cycling routes including Greenways & Blueways in County Offaly for recreational and utility purposes as set out in the 'Feasibility Study on the Development of a Major Cycling Destination in the Midlands of Ireland'.
- Support the provision of secure cycle parking facilities in towns and villages, at large scale developments and at all public service destinations.
- Promote and facilitate, in co-operation with the Department of Transport, Tourism and Sport, Irish Rail and adjoining local authorities, the provision of a second rail line between Portarlinton and Athlone, and the electrification of the Dublin to Galway line.
- Support and facilitate the operation of existing bus services and to facilitate the provisions of improved facilities 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.
- Facilitate development of the road network in Offaly and the Midland Region in accordance with the National Development Plan and with Government policy.
- Strictly control development, outside of identified settlements, which could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national roads/restricted regional roads and associated interchanges and possibly lead to the premature and unacceptable reduction in the level of service available to road users. This policy would also apply to National roads which may be downgraded during the lifetime of this plan but which will still comprise high quality regionally important links.
- Maintain and protect the safety, strategic transport function and efficiency of national roads and associated junctions. The Council will strive 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, namely the N62, N52 and N80, which would enable Athlone (Regional Growth Centre) and midland Key Towns on these routes (Tullamore, Mullingar and Portlaoise) to function as a network of economic drivers as per their envisaged role in the RSES.

- Support the provision of an airport in the Midlands.
- In accordance with RPO 8.6 of the RSES a Local Transport Plan will be made for Tullamore, a Key Town, as part of the preparation of Tullamore Local Area Plan.

(viii) Social Inclusion, Community and Cultural Development

Submission Reference Numbers: CDP/PD: 09, 14, 16, 19, 29, 30

The following is a summary of the main issues raised in the submissions received in this subject area:

1. EMRA state that Chapter 9 of the RSES details subjects including diversity, inclusivity, housing, regeneration, healthy place-making, social opportunity, economic opportunity, access to childcare, education, health services and access to arts, culture, language and heritage, which will support Offaly County Council in developing relevant policy in the plan.

CE Opinion: It is proposed to insert into the plan policies relating to diversity, social inclusion, housing, regeneration, healthy place-making, social and economic opportunity, access to childcare, education, health services and arts, culture, language and heritage.

2. Land in Kilcormac should be utilised to contribute to a consolidated form of development for use for example as retirement living accommodation in light of our aging population. The plan needs to take account of older people and their growing influence on our spatial planning and housing requirements. Although a parcel of land has been identified in the submission for this use, it cannot be considered at this pre-draft stage; a site-specific zoning submission is also proposed to be made at draft stage.

CE Opinion: There is a need for accommodation to meet the needs of older people within many settlements in Co. Offaly. An objective will be included in Volume 1 of the plan recognising this need. The council will promote universal design, well-designed lifetime adaptable housing, residential care homes for older people, retirement homes, nursing homes, independent living units, assisted living units, retirement villages and sheltered accommodation particularly in infill and brownfield developments close to existing services and facilities.

3. If the projected population increases materialise, a requirement for further education provision at both primary and post-primary level may emerge over the lifetime of the proposed new Plan. Advises that the Department of Education and Skills will continue to work closely with the Council in relation to the provision of new schools and the development of existing schools and emphasises the critical importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for this purpose.

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

Education and Science, and the Department of Environment, Heritage and Local Government (2008).

4. All public services, forms and publications be provided bilingually, initially in Irish (normal print) and English in second place (italics). An Irish language officer be located in the County to cater for Irish speakers living in Offaly and as a commitment to progress for the Irish language. Every citizen in Offaly should have the right to use the Irish version of their name for their home address in Irish. All road signs be in Irish in the first place (normal font) and English (italics) in second.

CE Opinion: The Council will have regard to the provisions of Section 10 of the Official Languages Act 2003 regarding the publication of the adopted County Development Plan simultaneously in both English and Irish. Issues relating to an Irish Language Officer and the right of citizens to use the Irish version of their names are outside the scope of the County Development Plan as they do not have a spatial or land use planning dimension and would be more appropriately addressed by other plans and programmes of Offaly County Council or of other Public Bodies. Regarding public signs, Regulations (S.I. No. 391 of 2008) state in relation to signs placed by local authorities or on their behalf at any location after 1 March 2009, that the text in Irish will appear first and is prominent, visible and legible and communicates the same information and reference to these Regulations will be made in the Development Management Section of the Draft Plan.

5. There should be creative hubs, centres, museums, tactical placemaking, with civic and public spaces that enable an inclusive community to collaborate with both cultural and contemporary art & design practices to gain feedback, with and by, the community for the community.

CE Opinion: Policies and objectives will be included in the draft Plan which will seek to assist and facilitate in the improvement of existing and provision of new social, community and cultural facilities, as appropriate, within the county. Recent examples of progression in this respect includes funding secured under the Town and Village Renewal Scheme to assist in the delivery of the Edenderry 'e-hive' co-working community hub; application under Project Ireland 2040 - Rural Regeneration and Development Fund to progress the delivery of a creative hub in the court house in Birr; and granting of planning permission under the Part 8 process for a new Community Arts Centre in Tullamore.

6. Anam Beo would like a space in the new Community Arts Centre.

CE Opinion: The Council acknowledges the importance of arts and cultural infrastructure to the county and that the renovation of Tullamore Community Arts Centre in Tullamore will be a valuable contribution for the people of Tullamore, its inhabitants and those people in surrounding areas. However, decisions in terms of occupation of the Arts Centre is outside the remit of the County Development Plan.

7. The Council should provide a meaningful multi-annual funding stream to support the arts and arts practice in the county which will not only grow local artists, attract national and international artists but generate income for the local economy, heighten the cultural profile of the county and enhance social connectedness and positive living for those resident in the county.

CE Opinion: The County Development Plan has no remit in the awarding of funding streams. It will however include policies to support Arts and Culture including the implementation of Council's Arts Strategy 2018-2022 and the Offaly Culture and Creative Strategy 2018-2021. The

Council will maximise the per cent for art scheme for Offaly in relation to its major capital projects which provides opportunities for artists of all disciplines to create work to exist in the public realm.

8. The Council should invest in and utilise the arts to enhance and deliver social health in collaboration with urban planning. Artists can explore with the community ways to enhance the physical environment and ways to improve social connectedness through creative methodologies.

CE Opinion: The Council recognises that Arts and Culture is a vibrant element of social life in Offaly and provides positives across a wide range of areas from tourism to cultural development. The draft Plan will include policies to support Arts and Culture including implementation of Council's Arts Strategy 2018-2022 and the Offaly Culture and Creative Strategy 2018-2021.

9. Anam Beo Arts would like to provide a consultation service with the council with regard to urban planning going forward. In particular, Anam Beo have identified design solutions that focus on the needs of older people in the community. Anam Beo would like to consult with the council regarding culture and wellbeing in the community going forward, providing the county council with recommendations regarding ways to develop, innovate and realise the value of cultural assets and involvement for local community benefit that as a consequence will provide a better way of life for those living in Offaly and a high quality visitor experience.

CE Opinion: In terms of engaging in or consulting on local level projects and initiatives to influence public realm improvements, etc. this could be achieved by way of engaging with the bodies and other local authority sections involved in the preparation and implementation of other plans and strategies including Council's Arts Strategy 2018-2022 and the Offaly Culture and Creative Strategy 2018-2021. In addition, many public realm improvement projects carried out by Council are pursued through Part 8 of the Planning and Development Regulations 2001 as amended, a process which also requires public consultation including invitation to the public and interested bodies to make submissions. Recent examples of projects which have been progressed through this process include the Arts Centre and O'Connor Square enhancement scheme.

10. The county council should set aside a meaningful funding stream to support arts and arts practice and cultural involvement in the county.

CE Opinion: The County Development Plan has no remit in the awarding of funding streams. It will however include policies to support Arts and Culture including the implementation of Council's Arts Strategy 2018-2022 and the Offaly Culture and Creative Strategy 2018-2021.

11. Anam Beo need to be accommodated in the new arts centre about to be built in Tullamore, the organisation is a vital cultural organ in the community and as such requires the profile, accessibility and visibility that a room or workshops space in the arts centre would provide.

CE Opinion: Council acknowledges the importance of a cultural infrastructure to the county and that the renovation of Tullamore Community Arts Centre in Tullamore will be a valuable contribution for the people of Tullamore, its inhabitants and those people in surrounding areas. However, decisions in terms of occupation of the Arts Centre is outside the remit of the County Development Plan. The draft Plan will however emphasise the important role that Arts and Culture play in place making and quality of life for the community.

CE Policy Recommendation:

It is important to promote settlements and communities where people can live and work, with access to a range of quality community and cultural facilities which are a vital component in increasing social inclusion and contributing to the quality of life for all.

It is recommended that the next Co. Development Plan include policies that:

- Support and facilitate the Local Community Development Committees / Socio-Economic Committee in its key objectives of strengthening the community sector throughout the county and developing a long-term strategy of social investment at community level.
- Support the implementation of the Offaly Local Economic and Community Plan in collaboration with the Local and Economic Development Committee to reduce the number of people in or at the risk of social exclusion.
- Facilitate the co-location and shared use of community facilities & amenities and to ensure communities are active during the day and into the evening, to use land more efficiently and to facilitate opportunities for further inclusion of community participation.
- Facilitate social inclusion and societal diversity through equality of access to services and facilities and to assist in the removal of barriers to full participation in society.
- Encourage the provision of childcare facilities in residential areas, employment areas, retail centres and other areas as appropriate, when development proposals are put forward for consideration.
- Promote Universal Design and well-designed lifetime adaptable 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, 2008) and particularly in infill and brownfield developments close to existing services and facilities.
- 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.
- Support the 'Offaly Age Friendly County Programme 2018-2021' as implemented by the Offaly Age Friendly Alliance and promote universal design, well-designed lifetime adaptable housing, residential care homes for older people, retirement homes, nursing homes, independent living units, assisted living units, retirement villages and sheltered accommodation particularly in infill and brownfield developments close to existing services and facilities.
- Consider the needs of children and young people, including those with disabilities and additional needs, in the provision of indoor and outdoor recreational facilities.
- 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.

- Liaise with and to facilitate the Department of Education and Skills in the provision of education facilities, as appropriate. This includes the identification and reservation of sufficient land to meet the need for expansion of existing schools and/or provision of new schools in accordance with the county's settlement hierarchy, requirements of individual settlements, their catchment area and the requirements of the relevant education authority, in accordance with 'The Provision of Schools and the Planning System, A Code of Practice for Planning Authorities', the Department of Education and Science, and the Department of Environment, Heritage and Local Government (2008).
- Encourage and promote the shared use of school facilities with community groups where possible and the shared use of all community facilities for use by all groups in the County.
- Restrict new development adjacent to existing schools where such development may have potential to restrict the expansion of that school.
- Ensure that the county library service is strongly positioned to support: the knowledge society, social inclusion, e-Government, life-long learning initiatives, local studies and archive services, children's services, services to rural communities, the housebound and older people.
- Implement the Council's Arts Strategy 2018-2022 and the Offaly Culture and Creative Strategy 2018-2021.
- Maximise the per cent for art scheme for Offaly in relation to its major capital projects which provides opportunities for artists of all disciplines to create work to exist in the public realm.
- 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. It is Council policy to encourage the integration of appropriate healthcare facilities within new and existing communities.
- Ensure the integration of safe and convenient alternatives to the car into the design of our communities by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.
- Support the key priorities of the Healthy Offaly Plan 2018-2020 (as updated in the future) to promote health and well-being.
- Support the designation of the Tullamore Midland Regional Hospital as a major trauma centre, its continued development as a 'teaching' hospital and the potential of a 'regional' hospice at this location.
- Facilitate the development of new or extended burial grounds and crematoria by reservation of land at suitable locations and provision of local authority burial grounds subject to appropriate safeguards with regard to environmental, noise and traffic impacts.

- Support and facilitate the development of places of worship and multi-faith facilities at appropriate locations, such as town and village centres.
- Ensure that both public and private led development is of high quality design that promotes and delivers on healthy place-making and quality of life.

(ix) Built Heritage

Submission Reference Numbers: CDP/PD: 02, 04, 37, 38, 39, 41, 44
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The following is a summary of the main issues raised in the submissions received in this subject area:

1. The insertion of the following as an objective in the new Co. Development Plan is requested; *'That the prestige of Tullamore as the County Town of Offaly be enhanced by the protection of its built heritage and the fostering of new high quality architecture'*.

CE Opinion: Tullamore is designated as a Key Town in the Regional Spatial & Economic Strategy a role that means it is a large economically active county town that provides employment for its surrounding area and has high quality transport links and has the capacity to act as a growth driver to complement the Regional Growth Centre of Athlone. The Council proposes to continue to ensure the protection and sympathetic enhancement of the built heritage of all of county Offaly and this will be reinforced in the draft Plan. The Council recognises the importance of encouraging high quality and well-designed development to support and promote healthy place-making and quality of life and this will be addressed in the draft plan.

2. Requests the following objectives; that *'Subject to a detailed assessment, the core areas of Kinnitty, Shannonbridge, Killeigh, and Banagher will be designated as Architectural Conservation Areas'* and *'that the Bord na Mona villages of St. Cormac's Park, Kilcormac and St. Brochan's Park, Bracknagh, be designated as Architectural Conservation Areas'*.

CE Opinion: Architectural Conservation Areas (ACA) comprise a place, an area, or group of structures or part of a townscape, which is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest or contributes to the appreciation of protected structures; and which is listed as such an area in the County Development Plan. Geashill Village is currently the only ACA in Co. Offaly. The draft Plan will state that the Council will investigate the need for designation of further ACAs at appropriate locations throughout the county. The Council will preserve the character of Geashill ACA and any future ACA's in Co. Offaly.

3. Seek more Architectural Conservation Areas & Special Planning Control Schemes.

CE Opinion: An objective will be included in the plan to investigate the designation of further Architectural Conservation Areas at appropriate locations in Offaly.

4. Awareness needs to be raised of the importance of the built environment and architectural heritage to the growth of tourism and related employment throughout the County.

CE Opinion: The Council proposes to continue to ensure the protection and sympathetic enhancement of the built heritage of county Offaly and this will be reinforced in the draft Plan through policies, objectives and development management standards. Such policy will be duly informed by legislative requirements including consideration of national and regional guidance, including *'Project Ireland 2040 - National Planning Framework'*, *'Eastern and Midland Regional Spatial and Economic Strategy'* and relevant Section 28 Guidelines, including *'Architectural*

Heritage Protection – Guidelines for Planning Authorities, 2011'. The Council recognises the importance of encouraging high quality and well-designed development to support and promote healthy place-making and quality of life, preservation of built heritage, economic development including tourism and related industries. This will be addressed in the draft plan;

5. Policy in the new plan should be informed by the '*Architectural Heritage Protection – Guidelines for Planning Authorities*', document, published by the Department of Arts, Heritage and the Gaeltacht in 2011.

CE Opinion: The '*Architectural Heritage Protection – Guidelines for Planning Authorities*', was published by the Minister for Arts, Heritage and the Gaeltacht in October 2011 under Section 28 Planning and Development Act 2000 (as amended). In accordance with Section 12(18) of the Planning and Development Act 2000 (as amended), in preparing the draft development plan, it is a statutory obligation of the Council to ensure that the plan is consistent with planning policy requirements specified in guidelines published pursuant to Section 28 of the Planning and Development Act 2000 (as amended). Section 28 guidelines when preparing the county development plan, Section 28(1A)(b) of the Planning and Development Act 2000 (as amended), requires the Council to append a statement to the draft development plan and the development plan which shall include the information which demonstrates how the planning authority has implemented the policies and objectives of the guidelines, including the '*Architectural Heritage Protection – Guidelines for Planning Authorities*';

6. Planning laws should be positively enforced in a way that is sympathetic to the built architectural heritage of the County's urban and rural landscapes.

CE Opinion: The county development plan will comprise policies, objectives and development management standards which will assist in the decision making process. Such policies, objectives and development management standards are duly informed by relevant national and regional guidance, including '*Project Ireland 2040 - National Planning Framework*', '*Eastern and Midland Regional Spatial and Economic Strategy*' and all relevant guidelines published by the Minister under Section 28 of the Planning and Development Act 2000 (as amended).

7. The preservation of heritage to improve tourism can in turn support that preservation. Proactive policies and objectives which support the reuse and refurbishment of protected structures and older buildings which make a positive contribution to local streetscapes should be provided for in the plan.

CE Opinion: A Built Heritage Chapter will feature policies for the reuse of protected structures.

8. Seir Kieran's Monastic Site needs to be better highlighted and promoted in the history and tourism of Offaly / Ireland.

CE Opinion: The Draft Plan will recognise Seir Kieran's status as a National Monument under State Ownership and an important monastic site in County Offaly. A policy will be included in the Draft Plan to support the maintenance of, and enhanced access to monastic sites for recreational and tourism purposes, in conjunction with relevant landowners and recreational / tourism agencies.

9. Requests public realm works in Seir Kieran including a wall plaque / wall mural to honour champion cyclist JJ Kinahan; enhancement of the external area / grounds of the GAA Club; and

upgrading of the car park opposite the church grounds which is used by the church, the parish hall and the school.

CE Opinion: Objectives will be included in the Clareen Sráid Plan which will form part of the Draft Plan to support the erection of a wall plaque in honour of champion cyclist JJ Kinahan and the enhancement of the GAA grounds and car park in Seir Kieran, which could in turn support future funding applications for these works e.g. Town and Village Renewal Scheme.

10. Repurposing of listed buildings needs to be made more attractive and user friendly as a commercial undertaking.

CE Opinion: There will be policy in the draft plan to ensure the protection, sympathetic enhancement and sensitive reuse of protected structures or parts of protected structures, and the immediate surrounds included and proposed for inclusion in the Record of Protected Structures (RPS) that are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, together with the integrity of their character and setting. Furthermore, policy will be included to favourably consider the change of use of protected structures provided such a change of use does not adversely impact on its intrinsic character.

CE Policy Recommendation:

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

In this regard, it is recommended that policies be included to:

- Protect, conserve and enhance buildings, areas, structures, sites and features of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. The Council will aim to strike a reasonable balance between conservation and development objectives in the interests of the proper planning and sustainable development of the county.
- Ensure the protection, sympathetic enhancement and sensitive reuse of protected structures or parts of protected structures, and the immediate surrounds included and proposed for inclusion in the Record of Protected Structures (RPS) that are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, together with the integrity of their character and setting.
- Preserve the character of Geashill ACA and any future ACA's in Co. Offaly.
- Encourage the protection, retention, appreciation and appropriate revitalisation of the vernacular heritage of Offaly.
- Protect the industrial heritage of Offaly, including the county's mills, historic industrial buildings, canals and historic bridges.

- 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.
- Encourage the conservation, preservation, restoration and protection in their original setting of mausolea and monuments: follies, grottoes; garden buildings and other structures of particular beauty or historic, environmental, architectural or industrial significance.
- Support and promote the conservation and appropriate management and enhancement of the County's archaeological heritage within the plan area.

(x) Water Services and Environment

Submission Reference Numbers: CDP/PD: 05, 06, 28, 36, 37

The following is a summary of the main issues raised in the submissions received in this subject area:

1. Irish Water requests the inclusion of updated text to the Water Services chapter of the current Plan in respect of Chapter Context, The National Water Resources Plan, The Water Services Strategic Plan and the Irish Water Capital Investment Plan. Suggests the inclusion of policies and objectives in respect of Water Supply & Distribution; Wastewater Collection and Treatment; and Water Quality and Groundwater Protection.

CE Opinion: Irish Water is now responsible for the provision of public water supply, wastewater collection and treatment services. The Council is an agent of Irish Water through Service Level Agreements. It is acknowledged that the County's ability to accommodate future growth is dependent on the capacity of water supply and wastewater infrastructure. Offaly County Council will continue to work closely with Irish Water in the provision of such infrastructure and will have regard to Irish Waters Plans and Strategies in the formulation of the Draft Plan. Pursuant to Section 33(5)(b)(i) of the Water Services (No. 2) Act 2013, subsequently amended by Section 62 of the Planning and Development (Amendment) Act 2018, 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 Planning and Development Act 2000, as amended (e.g. County Development Plan), in particular with the core strategy as provided for under section 10 of the Planning and Development Act 2000 (as amended). Also pursuant to section 33(5)(a) Irish Water shall, when preparing a water services strategic plan ensure, as far as practicable, that the plan is consistent with the National Spatial Strategy (replaced by NPF), the regional planning guidelines (replaced by Regional Spatial & Economic Strategy), and any river basin management plans. The Water Framework Directive and River Basin Management Plans will also be key considerations for the Draft Plan in the protection of groundwater, surface water and drinking water. The Draft Plan will also promote water conservation and Sustainable Urban Drainage Systems (SUDs) to mitigate and adapt to climate change. Existing policies and objectives contained in the current Plan will be updated where appropriate.

2. The Health & Safety Authority requests the Plan to contain:
 - An indication of planning policy in relation to major accident hazard sites notified under the regulations, which reflects the intentions of Article 13 of Directive 2012/18/EU
 - The consultation distances and generic advice, where applicable, supplied by the HSA in relation to such sites. These distances to be indicated on the various maps included in the Plan, as well as more specific distances and advice supplied by the Authority.
 - A policy on the siting of new major hazard establishments, taking account of Article 13 and the published policy of the Authority in relation to new developments, including developments in the vicinity of such establishments.

- There are currently two COMAH establishments in the County Offaly which are as follows: Synergy Health Ireland Ltd and William Grant & Sons Irish Manufacturing in Tullamore.

CE Opinion: The Major Accidents Directive (2012/18/EU), also known as the Seveso III Directive, was transposed into Irish legislation through the Chemicals Act (Control of Major Accident Hazards involving Dangerous Substances) Regulations 2015 (S.I. No. 209 of 2015) (the “COMAH Regulations”). The Directive aims to prevent major accident hazards involving dangerous substances and chemicals and the limitation of their consequences for people and the environment. The Draft Plan will have regard to the Major Accidents Directive and the comments of the Health & Safety Authority. Existing policies, objectives and maps contained in the current Plan will be updated where necessary.

3. The ‘EPA Water Quality in 2017: An Indicators Report’ stated that 56% of our rivers are at high or good biological quality with the remaining 44% at moderate or worse. In particular, nitrate concentrations are a cause of concern for many water schemes including Geashill where concentrations appear to have risen gradually over the last number of years.

CE Opinion: The Draft Plan will support the implementation of the EU Water Framework Directive (WFD) which aims to improve our water quality of all our waterbodies (rivers, lakes, estuaries and coastal waters) and the River Basin Management Plan for Ireland 2018-2021 which sets out the actions that Ireland will take to improve water quality and achieve ‘good’ ecological status in water bodies by 2027.

4. Water and wastewater limitations along with congestion issues are inhibiting economic growth in Tullamore.

CE Opinion: Irish Water is responsible for the provision of public water supply, wastewater collection and treatment services. The Council is an agent of Irish Water through Service Level Agreements. It is acknowledged that the County’s ability to accommodate future growth is dependent on the capacity of water supply and wastewater infrastructure. Offaly County Council will continue to work closely with Irish Water in the provision of such infrastructure and will have regard to Irish Waters Plans and Strategies in the formulation of the Draft Plan. In respect of Tullamore, Offaly County Council will work closely with Irish Water in the implementation of the Tullamore Area Drainage Plan.

5. Provide policies to achieve legal obligations under the Water Framework Directive and River Basin Management Plans, and be consistent with the Waste Water Discharge (Authorisation) Regulations.

CE Opinion: The plan will provide policies and objectives in relation to environment and water services that are in accordance with related legislation.

6. Do not grant permission for developments where there is insufficient cumulative capacity within the relevant waste water treatment plant.

CE Opinion: Planning applications will be referred where necessary to Irish Water who are the body responsible for wastewater and related capacity. Their reports will be considered.

7. All private wastewater treatment proposals shall comply with the EPA Code of Practice.

CE Opinion: The new plan will refer to the EPA Code of Practice.

8. Use SuDs and rainwater harvesting in all new development proposals.

CE Opinion: SuDs and rainwater harvesting standards will be included in the development management standards chapter of the new plan, as is the case in the current County Development Plan.

CE Policy Recommendation:

While many infrastructural requirements and issues relating to public water services are not the direct remit of Offaly County Council, they have implications for planning and development. Offaly County Council will work closely with Irish Water to facilitate the timely provision of water services infrastructure within the County in line with Council's Core Strategy and Settlement Strategy.

It is recommended that policies in the next Development Plan should seek to:

- Liaise and co-operate with Irish Water in the implementation and delivery of the 'Water Services Strategic Plan (2015)', the 'Irish Water Business Plan 2015-2021', the future 'Irish Water National Water Resource Plan' and the future 'Irish Water Investment Plan 2020-2024' (or any amendment thereof) and other relevant investment works programme of Irish Water, to provide infrastructure to service settlements in accordance with the Council's Core Strategy and Settlement Strategy.
- 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.
- Require developments to connect to public water supplies where adequate, or where proposals for upgrading works are put forward, as appropriate.
- Promote the sustainable use of water and water conservation in existing and new development within the County and encourage demand management measures among all water users.
- Co-operate and support Irish Water to eliminate untreated discharges from settlements in the short term, while planning strategically for long-term growth in tandem with Project Ireland 2040 and in increasing compliance with the requirements of the Urban Waste Water Treatment Directive to 90% by the end of 2021, to 99% by 2027 and to 100% by 2040.
- Ensure that proposed wastewater treatment system for development in unserved areas complies with the relevant EPA Codes of Practice.
- Have regard to and conform with policies and objectives contained in the Irish Water's National Wastewater Sludge Management Plan.
- Ensure adequate surface water drainage systems are in place which meet the requirements of the Water Framework Directive and the associated River Basin Management Plan(s).

- Limit and manage the permitted stormwater run-off from all new developments. The maximum permitted surface outflow from any new development is to be restricted to that of a greenfield site before any development took place unless otherwise agreed with Offaly County Council (as per the existing County Development Plan).
- 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 adaption.
- Require the use of sustainable urban drainage systems (SuDS) to minimise and limit the extent of hard surfacing and paving and require the use of sustainable urban drainage techniques where appropriate, for new developments or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risks and to provide amenity, biodiversity and recreational benefits. For large scale residential schemes, business parks and industrial parks, a Green Infrastructure Masterplan should be required and shall consider among other things, proposed SuDs systems.

4 Summary of EMRA Submission & CE's Recommendations

This section contains a summary of the issues raised & recommendations made by the Eastern & Midland Regional Assembly (EMRA), and the recommendations of the CE in relation to the manner in which those issues and recommendations will be addressed in the draft Development Plan.

Issues raised & recommendations made by EMRA:

1. In accordance with the provisions of the Planning & Development Act 2000 (as amended), ensure that the entirety of the Co. Development Plan is consistent with the Regional Spatial & Economic Strategy (RSES) for the Eastern & Midland Regional Assembly (EMRA) area.

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

2. Attention is brought by EMRA to the Growth Enablers stated in section 3.2. of the RSES which are:
 - Promote regional accessibility & integrated landuse and transportation,
 - Support the future success of Dublin as Ireland's leading global city of scale,
 - Target significant growth in the Regional Growth Centres (e.g. Athlone),
 - Promote compact urban growth to realise targets of at least 30% of the urban areas of Offaly (which is also addressed in Regional Policy Objective ref RPO 3.2 of RSES which states that the Core Strategy shall set out measures to achieve compact urban development targets of at least 30% for the urban areas in Co. Offaly),
 - Embed a network of Key Towns throughout the region (e.g. Tullamore), which have the capacity to deliver sustainable compact growth and employment in their catchments in tandem with enabling public transport, infrastructure and service.
 - Promote targeted 'catch up' 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 renewables, recreation and tourism opportunities including green infrastructure planning and the development of an integrated network of greenways, blueways and peatways.

CE Recommendation: *It is proposed to include in the plan the Key Enablers for growth for the region as they affect Co. Offaly and to ensure compliance with RPO 3.2 of the RSES which relates to requiring at least 30% of future homes that are targeted in settlements to be located within the existing built-up footprint of the settlements in an effort to make settlements more compact*

and reduce unsustainable urban sprawl and ribbon development as is stated in National Policy Objective 3c of the National Planning Framework. The county population target will accord with Appendix 2 of the RSES.

3. The Co. Development Plan shall ensure consistency with RPO 3.3 of the RSES which states that Core Strategies shall identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide increased densities as set out in the *'Sustainable Residential Development in Urban Areas Guidelines'*, the *'Sustainable Urban Housing: Design Standards for new Apartments Guidelines'* and the *'Urban Development and Building Heights Guidelines for Planning Authorities'*.

CE Recommendation: The Core Strategy will provide average densities for the settlement typologies in accordance with Government Guidelines. Regeneration / Opportunity sites will be identified in the plan.

4. A Settlement Hierarchy will be required as part of preparing the Core Strategy of the plan to ensure that towns grow at a sustainable and appropriate level in accordance with RPO 4.1 of the RSES. Tullamore is designated as a Key Town in the RSES and its role is described in the RSES which will be adhered to in the plan (Table 4.3, RPO 4.26, RPO 4.68 to 4.70; which refer to it being a large economically active county town, develop the town through compact growth with a focus on key sites for regeneration, support the town's role as a Tourism Destination Town, support the town as a service hub for the *'Midlands Cycle destination – Offaly'*, and the recognition of the town's potential as a conferencing and event hub, support its role as a major employment centre, and to examine the need for complementary third level outreach educational facilities at Tullamore.

CE Recommendation: A Settlement Hierarchy will form part of the plan which is also required in accordance with the provisions of the Planning & Development Act 2000 as amended. It will utilise the format set out in Table 4.1 of the RSES; key town, self-sustaining growth towns, self-sustaining towns, towns, and rural which includes villages and the wider rural area. Recognition of Tullamore's role as a Key Town as set out in the RSES will be made in the plan.

5. Adherence with RPO 4.2 of the RSES is required in preparing the plan, by ensuring that infrastructure investment and priorities are aligned with the spatial planning strategy. It states that all residential and employment developments should be planned on a phased basis in collaboration with infrastructural providers so as to ensure adequate capacity for services is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.

CE Recommendation: In preparing the plan, the capacity of services to meet demand will be investigated in order to ensure alignment with proposed growth.

6. The Asset-Based Approach to spatial development utilised in section 3.1 and Appendix A of the RSES would be useful in formulating a Settlement Strategy of the plan that secures the proper planning and sustainable development of the area.

CE Recommendation: The Asset-Based Approach utilised in the RSES will be considered as a basis for compiling the Settlement Strategy of the plan.

7. The vision of the Co. Development Plan should consider the vision, key principles and RSO's stated in Chapter 2 of the RSES.

CE Recommendation: The vision of the Co. Development Plan will consider the vision, key principles and Regional Strategic Outcomes (RSOs) stated in Chapter 2 of the RSES. It is noted that the Vision statement in the RSES states *'To create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all'*. The key principles are; healthy place-making, climate action, and economic opportunity. The Regional Strategic Outcomes (RSO's) of the RSES are;

- Sustainable settlement patterns
 - Compact growth and urban regeneration
 - Rural communities
 - Healthy communities
 - Creative places
 - Integrated transport and land use
 - Sustainable management of water, waste and other environmental resources
 - Build climate resilience
 - Support the transition to low carbon and clean energy
 - Enhanced green infrastructure
 - Biodiversity and natural heritage
 - A strong economy supported by enterprise and innovation
 - Improve education skills and social inclusion
 - Global city region
 - Enhanced strategic connectivity
 - Collaboration platform.
8. Alignment will be required between the policies of the National Planning Framework and the RSES with the Core Strategy, Settlement Strategy and Housing Strategy of the Plan. Sections 9.3 and 4.8 of the RSES will provide further direction to assist in formulating policy for the plan. Section 9.3 relates to the Asset-Based Approach, Housing Need Demand Assessment, and Regeneration. It also states that housing quality is important in order to secure positive health outcomes. Section 4.8 relates to:

- The Challenges Facing Rural Places (e.g. *'In general, those rural places in proximity to large urban centres have experienced significant growth and urban generated pressures and require levels of growth to be managed in order to ensure that there is a requisite service level for the existing population'*), and
- Planning for Future Growth of Rural Places [e.g. (i) *'Support for housing and population growth within rural towns and villages will help to act as a viable alternative to rural one-off housing, contributing to the principles of compact growth'*, (ii) *'The NPF and RSES make a distinction between areas under urban influence i.e. within the commuter catchment of cities and large towns and centres of employment, and rural areas outside these catchments'*, (iii) *'The NPF identified the need to strengthen and diversify rural towns to be a focus for local housing and employment growth'*, (iv) *'The countryside within the region provides for rural economies and rural communities, based on agriculture, forestry, tourism and rural enterprise. This should be facilitated while avoiding overspill development from urban areas and urban generated housing'*].

CE Recommendation: It is proposed to align the Core Strategy, Settlement Strategy and Housing Strategy of the Plan with the policies of the National Planning Framework and the RSES.

9. The Council is obliged to make a Housing Need Demand Assessment (HNDA).

CE Recommendation: A Housing Need Demand Assessment (HNDA) will be made which will feed into the Plan. A HNDA is a robust evidence base undertaken to correlate and accurately align future housing requirements which informs housing policies, the housing strategy in terms of the proportion of social and affordable housing required, and the Core Strategy through associated land requirements.

10. Information contained in chapters 7, 8 and 10 of the RSES will assist in developing policy in the plan relating to climate action and energy. Attention is drawn by EMRA to Regional Policy Objective RPO 7.9 of the RSES. This states that it is an objective to *'support collaboration between local authorities, the Bord na Móna Transition Team and relevant stakeholders and the development of partnership approaches to integrated peatland management that incorporate any relevant policies and strategies such as Bord na Móna Biodiversity Plan 2016-2021 and the national Climate Mitigation and Adaptation Plans. This shall include support for the rehabilitation and / or re-wetting of suitable peatland habitats'*. Attention is also drawn to Guiding Principles for peatland areas as stated in the RSES as follows;

- consideration of the potential contribution of peatlands to climate change mitigation and adaptation including renewable energy production,
- consideration of habitats and species of environmental significance,
- consideration of the potential contribution of peatlands to an existing or proposed greenway/ blueway / peatway network,
- consideration of the ecosystem services and tourism provided by peatlands,
- development of peatlands shall ensure that there are no negative impacts on water quality.

CE Recommendation: The RSES will be used to as a contributor to formulating policy in relation to climate action and energy. It is proposed that reference will be made in the plan to Offaly County Council working in collaboration with other local authorities, the Bord na Móna Transition Team and relevant stakeholders; the development of partnership approaches to integrated peatland management and; the preparation of a comprehensive after use framework plan for industrial peatlands and associated workshops / office buildings / industrial sites. It is proposed to accord with the Guiding Principles for Peatlands as set out in the RSES in terms of assessing development on peatlands.

11. Chapter 6 of the RSES will be of assistance in developing policy relating to Economy & Employment. In particular reference is made by EMRA to section 6.4 (sectoral opportunities), section 6.4 (retail), Regional Policy Objectives RPOs 6.4-6.9, 6.19-6.20, and 4.84. These relate to:
- Provision of regeneration of rural towns and villages
 - Support local authorities to develop sustainable and economically efficient economies through initiatives to enhance sectors such as agricultural and food, forestry, fishing and aquaculture, energy and extractive industries, the bioeconomy, tourism, and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage.
 - EMRA supports Regional Enterprise Plans to focus on:
 - o Advanced manufacturing
 - o Leverage opportunities in Big data and data analytics from iLOFAR
 - o Transition to a low carbon economy and renewable energy
 - o Develop a network of innovative co-working spaces in the Midlands to mitigate long commuting, promote remote working opportunities and life-style benefits.
 - Link the River Shannon Blueway, the Royal and Grand Canal Greenways and the proposed Barrow Blueway.
 - Develop the 'Midlands Cycling Destination – Offaly'
 - 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. Support the longer term strategic planning for industrial peatland areas which may involve the putting in place of a Transition Team, preparation of a comprehensive after-use framework plan for the peatlands which addresses environmental, economic and social issues, including employment and replacement enterprise.

CE Recommendation: The draft plan will include policy relating to economy & employment, regeneration, supporting the rural economy (e.g. tourism, renewable energy, agri-business, strategic afteruse of industrial peatland areas), supporting advanced manufacturing, big data and data analytics, iLOFAR, transition to a low carbon economy and renewable energy, the development of innovative co-working spaces, promotion of remote working, linking of the various Greenways i.e. River Shannon Blueway, the Royal and Grand Canal Greenways and the

proposed Barrow Blueway, and development of 'Midlands Cycling Destination – Offaly'. It will support the Midlands Regional Enterprise Action Plan 2019-2020 and future editions.

12. Elements of chapter 7, 8, 9 and 10 of the RSES will aid the Council in developing policy relating to biodiversity, landscape, natural heritage, green infrastructure, protected structures and infrastructure. Regional Policy Objective RPO 8.6 outlines the requirement to make a Local Transport Plan for Tullamore.

CE Recommendation: The plan will include policy relating to biodiversity, landscape, natural heritage, green infrastructure, protected structures and infrastructure, which will adhere to the RSES. An objective will be inserted to make a Local Transport Plan for Tullamore.

13. EMRA state that Chapter 9 of the RSES details subjects including diversity, inclusivity, housing, regeneration, healthy place-making, social opportunity, economic opportunity, access to childcare, education, health services and access to arts, culture, language and heritage, which will support the Council in developing relevant policy in the plan.

CE Recommendation: It is proposed to insert into the plan policies relating to diversity, social inclusion, housing, regeneration, healthy place-making, social and economic opportunity, access to childcare, education, health services and arts, culture, language and heritage.

14. EMRA state that the RSES recognises the contribution that rural places make towards regional and national development in economic, social and environmental terms. Reference is made to section 4.8, section 6.4 and Regional Policy Objective RPO 4.84 of the RSES. Section 4.8 has been addressed in point 8 above. Section 6.4 relates to the role of the various settlement typologies e.g. key town. RPO 4.84 refers to the support of 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. Support the longer term strategic planning for industrial peatland areas which may involve the putting in place of a Transition Team, preparation of a comprehensive after-use framework plan for the peatlands which addresses environmental, economic and social issues, including employment and replacement enterprise.

CE Recommendation: The plan will recognise the contribution that rural places make economically, socially and environmentally. This will be dispersed through many chapter of the plan.

15. The plan shall be carried out in tandem with the required environmental processes, namely Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment.

CE Recommendation: The plan will be carried out in tandem with the required environmental processes, namely Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. Consultants are engaged to carry out these assessments.

5 Summary of Issues Raised During Public Consultation Sessions

A number of issues were raised at the public consultation meetings and are summarised below. This summary is not location specific and relates to the general queries and topics that were discussed at the meetings.

Tullamore Session:

- Provide regular seating for older people along streets.
- Provide a workshop space in the proposed Arts Centre for older persons.
- Signpost the shortest route from Dublin to Galway via Edenderry through Tullamore and through Shannonbridge. This would bring more people into the county and past e.g. the Grand Canal Greenway and Lough Boora. Another route is the Kinnegad via Clara via Clonmacnoise route.
- Provide set-down areas for older persons at retail centres.
- Provide 'WeWork' in Tullamore e.g. at the Grand Canal Docklands site.
- Provide more Greenways (e.g. Lough Boora to Slieve Bloom Mts) and link them together
- Enquired whether the Council will continue to reserve land for the western leg of the Tullamore by-pass.
- Offaly should be exploited as a destination as it is only 1 hours from Dublin.
- Promote the R421 as a Scenic Route.
- Protect the Slieve Bloom Mts from Wind Energy development.
- Have regard to the cumulative impact of permitted wind energy facilities.
- Need to recycle more and reduce plastics.
- Enquired would there be a Solar Energy Strategy.
- Protect environmental designations on bogs.
- Don't want large housing estates in Kinnitty.
- Concerned about the Wind Energy Strategy, particularly the location of windfarms around Mountbolus.
- Small villages could do with some housing to maintain services.

Edenderry Session

- Wants a community hub in Walsh Island. Funding sought for it under the Town & Village Scheme this year.
- Are about 7 derelict properties in Walsh Island.
- Would like to see more development in the centre of Walsh Island village.
- Would like to see retro fitting of older buildings as a result of the transition from peat to alternative heating systems / greater insulation.

Birr Session:

- Want heritage buildings protected.
- See benefits of renewable energy.
- Want sustainable development.
- Promotion of The Growery and Irish Regenerative Land Trust as ways of adapting to climate change / reducing carbon footprint.
- Climate change mitigation schemes should be promoted such as One Planet Development in Wales and agricultural schemes.
- Policy on climate change should be holistic, practical and measurable.
- One of the visitors is researching and developing 3 wheel pods capable of driving and without a driver at College. Customers may reserve and pay for a pod through an app and a pod will drive itself to the customers' address and back to base following the customer reaching their destination. Settlements in west of the county may be suitable for R&D and maintenance of the pods.
- The River Shannon should be greater capitalised on by Banagher and Shannonbridge.
- References that 'The Growery' in Birr supplies vegetables to HSE clinics and local restaurants and organisers run courses. Council should look at allowing parts of centrally located land in settlements and smaller/narrow tracts of open space to be used for growing vegetables as its more sustainable to grow food locally and it would be an opportunity for economic development and social interaction for people.
- Co-operative housing should be provided in Offaly. Housing co-operatives can be involved in the building, management and maintenance of houses and apartments across various forms of tenure – rental and ownership.
- A walkway should be encouraged from the Catholic Church in Clareen to the Seir Kieran remains.
- The community centre in Clareen should be refurbished.
- Pollination zones could be located around Clareen.
- A public realm/market area is needed at the crossroads in Clareen.
- Enquired in relation to the phasing of land that took place through variation in response to the making of the first Core Strategy ca 2010.
- Need to protect the heritage of Birr town.
- Need enforcement action particularly in relation to the replacement of original windows in protected structures with upvc.
- Want to retain the zoning of particular land; however, it was explained that zoning does not form part of the first stage of public consultation on the pre-draft plan.
- Want to retain a road objective in the new Development Plan.

6 Procedure Following Chief Executive's Report

Not later than 10 weeks following the receipt and consideration of this Chief Executive's report (i.e. no later than 29th January 2020), the Members may issue directions to the Chief Executive regarding the preparation of the Draft Offaly County Development Plan 2021-2027. Any such directions shall be strategic in nature, consistent with the draft core strategy and shall take account of the statutory obligations of the Council and any relevant policies or objectives for the time being of the Government or of any Minister of the Government. A Council meeting will be arranged in December with the Members to consider the CE report, which will then be followed by a meeting in January where members will give written directions.

In issuing directions, the Members shall be restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates.

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

Appendix A: Copy of Public Notice

Copy of the Public Notice published under section 11(2) of the Planning & Development Act 2000 (as amended), including public consultation sessions held under section 11(3)(b) of the Planning & Development Act 2000 (as amended)

TELL US YOUR VIEWS & BECOME INVOLVED IN THE FUTURE OF CO. OFFALY

COMHAIRLE CHONTAE UÍBH FHAILÍ

OFFALY COUNTY COUNCIL

Notice of Intention to review the Offaly County Development Plan 2014 - 2020 and to prepare a new Offaly County Development Plan 2021-2027

Notice is hereby given in accordance with Section 11(1) of the Planning and Development Act 2000 (as amended) that Offaly County Council intends to review its existing Offaly County Development Plan 2014-2020 and to prepare a new Offaly County Development Plan 2021-2027.

The preparation of a new Development Plan for County Offaly shall be strategic in nature for the purposes of developing objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area of the Development Plan and the Core Strategy.

SEA and AA

The Planning Authority will carry out a Strategic Environmental Assessment (SEA) as part of the review process, pursuant to Article 13B of the Planning and Development (SEA) Regulations 2004 (S.I. No. 436 of 2004), as amended by the Planning and Development (SEA) (Amendment) Regulations 2011 (S.I. No. 201 of 2011).

For this purpose, the Planning Authority will prepare an environmental report of the likely significant effects on the environment of implementing the new plan. The provisions of Articles 13C to 13J of the SEA Regulations (as amended) shall apply while undertaking the SEA.

Stage One Appropriate Assessment (AA) Screening (and Stage Two AA, if required), pursuant to Article 6 of the Habitats Directive 92/43/EEC and the Planning and Development Act 2000 (as amended), and Strategic Flood Risk Assessment, in compliance with "The Planning System and Flood Risk Management Guidelines for Planning Authorities" (2009), will also be carried out as part of the review process.

Planning Consultation Paper and Public Consultation

In order to stimulate debate and encourage participation in this process the Planning Authority has prepared a Planning Consultation Issues Paper which will be available for inspection from the Planning Department, Offaly County Council, Áras an Chontae, Charleville Road, Tullamore, Co. Offaly during public opening hours and on the website at www.offaly.ie/cdp2021-2027.

As required by Section 11 (3) of the Planning and Development Act 2000 as amended, public consultation sessions will be held at the following locations:

Public Consultation Sessions	Date	Time
Tullamore Offaly County Council, Áras an Chontae, Charleville Road, Tullamore, Co. Offaly	Monday 19 th August 2019	4-7pm
Edenderry Edenderry Municipal District, Market Square, Edenderry, Co. Offaly	Tuesday 20 th August 2019	4-7pm
Birr Birr Municipal District, Civic Offices & Library, Wilmer Road, Birr, Co. Offaly	Monday 26 th August 2019	4-7pm

These sessions will be facilitated by staff of the Forward Planning Section of Offaly County Council. Individuals, groups, organisations or representatives are all invited to discuss any element or issues stemming from the existing Offaly County Development Plan (2014-2020) and to play a part in shaping the new Offaly County Development Plan (2021-2027).

Submissions/Observations

Offaly County Council hereby invites any interested parties to make a submission or observation in accordance with the review of the existing Offaly County Development Plan 2014-2020 and preparation of the new Offaly County Development Plan 2021-2027, including the Strategic Environmental Assessment and Appropriate Assessment processes.

In respect of making a submission or observation please note the following:

- Submissions should relate to the proper planning and sustainable development of Co. Offaly.
- Children or groups or associations representing the interests of children, are entitled to make submissions or observations regarding the objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area of the development plan.
- The Planning Authority intends to review the zoning of the area of the development plan for the purposes of developing objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area of the development plan and core strategy. **However, requests or proposals for the zoning of particular land for any purpose shall not be considered at this stage. (Any such submissions will be returned).**

- If you consider that you have a disability, please give details of any special requirements for public consultation purposes that you may have in order that appropriate arrangements can be made if necessary.

Submissions or observations regarding the review of the existing Offaly County Development Plan 2014-2020 and the preparation of the new plan Offaly County Development Plan 2021-2027 may be made to the Planning Authority from **the 31st July 2019 to 26th September 2019 (both dates inclusive)** and can be submitted by one of the following mediums:

- In writing to: Review of County Development Plan, Forward Planning Department, Offaly County Council, Áras an Chontae, Charleville Road, Tullamore, Co Offaly.
- Online at www.offaly.ie/cdp2021-2027.

Please make your submission or observation by one medium only i.e. in hard copy or online. This will avoid the duplication of submission reference numbers and will streamline the process. All submissions should be clearly marked **“Review of County Development Plan”**. 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.

The deadline for receipt of all submissions is 4pm 26th September 2019.

Please note that public submissions may be published on the Offaly County Council website and subject to Freedom of Information.

Signed: Tom Shanahan
Director of Services
Planning Section
31st July 2019

Appendix B: List of Persons / Bodies who made submission / observation received within the statutory timeframe for public consultation under section 11(2)(b) of the Planning & Development Act 2000 as amended. (46 no.)

Ref. No.	Name of Persons / Bodies
CDP/PD/01	Trevor Hayden
CDP/PD/02	Fergal MacCabe
CDP/PD/03	Frank & Anne Kilrane
CDP/PD/04	Fergal MacCabe
CDP/PD/05	Irish Water
CDP/PD/06	Health & Safety Authority
CDP/PD/07	Construction Industry Federation (Midland Branch)
CDP/PD/08	Dean Brickland
CDP/PD/09	Eastern and Midland Regional Assembly
CDP/PD/10	Transport Infrastructure Ireland
CDP/PD/11	National Transport Authority
CDP/PD/12	Lorna Ryan
CDP/PD/13	Dean Brickland
CDP/PD/14	CNN Construction Ltd
CDP/PD/15	Laois County Council
CDP/PD/16	Department of Education & Skills
CDP/PD/17	RGDATA
CDP/PD/18	Vincent Hussey
CDP/PD/19	Tadhg O’Cruadhlaich
CDP/PD/20	Peter Doolan
CDP/PD/21	Geological Survey Ireland
CDP/PD/22	Meath County Council
CDP/PD/23	Office of the Planning Regulator
CDP/PD/24	Ferbane Tidy Towns
CDP/PD/25	Olympia Investments Ltd
CDP/PD/26	Michael Hoey
CDP/PD/27	Gas Networks Ireland
CDP/PD/28	Tim O’Rourke
CDP/PD/29	Anam Beo, Offaly Arts, Health & Wellbeing
CDP/PD/30	Anam Beo, Offaly Arts, Health & Wellbeing
CDP/PD/31	Electricity Supply Board
CDP/PD/32	PJ Dooley
CDP/PD/33	Elgin Energy
CDP/PD/34	Clemens von Ow
CDP/PD/35	EirGrid
CDP/PD/36	Flanagan Properties Ltd
CDP/PD/37	An Taisce
CDP/PD/38	Tullamore and District Chamber of Commerce
CDP/PD/39	Birr and Midlands Chapter Irish Georgian Society
CDP/PD/40	I-LOFAR Consortium
CDP/PD/41	Fáilte Ireland

CDP/PD/42	Roger Guiney
CDP/PD/43	Fáilte Ireland
CDP/PD/44	Seir Kieran Community Group
CDP/PD/45	Inland Waterways Association of Ireland (Offaly Branch)
CDP/PD/46	Bord na Móna

Appendix C: Bodies required to be notified under section 11(2) of the Planning & Development Act 2000 (as amended) (38. no.)

Notified Bodies
Minister for Housing, Planning & Local Government
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 Business, Enterprise & Innovation
Environmental Protection Agency (EPA)
An Bord Pleanála
Dublin Airport Authority
Department of Culture, Heritage & the Gaeltacht
Minister for Communications, Climate Action and Environment
Minister for Rural & Community Development
Minister for Defence
Minister for Agriculture, Food and the Marine
Minister for Transport, Tourism and Sport
Minister for Education and Skills
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: Interested Bodies consulted under section 11(3)(c) of the Planning & Development Act 2000 (as amended) (24 no.)

Interested Bodies
Bord Gáis Energy
Bord na Móna
Bus Éireann
Superintendent at Tullamore Garda Station
Superintendent at Birr Garda Station
Eir
Iarnród Éireann
Irish Bioenergy Association
Irish Solar Energy Association
Irish Wind Energy Association
Offaly & Laois Education & Training Board
Sustainable Energy Authority of Ireland
Three
Vodafone
Waterways Ireland
Offaly County Childcare Committee
Offaly Sports Partnership
Coillte
ESB Networks
Commission for Regulation of Utilities
National Youth Council of Ireland
Construction Industry Federation
National Transport Authority

Appendix E: List of Late Submissions Received which could not be considered (6 no.)

Ref No.	Name of Persons / Bodies
CDP/PD/L01	Walsh Island Development Group
CDP/PD/L02	K & P Beacon
CDP/PD/L03	Pat Guinan
CDP/PD/L04	Midland Airport Developments Ltd.
CDP/PD/L05	Julie Spollen
CDP/PD/Z04	Ronan Corcoran

Note Ref no. Z04 was also zoning related

Appendix F: List of Zoning related submissions received which could not be considered (4 no.)

Ref No.	Name of Persons / Bodies
CDP/PD/Z01	Ken Matthews
CDP/PD/Z02	Condron Concrete Ltd.
CDP/PD/Z03	James Choiseul
CDP/PD/Z04	Ronan Corcoran

Note Ref no. Z04 was also late