



# Offaly County Development Plan 2021 - 2027

## Chief Executive's Report on Material Alteration Consultation Stage

Comhairle Chontae Uíbh Fhailí  
Offaly County Council



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## 1 Requirement for CE's Report

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

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

This report is a requirement of section 12 (8) of the Planning and Development Act 2000 (as amended) whereby the Planning Authority is obliged to '*prepare a report on any submissions or observations received*' within a specified submission/observation period. Not later than 8 weeks after publishing notice of the proposed material alterations, the planning authority shall prepare the CE report. Therefore, this CE report is required to be circulated to the Elected Members of Offaly County Council for their consideration.

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

The CE's Report is required to:

- List the persons or bodies who made submissions or observations.
- Summarise the recommendations, submissions and observations made by the Office of the Planning Regulator (OPR).
- Summarise the submissions and observations made by any other person.
- Give the response of the CE on the issues raised taking account of (a) any directions of the members of the authority, (b) the proper planning and sustainable development of the area, (c) the statutory obligations of any local authority in the area, and (d) any relevant policies or objectives of the Government or of any Minister of the Government.

## 2 Consultation Undertaken on Draft Plan

### 2.1 Methods of Consultation

The public consultation stage of the material alterations to the draft Offaly County Development Plan 2021-2027 took place from the 17<sup>th</sup> June 2021 to the 16<sup>th</sup> July 2021 (inclusive).

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

- The material alterations to the draft Plan was uploaded onto a dedicated webpage [www.offaly.ie/cdp2021-2027](http://www.offaly.ie/cdp2021-2027).
- Hard copies of the material alterations were available for inspection at the following locations: Branch Libraries at Birr, Clara, Edenderry and Tullamore (during branch opening hours).
- The statutory public notice was advertised in locally circulating newspapers, a copy of which is provided in Appendix A;

Local Papers
Leinster Express
Midlands Tribune
Offaly Topic
Tullamore Tribune

- Notification of the material alterations and a link to the website was issued to:
  - The prescribed authorities listed in Appendix C (required under section 12(7)(a) of the Planning Act).
  - Offaly's elected members and Oireachtas members.
- Notification of the material alterations were advertised on the Council's Twitter, Facebook and Instagram accounts.

## 2.2 Submissions

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

2376 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 3 no. late submissions received outside the statutory timeframe for accepting submissions/observations which cannot be considered. They are listed in Appendix D.

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

### 3.1 Introduction

This section contains a summary of the 2376 no. written submissions received as part of the consultation process, and the response of the CE to the recommendations / submissions / observations raised therein.

Section 12(7)(b)(ii) of the Planning and Development Acts as amended relates to the stage of the review process where submissions are invited 'with respect to the proposed amendment' to the draft plan.

In accordance with section 12(8)(b)(iii) of the Planning Act, the CE's response on the issues raised in the submissions take account of (a) any directions of the members of the authority, (b) the proper planning and sustainable development of the area, (c) the statutory obligations of any local authority in the area, and (d) any relevant policies or objectives of the Government or of any Minister of the Government.

Submissions are addressed in this CE Report under topic headings in section 3.2 below, and in relation to settlements in section 3.3. The submission received by the Office of the Planning Regulator (OPR) is addressed in sections 4. Submissions in relation to Protected Structures are included in section 5.

Appendix B of this CE Report lists the reference numbers and accompanying names of all submissions.

Recommended proposed new text as an amendment to the draft Plan is coloured in red in the CE Responses (**abcdefghijkl**), whilst recommended text to be removed from the draft Plan is indicated by green strike-through in the CE Responses (~~abcdefghijkl~~).

## 3.2 Submissions – Volume 1 and Strategies / Addendums

### 3.2.1 Local / Central Government

[Ref: CDP/MA/434](#)

**Person / Body:**

**HSE**

#### **Summary of submissions / observations:**

The submission quotes sections from Chapter 14 of the Plan titled ‘Implementation and Monitoring’, such as;

*‘As far as practicable, every effort has been made to formulate objectives that are specific, measurable, achievable and realistic’*

*‘...a progress report on achieving the objectives will be prepared within 2 years of implementing the development plan’.*

The submission states that no further details are provided on the nature of the progress reports or the data sources which will be utilised to monitor progress on the policy objectives outlined in the Development Plan.

Submission makes following requests;

- It is recommended that criteria for ‘measuring progress’ is outlined for individual policy objectives (where applicable). Offaly County Council could consider setting specific targets in the Development Plan as a goal to work towards.
- Offaly County Council should highlight and promote areas where progress is being made and also examine areas where less was achieved and investigate the reasons why. Any barriers to the implementation of the policy objectives should be identified.
- It is recommended that local communities are involved in the monitoring process. The results of all monitoring and progress reports should be made public.

#### **CE Response:**

Chapter 14 is set out in Material Alteration Ref No. MA258.

There are a number of legislative provisions which relate to monitoring and implementation in the Planning and Development Act 2000 as amended, such as:

Section 10 of the Act sets out content requirements of Development Plans.

Section 15(1) of the Act states that it shall be the duty of a planning authority to take such steps within its powers as may be necessary for securing the objectives of the development plan.

Section 15 (2) of the Act states that the planning authority shall, not more than 2 years after the making of a development plan, give a report to the members of the authority on the progress achieved in securing the objectives.

Section 23 of the Act outlines requirements in relation to monitoring and evaluation of the Regional Spatial and Economic Strategy (RSES) by Regional Assemblies.

Section 6 of the Departmental Guidance document titled 'Development Plan, Guidelines for Planning Authorities', 2007, provides guidance in relation to monitoring and evaluation which will be of assistance in this area. (New Development Plan Guidelines are awaited).

The progress report will be uploaded on the council website for public inspection.

Recommendation: No Change

**Ref: CDP/MA/993**

**Person / Body:**

**Meath County Council**

**Summary of submissions / observations:**

- a) Meath County Council is satisfied with the response to its initial submission as set out in the Chief Executive Report, March 2021.
- b) Meath County Council looks forward to continuing to work in partnership with Offaly County Council and the Eastern and Midland Regional assembly (EMRA) to achieve the continued sustainable growth of our region.

**CE Response:**

- a) Noted
- b) Noted

Recommendation: No Change

**Ref: CDP/MA/1000**

**Person / Body:**

**Dept. of Education**

**Summary of submissions / observations:**

- a) Material alteration MA19, which proposes to change population projections in Tullamore, Edenderry and Portarlinton, could have some impact on school capacity, however the requirements as identified in the Department's submission to the draft Plan remain unchanged.
- b) Notes that the requirements identified in the original submission to the Draft Plan for the reservation of sites for one primary school and one post-primary school in Tullamore are to be considered in the forthcoming Tullamore Local Area Plan (LAP).
- c) Notes and welcomes the retention of the Community Service Facilities zoning of circa 2.3 ha land west of Lidl in Birr as per the request of their submission to the draft Plan.
- d) Acknowledges Offaly County Council for the ongoing assistance in relation to school planning matters.



**CE Response:**

- c) Noted
- d) Noted
- e) Noted
- f) Noted

Recommendation: No Change

### 3.2.2 Environmental

[Ref: CDP/MA/74](#)

**Person / Body:**

**EPA**

#### **Summary of submissions / observations:**

The submission received from the EPA refers to both the proposed Material Alterations and to the Strategic Environmental Assessment (SEA) in respect of the proposed Material Alterations.

#### Proposed Material Alterations

- a) In proposing the alterations, Offaly County Council should ensure that the Plan, as amended, is consistent with the need for proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required to be put in, to service any development proposed and authorised during the lifetime of the Plan.
- b) In considering the Alterations, Offaly County Council should consider the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations on sectoral, regional and local climate adaptation plans.
- c) Offaly County Council should also ensure that the Alterations are consistent with key relevant higher-level plans and programmes, including the National Planning Framework and the Regional Spatial and Economic Strategy for the Eastern and Midland Region. The Alterations should also support national efforts at addressing significant environmental challenges including climate change and the decline in biodiversity.

#### Strategic Environmental Assessment (SEA)

- d) Where the SEA has identified any alterations as having potential for likely significant environmental effects or which conflict with national environmental or planning policy, clear justification should be given for proceeding with those alterations. The Plan, prior to its adoption, should also consider and integrate the recommendations of the SEA.
- e) **Future Modifications to the Draft Plan** – Where further changes to the Draft Plan are proposed, these should be screened for likely significant effects in accordance with SEA Regulations.
- f) **SEA Statement – “Information on the Decision”** – Once the Plan is adopted, you should prepare an SEA Statement that summarises the following:
  - How environmental considerations have been integrated into the Plan;
  - How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
  - The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and
  - The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

g) **Environmental Authorities**

Under the SEA Regulations, you should consult with:

- Environmental Protection Agency;
- Minister for Housing, Local Government and Heritage;
- Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media (formerly Minister for Culture, Heritage and the Gaeltacht (functions transferred from Minister for Environment, Heritage and Local Government/ Minister for Housing, Planning and Local Government to Minister for Culture, Heritage and the Gaeltacht by S.I. 192 of 2011));
- Minister for Environment, Climate and Communications; and
- Minister for Agriculture, Food and the Marine.
- any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

**CE Response:**Proposed Material Alterations

- a) These issues have been and will be taken into account in the consideration of Proposed Material Alterations.

In terms of critical services infrastructure to cater for new development, note that Proposed Material Alteration Ref. MA260 recommends the introduction of an Infrastructural Assessment Report, to be contained in a new Appendix (Appendix 2) to Volume 1 of the draft Plan. This has been prepared in response to a recommendation in both the OPR submission and the EMRA submission to the draft Plan to include an Infrastructural Assessment Report, to underpin the Tiered Approach to Zoning (TAZ), as required under NPO 72a, 72b and 72c of the NPF.

Appendix 3 of the NPF provides a methodology for a tiered approach to land zoning as referred to in NPO 72a. The implementation of this tiered approach allows for greater co-ordination between land use zoning and infrastructure availability. Appendix 3 of the NPF provides a description of Tier 1 (Serviced Zoned Land) and Tier 2 (Serviceable Zoned Land) as follows:

<b>Tier 1: Serviced Zoned Land</b>	Land that is <u>able to connect to existing development services</u> i.e. road and footpath access, public lighting, foul sewer drainage, surface water drainage and water supply, for which there is <u>service capacity available</u> .
<b>Tier 2: Serviceable Zoned Land</b>	Land that is not currently sufficiently serviced to support new development but <u>has the potential to become fully serviced within the life of the Plan</u> . The potential for the delivery of the required services and / or capacity to support new development must be identified.

In this regard, lands, including to which the proposed material alterations relate, have only been identified for development where they are able to connect to existing development services for which there is service capacity available or has the potential to become fully serviced within the life of the Plan.

The Infrastructural Assessment Report includes zoning maps for each of the towns and villages that also identify the extent of existing water mains, waste water mains, footpaths and lighting. These maps illustrate the proximity of infrastructure relative to a particular site and accordingly demonstrate whether a particular site is Tier 1 or 2.

The Infrastructural Assessment Report includes details on 'Infrastructure Requirements' in terms of water services (wastewater and water supply), surface water and transport (roads and access).

In respect of water services and the remit of Irish Water, the Infrastructural Assessment Report refers to the 'plan-led' approach, as follows:

Section 33 (5) of the Water Services (no. 2) Act 2013 as amended by the Planning and Development Amendment Act 2018 concerns Irish Water's Water Services Strategic Plan (2015, under review in 2020), which sets out the strategic objectives for the delivery of water services over the next 25 years up to 2040 and sets a context for investment and implementation plans. This plan is reviewed every five years. It states that '*Irish Water shall when preparing a water services strategic plan have regard to proper planning and sustainable development in line with any development plans within the meaning of the Act 2000, in particular the Core Strategy under section 10 of the Act*'.

Accordingly, the Core Strategy sets the desired population allocation within the county whilst the IW Water Services Strategic Plan shall follow pursuit by having regard to it.

In terms of the delivery of water services infrastructure, the Infrastructural Assessment Report refers to the following statement by Irish Water in their submission to the draft Offaly County Development Plan:

*'The County is served by a large number of wastewater treatment plants. Available capacity at any plant varies daily. Where there are constraints, applications for developments are on a first come, first served basis. If no [IW] project is associated with a constrained area, then any infrastructure will be developer-led. Irish Water can work with developers to form the best solution for a particular site'*.

On this basis, where there are deficiencies in the capacity of a particular wastewater treatment plant to cater for all of the proposed population allocation for a settlement that is advocated under the Development Plan, the sites that come forward first for development may be served by I.W. based on their first come first served approach, whilst later sites might require a developer-led approach to finance the infrastructure.

In this regard, the Infrastructural Assessment Report includes a list of deficiencies in the waste water and water infrastructure within the settlements and the actions proposed to be undertaken in order to address these up to the year 2027.

- b) These issues have been and will be taken into account in the consideration of Proposed Material Alterations.

The draft Plan contains the following objectives:

**CAEO-01** *It is an objective of the Council to implement the current Climate Change Adaptation Strategy for County Offaly.*

**CAEO-XX** *It is an objective of the Council to consider a variation of the development plan within a reasonable period of time, or to include such other mechanism, as may be appropriate, to ensure*

*that the development plan will be consistent with the approach to climate action recommended in the revised Development Plan Guidelines as adopted or any relevant guidelines. (Proposed Material Alteration MA75)*

- c) These issues have been and will be taken into account in the consideration of Proposed Material Alterations.

The proposed material alterations are consistent with the relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy, as required by Section 10(1A) of the Planning and Development Act 2000 (as amended).

#### Strategic Environmental Assessment (SEA)

- d) These issues have been and will be taken into account in the consideration of Proposed Material Alterations.

The further modifications recommended have been considered by the SEA and AA processes which have advised, taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, that the further modifications, as recommended:

- Would not be likely to have any significant environmental effect; and
- Would not adversely affect the integrity of a European Site.

- e) Future modifications will be examined in compliance with the Regulations.
- f) An SEA statement will be prepared after adoption of the Plan and circulated as required.
- g) The relevant authorities have been consulted with in compliance with the Regulations.

#### Ref: CDP/MA/719

#### **Person / Body:**

#### **Office of Public Works (OPW)**

#### **Summary of submissions / observations:**

- a) The OPW welcomes Proposed Material Alteration MA53, which recommends the inclusion of additional text describing the Council's approach to zoning in flood risk areas.

The OPW recommends that the Constrained Land Uses designation should be applied to all land within Flood Zone A and B.

- b) The OPW welcomes the additional text added to policy CAEP-50 under Proposed Material Alteration MA69, to ensure all flood risk datasets are assessed and climate change considered, is welcomed by OPW. OPW further notes that National Indicative Fluvial Mapping (NIFM) is referenced in the updated objective.
- c) Referring again to Proposed Material Alteration MA69, the OPW acknowledges that National Indicative Fluvial Mapping outputs were not available at the time of development of this Plan. The outputs are now available on request to Local Authorities.

The flood maps, including those for potential future scenarios taking account of the possible impacts of climate change, may be obtained in GIS format from the OPW Flood Risk Management – Data Management Section via email (flood\_data@opw.ie).

While these maps are an improvement on PFRA mapping, they are still indicative maps and the same cautions and limitations as outlined in Circular PL 2/2014 for PFRA should be followed. Please note that NIFM mapping does not cover catchments that were smaller than 5km<sup>2</sup>.

- d) (i) The Chief Executive’s report notes the provision for climate change in policy objectives CAEP-51, CAEP-52 and development management standards. These objectives and development management standards are in relation to site-specific flood risk assessments. The OPW recommend that the Draft Plan details how climate change has been considered in the production of this development plan.

(ii) The Guidelines state that a precautionary approach to climate change should be applied and a cautious approach to zoning in potential transitional areas. Planning authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives. It should be noted that the flood maps prepared under the CFRAM and NIFM Programmes include maps for two potential future scenarios taking account of different degrees of climate impact.

e) **Tullamore**

The OPW welcomes Proposed Material Alteration MA268, MA269, MA270, MA271 and MA272, to rezone undeveloped sites located within the Constrained Land Use zoning to ‘*Open Space, Amenity and Recreation*’

The OPW notes that it intends to carry out a review of the flood maps for Tullamore, taking into account the changes that have occurred since they were produced in 2016. The OPW area aware of the project undertaken by Offaly County Council to construct various water quality features along the Tullamore River. The OPW’s flood map review will commence once Offaly County Council have confirmed that the works in the watercourse have been completed.

f) **Ferbane**

The OPW welcomes Proposed Material Alteration MA332, MA333 and MA334, to rezone undeveloped sites located within the Constrained Land Use zoning to ‘*Open Space, Amenity and Recreation*’

g) **Killeigh**

The OPW welcomes Proposed Material Alteration MA363 to rezone undeveloped ‘*Community Facilities/ Services*’ site located within the Constrained Land Use zoning to ‘*Open Space, Amenity and Recreation*’

h) **Rahan**

Referring to Proposed Material Alteration MA403 and MA404, the OPW notes that Rahan is proposed to be changed from a Sráid to a Village, and that a flood zone map for the settlement has been included. The OPW recommends that the historical indicators and predictive indicators maps, as were included in the SFRA for other settlements in Offaly, should also be produced.

The OPW also notes that there is an Arterial Drainage Scheme in the area and that consideration should be given in zoning land for development to ensure that access requirements are preserved for the maintenance of Arterial Drainage Schemes and Drainage Districts. Applications for

development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The location of Arterial Drainage Schemes and Drainage Districts may be viewed on [www.floodinfo.ie](http://www.floodinfo.ie).

i) **Moneygall**

OPW notes that a groundtruthing exercise was undertaken for Moneygall. This has confirmed that the ‘Enterprise and Employment’ site, which was partially within Flood Zone A in the original draft Plan, is not at risk of flooding and Offaly County Council have updated the flood zone mapping for Moneygall accordingly.

**CE Response:**

- a) It is recommended that the text under Section 3.6.3 of the draft Plan to which Proposed Material Alteration MA53 relates, be amended by removing the word ‘undeveloped’, as follows:

A precautionary approach has largely been employed to landuse zoning to avoid directing development towards areas at risk of flooding. ~~Areas at risk of flooding as identified which are being put forward for landuse zoning have been subject to assessment through the justification test.~~ Under the Plan, no highly or less vulnerable land uses are being proposed on undeveloped lands in Flood Zone A (high flood risk) and no highly vulnerable land uses are being proposed on undeveloped lands in Flood Zone B (moderate flood risk). This is because a Constrained Land Uses designation (see Section 12.6.1 and the SFRA that accompanies the Plan) is being applied through the Plan across all undeveloped lands within Flood Zones A and B.

- b) Noted.
- c) Noted. The SFRA report that was placed on public display alongside the Draft Plan will be updated to include CFRAMS High End and Mid-Range climate mapping.
- d) Noted.
- i. Climate change is a cross-cutting theme across all chapters in the draft Plan, including a dedicated Climate Action and Energy Chapter (Chapter 3), the Strategic Aim of which is as follows (see Proposed Material Alteration MA55):

*To achieve a transition to an economically competitive, low carbon climate resilient and environmentally sustainable county, through reducing the need to travel, promoting sustainable settlement patterns and modes of transport, and by reducing the use of non-renewable resources, whilst recognising the role of natural capital and ecosystem services in achieving this.*

In addition, Table 3.1 in Chapter 3, titled ‘Decarbonisation Actions and Projects’ (see Proposed Material Alteration MA55). Table 3.1 lists all actions and specific projects that that can be undertaken in County Offaly in the lifetime of this County Development Plan to help achieve a low carbon, climate resilient and environmentally sustainable economy.

To address the recommendation by the OPW, it is recommended that the following text be inserted under a new sub-heading in Chapter 3, ‘Climate Change and Energy’.

**3.1.X Climate Change and Flooding**

*The Council have avoided incompatible zoning in areas at risk of flooding and integrated various provisions into the Plan that will contribute towards climate mitigation and adaptation, including provisions requiring that climate change is taken into account in flood risk management, for example:*

- *Chapter 3 “Climate Action & Energy”, Policy CAEP-51 “...The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) and available information from the CFRAM Studies shall be consulted with to this effect.”*
- *Chapter 13 “Development Management Standards”, DMO-106 “Flood Risk assessments”, “...The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations....”*

*Furthermore, Policy CAEP-52 from Chapter 3 “Climate Action & Energy” states that:*

- *“It is Council policy to ensure that applications to existing developments in flood vulnerable zones provide details of structural and non-structural risk management measures to include, but not be limited to specifications of the following - floor levels, internal layout, flood resilient construction, flood resistant construction, emergency response planning, access and egress during flood events.”*

- ii. The SFRA report that was placed on public display alongside the Draft Plan will be updated to include CFRAMS High End and Mid-Range climate mapping.

e) Noted.

f) Noted.

g) Noted.

- h) The SFRA report that was placed on public display alongside the Draft Plan will be updated to include mapping of historical indicators and predictive indicators for Rahan.

Site-specific flood risk assessments are provided for by the Plan and Policy CAEP-55 provides for: consultation with the Office of Public Works (OPW) in relation to proposed developments in the vicinity of drainage channels and rivers for which the OPW are responsible; and the retention of a strip of 10 metres on either side of such channel where required, to facilitate access.

i) Noted.



### 3.2.2.1 Renewable Energy

Ref: CDP/MA/01

**Persons / Bodies:**

**Olive Maher**

**Summary of submissions / observations:**

Requests that Lemanaghan Bog be removed in its entirety as an area open for consideration for wind energy i.e. windfarms, due to the detrimental impact on the history, archaeology, wildlife of the area and also the visual impact of the proposed wind turbines on the area and surrounding homes.

**CE Response:**

I am satisfied with the approach taken, comprehensiveness and robustness of the sieve mapping analysis in Section 5 and the Field Analysis and Desk Top Survey in Section 6 of the County Wind Energy Strategy in the Draft Plan, completed in line with the advice contained in Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6), which designated this area as ‘Open for consideration for Wind Energy Development’ as the area;

- has a viable wind speed and good access to the electricity grid;
- has fewer environmental and landscape constraints than other areas in the county;
- is characterised by dispersed or sparse patterns of rural housing;
- is of a sufficient size to accommodate commercial wind farms and associated infrastructure rather than a smaller remote and dispersed area.

It is important to make the point that the designation ‘Open for consideration for Wind Energy Development’ does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and
- Advice received from prescribed authorities.

It should be further noted that the members passed a motion at the Special Council Meeting considering the Chief Executives Report on the Draft Plan which excluded from the designation ‘Open for Consideration for Wind Energy Development’ an area 500 metres north of the disused railway line known locally as “The Banagher Line” and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane in order to protect the character of the monastic site. In addition, this motion amended the description of Area 5 in the County Wind Energy Strategy to read as follows; “Area generally west of Doon and north east of Ferbane.”

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

[Ref: CDP/MA/02 and the following CDP/MA Ref Numbers also 6 to 13, 15 to 73, 75 to 140, 142 to 212, 215 to 242, 244 to 263, 265, 287, 290 to 340, 343, 346 to 370, 372 to 419, 424 to 433, 435 to 646, 655 to 718, 722, 750 to 965, 977 to 992, 1003 to 1460, 1465, 1468 to 2353 and 2375 to 2376](#)

#### Persons / Bodies:

#### See Appendix B

#### Summary of submissions / observations:

Requests that Lemanaghan Bog be removed in its entirety as an 'Area Open for Consideration for Wind Energy Development' for the following reasons;

- a) Mapping this area as Open for Consideration for Wind Energy Development contradicts statements from Chapter 4 of the Plan which;
  - identifies Lemanaghan as highly sensitive to new developments which could potentially damage the historical character and the cultural and social importance of the area;
  - states that the Council shall endeavour to ensure that developments in this area are sympathetic to the sensitive nature of the landscape as the acceptability of development for consideration in this area is very limited;
- b) The 'protected zone' in the material alterations was created without a site survey and with no specialist archaeological or historical expertise. Many recorded National Monuments in the bog were not afforded any protection in the material alteration MA443;
- c) Provides extracts from the Lemanaghan Conservation Plan referring to the sense of peace, tranquillity and antiquity provided at Lemanaghan (Section 4) potential archaeology of the area (Section 5.4) and the consideration of sympathetic post-industrial use of the bog (Section 5.6);
- d) A research document from UCD and WARP stated that surveys of the area identified over 630 archaeological sites making this one of the highest densities of wetland archaeology in the world;
- e) Turbines in the area will be detrimental to wildlife, biodiversity and birds;
- f) Maps on pages 276 and 277 of the Material Alteration Report indicate that Lemanaghan Bog is Medium Sensitive in relation to Landscape Sensitivity;
- g) An eco-tourism plan would be a welcome development for the area, using the ancient pilgrim path the Sil Mor, to link to St. Manchan's Shrine in Boher and to Clonmacnoise.

#### CE Response:

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- Extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan; and
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment;
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I make the following observations;

- (a) Whilst I note the contents of Table 4.21 ‘High Sensitivity Areas in County Offaly’ relating to Archaeological and Historical Landscapes, I emphasise that the Wind Energy Guidelines 2006 state that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development.

The impacts of any windfarm development in the vicinity on these areas would need be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment to determine the appropriateness of the development proposed.

- (b) It is noted that the members passed a motion at the Special Council Meeting considering the Chief Executive’s Report on the Draft Plan which excluded from the designation ‘Open for Consideration for Wind Energy Development’ in the County Wind Energy Strategy an area 500 metres north of the disused railway line known locally as “The Banagher Line” and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane around the Lemanaghan Monastic Site in addition to the monastic site. It is noted that the area removed by this motion ensures that all of the monastic site area as shown on Figure 3 Site Map (page 19) and Figure 4 Geological Survey Map c.1840 (page 21) of the Lemanaghan Heritage Conservation Plan is excluded from a potential wind energy area in the Draft Plan.

In relation to the reference to Recorded Monuments located elsewhere in the area, it should be noted that;

- Recorded Monuments are protected under the National Monuments Acts 1930 to 2014;
- The impacts of any windfarm development in the vicinity on these areas would be addressed at project level through Environmental Impact Assessment as part of a planning or Strategic Infrastructure Development application with input from experts in the fields of archaeology, cultural heritage and landscape character assessment; and
- all planning or Strategic Infrastructure Development applications affecting archaeological and natural heritage are referred to the Minister for Culture, Heritage and the Gaeltacht and a number of other prescribed authorities including the Heritage Council, An Taisce – the National Trust for Ireland, the Arts Council and Fáilte Ireland (the national tourism authority) for comments.

(c) It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;

- A sacred place of great antiquity;
- A place containing buildings of architectural significance;
- A place rich in documentary history and archaeological potential;
- A place where there is a long tradition of devotional practice; and
- A place 'apart', possessing a strong sense of being untouched by the modern world.

The impacts of any windfarm development in the vicinity on these areas would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment to determine the appropriateness of the development proposed.

(d) See (b) above.

(e) It should be noted that;

- The Draft Plan contains a number of relevant objectives which address concerns relating to the preservation of biodiversity, such as Objective BLO-01 relating to the sustainable management of all of Offaly's natural capital, Policy BLP-01 which states that it is Council policy to protect, conserve, and seek to enhance the county's biodiversity and ecological connectivity and Policy BLP-30 which states that it is Council policy to support the aims and objectives of the All Ireland Pollinator Plan 2021-2025;
- The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy;
- All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from 'Areas Open for Consideration for Wind Energy Developments' in the County Wind Energy Strategy. **Lemanaghan Bog is not a European Designated Site;**
- Development Management Standard 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments are required to detail the impacts of the proposed development on nature conservation (ecology, flora and fauna) including birds.
- Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 site cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site would be required.

The following objective was proposed for inclusion by Material Alteration (MA108) in Chapter 4 Biodiversity and Landscape in regard to the protection of birds outside Special Protection

Areas; “In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas.”

- (f) Whilst Lemanaghan Bog is designated a ‘Medium Landscape Sensitivity’ Area in Figure 4.22 ‘Landscape Classification Areas in Co. Offaly’ in Chapter 4 of the Draft Plan, Step 2 of the sieve mapping analysis carried out in Section 5 ‘Identifying Suitable Areas in County Offaly for Wind Energy Development’ of the County Wind Energy Strategy in the Draft Plan excluded only high landscape sensitivity areas only from ‘Open for Consideration for Wind Energy Development’. It is noted in this regard that Table 4.20 ‘Moderate Sensitivity Areas in County Offaly’ of Chapter 4 the Draft Plan states that “some of these cutaway bogs may be appropriate for other sensitively designed and located developments including renewable energy (wind farms, biomass crops) and/or industrial use”.
- (g) The Draft Plan makes provision for a range of potential eco-tourism uses on cutaway bogs in the County through the following;
- Policy CAEP-13 which recognises that the industrial peatlands in the midlands are a significant resource for transition to after uses ranging from amenity, tourism, biodiversity services, ‘wild areas’, flood management, climate mitigation, energy development, industry, education, conservation and many more; and
  - Objective RDO-05 in Chapter 5 ‘Economic Development’ to support the longer-term strategic planning for industrial peatland areas, to include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure which provides for as well as a range of uses including climate mitigation, tourism uses such as peatways, recreational forestry, biodiversity, and a designation of a National Peatlands Heritage Park.

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

**Ref: CDP/MA/03**

**Person / Body:**

**Eddie Byrne**

**Summary of submissions / observations:**

Objects to the inclusion of Lemanaghan Bog as a possible location for wind turbines in the County Wind Energy Strategy in the Draft Plan.

**CE Response:**

See Response to CDP/MA/01 above.

No change proposed.

**Ref: CDP/MA/04****Person / Body:****Mary Connolly nee Lehane****Summary of submissions / observations:**

States that she is appalled that there is a proposal to erect wind turbines on a bog that is not only unique to Lemanaghan but indeed Ireland.

**CE Response:**

See Response to CDP/MA/01 above.

No change proposed.

**Ref: CDP/MA/05****Person / Body:****Peter Doolan****Summary of submissions / observations:**

States that Lemanaghan Bog should be considered for wind turbines as no area or section of the county should be exempt due to a perceived beauty, importance or NIMBY-ism. All areas have significance and beauty to their local public. Banning turbines in West Offaly will force more turbines into East Offaly proper planning should balance the needs and wants of the public.

**CE Response:**

I am satisfied with the approach, comprehensiveness and robustness of the sieve mapping analysis in Section 5 and the Field Analysis and Desk Top Survey in Section 6 of the County Wind Energy Strategy in the Draft Plan, completed in line with the advice contained in Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6), which informed the County Wind Energy Strategy in the Draft Plan.

It should also be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

**Ref: CDP/MA/14****Person / Body:****Mel McIntyre****Summary of submissions / observations:**

This submission states that renewable energy is erratic and unreliable.

**CE Response:**

I am satisfied that the Draft Plan meets all its statutory requirements and supports National Plans and policies in relation to Climate Action and Renewable Energy through its range of policies and objectives supporting renewable energy development in Chapter 3 Climate Action and Energy, related development management standards in Chapter 13 Development Management Standards and the development of a Wind Energy Strategy as part of the Draft Plan.

The Draft Plan does recognise that whilst renewable energy sources have vast potential to reduce dependency on fossil fuels and GHG emissions, many of the resources have intermittent or variable output, therefore if they are not harnessed, the energy goes to waste and accordingly, includes a specific policy, CAEP-03, to promote the use of efficient energy storage systems and infrastructure that supports energy efficiency and reusable energy system optimization, in accordance with proper planning and sustainable development.

No change proposed.

**Ref: CDP/MA/141****Person / Body:**

**Teresa Ryan Feehan**

**Summary of submissions / observations:**

Requests that the Council consider removing Lemanaghan from wind turbines as wind turbines will impact negatively upon the unique Lemanaghan early Christian site and the wildlife in the area.

**CE Response:**

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I make the following observations;

- (a) It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;

- A sacred place of great antiquity;

- A place containing buildings of architectural significance;
- A place rich in documentary history and archaeological potential;
- A place where there is a long tradition of devotional practice; and
- A place 'apart', possessing a strong sense of being untouched by the modern world.

The impacts of any windfarm development in the vicinity on these areas would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment to determine the appropriateness of the development proposed. In addition, the Council will take into account comments received relating to planning applications from Minister for Culture, Heritage and the Gaeltacht and a number of other prescribed authorities including the Heritage Council, An Taisce – the National Trust for Ireland, the Arts Council and Fáilte Ireland (the national tourism authority).

It should be noted also that the motion passed by members at the Special Council Meeting considering the Chief Executives Report on the Draft Plan excluded from the Area Open for Consideration for Wind Energy Development an area 500 metres north of the disused railway line known locally as "The Banagher Line" and 700 metres in each direction from Lemnaghan/Pollagh junction east towards Ballycumber and west towards Ferbane. This exclusion area contains the Lemnaghan Monastic Site as shown on Figure 3 Site Map (page 19) and Figure 4 Geological Survey Map c.1840 (page 21) of the Lemnaghan Heritage Conservation Plan.

- (b) The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy and all European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from 'Areas Open for Consideration for Wind Energy' (**Lemnaghan Bog is not a European Designated site**).

In addition, the Draft Plan contains a number of policies and objectives which recognise the importance of and support the preservation of the county's biodiversity which combined with requirements for Appropriate Assessment (Section 13.5.1) and for the impacts of proposed wind farms on nature conservation to be detailed (Development Management Standard 109) will adequately provide for a proper consideration of wildlife, biodiversity and birds should any planning application for wind farm development be made in the area.

No change proposed.

[Ref: CDP/MA/213](#)

**Person / Body:**

**Eilish Keyes**

**Summary of submissions / observations:**

This submission states that;



- (a) Bogs are a better method of carbon storage than wind turbines due to millions of tonnes of concrete being pumped into the bog;
- (b) Ballycumber Community Development Plan which incorporates tourism, recreation and biodiversity proposals for Lemanaghan Bog is the way forward;
- (c) Lemanaghan also has a very significant history and heritage, which council is aware of as it sponsored the Lemanaghan Conservation Plan which was published by the Heritage Council;
- (d) Turbines on the flat bog will have a serious impact on landscape;
- (e) The constant noise from turbines will be impossible for residents to live with;
- (f) The bog should be allowed restore to its natural habitat which would in turn increase the population of birds and wildlife which is in decline.
- (g) A greater emphasis should be put on energy options such as solar panels on top of large factories, industrial units or farmers' sheds.

#### CE Response:

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan; and
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment;
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I make the following observations;

- (a) It is considered that any issue relating to ancillary impacts to wind energy developments such as the pouring of concrete into the foundations of proposed turbines can be assessed with regard to policy CAEP-16 from Chapter 3 of the Draft, which is subject to a proposed material alteration (additional text in red, deletion in strikethrough); "It is Council policy that planning applications for development on or immediately adjacent to peatlands shall be accompanied by assessments considering the following issues where relevant; peatland stability, hydrology, ~~and/or~~ carbon emissions balance **and ecological impact assessment.**"

In addition, the Draft Plan provides for the following climate mitigation measures on peatlands;

- Proposing a number of specific actions and projects in Table 3.1 Decarbonisation Actions and Projects relating to the creation and delivery of carbon sinks, afforestation and rewilding of peatlands; and

- Supporting the preparation of a comprehensive after use framework plan for the industrial peatlands and recognises that these peatlands are a significant resource relating to a range of uses including wild areas, flood management and climate mitigation in Policy CAEP-13 in Chapter 3 Climate Action and Energy.
- (b) The Draft Plan recognises the range of potential uses that can be accommodated on peatlands (such as the Lemanaghan Bogs) in Table 3.1 and through Policy CAEP-13 as referred to above in response (a) in addition to objectives TRO-09 relating to the development of outdoor pursuits and peatways on peatlands in the county and TRO-17 relating to the protection of potential peatway routes along and in proximity to abandoned rail lines and Midland Cycling Destination routes identified in the Draft Plan.
- (c) It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;
- A sacred place of great antiquity;
  - A place containing buildings of architectural significance;
  - A place rich in documentary history and archaeological potential;
  - A place where there is a long tradition of devotional practice; and
  - A place ‘apart’, possessing a strong sense of being untouched by the modern world.

Notwithstanding this, it is noted that the Wind Energy Guidelines state that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development.

The impacts of any windfarm development in the vicinity on these areas would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment to determine the appropriateness of the development proposed.

- (d) It is noted that Section 6.9.3 of the Wind Energy Guidelines 2006 state in relation to peatlands that “landscapes of this type comprise a vast planar extent of peatland and have significant potential for future wind energy development” whilst Appendix 4 of these Guidelines include best practice guidelines for Wind Energy Development in Peatlands. Notwithstanding this, the visual and landscape impacts of planning applications for wind farm developments will be examined in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment.
- (e) DMS 109 in Chapter 13 of the Draft Plan outlines that planning applications for wind energy developments have to detail the impacts on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region) and shadow flicker. In assessing planning applications for windfarms, the Council will have regard to the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made.

It should be noted in this regard that the noise and shadow flicker limits in the draft Wind Energy Guidelines (WEG) are more onerous than the 2006 WEGs and afford a higher level of protection to people who live in the vicinity of any future wind farm developments.

(f) It should be noted that;

- The Draft Plan contains a number of relevant objectives which address concerns relating to the preservation of biodiversity, such as Objective BLO-01 relating to the sustainable management of all Offaly's natural capital, Policy BLP-01 which states that it is Council policy to protect, conserve, and seek to enhance the county's biodiversity and ecological connectivity and Policy BLP-30 which states that it is Council policy to support the aims and objectives of the All Ireland Pollinator Plan 2021-2025;
- The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy;
- All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from 'Areas Open for Consideration for Wind Energy Developments' in the County Wind Energy Strategy. **Lemanaghan Bog is not a European Designated Site;**
- Development Management Standard 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments are required to detail the impacts of the proposed development on nature conservation (ecology, flora and fauna) including birds.
- Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 site cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site would be required.
- The following objective was proposed for inclusion by Material Alteration (MA108) in Chapter 4 Biodiversity and Landscape in regard to the protection of birds outside Special Protection Areas; "In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas."

(g) The Draft Plan encourages and facilitates the production of energy from a wide range of renewable sources, such as from bioenergy, waste material, solar, hydro, geothermal and wind energy, subject to proper planning and environmental considerations. Specifically, in relation to solar energy, the Draft Plan includes a policy, CAEP-31, promoting the development of a range of solar energy infrastructure for on-site energy use, including solar PV, solar thermal and seasonal storage technologies subject to environmental safeguards and the protection of natural or built heritage features, biodiversity views and prospects.

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

[Ref: CDP/MA/214](#)**Person / Body:****Noel Coolahan****Summary of submissions / observations:**

This submission:

- (a) Expresses concern in relation to the proliferation of wind turbines in an area that is populated, historical, suitable for tourism and perfect for natural biodiversity;
- (b) Millions of tonnes of concrete being pumped into the bog, completely nulling any energy saving effect of the windfarm, and in turn will lead to flooding as the roads are at a very low level around the bog;
- (c) Lemanaghan also has a very significant history and heritage, which the council is aware of as it sponsored the Lemanaghan Conservation Plan which was published by the Heritage Council;
- (d) Turbines on the flat bog will have a serious impact on landscape;
- (e) Expresses concern in relation to the consistency of wind speed and lack of storage for energy generated;
- (f) Wind energy has the potential to reduce and degrade wildlife habitats;
- (g) A greater emphasis should be put on energy options such as solar panels on top of large factories, industrial units or farmer's sheds.

**CE Response:**

In relation to the specific points raised in this submission, I make the following observations;

- (a) It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;
  - Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
  - extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan; and
  - requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment;
  - Detailed site visits; and
  - Advice received from prescribed authorities.

It should be further noted that the members passed a motion at the Special Council Meeting considering the Chief Executives Report on the Draft Plan which excluded from the designation 'Open for Consideration for Wind Energy Development' an area 500 metres north of the disused railway line known locally as "The Banagher Line" and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane in order to protect the character of the monastic site.

(b) It is considered that any issue relating to ancillary impacts to wind energy developments such as the pouring of concrete into the foundations of proposed turbines can be assessed with regard to policy CAEP-16 from Chapter 3 of the Draft, which is subject to a proposed material alteration (additional text in red, deletion in strikethrough); “It is Council policy that planning applications for development on or immediately adjacent to peatlands shall be accompanied by assessments considering the following issues where relevant; peatland stability, hydrology, ~~and/or~~ carbon emissions balance **and ecological impact assessment.**” In addition, the Draft Plan provides for the following climate mitigation measures on peatlands;

- Proposing a number of specific actions and projects in Table 3.1 Decarbonisation Actions and Projects relating to the creation and delivery of carbon sinks, afforestation and rewilding of peatlands; and
- Supporting the preparation of a comprehensive after use framework plan for the industrial peatlands and recognises that these peatlands are a significant resource relating to a range of uses including wild areas, flood management and climate mitigation in Policy CAEP-13 in Chapter 3 Climate Action and Energy.

(c) It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;

- A sacred place of great antiquity;
- A place containing buildings of architectural significance;
- A place rich in documentary history and archaeological potential;
- A place where there is a long tradition of devotional practice; and
- A place ‘apart’, possessing a strong sense of being untouched by the modern world.

Notwithstanding this, it is noted that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development. The impacts of any windfarm development in the vicinity on these areas would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment.

(d) It is noted that Section 6.9.3 of the Wind Energy Guidelines 2006 state in relation to peatlands that “landscapes of this type comprise a vast planar extent of peatland and have significant potential for future wind energy development” whilst Appendix 4 of these Guidelines include best practice guidelines for Wind Energy Development in Peatlands. Notwithstanding this, the visual and landscape impacts of planning applications for wind farm developments will be examined in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment.

(e) Section 5.1 of the Wind Energy Strategy in the Draft Plan included an assessment of viable wind speeds and access to the electricity grid. Generally, to date, the areas considered economically viable for wind energy development have wind speeds above 7.5 metres per second. Map No. 2 of the Wind Energy Strategy in the Draft Plan shows the current viable wind speed areas in County Offaly at a hub height of 100 metres above ground level based on

the Sustainable Energy Authority of Ireland (SEAI) Wind Atlas 2013 in recognition that turbines are getting larger potentially generating more power. Areas deemed Open for Consideration for Wind Energy Development in the Draft Plan, have a wind speed of at least 7.5 metre per second.

The Draft Plan recognises that whilst renewable energy sources have vast potential to reduce dependency on fossil fuels and GHG emissions, many of the resources have intermittent or variable output, therefore if they are not harnessed, the energy goes to waste and accordingly, includes a specific policy, CAEP-03, to promote the use of efficient energy storage systems and infrastructure that supports energy efficiency and reusable energy system optimization, in accordance with proper planning and sustainable development.

(f) It should be noted that;

- The Draft Plan contains a number of relevant objectives which address concerns relating to the preservation of biodiversity, such as Objective BLO-01 relating to the sustainable management of all Offaly's natural capital, Policy BLP-01 which states that it is Council policy to protect, conserve, and seek to enhance the county's biodiversity and ecological connectivity and Policy BLP-30 which states that it is Council policy to support the aims and objectives of the All Ireland Pollinator Plan 2021-2025;
- The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy;
- All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from 'Areas Open for Consideration for Wind Energy Developments' in the County Wind Energy Strategy. **Lemanaghan Bog is not a European Designated Site;**
- Development Management Standard 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments are required to detail the impacts of the proposed development on nature conservation (ecology, flora and fauna) including birds.
- Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 site cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site would be required.
- The following objective was proposed for inclusion by Material Alteration (MA108) in Chapter 4 Biodiversity and Landscape in regard to the protection of birds outside Special Protection Areas; "In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas."

(g) The Draft Plan encourages and facilitates the production of energy from a wide range of renewable sources, such as from bioenergy, waste material, solar, hydro, geothermal and wind energy, subject to proper planning and environmental considerations. Specifically, in relation to solar energy, the Draft Plan includes a policy, CAEP-31, promoting the development of a range of solar energy infrastructure for on-site energy use, including solar PV, solar

thermal and seasonal storage technologies subject to environmental safeguards and the protection of natural or built heritage features, biodiversity views and prospects.

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

**Ref: CDP/MA/243**

**Person / Body:**

**Charles Daly**

**Summary of submissions / observations:**

No submission attached.

**CE Response:**

No response as no submission attached.

**Ref: CDP/MA/266**

**Person / Body:**

**Claire Keegan**

**Summary of submissions / observations:**

This submission objects to the proposed installation of wind turbines in the Lemanaghan bog area on health and safety, and radiation concerns.

**CE Response:**

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I make the following observations;

DMS 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments have to detail the impacts on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region) and shadow flicker. In assessing planning applications for windfarms, the Council will have regard to the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made. It should be noted in this regard that the noise and shadow flicker limits in the Draft Wind Energy Guidelines (WEGs) 2019 are more onerous than the 2006 WEGs and afford a higher level of protection to people who live in the vicinity of any future wind farm developments. Neither the Wind Energy Guidelines 2006 nor the Draft Wind Energy Guidelines 2019 refer to radiation being a specific concern or ancillary impact of wind turbines.

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

[Ref: CDP/MA/267](#)

**Person / Body:**

**Mel McIntyre**

**Summary of submissions / observations:**

This submission states that this industry (wind) is of no benefit to the community or the area. Areas that contribute most to carbon emissions shouldn't be relying on other areas to host their pollution.

**CE Response:**

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment;
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I make the following observations;

I am satisfied that the Draft Plan meets all its statutory requirements and supports National Plans and policies in relation to Climate Action and Renewable Energy through its range of policies and objectives supporting renewable energy development in Chapter 3 Climate Action and Energy, related



development management standards in Chapter 13 Development Management Standards and the development of a Wind Energy Strategy as part of the Draft Plan.

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

**Ref: CDP/MA/268**

**Person / Body:**

**Seamus Coughlan**

**Summary of submissions / observations:**

This submission objects to the erection of wind turbines in Area 5 as he lives in a residential area.

**CE Response:**

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific point raised in this submission, I am satisfied with the approach taken, comprehensiveness and robustness of the sieve mapping analysis in Section 5 and the Field Analysis and Desk Top Survey in Section 6 of the County Wind Energy Strategy in the Draft Plan, completed in line with the advice contained in Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6), which designated this area as 'Open for consideration for Wind Energy Development' as the area;

- has a viable wind speed and good access to the electricity grid;
- has fewer environmental and landscape constraints than other areas in the county;
- is characterised by dispersed or sparse patterns of rural housing;
- is of a sufficient size to accommodate commercial wind farms and associated infrastructure rather than a smaller remote and dispersed area.

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

[Ref: CDP/MA/269 and the following CDP/MA Ref. Numbers also 270 to 278, 280 to 286, 423, 647, 649 to 651, 653 to 654, 968, 971 to 973 and 975 to 976](#)

#### Persons / Bodies:

See Appendix B

#### Summary of submissions / observations:

This submission requests that Lemanaghan Bog be removed as an Area Open for Consideration for Wind Energy as;

- (a) The Lemanaghan Conservation Plan, published by the Heritage Council which was sponsored by Offaly County Council developed a plan to protect the area and it should be followed;
- (b) Enormous records of archaeology have been recorded in Lemanaghan Bog, documented as one of the highest densities of wetland archaeology in the world - and should be protected.
- (c) Wildlife, biodiversity, and threat of Irish Birds in decline needs to be carefully managed, habitats should be encouraged not destroyed.
- (d) Noise Pollution, Flicker and Visual Amenity of this important cultural site should be considered.

#### CE Response:

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment;
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I make the following observations;

- (a) It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing

applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;

- A sacred place of great antiquity;
- A place containing buildings of architectural significance;
- A place rich in documentary history and archaeological potential;
- A place where there is a long tradition of devotional practice; and
- A place ‘apart’, possessing a strong sense of being untouched by the modern world.

Notwithstanding this, it is noted that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development. The impacts of any windfarm development in the vicinity on these areas would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment. In addition, all planning applications affecting archaeological and natural heritage are referred to the Minister for Culture, Heritage and the Gaeltacht and a number of other prescribed authorities including the Heritage Council, An Taisce – the National Trust for Ireland, the Arts Council and Fáilte Ireland (the national tourism authority) for comments. All Recorded Monuments are protected under the National Monuments Acts 1930 to 2014.

It is noted that the area 500 metres north of the disused railway line known locally as “The Banagher Line” and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane around the Lemanaghan Monastic Site proposed to be excluded from the Area Open for Consideration for Wind Energy Development by a motion passed by the members at the Special Council Meeting considering the Chief Executives Report on the Draft Plan contains the monastic site area as shown on Figure 3 Site Map (page 19) and Figure 4 Geological Survey Map c.1840 (page 21) of the Lemanaghan Heritage Conservation Plan. It is considered that the exclusion of this area along with a project level assessment of the impacts of any windfarm proposal as detailed in (b) above would adequately address issues relating to the protection of the character of the monastic site from an archaeology, cultural heritage and landscape character perspective.

(b) See Response (a) above.

(c) It should be noted that;

- The Draft Plan contains a number of relevant objectives which address concerns relating to the preservation of biodiversity, such as Objective BLO-01 relating to the sustainable management of all Offaly’s natural capital, Policy BLP-01 which states that it is Council policy to protect, conserve, and seek to enhance the county’s biodiversity and ecological connectivity and Policy BLP-30 which states that it is Council policy to support the aims and objectives of the All Ireland Pollinator Plan 2021-2025;
- The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy;
- All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of

the Directive) have been excluded from 'Areas Open for Consideration for Wind Energy Developments' in the County Wind Energy Strategy. **Lemanaghan Bog is not a European Designated Site;**

- Development Management Standard 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments are required to detail the impacts of the proposed development on nature conservation (ecology, flora and fauna) including birds.
  - Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 site cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site would be required.
  - The following objective was proposed for inclusion by Material Alteration in Chapter 4 Biodiversity and Landscape in regard to the protection of birds outside Special Protection Areas; "In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas."
- (d) DMS 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments have to detail the impacts on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region) and shadow flicker. In assessing planning applications for windfarms, the Council will have regard to the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made. It should be noted in this regard that the noise and shadow flicker limits in the Draft Wind Energy Guidelines (WEGs) 2019 are more onerous than the 2006 WEGs and afford a higher level of protection to people who live in the vicinity of any future wind farm developments.

The visual and landscape impacts of planning applications for wind farm developments will be examined in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment.

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

**[Ref: CDP/MA/279](#)**

**Person / Body:**

**Catherine Kiveney**

**Summary of submissions / observations:**

This submission just states that she objects.

**CE Response:**

No change proposed. The submission does not state what is being objected to.

[Ref: CDP/MA/288](#)**Person / Body:****Anne Dickinson****Summary of submissions / observations:**

This submission objects against the wind farms being placed in Lemanaghan bog.

**CE Response:**

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment;
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific point raised in this submission, I make the following observations;

I am satisfied with the approach, comprehensiveness and robustness of the sieve mapping analysis in Section 5 and the Field Analysis and Desk Top Survey in Section 6 of the County Wind Energy Strategy in the Draft Plan, completed in line with the advice contained in Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6), which informed the County Wind Energy Strategy in the Draft Plan.

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

[Ref: CDP/MA/289](#)**Person / Body:****Yvonne English****Summary of submissions / observations:**

This submission objects to any windfarm or any destruction done to Lemanaghan Bog. This is a unique area for wildlife. Also it is illegal under EU law to have any windfarm constructed without an SEA done. If this is not done, then it is illegal. A recent case was won in the European Courts this year.

**CE Response:**

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I make the following observations;

The County Wind Energy Strategy in the Draft Plan and subsequent material alterations have been informed by Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA).

I am satisfied with the approach taken, comprehensiveness and robustness of the sieve mapping analysis in Section 5 and the Field Analysis and Desk Top Survey in Section 6 of the County Wind Energy Strategy in the Draft Plan, completed in line with the advice contained in Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6), which designated this area as 'Open for consideration for Wind Energy Development' as the area;

- has a viable wind speed and good access to the electricity grid;
- has fewer environmental and landscape constraints than other areas in the county;
- is characterised by dispersed or sparse patterns of rural housing;
- is of a sufficient size to accommodate commercial wind farms and associated infrastructure rather than a smaller remote and dispersed area.

No change proposed.

**[Ref: CDP/MA/345](#)****Person / Body:**

**Dolores Power**

**Summary of submissions / observations:**

This submission requests that Lemanaghan Bog be removed as an area open to consideration to wind energy.

**CE Response:**

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific point raised in this submission, I make the following observations;

I am satisfied with the approach, comprehensiveness and robustness of the sieve mapping analysis in Section 5 and the Field Analysis and Desk Top Survey in Section 6 of the County Wind Energy Strategy in the Draft Plan, completed in line with the advice contained in Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6), which informed the County Wind Energy Strategy in the Draft Plan.

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

[Ref: CDP/MA/371](#)

**Person / Body:**

**Conor McDermott**

**Summary of submissions / observations:**

This submission;

- (a) States that the peatlands of Lemanaghan represent one of the richest assemblages of peatland archaeology in Ireland with successive archaeological survey and excavation programmes (some of which Mr. McDermott participated in) having revealed nationally and internationally significant complexes of archaeological sites of prehistoric and historic date;
- (b) Refers to the many recorded sites and artefacts related to the monastery at Lemanaghan found on the bog which demonstrates the bogs archaeological importance and the potential for further identifications during further peat extraction or construction work
- (c) States that it is imperative that any plans for the Lemanaghan bogs include comprehensive strategies for the long-term protection of known archaeological sites from mechanical extraction, drainage or intrusive after use such as windfarms or forestry. If any extraction, disturbance or drainage of peat occurs it must be preceded by comprehensive programmes of archaeological surveys and mitigation with integrated environmental studies.

**CE Response:**

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I make the following observations;

- (a) The Council recognises the archaeological importance of all monastic sites and includes a policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;
- A sacred place of great antiquity;
  - A place containing buildings of architectural significance;
  - A place rich in documentary history and archaeological potential;
  - A place where there is a long tradition of devotional practice; and
  - A place 'apart', possessing a strong sense of being untouched by the modern world.

Notwithstanding this, it should be noted that the Wind Energy Guidelines 2006 state that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development. The impacts of any windfarm development in the vicinity of any heritage areas need to be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment, to assess the impacts and required mitigation. In addition, all planning applications affecting archaeological and natural heritage are referred to the Minister for Culture, Heritage and the Gaeltacht and a number of other prescribed authorities including the Heritage Council, An Taisce – the National Trust for Ireland, the Arts Council and Fáilte Ireland (the national tourism authority) for comments.

It is noted that the area 500 metres north of the disused railway line known locally as "The Banagher Line" and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane around the Lemanaghan Monastic Site proposed to be excluded from the Area Open for Consideration for Wind Energy Development



contains the monastic site area as shown on Figure 3 Site Map (page 19) and Figure 4 Geological Survey Map c.1840 (page 21) of the Lemanaghan Heritage Conservation Plan. It is considered that the exclusion of this area along with a project level assessment of the impacts of any windfarm proposal as detailed in (b) above would adequately address issues relating to the protection of the character of the monastic site from an archaeology, cultural heritage and landscape character perspective.

(b) See Response (a).

(c) I am satisfied that the Draft Plan includes the necessary objectives for the protection of the archaeological heritage of the county in accordance with the Planning and Development Act 2000 as amended. It should be noted that the Minister for Housing, Local Government and Heritage has a responsibility to protect the archaeological heritage and to exercise powers of preservation under the National Monuments Acts, 1930- 2004, taking account of the European Convention for the Protection of the Archaeological Heritage. Any extraction, disturbance or drainage works in the vicinity of archaeological sites or monuments must have strict adherence to the National Monuments Acts and national policy on the protection of the archaeological heritage in the course of development as set out in the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999), available at: <https://www.archaeology.ie/sites/default/files/media/publications/framework-and-principles-for-protection-of-archaeological-heritage.pdf>. See in particular Part III, "Principles for the Protection of the Archaeological Heritage".

No change proposed.

#### [Ref: CDP/MA/648](#)

#### **Person / Body:**

**Angela Kelly**

#### **Summary of submissions / observations:**

This submission asks for Lemanaghan Bog and its surrounds to be removed from Area 5 as an Area Open for Consideration for wind energy development and makes the following points;

- a) The development being considered comes very close to the ruins of the castle at Castlearmstrong which dates back to the 16<sup>th</sup> century and a little island or derry called Derravane, formerly used as a field hospital or safe house during the Black and Tan Era.
- b) There exists a prehistoric pathway/road that runs across the bog from Lemanaghan to Boher Church which would be destroyed if the windfarm development goes ahead;
- c) The Slí Mór from Ballycumber to Clonmacnoise was described in an Irish Times article in May this year as a 'mini camino' which is ideal for country cycling and meandering;
- d) There seems to be a contradiction in the Draft Offaly County Development Plan as page 11 states that areas shown in orange on the map are 'Landscape Sensitivity Areas' and have not been included in Areas Open for Consideration for Wind Energy Development while the map on page 23 states that the same area is Open for Consideration for Wind Energy Development.

- e) We need to prevent habitat destruction by preserving this natural resource at Leamanaghan Bog so that our animals and plants can survive. Tons and Tons of cement foundations will be detrimental to wildlife and plant life.
- f) Lemanaghan bog should be used as a nature trail and tourist attraction.

#### CE Response:

- (a) Apart from the monastic site, in relation to the reference to Recorded Monuments located elsewhere in the area, it should be noted that;
  - Recorded Monuments are protected under the National Monuments Acts 1930 to 2014;
  - the impact of any wind farm development on natural heritage, built heritage and archaeological sites would likely to be detailed in an environmental impact assessment at planning application stage; and
  - all planning applications affecting archaeological and natural heritage are referred to the Minister for Culture, Heritage and the Gaeltacht and a number of other prescribed authorities including the Heritage Council, An Taisce – the National Trust for Ireland, the Arts Council and Fáilte Ireland (the national tourism authority) for comments.
- (b) See point 1 of this response.
- (c) See point 1 of this response.
- (d) Lemanaghan Bog is designated a ‘Medium Landscape Sensitivity’ Area in Figure 4.22 ‘Landscape Classification Areas in Co. Offaly’ in Chapter 4 of the Draft Plan. It is noted in this regard that Table 4.20 ‘Moderate Sensitivity Areas in County Offaly’ of Chapter 4 the Draft Plan states that “some of these cutaway bogs may be appropriate for other sensitively designed and located developments including renewable energy (wind farms, biomass crops) and/or industrial use”.
 

Step 2 of the sieve mapping analysis carried out in Section 5 ‘Identifying Suitable Areas in County Offaly for Wind Energy Development’ of the County Wind Energy Strategy in the Draft Plan excluded only high landscape sensitivity areas from ‘Open for Consideration for Wind Energy Development’.
- (e) It should be noted that;
  - The Draft Plan contains a number of relevant objectives which address concerns relating to the preservation of biodiversity, such as Objective BLO-01 relating to the sustainable management of all Offaly’s natural capital, Policy BLP-01 which states that it is Council policy to protect, conserve, and seek to enhance the county’s biodiversity and ecological connectivity and Policy BLP-30 which states that it is Council policy to support the aims and objectives of the All Ireland Pollinator Plan 2021-2025;
  - The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy;
  - All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from ‘Areas Open for Consideration for Wind

Energy Developments' in the County Wind Energy Strategy. **Lemanaghan Bog is not a European Designated Site;**

- Development Management Standard 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments are required to detail the impacts of the proposed development on nature conservation (ecology, flora and fauna) including birds.
- Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 site cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site would be required.
- The following objective was proposed for inclusion by Material Alteration (MA108) in Chapter 4 Biodiversity and Landscape in regard to the protection of birds outside Special Protection Areas; "In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas."

It is considered that any issue relating to ancillary impacts to wind energy developments such as the pouring of concrete into the foundations of proposed turbines can be assessed with regard to policy CAEP-16 from Chapter 3 of the Draft , which is subject to a proposed material alteration; "It is Council policy that planning applications for development on or immediately adjacent to peatlands shall be accompanied by assessments considering the following issues where relevant; peatland stability, hydrology, and/ or carbon emissions balance and ecological impact assessment."

- (f) The Council recognises the range of potential uses that can be accommodated on peatlands (such as the Leamanaghan Bogs) in Table 3.1 and Policy CAEP-13 in addition to objectives TRO-09 relating to the development of outdoor pursuits and peatways on peatlands in the county and TRO-17 relating to the protection of potential peatway routes along and in proximity to abandoned rail lines and Midland Cycling Destination routes identified in the Draft Plan.

No change proposed.

[Ref: CDP/MA/652](#)

**Person / Body:**

**Lisa Cantwell**

**Summary of submissions / observations:**

This submission urges members of Offaly County Council to halt all plans for wind farm development on Lemanaghan Bog as;

- (a) It is recognised as an area of great historical and cultural importance with its strong links to Clonmacnoise and presence of the Pilgrim Way etc.
- (b) From an ecological standpoint, the bog and wetland area would serve wildlife and the local community so much better as a reclaimed and protected nature reserve for flora and fauna

rather than being turned into a practical wasteland and eyesore for countless decades to come;

- (c) There are viable alternatives for generating renewable energy that are far less destructive to the ecosystem, landscape and community.

#### CE Response:

- (a) It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;

- A sacred place of great antiquity;
- A place containing buildings of architectural significance;
- A place rich in documentary history and archaeological potential;
- A place where there is a long tradition of devotional practice; and
- A place 'apart', possessing a strong sense of being untouched by the modern world.

Notwithstanding this, it is noted that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development. The impacts of any windfarm development in the vicinity on these areas would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment.

- (b) It should be noted that;

- The Draft Plan contains a number of relevant objectives which address concerns relating to the preservation of biodiversity, such as Objective BLO-01 relating to the sustainable management of all Offaly's natural capital, Policy BLP-01 which states that it is Council policy to protect, conserve, and seek to enhance the county's biodiversity and ecological connectivity and Policy BLP-30 which states that it is Council policy to support the aims and objectives of the All Ireland Pollinator Plan 2021-2025;
- The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy;
- All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from 'Areas Open for Consideration for Wind Energy Developments' in the County Wind Energy Strategy. **Lemanaghan Bog is not a European Designated Site;**
- Development Management Standard 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments are required to detail the impacts of the proposed development on nature conservation (ecology, flora and fauna) including birds.

- Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 site cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site would be required.
  - The following objective was proposed for inclusion by Material Alteration (MA108) in Chapter 4 Biodiversity and Landscape in regard to the protection of birds outside Special Protection Areas; “In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas.”
- (c) The Draft Plan encourages and facilitates the production of energy from a wide range of renewable sources, including a specific Policy in the Draft Plan, CAEP-22, to encourage and facilitate the production of energy from renewable sources, such as from bioenergy, waste material, solar, hydro, geothermal and wind energy, subject to proper planning and environmental considerations. The Council is cognitive of striking a balance also in this regard and importantly the Draft Plan includes a specific objective, CAEO-02, for the Council to achieve a reasonable balance between responding to government policy on renewable energy and in enabling the wind energy resources of the county to be harnessed in an environmentally sustainable manner. It is considered that the policy and objectives contained in Climate 3 Climate Action and Energy, the County Wind Energy Strategy and the relevant development management standards in Chapter 13 of the draft Plan are consistent with these objectives.

No change proposed.

[Ref: CDP/MA/725](#)

**Person / Body:**

**David Connolly**

**Summary of submissions / observations:**

This submission states that;

- (a) Lemanaghan bogs contain some of the richest and most diverse archaeological material in the country and is probably one of the most important wetland sites in the world. Lemanaghan monastic complex is of historical importance and national archaeological significance with the 2007 Conservation Plan for Lemanaghan citing it as a sacred place of great antiquity, with buildings of architectural significance and archaeological importance and that options for post-industrial use of the bogs are sympathetic to the significance of the site;
- (b) The construction of a large scale wind farm on Lemanaghan Bogs would entail the laying of thousands of tonnes of gravel for access roads and the pouring of thousands of tons of cement for foundations of turbines would leave an enormous carbon footprint;
- (c) A windfarm would be extremely detrimental to the flora and fauna of this special place of biodiversity;
- (d) The impact of a large scale wind farm on local communities on the immediate periphery of the bogs in relation to visual pollution, noise pollution, shadow flicker and health would be life changing;

- (e) The construction of a wind farm with its visual impact is not in harmony with ecotourism and the long term development of heritage sites such as the existing Pilgrim Route, the Slí Mór and St. Manchan's Shrine;
- (f) The proposal to site a wind farm on Lemanaghan Bog is contrary to the Offaly County Development Plan which identifies Lemanaghan as highly sensitive to new developments, which could potentially damage the historical character and social importance of the area and which further recommends very limited development subject to appropriateness, the very antithesis of a large scale wind farm.

The following documents were attached to this submission;

- WHO European Environmental Noise Guidance, 2018
- Oxford Handbook of Wetland Archaeology 2013;
- Filling in the Blanks; an archaeological survey of the Lemanaghan Bogs 1997;
- Offaly History and Society, 1998.

#### CE Response:

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment;
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I make the following observations;

- (a) It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;
  - A sacred place of great antiquity;
  - A place containing buildings of architectural significance;
  - A place rich in documentary history and archaeological potential;
  - A place where there is a long tradition of devotional practice; and
  - A place 'apart', possessing a strong sense of being untouched by the modern world.

Notwithstanding this, it is noted that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development. The impacts of any windfarm development in the vicinity on these areas would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment.

- (b) It is considered that any issue relating to ancillary impacts to wind energy developments such as the pouring of concrete into the foundations of proposed turbines or laying of gravel for roads can be assessed at planning application stage with regard to policy CAEP-16 from Chapter 3 of the Draft , which is subject to a proposed material alteration (additional text in red, deletion in strikethrough); “It is Council policy that planning applications for development on or immediately adjacent to peatlands shall be accompanied by assessments considering the following issues where relevant; peatland stability, hydrology, ~~and/or~~ carbon emissions balance **and ecological impact assessment.**”

In addition, the Draft Plan provides for the following climate mitigation measures on peatlands;

- Proposing a number of specific actions and projects in Table 3.1 Decarbonisation Actions and Projects relating to the creation and delivery of carbon sinks, afforestation and rewilding of peatlands; and
  - Supporting the preparation of a comprehensive after use framework plan for the industrial peatlands and recognises that these peatlands are a significant resource relating to a range of uses including wild areas, flood management and climate mitigation in Policy CAEP-13 in Chapter 3 Climate Action and Energy.
- (c) The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy. It should be noted in this regard that;
- All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from ‘Areas Open for Consideration for Wind Energy Developments’ in the County Wind Energy Strategy;
  - DMS 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments have to detail the impacts on of the proposed development on nature conservation, including birds;
  - Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site would be required.

In addition, it is noted that the following objective was proposed for inclusion by Material Alteration in Chapter 4 Biodiversity and Landscape in regard to the protection of birds outside Special Protection Areas; “*In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas.*”

- (d) DMS 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments have to detail the impacts on human health in relation to noise disturbance

(including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region) and shadow flicker. In assessing planning applications for windfarms, the Council will have regard to the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made. It should be noted in this regard that the noise and shadow flicker limits in the draft Wind Energy Guidelines (WEG) are more onerous than the 2006 WEGs and afford a higher level of protection to people who live in the vicinity of any future wind farm developments.

- (e) As mentioned in point (a) of this response above, the Council supports and promotes the protection and appropriate management of all monastic sites in the county and the impacts of any windfarm development on Lemanaghan Bogs would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment.

In relation to development on peatland areas, the Council recognises the range of potential uses that can be accommodated on peatlands (such as the Leamanaghan Bogs) in Table 3.1 and Policy CAEP-13 above in Response 1 in addition to objectives TRO-09 relating to the development of outdoor pursuits and peatways on peatlands in the county and TRO-17 relating to the protection of potential peatway routes along and in proximity to abandoned rail lines and Midland Cycling Destination routes identified in the Draft Plan, all of which are conducive to the sensitive long term development of heritage routes in the area.

- (f) As mentioned in point (a) of this response above, the Council supports and promotes the protection and appropriate management of all monastic sites in the county and the impacts of any windfarm development on Lemanaghan Bogs would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment. It is noted that Section 6.9.3 of the Wind Energy Guidelines 2006 state in relation to peatlands that “landscapes of this type comprise a vast planar extent of peatland and have significant potential for future wind energy development” whilst Appendix 4 of these Guidelines include best practice guidelines for Wind Energy Development in Peatlands. Notwithstanding this, the visual and landscape impacts of planning applications for wind farm developments will be examined in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment.

No change proposed.



[Ref: CDP/MA/726 and the following CDP/MA Ref. Numbers 727 to 749 and 2358](#)

### Persons / Bodies:

See Appendix B

### Summary of submissions / observations:

Requests that Lemanaghan Bog be removed in its entirety as an 'Area Open for Consideration for Wind Energy Development' for the following reasons;

- a) Mapping this area as Open for Consideration for Wind Energy Development contradicts statements from Chapter 4 of the Plan which;
  - identifies Lemanaghan as highly sensitive to new developments which could potentially damage the historical character and the cultural and social importance of the area;
  - states that the Council shall endeavour to ensure that developments in this area are sympathetic to the sensitive nature of the landscape as the acceptability of development for consideration in this area is very limited;
- b) The 'protected zone' in the material alterations was created without a site survey and with no specialist archaeological or historical expertise. Many recorded National Monuments in the bog were not afforded any protection in the material alteration MA443;
- c) Provides extracts from the Lemanaghan Conservation Plan referring to the sense of peace, tranquillity and antiquity provided at Lemanaghan (Section 4) potential archaeology of the area (Section 5.4) and the consideration of sympathetic post-industrial use of the bog (Section 5.6);
- d) A research document from UCD and WARP stated that surveys of the area identified over 630 archaeological sites making this one of the highest densities of wetland archaeology in the world;
- e) Turbines in the area will be detrimental to wildlife, biodiversity and birds;
- f) Maps on pages 276 and 277 of the Material Alteration Report indicate that Lemanaghan Bog is Medium Sensitive in relation to Landscape Sensitivity;
- g) An eco-tourism plan would be a welcome development for the area, using the ancient pilgrim path the Slí Mór, to link to St. Manchan's Shrine in Boher and to Clonmacnoise.
- h) Bellair Hill at its closest point, is approximately 2 km from Lemanaghan Bog. Bellair Hill is listed as a 'Group of Trees that Contribute to Amenity' in the Draft Plan.

### CE Response:

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment;

- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I make the following observations;

- (a) Whilst I note the contents of Table 4.21 ‘High Sensitivity Areas in County Offaly’ relating to Archaeological and Historical Landscapes, I emphasise that the Wind Energy Guidelines 2006 state that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development.

The impacts of any windfarm development in the vicinity on these areas would need be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment to determine the appropriateness of the development proposed.

- (b) It is noted that the members passed a motion at the Special Council Meeting considering the Chief Executive’s Report on the Draft Plan which excluded from the designation ‘Open for Consideration for Wind Energy Development’ in the County Wind Energy Strategy an area 500 metres north of the disused railway line known locally as “The Banagher Line” and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane around the Lemanaghan Monastic Site in addition to the monastic site. It is noted that the area removed by this motion ensures that all of the monastic site area as shown on Figure 3 Site Map (page 19) and Figure 4 Geological Survey Map c.1840 (page 21) of the Lemanaghan Heritage Conservation Plan is excluded from a potential wind energy area in the Draft Plan.

I am satisfied that the Draft Plan includes the necessary objectives for the protection of the archaeological heritage of the county in accordance with the Planning and Development Act 2000 as amended. It should be noted that the Minister for Housing, Local Government and Heritage has a responsibility to protect the archaeological heritage and to exercise powers of preservation under the National Monuments Acts, 1930- 2004, taking account of the European Convention for the Protection of the Archaeological Heritage. Any extraction, disturbance or drainage works in the vicinity of archaeological sites or monuments must have strict adherence to the National Monuments Acts and national policy on the protection of the archaeological heritage in the course of development as set out in the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999), available at: <https://www.archaeology.ie/sites/default/files/media/publications/framework-and-principles-for-protection-of-archaeological-heritage.pdf>. See in particular Part III, “Principles for the Protection of the Archaeological Heritage”.

- (c) It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;
- A sacred place of great antiquity;
  - A place containing buildings of architectural significance;
  - A place rich in documentary history and archaeological potential;
  - A place where there is a long tradition of devotional practice; and

- A place ‘apart’, possessing a strong sense of being untouched by the modern world.

As referred to in part (a) of this response, the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development. The impacts of any windfarm development in the vicinity on these areas would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment.

(d) See (b) above.

(e) It should be noted that;

- The Draft Plan contains a number of relevant objectives which address concerns relating to the preservation of biodiversity, such as Objective BLO-01 relating to the sustainable management of all of Offaly’s natural capital, Policy BLP-01 which states that it is Council policy to protect, conserve, and seek to enhance the county’s biodiversity and ecological connectivity and Policy BLP-30 which states that it is Council policy to support the aims and objectives of the All Ireland Pollinator Plan 2021-2025;
- The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy;
- All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from ‘Areas Open for Consideration for Wind Energy Developments’ in the County Wind Energy Strategy. **Lemanaghan Bog is not a European Designated Site;**
- Development Management Standard 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments are required to detail the impacts of the proposed development on nature conservation (ecology, flora and fauna) including birds.
- Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 site cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site would be required.
- The following objective was proposed for inclusion by Material Alteration (MA108) in Chapter 4 Biodiversity and Landscape in regard to the protection of birds outside Special Protection Areas; “In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas.”

(f) Whilst Lemanaghan Bog is designated a ‘Medium Landscape Sensitivity’ Area in Figure 4.22 ‘Landscape Classification Areas in Co. Offaly’ in Chapter 4 of the Draft Plan, Step 2 of the sieve mapping analysis carried out in Section 5 ‘Identifying Suitable Areas in County Offaly for Wind Energy Development’ of the County Wind Energy Strategy in the Draft Plan excluded only high landscape sensitivity areas only from ‘Open for Consideration for Wind Energy Development’.

It is noted in this regard that Table 4.20 ‘Moderate Sensitivity Areas in County Offaly’ of Chapter 4 the Draft Plan states that “some of these cutaway bogs may be appropriate for other sensitively designed and located developments including renewable energy (wind farms, biomass crops) and/or industrial use”.

Notwithstanding this, as mentioned in part (a) and (c) above, the visual and landscape impacts of planning applications for wind farm developments will be examined in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment.

- (g) The Draft Plan makes provision for a range of potential eco-tourism uses on cutaway bogs in the County through the following;
- Policy CAEP-13 which recognises that the industrial peatlands in the midlands are a significant resource for transition to after uses ranging from amenity, tourism, biodiversity services, ‘wild areas’, flood management, climate mitigation, energy development, industry, education, conservation and many more; and
  - Objective RDO-05 in Chapter 5 ‘Economic Development’ to support the longer-term strategic planning for industrial peatland areas, to include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure which provides for as well as a range of uses including climate mitigation, tourism uses such as peatways, recreational forestry, biodiversity, and a designation of a National Peatlands Heritage Park.
- (h) The trees at Bellair Hill are included in Table 4.15 ‘Group of Trees that Contribute to Amenity’ of the Draft Plan as they are of significant value to the environment. It is Council policy to support the protection and management of existing networks of woodlands and trees (such as ‘Group of Trees that Contribute to Amenity’) which are of amenity or biodiversity value and/or contribute to landscape character, and to strengthen local networks. This group of trees is not likely to be damaged or impacted by any windfarm development on Lemanaghan Bogs due to the distance of the trees from the bogs.

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

[Ref: CDP/MA/966](#)

**Person / Body:**

**Michael Daly**

**Summary of submissions / observations:**

This submission requests that the Lemanaghan Bog be removed entirely from being considered for wind energy development in the development plan due to;

- (a) The impact that construction of this scale would have on wild life and their habitat;
- (b) The visual impact of an industrial wind farm, in particular on views across to the south of the Slieve Bloom Mountains from Corr Hill, Rashina, Staduff, Kilnagooney, Tumbeagh,

Cappallosset, Boher, Athlone Rd in Ferbane and Ballylin, and then the north to Bellair Hill and Rashina from Lemanaghan;

- (c) The impact of an industrial wind farm on Lemanaghan's heritage citing it as a sacred place of great antiquity with a long tradition of devotional practice;
- (d) The impact on people's health in the area;
- (e) Concerns over how a windfarm will affect children who are on the autistic spectrum;
- (f) The environmental impact of the extraction of stone and manufacture of concrete needed to supply the construction of any windfarm;
- (g) A bog being better if allowed regenerate naturally;
- (h) Other counties in the midlands not contributing to renewable energy to the same extent as Offaly; and
- (i) Potential structural damage to houses in the area during construction.

#### CE Response:

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I note that;

- (a) The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy. It should be noted in this regard that;
  - All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from 'Areas Open for Consideration for Wind Energy Developments' in the County Wind Energy Strategy;
  - DMS 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments have to detail the impacts on of the proposed development on nature conservation, including birds;
  - Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 cannot be ruled out, a

full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site would be required.

- In addition, it is noted that the following objective was proposed for inclusion by Material Alteration in Chapter 4 Biodiversity and Landscape in regard to the protection of birds outside Special Protection Areas; *“In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas.”*

- (b) Whilst Lemanaghan Bog is designated a ‘Medium Landscape Sensitivity’ Area in Figure 4.22 ‘Landscape Classification Areas in Co. Offaly’ in Chapter 4 of the Draft Plan, Step 2 of the sieve mapping analysis carried out in Section 5 ‘Identifying Suitable Areas in County Offaly for Wind Energy Development’ of the County Wind Energy Strategy in the Draft Plan excluded only high landscape sensitivity areas only from ‘Open for Consideration for Wind Energy Development’. It is noted in this regard that Table 4.20 ‘Moderate Sensitivity Areas in County Offaly’ of Chapter 4 the Draft Plan states that “some of these cutaway bogs may be appropriate for other sensitively designed and located developments including renewable energy (wind farms, biomass crops) and/or industrial use”.

Notwithstanding this, the visual and landscape impacts of planning applications for wind farm developments will be examined in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment.

- (c) It is noted that the members passed a motion at the Special Council Meeting considering the Chief Executive’s Report on the Draft Plan which excluded from the designation ‘Open for Consideration for Wind Energy Development’ an area 500 metres north of the disused railway line known locally as “The Banagher Line” and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane around the Lemanaghan Monastic Site, in addition to the monastic site. It is noted that the area removed by this motion ensures that all of the monastic site area as shown on Figure 3 Site Map (page 19) and Figure 4 Geological Survey Map c.1840 (page 21) of the Lemanaghan Heritage Conservation Plan is excluded from a potential wind energy area in the Draft Plan.

In relation to the reference to Recorded Monuments located elsewhere in the area, it should be noted that;

- Recorded Monuments are protected under the National Monuments Acts 1930 to 2014;
  - the impact of any wind farm development on natural heritage, built heritage and archaeological sites would likely to be detailed in an environmental impact assessment at planning application stage; and
  - all planning applications affecting archaeological and natural heritage are referred to the Minister for Culture, Heritage and the Gaeltacht and a number of other prescribed authorities including the Heritage Council, An Taisce – the National Trust for Ireland, the Arts Council and Fáilte Ireland (the national tourism authority) for comments.
- (d) DMS 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments have to detail the impacts on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region) and shadow flicker. In assessing planning applications for

windfarms, the Council will have regard to the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made. It should be noted in this regard that the noise and shadow flicker limits in the Draft Wind Energy Guidelines (WEGs) 2019 are more onerous than the 2006 WEGs and afford a higher level of protection to people who live in the vicinity of any future wind farm developments. It is noted that also that the Draft Wind Energy Guidelines state in Section 5.7.6.3 that modern wind turbines have the blades upwind of the tower which has effectively eliminated continuous infrasound elements from wind turbine noise during normal operation.

- (e) The Draft Wind Energy Guidelines 2019 in Section 4.10 state that health and safety issues are generally covered by separate legislation and not by planning legislation however developers of wind energy developments should be aware of the requirements. The Health and Safety Authority (<https://www.hsa.ie/eng/>) can provide advice and guidance.
- (f) It is considered that any issue relating to ancillary impacts to wind energy developments such as the pouring of concrete into the foundations of proposed turbines or extraction of stone or gravel at planning application stage with regard to;
- DMS 109 in Chapter 13 of the Draft Plan, including assessment of cumulative impacts of projects;
  - DMS 112 in Chapter 13 of the Draft Plan relating to quarrying;
  - Policy CAEP-16 from Chapter 3 of the Draft Plan, which is subject to a proposed material alteration (additional text in red, deletion in strikethrough); “It is Council policy that planning applications for development on or immediately adjacent to peatlands shall be accompanied by assessments considering the following issues where relevant; peatland stability, hydrology, ~~and/or~~ carbon emissions balance **and ecological impact assessment.**”
- (g) I consider that the Draft Plan provides for a range of uses on peatland areas in the county such as regeneration of peatlands areas while also contributing to realising overall national targets on renewable energy and climate change, in particular the Draft Plan supports the restoration of peat bogs when turf cutting has ceased and the creation or enhancement of carbon sinks on wetlands and bogs in Table 3.1 Decarbonisation Actions and Projects. This actions and projects are in addition to;
- Policy CAEP-13 which recognises that the industrial peatlands in the midlands are a significant resource for transition to after uses ranging from amenity, tourism, biodiversity services, ‘wild areas’, flood management, climate mitigation, energy development, industry, education, conservation and many more; and
  - Objective RDO-05 in Chapter 5 ‘Economic Development’ to support the longer-term strategic planning for industrial peatland areas, to include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure which provides for as well as a range of uses including climate mitigation, tourism uses such as peatways, recreational forestry, biodiversity, and a designation of a National Peatlands Heritage Park.

- (h) Whilst Section 9 of the County Wind Energy Strategy of the Draft Plan demonstrates the consistency of the Strategy with adjacent local authorities' wind strategies, it is not appropriate for me to comment on other counties contributions to wind energy generation. I am satisfied though that Co. Offaly has to date significantly supported renewable energy development and contributed to realising overall national targets on renewable energy and climate action whilst striking a reasonable balance between responding to government policy on renewable energy and in enabling the wind energy resources of the county to be harnessed in an environmentally sustainable manner.
- (i) DMS 109 in Chapter 13 of the Draft Plan outlines that planning applications for wind energy developments have to detail the impacts of development on the surrounding road network, thereby safeguarding existing dwellings from the impact of vibration from construction – generated traffic.

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

[Ref: CDP/MA/967](#)

**Person / Body:**

**Cllr John Clendennen**

**Summary of submissions / observations:**

This submission requests that Lemanaghan Bog be removed in its entirety as an Area Open for Consideration for Wind Energy Development. The submission further expresses concerns regarding the;

- (a) potential impact of such developments on the local landscape, an area rich in ecology and heritage. It is imperative that a full and comprehensive ecological and heritage study of the boglands is conducted to ensure the integrity of Lemanaghan bog is fully protected.
- (b) heritage of the area which has an important tourism and theological role within Offaly and beyond. A full and comprehensive study of the visual impact on monastic and monumental sites in the area must be considered.

**CE Response:**

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;



- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment;
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I note that;

- (a) The Lemanaghan Heritage Conservation Plan (2007) already provides a framework for the conservation of the monastic site and adjacent bog establishing that Lemanaghan is;
- A sacred place of great antiquity;
  - A place containing buildings of architectural significance;
  - A place rich in documentary history and archaeological potential;
  - A place where there is a long tradition of devotional practice; and
  - A place 'apart', possessing a strong sense of being untouched by the modern world.

As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area.

- (b) The theological significance of all monastic sites is recognised by Policy BHP-24 in the Draft Plan which states that it is Council policy to support and promote the protection and appropriate management of all monastic sites in the county.

The list of Recorded Monuments and Archaeology known to date are recorded by the National Monuments Service are available for viewing on their Historic Environment Viewer at <https://maps.archaeology.ie/HistoricEnvironment/>.

The impacts of any windfarm development in the vicinity on these areas would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment to determine the appropriateness of the development proposed.

In relation to the tourism potential of the area, it is noted that the Draft Plan contains the following policies which are conducive to the tourism development of monastic sites and peatland areas;

- **TRP-13** which promotes the monastic sites of County Offaly as tourist attractions in conjunction with Fáilte Ireland, the OPW and relevant stakeholders
- Policy CAEP-13 which recognises that the industrial peatlands in the midlands are a significant resource for transition to after uses ranging from amenity, tourism, biodiversity services, 'wild areas', flood management, climate mitigation, energy development, industry, education, conservation and many more; and
- Objective RDO-05 in Chapter 5 'Economic Development' to support the longer-term strategic planning for industrial peatland areas, to include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure which provides for as well as a range of uses including climate mitigation, tourism uses such as peatways, recreational forestry, biodiversity, and a designation of a National Peatlands Heritage Park.

The visual and landscape impacts of planning applications for wind farm developments will be examined in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment.

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

#### [Ref: CDP/MA/970](#)

#### **Person / Body:**

**Debbie Carey**

#### **Summary of submissions / observations:**

This submission requests that Lemanaghan Bog be removed from an Area Open for Consideration for Wind Energy Development in the Draft Plan due to the following;

- (a) Area of Archaeological and monastic importance.
- (b) Social: Visual pollution, noise pollution, shadow flicker and health issues.
- (c) Environmental: threat to species, Flora and fauna.
- (d) Should aim to promote Eco tourism, not Eco vandalism as this scheme would be. Should put infrastructure in place Inform of Bog rail to connect Lemanaghan with Lough Boora and Clonmacnoise. Bog boardwalks etc.

#### **CE Response:**

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment;
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I note that;

- (a) It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing

applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;

- A sacred place of great antiquity;
- A place containing buildings of architectural significance;
- A place rich in documentary history and archaeological potential;
- A place where there is a long tradition of devotional practice; and
- A place ‘apart’, possessing a strong sense of being untouched by the modern world.

Notwithstanding this, it is noted that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development. The impacts of any windfarm development in the vicinity on these areas would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment.

It is noted that the members passed a motion at the Special Council Meeting considering the Chief Executives Report on the Draft Plan which excluded from the designation ‘Open for Consideration for Wind Energy Development’ an area 500 metres north of the disused railway line known locally as “The Banagher Line” and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane around the Lemanaghan Monastic Site, in addition to the monastic site. It is noted that the area removed by this motion ensures that all of the monastic site area as shown on Figure 3 Site Map (page19) and Figure 4 Geological Survey Map c.1840 (page21) of the Lemanaghan Heritage Conservation Plan is excluded from a potential wind energy area in the Draft Plan.

In relation to the reference to Recorded Monuments located elsewhere in the area, it should be noted that;

- Recorded Monuments are protected under the National Monuments Acts 1930 to 2014;
  - the impact of any wind farm development on natural heritage, built heritage and archaeological sites is likely to be detailed in an environmental impact assessment at planning application stage; and
  - all planning applications affecting archaeological and natural heritage are referred to the Minister for Culture, Heritage and the Gaeltacht and a number of other prescribed authorities including the Heritage Council, An Taisce – the National Trust for Ireland, the Arts Council and Fáilte Ireland (the national tourism authority) for comments.
- (b) DMS 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments have to detail the impacts on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region) and shadow flicker. In assessing planning applications for windfarms, the Council will have regard to the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made. It should be noted in this regard that the noise and shadow flicker limits in the Draft Wind Energy Guidelines (WEGs) 2019 are more onerous than the 2006 WEGs and afford a

higher level of protection to people who live in the vicinity of an any future wind farm developments.

The visual and landscape impacts of planning applications for wind farm developments will be examined in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment.

(c) It should be noted that;

- The Draft Plan contains a number of relevant objectives which address concerns relating to the preservation of biodiversity, such as Objective BLO-01 relating to the sustainable management of all of Offaly's natural capital, Policy BLP-01 which states that it is Council policy to protect, conserve, and seek to enhance the county's biodiversity and ecological connectivity and Policy BLP-30 which states that it is Council policy to support the aims and objectives of the All Ireland Pollinator Plan 2021-2025;
- The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy;
- All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from 'Areas Open for Consideration for Wind Energy Developments' in the County Wind Energy Strategy. **Lemanaghan Bog is not a European Designated Site;**
- Development Management Standard 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments are required to detail the impacts of the proposed development on nature conservation (ecology, flora and fauna) including birds.
- Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 site cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site would be required.

The following objective was proposed for inclusion by Material Alteration (MA108) in Chapter 4 Biodiversity and Landscape in regard to the protection of birds outside Special Protection Areas; "In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas."

(d) The Draft Plan makes provision for a range of uses on cutaway bogs in the County through;

- Policy CAEP-13 which recognises that the industrial peatlands in the midlands are a significant resource for transition to after uses ranging from amenity, tourism, biodiversity services, 'wild areas', flood management, climate mitigation, energy development, industry, education, conservation and many more;
- Objective RDO-05 in Chapter 5 'Economic Development' to support the longer-term strategic planning for industrial peatland areas, to include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure which provides for as well as a range of uses including climate mitigation, tourism uses such as peatways,

recreational forestry, biodiversity, and a designation of a National Peatlands Heritage Park.

- Policy TRP–03 to co-operate with strategic partners such as Bord na Móna, National Parks and Wildlife Service and Coillte on the identification of land use strategies for appropriate areas of peatland and forestry within the county focusing on the tourism, environmental and heritage value of these areas.

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

#### [Ref: CDP/MA/974](#)

#### **Person / Body:**

**Maura Higgins**

#### **Summary of submissions / observations:**

This submission requests that Lemanaghan bog be removed as an Area Open for Consideration for Wind Energy Development due to its;

- (a) wildlife and biodiversity; and
- (b) history and archaeology.

#### **CE Response:**

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission;

- (a) It should be noted that;
  - The Draft Plan contains a number of relevant objectives which address concerns relating to the preservation of biodiversity, such as Objective BLO-01 relating to the

sustainable management of all of Offaly's natural capital, Policy BLP-01 which states that it is Council policy to protect, conserve, and seek to enhance the county's biodiversity and ecological connectivity and Policy BLP-30 which states that it is Council policy to support the aims and objectives of the All Ireland Pollinator Plan 2021-2025;

- The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy;
  - All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from 'Areas Open for Consideration for Wind Energy Developments' in the County Wind Energy Strategy. **Lemanaghan Bog is not a European Designated Site;**
  - Development Management Standard 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments are required to detail the impacts of the proposed development on nature conservation (ecology, flora and fauna) including birds.
  - Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 site cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site would be required.
  - The following objective was proposed for inclusion by Material Alteration (MA108) in Chapter 4 Biodiversity and Landscape in regard to the protection of birds outside Special Protection Areas; "In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas."
- (b) It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;
- A sacred place of great antiquity;
  - A place containing buildings of architectural significance;
  - A place rich in documentary history and archaeological potential;
  - A place where there is a long tradition of devotional practice; and
  - A place 'apart', possessing a strong sense of being untouched by the modern world.

Notwithstanding this, it is noted that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development. The impacts of any windfarm development in the vicinity on these areas would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment.

It is noted that the members passed a motion at the Special Council Meeting considering the Chief Executives Report on the Draft Plan which excluded from the designation ‘Open for Consideration for Wind Energy Development’ an area 500 metres north of the disused railway line known locally as “The Banagher Line” and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane around the Lemanaghan Monastic Site, in addition to the monastic site. It is noted that the area removed by this motion ensures that all of the monastic site area as shown on Figure 3 Site Map (page 19) and Figure 4 Geological Survey Map c.1840 (page 21) of the Lemanaghan Heritage Conservation Plan is excluded from a potential wind energy area in the Draft Plan.

In relation to the reference to Recorded Monuments located elsewhere in the area, it should be noted that;

- Recorded Monuments are protected under the National Monuments Acts 1930 to 2014;
- the impact of any wind farm development on natural heritage, built heritage and archaeological sites is likely to be detailed in an environmental impact assessment at planning application stage; and
- all planning applications affecting archaeological and natural heritage are referred to the Minister for Culture, Heritage and the Gaeltacht and a number of other prescribed authorities including the Heritage Council, An Taisce – the National Trust for Ireland, the Arts Council and Fáilte Ireland (the national tourism authority) for comments.

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

[Ref: CDP/MA/997](#)

**Person / Body:**

**Bord na Móna**

**Summary of submissions / observations:**

This submission;

- (a) While welcoming the concept of the Wilderness Corridor, states that;
- (i) As the definition used arises from a document whose full title is ‘Guidelines on Wilderness in Natura 2000 Management of terrestrial wilderness and wild areas within the Natura 2000 Network’ European Technical Report 2013-069, the definition as proposed is not applicable to the lands identified as none of those areas are within the Natura 2000 network;
  - (ii) The inclusion of a Wilderness Corridor as part of CAEP-35 (Material Alterations Ref. No. MA65) is premature, inappropriate and unwarranted, as the proposed Wilderness Corridor concept has not gone through a feasibility study stage, and has not been delineated or detailed in any form.

- (iii) It provides an unknown and unquantifiable constraint to windfarm development on these lands (specifically due to the statement in MA435 that “the council will not be in favour of any development proposed on these bogs with the potential to impact on the character, uniqueness and wilderness potential of these areas”) and has the potential to conflict with the implementation of the proposed Midland Cycling Destination routes prior to the feasibility and location of the Wilderness Corridor has been decided and/or delineated;
  - (iv) Bord na Móna are of the strong view that commercial operations such as a wind farm, rehabilitation and amenity can work in combination.
- (b) Suggests the following amendments (red text);

Table 3.1 Decarbonisation Actions and Projects, Material Alteration, Ref. No. MA55

- (i) Cessation of peat fired electricity generation, **and support the transition of existing units to run on sustainable biomass;**
- (ii) Support the restoration of peat bogs **and other climate mitigation actions** when turf cutting has ceased;
- (iii) Create or enhance delivery of carbon sinks, for example, wetlands, bogs, forestry, permanent grassland **in conjunction with other climate mitigation actions;**
- (iv) Identify a spatial area to be designated a Decarbonising Zone and develop an implementation plan in which a range of climate mitigation, adaptation and biodiversity measures and actions are identified **and potentially co-located** to address local low carbon energy, greenhouse gas emissions and climate needs to contribute to national climate action targets.

CAEP-12 Material Alteration, Ref. No. MA62

- (v) It is Council policy to support the enhancement of carbon sinks such as peatlands, forestry, and permanent grasslands, with consideration of re-wetting and restoration of cut away peatlands, **in conjunction with other climate mitigation actions**, where appropriate

CAEP-21 Material Alteration, Ref. No. MA64

- (vi) Appropriate re-use of some, (where identified within an overall strategic framework) former industrial peatlands and associated infrastructure / works sites with a focus on sustainable employment generation, **renewable energy projects**, community resilience, tourism facilities and amenities.

New Objective - Material Alteration, Ref. No. MA77

- (vii) It is an objective of the Council to ensure the security of energy supply by supporting the potential of the wind energy **(and other renewable)** resources of the County in a manner that is consistent with proper planning and sustainable development of the area

New Economic Profile of County Offaly – Chapter 5 Economic Development Strategy - Material Alteration, Ref. No. MA115

- (viii) The West Offaly power station in Shannonbridge closed in 2021, the Rhode power station closed in 2003, while Edenderry power station, which is now co-firing with peat and biomass, has permission to stay in operation until 2023, **a planning application to transition the Edenderry station to run exclusively on sustainable biomass is under consideration with the planning authority.**



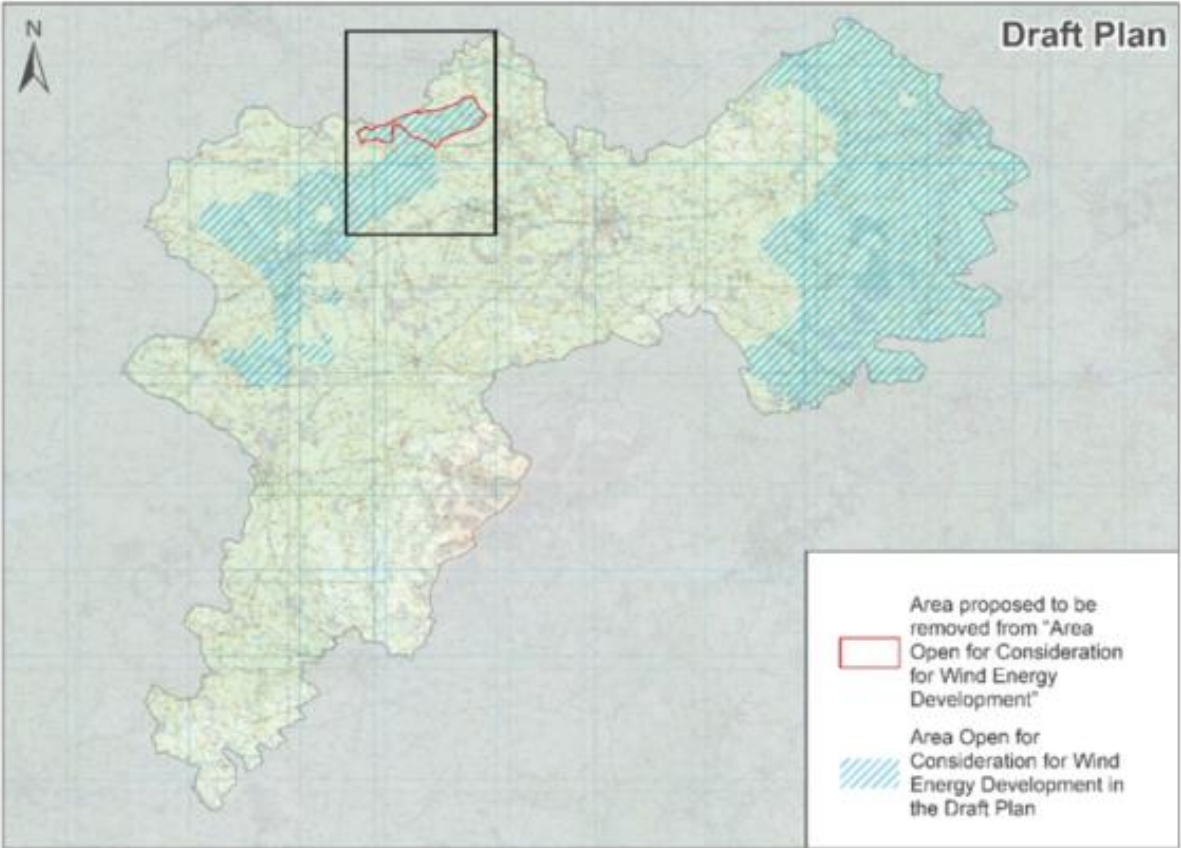
New Policy – Chapter 5 Economic Development Strategy - Material Alteration, Ref. No. MA160

- (ix) It is Council policy to proactively encourage the Bord na Móna Peatlands Rehabilitation Scheme (which is to be administered by the Department of the Environment, Climate and Communications (DECC) and regulated by the National Parks and Wildlife Service (NPWS) of the Department of Housing, Local Government and Heritage) to deliver on potential amenity and tourism benefits for example complimenting the delivery of the *Midlands Cycling Destination – Offaly*, where routes pass through the rehabilitated bogs, subject to environmental, biodiversity ~~and~~ hydrological and climate mitigation actions (including renewable energy projects) requirements.

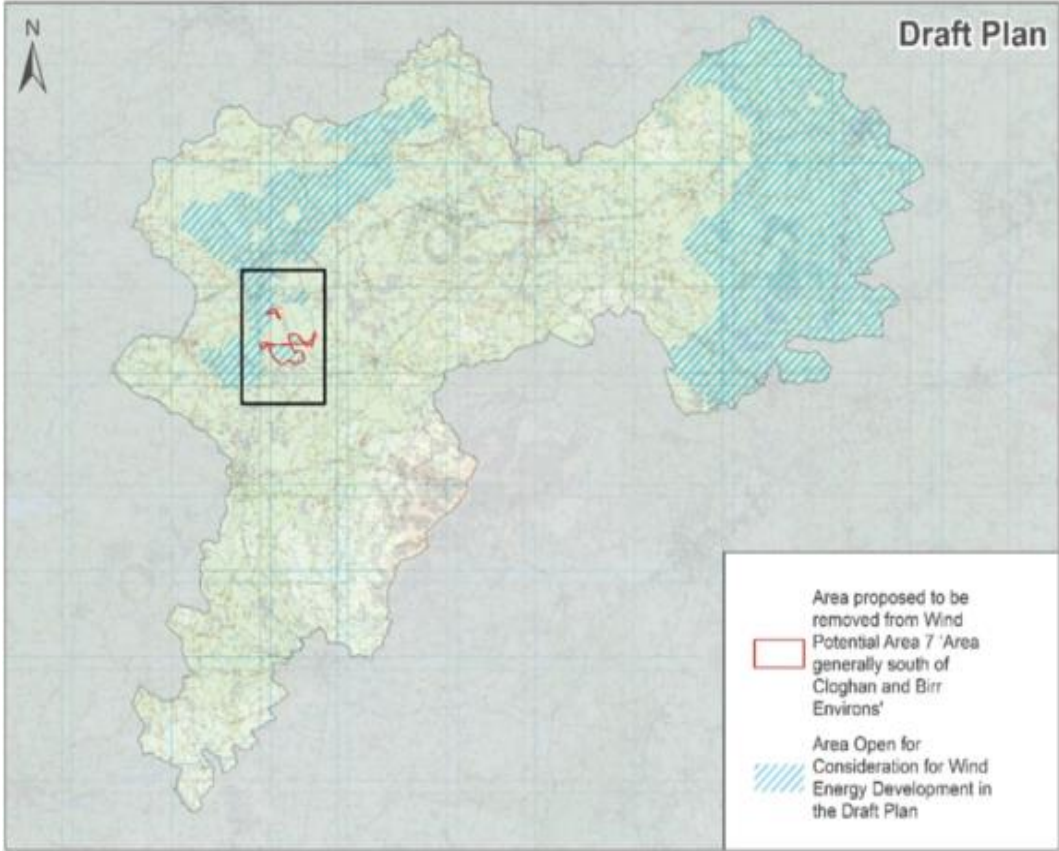
REDO-08 – Chapter 5 Economic Development Strategy - Material Alteration, Ref. No. MA164

- (x) It is an objective of the Council to consider proposals for the potential re-purposing of both Shannonbridge ~~and Edenderry peat~~ powered electricity generating plants, and the appropriate rehabilitation of associated lands.
- (c) Strongly contends the proposed material alterations MA435, MA437, MA440, MA441, MA442 and MA443 relating to the Wind Energy Strategy (the former two relating to Wilderness Corridors and the latter 4 mapped below relating to boundary changes to the Area Open for Consideration for Wind Energy Development);
- (i) Stating that the proposed amendments do not offer any criteria as to why the proposed areas are removed or included. In addition, removing these areas generates a disjointed approach to the designation of Areas Open for Consideration for Wind Energy Development;
  - (ii) Encouraging Offaly County Council to continue to recognise the importance that cutaway bogs have in terms of renewable energy generation. These lands are brownfield in nature, have limited environmental constraints and are largely removed from large numbers of sensitive receptors.
  - (iii) Stating that proposed Material Alteration MA443 (Lemanaghan Bog area) is of particular concern as Bord na Móna have publicly launched its proposal for a large scale wind farm at Lemanaghan having regard to its designation in the current and Draft County Development Plan, for which the planning application will contain a comprehensive and robust impact assessment.

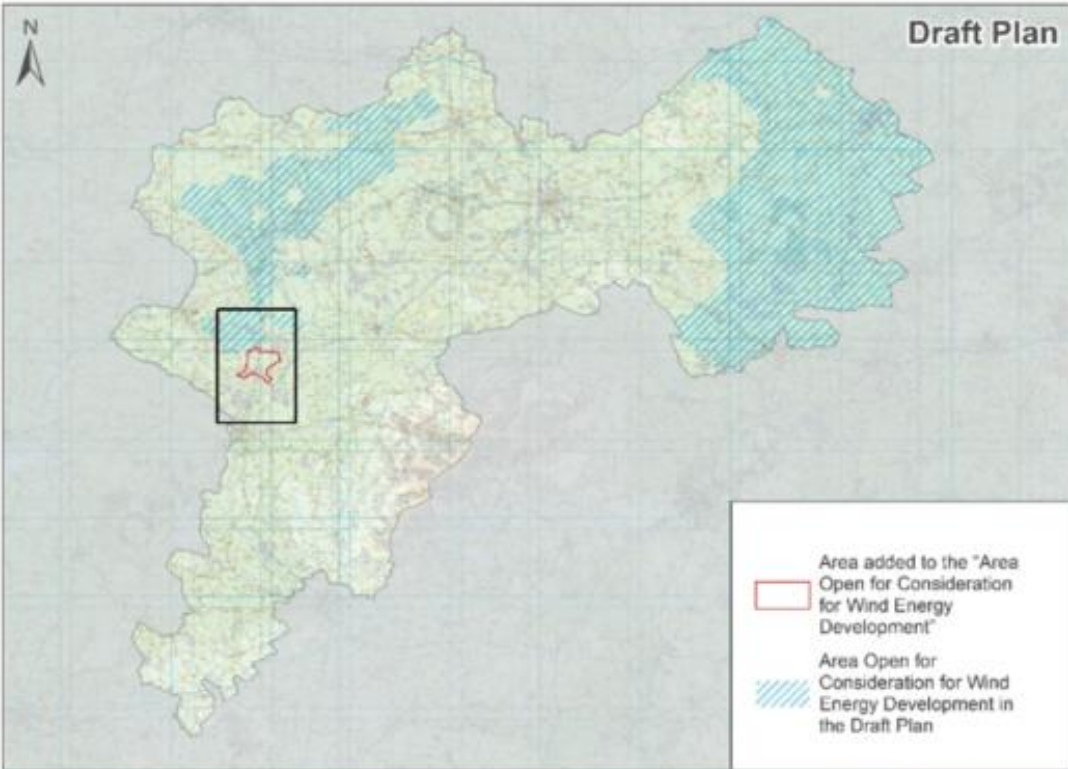
MA440:



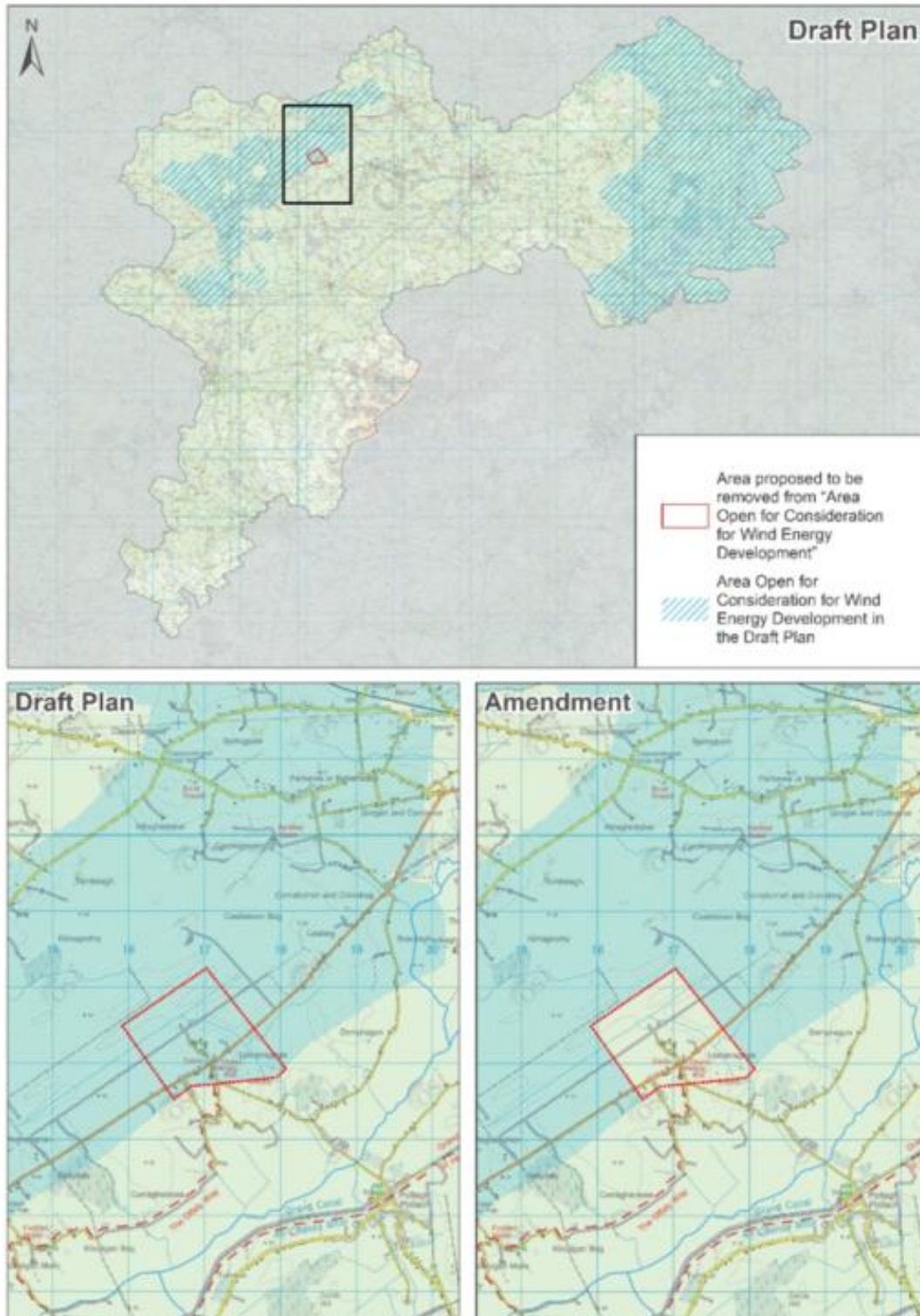
MA441:



MA442:



**MA443:**



- (d) The submission states in relation to Material Alteration MA430 that the operational Mount Lucas Wind Farm has 28 turbines as opposed to 29 turbines

**CE Response:**

(a)

- (i) I consider it appropriate to remove using the definition of the Wilderness Corridor from the Guidelines on Wilderness in Natura 2000 European Commission Technical Report 2013-069 referred to in Material Alteration MA88 and instead include the following paragraph in Section 4.7 'Peatlands' in the Draft Plan;

“The Council envisages that Wilderness Corridors will be large areas that are;

- characterised by an absence of intrusive human activity, settlements, infrastructure or visual disturbance encouraging visitors to ‘go off the beaten track’, ‘to get away from it all’ and ‘to immerse themselves in nature’;
- composed of natural habitats and species and regenerated peatlands;
- located close to major tourist attractions such as Clonmacnoise, the River Shannon and the Grand Canal Greenway which provide opportunities to develop a network of interlinked ‘peatways’ by reusing existing turbary access tracks and bog railway lines along with routes of this nature.”

- (ii) No change proposed. I disagree with this statement as the wording of BLO-26 provides for all stakeholders (with specific mention made to Bord na Móna) and related groups to examine the feasibility of developing a Wilderness Corridor on rehabilitated peatlands linked to routes identified in Figure 6.14 ‘Midlands Cycling Destination, Offaly Network Map at;

- Cavemount, Esker, Ballycon, Derrycricket, Clonsast North, Clonsast and Derrycastle Bogs in East Offaly; and
- Blackwater, Ballaghurt and Belmont Bogs in West Offaly, from Clonmacnoise in the direction of Belmont village in West Offaly.

It is envisaged that through these discussions that the constituent elements of each wilderness corridor and their boundaries of proposed wilderness areas will be developed and agreed upon during the plan period.

- (iii) No change proposed. I do not agree that the Wilderness Corridor concept;

- “provides an unknown and unquantifiable constraint to commercial development on these lands”. The Draft Plan already allows for a significant part of the county (including peatland areas) to be Open for Consideration for Wind Energy Development in addition to policies and objectives supporting renewable energy in appropriate locations. It is considered that the Wilderness Corridor concept supports objective CAEO-02 in Chapter 3 Climate Action and Energy to achieve a reasonable balance between responding to government policy on renewable energy and in enabling the wind energy resources of the county to be harnessed in an environmentally sustainable manner.
- “has the potential to conflict with the implementation of the proposed Midland Cycling Destination routes prior to the feasibility and location of the Wilderness Corridor has been decided and/or delineate”. MA113 as proposed makes specific reference to the development of a Wilderness Corridor on rehabilitated peatlands

being linked to routes identified in Figure 6.14 'Midlands Cycling Destination, Offaly Network Map. MA113 reads as follows:

It is an objective of the Council to work with stakeholders such as Bord na Móna, Coillte, National Parks and Wildlife Service, Waterways Ireland and Just Transition related groups to examine the feasibility of developing a Wilderness Corridor on rehabilitated peatlands linked to routes identified in Figure 6.14 'Midlands Cycling Destination, Offaly Network Map at;

- (i) Cavemount, Esker, Ballycon, Derrycricket, Clonsast North, Clonsast and Derryounce Bogs in East Offaly; and
  - (ii) Blackwater, Ballaghurt and Belmont Bogs in West Offaly, from Clonmacnoise in the direction of Belmont village in West Offaly.
- (iv) No change proposed. I agree that wind farms, rehabilitation and amenity can co-exist on peatlands however the Wilderness Corridor concept requires the peatland locations proposed for Wilderness Corridors are of a sufficient size to allow visitors to 'get away from it all' whilst also being in close proximity to regional tourist attractions such as Clonmacnoise and the Grand Canal Greenway, in addition a range of Midland Cycling Destination – Offaly routes, to lengthen tourist stay and broaden the tourism product in these areas.

(b)

Table 3.1 Decarbonisation Actions and Projects, Material Alteration, Ref. No. MA55

- (i) I consider the proposed change to the wording as proposed below to be acceptable; "Cessation of peat fired electricity generation, **and support the transition of existing units to run on sustainable biomass**";
- (ii) I consider the proposed change to the wording as proposed below to be acceptable; "Support the restoration of peat bogs **and other climate mitigation actions** when turf cutting has ceased";
- (iii) I consider the proposed change to the wording as proposed to be acceptable; "Create or enhance delivery of carbon sinks, for example, wetlands, bogs, forestry, permanent grassland **in conjunction with other climate mitigation actions**"
- (iv) I consider the proposed change to the wording as proposed below to be acceptable; "Identify a spatial area to be designated a Decarbonising Zone and develop an implementation plan in which a range of climate mitigation, adaptation and biodiversity measures and actions are identified **and potentially co-located** to address local low carbon energy, greenhouse gas emissions and climate needs to contribute to national climate action targets."

CAEP-12 Material Alteration, Ref. No. MA62

- (v) I consider the proposed change to the wording as proposed below to be acceptable; "It is Council policy to support the enhancement of carbon sinks such as peatlands, forestry, and permanent grasslands, with consideration of re-wetting and restoration of cut away peatlands, **in conjunction with other climate mitigation actions**, where appropriate."

CAEP-21 Material Alteration, Ref. No. MA64

- (vi) I consider the proposed change to the wording as proposed below to be acceptable;  
 “Appropriate re-use of some, (where identified within an overall strategic framework) former industrial peatlands and associated infrastructure / works sites with a focus on sustainable employment generation, **renewable energy projects**, community resilience, tourism facilities and amenities.”

New Objective - Material Alteration, Ref. No. MA77

- (vii) I consider the proposed change to the wording as proposed below to be acceptable;  
 “It is an objective of the Council to ensure the security of energy supply by supporting the potential of the wind energy (**and other renewable**) resources of the County in a manner that is consistent with proper planning and sustainable development of the area.”

New Economic Profile of County Offaly – Chapter 5 Economic Development Strategy - Material Alteration, Ref. No. MA115

- (viii) No change proposed. It would not be good practice to refer to a current planning application (submitted in 2021) in a County Development Plan. Furthermore, the wording as requested in the submission would go out of date as soon as a decision would be made on the application.

New Policy – Chapter 5 Economic Development Strategy - Material Alteration, Ref. No. MA160

- (ix) No change proposed as to include the suggested wording may conflict with the County Wind Energy Strategy in the Draft Plan in relation to certain peatland areas that may be subject to peatland rehabilitation during the life of the plan not being located in areas designated an Area deemed Open for Consideration for Wind Energy Development. Furthermore, the focus of this particular objective is on the potential for amenity within the Peatland Climate Action Strategy bogs.

REDO-08 – Chapter 5 Economic Development Strategy - Material Alteration, Ref. No. MA164

- (x) No change proposed as the wording of objective REDO-08 which refers to the Council considering the potential re-purposing of both plants and the appropriate rehabilitation of associated lands allows the Council sufficient flexibility in assessing future proposals for these sites.

(c)

- (i) No change proposed. I disagree with the statement that the proposed amendments do not offer any criteria as to why the proposed areas are removed or included. It is noted that;
- MA435 relating to the potential constraint to wind energy development from the proposed wilderness corridor being located in Wind Energy Area 2 (Area generally Cloneygowan to Clonbullogue) originated from my recommendation in the Chief



Executive Report on submissions received in relation to the Draft Plan, Ref. No. CDP/D/149, pages 276-277;

- MA437 relating to the potential constraint to wind energy development from the proposed wilderness corridor being located in Wind Energy Area 6 (Area generally east of Shannonbridge and south of Clonmacnoise) originated from my recommendation in the Chief Executive Report on submissions received in relation to the Draft Plan, Ref. No. CDP/D/149, page 277;
  - MA440 (exclusion of Corracullin Bog from Area deemed Open for Consideration in the County Wind Energy Strategy in the Draft Plan) was subject to a motion (Ref. EMD11) at the May Special Council meeting;
  - MA441 (Remove section of Lough Boora Area of High Amenity and within the vicinity of a Protected View in area south of Cloghan from Open for Consideration for Wind Energy Development) originated from my recommendation in the Chief Executive Report on submissions received in relation to the Draft Plan, Ref. No. Miscellaneous Change (r), pages 583-555;
  - MA442 (addition of lands at Galross Td/Cush Td to Area deemed Open for Consideration in the County Wind Energy Strategy in the Draft Plan) was subject to a motion from members (Ref. EMD28) at the May Special Council meeting.
  - MA443 (removal of area around the Lemanaghan Monastic Site) was subject to a motion from the members amending motion EMD13 at the May Special Council meeting.
- (ii) No change proposed. This is not an issue that can be considered as it does not relate to a Material Alteration.
- (iii) No change proposed. Section 6 (page 22) of the County Wind Energy Strategy in the Draft Plan states that “Wind energy developments in areas designated ‘Open for Consideration for Wind Energy Development’ does not imply ‘automatic approval’ as each proposal for development will be considered on their individual merits at planning application stage”. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;
- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) and any amendments to the Guidelines which may be made;
  - extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
  - requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment;
  - Detailed site visits; and
  - Advice received from prescribed authorities.
- (d) I note this correction. It is accordingly proposed to amend MA430 as follows;
- Table 1 shows County Offaly’s current total installed wind capacity to date comprising 3 wind farms with a combined installed capacity of 98.5 MW and a total of ~~35~~ 34 turbines.

**Table 1: Installed Wind Capacity in County Offaly (Source: Offaly County Council Planning Register, 2020)**

Location	Capacity MW	No. of Turbines
Leabeg	4.5	2
Meenwaun	10	4
Mount Lucas	84	<del>29</del> 28
<b>Total</b>	<b>98.5</b>	<del>35</del> 34

[Ref: CDP/MA/998 and the following CDP/MA Ref. Number 1002](#)

**Person / Body:**

**Lemanaghan Graveyard and Heritage Site Group**

**Summary of submissions / observations:**

This submission requests that consideration be given to the removal of Lemanaghan Bog from an Area Open for Consideration for Wind Energy Development for the following reasons;

The Lemanaghan Conservation Plan sponsored by Offaly County Council and the Heritage Council specifically states that Lemanaghan is a sacred place of great antiquity and of national archaeological significance. A wind farm in the vicinity of the above complex would totally undermine the integrity and significance of the site.

The identity of the people of Lemanaghan has been associated with the St. Manchan and the Monastic Site for centuries. It is important to the people of Lemanaghan that this is continued for future generations. A copy of the Conservation Plan is attached for your perusal.

**CE Response:**

It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;

- A sacred place of great antiquity;
- A place containing buildings of architectural significance;
- A place rich in documentary history and archaeological potential;
- A place where there is a long tradition of devotional practice; and
- A place 'apart', possessing a strong sense of being untouched by the modern world.

Notwithstanding this, it is noted that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development. The impacts of any windfarm development in the vicinity on these areas would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment.

It is noted that the members passed a motion at the Special Council Meeting considering the Chief Executives Report on the Draft Plan which excluded from the designation 'Open for Consideration for Wind Energy Development' an area 500 metres north of the disused railway line known locally as "The Banagher Line" and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane around the Lemanaghan Monastic Site, in addition to the monastic site. It is noted that the area removed by this motion ensures that all of the monastic site area as shown on Figure 3 Site Map (page19) and Figure 4 Geological Survey Map c.1840 (page21) of the Lemanaghan Heritage Conservation Plan is excluded from a potential wind energy area in the Draft Plan.

In relation to the reference to Recorded Monuments located elsewhere in the area, it should be noted that;

- Recorded Monuments are protected under the National Monuments Acts 1930 to 2014;
- the impact of any wind farm development on natural heritage, built heritage and archaeological sites is likely to be detailed in an environmental impact assessment at planning application stage; and
- all planning applications affecting archaeological and natural heritage are referred to the Minister for Culture, Heritage and the Gaeltacht and a number of other prescribed authorities including the Heritage Council, An Taisce – the National Trust for Ireland, the Arts Council and Fáilte Ireland (the national tourism authority) for comments.

It should be noted that Section 12(10)(c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

[Ref: CDP/MA/999](#)

**Person / Body:**

**Not Here Not Anywhere**

**Summary of submissions / observations:**

The submission outlines that 'Not Here Not Anywhere' (NHNA) is a nationwide, grassroots, non-partisan group campaigning to end fossil fuel exploration and the development of new fossil fuel infrastructure in Ireland. The submission makes recommendations under the following headings:

**a) Fossil fuels and new fossil fuel infrastructure**

- i. The County Development Plan should ensure a rapid phasing out of all fossil fuels including gas.
- ii. The County Development Plan should not allow the expansion of the gas grid.

- iii. The County Development Plan should ban fracked gas in its energy mix.
- iv. Any new large scale fossil fuel infrastructure projects must be mandated to undertake climate impact assessment to ensure they are consistent with Ireland's fair share net cumulative carbon dioxide (CO<sub>2</sub>) quota in line with the Paris agreement.

**b) Data Centres**

- i. A national cap on the level of data centre demand that can be accommodated by the grid to 2030, while meeting our renewable energy and climate emissions targets consistent with our obligations under the Paris Agreement, must be set out in national policy.
- ii. New data centres must be powered entirely by onsite or new off-site renewable energy.
- iii. Existing centres should be required to transition rapidly to on-site or new off-site renewables.
- iv. Where technically possible, heat generated from a data centre should be utilised for district heating systems.

**c) Public Participation and People-led Policy**

- i. Outside the development of this plan, the Council should lead annual local climate dialogues which serve to inform communities about the ongoing transition to a low carbon society and seek their opinions, ideas and consent.
- ii. The Climate Action and Environment office, or equivalent, within the Council must be adequately resourced, publicised and staffed. These offices should work closely with local communities to improve education and access to information around environmental issues, proactively engage in consultations and participatory processes which allow local people to have a say in the energy transition in their area.
- iii. Wherever practically possible, participatory processes should be designed in a participatory way, with input from representatives of all groups who are expected to take part.
- iv. Special outreach efforts must be made to include disadvantaged or marginalised groups in participatory processes. Those running participatory processes should keep a detailed record of the participation of marginalised groups and of best practices that serve to increase this participation.
- v. Support and establish community energy projects throughout the lifetime of the county development plan.

**CE Response:**

**a) Fossil fuels and new fossil fuel infrastructure**

- i. This request relating to the rapid phasing out of all fossil fuels cannot be considered at this stage of the plan making process because it does not relate to any specific proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).

However, it is noted that Proposed Material Alteration MA45 introduces the following Strategic Aim for Chapter 3 'Climate Action and Energy':

*To achieve a transition to an economically competitive, low carbon climate resilient and environmentally sustainable county, through reducing the need to travel, promoting sustainable settlement patterns and modes of transport, and by reducing the use of non-*

*renewable resources, whilst recognising the role of natural capital and ecosystem services in achieving this.*

- ii. This request relating to the gas grid cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).
- iii. This request relating to fracked gas cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).
- iv. This request relating to large scale fossil fuel infrastructure projects cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).

**b) Data Centre**

- i. Setting national policy is outside the remit of the county development plan. Furthermore, this request relating to setting a national cap on the level of data centre demand cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).
- ii. This request relating to the powering of new data centres cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).
- iii. This request relating to the powering of existing data centres cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).
- iv. This request relating to the use of heat generated from a data centre cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).

**c) Public Participation and People-led Policy**

- i. This request relating to annual local climate dialogues cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).

However, it is noted that Proposed Material Alteration MA46 inserts the following text in Section 3.1.6 of the draft Plan.

*In terms of addressing the future challenges of climate change, the Council will work closely with the Climate Action Regional Offices (CAROs). The Dublin Metropolitan Climate Action Regional Office (run by the four Dublin local authorities assisted by Codema) and the Eastern and Midland Climate Action Regional Office (run by Kildare County Council) will be responsible for planning and actions regarding Climate Change mitigation and adaptation in*

*their regions. Climate Action Regional Offices shall ensure coherence and coordination with the RSES when formulating regional climate change adaptation plans.*

Furthermore, referring to Proposed Material Alteration MA125 the following Strategic Opportunity is identified as part of the Rhode Green Energy Park

*Educational/ Innovation/ Centre of Learning for renewables and electricity grid: to improve awareness within the community of how the energy transition is happening, for collaboration with stakeholders across the Midlands Region and to create partnerships with University and Third Level Institutions.*

- ii. This request relating to local authority resources cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).
- iii. This request relating to participatory processes cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).
- iv. This request relating to participatory processes cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).
- v. This request relating to community energy projects cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).

**Ref: CDP/MA/1461**

**Person / Body:**

**Cllr Noel Cribbin**

**Summary of submissions / observations:**

This submission proposes that the area known as Lemanaghan Bog be removed from the County Development Plan as an Area Open for Consideration for Wind Energy Development. This is an area of great archaeological and historical significance in the county with links to nearby Clonmacnoise which should be further explored and developed as part of our tourism trail in Offaly.

**CE Response:**

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and

- Advice received from prescribed authorities.

It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;

- A sacred place of great antiquity;
- A place containing buildings of architectural significance;
- A place rich in documentary history and archaeological potential;
- A place where there is a long tradition of devotional practice; and
- A place 'apart', possessing a strong sense of being untouched by the modern world.

The Wind Energy Guidelines 2006 state that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development. The impacts of any windfarm development in the vicinity on these areas would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment. All planning applications affecting archaeological and natural heritage are referred to the Minister for Culture, Heritage and the Gaeltacht and a number of other prescribed authorities including the Heritage Council, An Taisce – the National Trust for Ireland, the Arts Council and Fáilte Ireland (the national tourism authority) for comments.

In addition, it is noted that the members passed a motion at the Special Council Meeting considering the Chief Executive's Report on the Draft Plan which excluded from the designation 'Open for Consideration for Wind Energy Development' an area 500 metres north of the disused railway line known locally as "The Banagher Line" and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane around the Lemanaghan Monastic Site, in addition to the monastic site. It is noted that the area removed by this motion ensures that all of the monastic site area as shown on Figure 3 Site Map (page 19) and Figure 4 Geological Survey Map c.1840 (page 21) of the Lemanaghan Heritage Conservation Plan is excluded from a potential wind energy area in the Draft Plan.

The Draft Plan contains a number of policies and objectives which are conducive to developing links between the Lemanaghan and Clonmacnoise Monastic sites such as;

- Policy TRP-18 which supports in conjunction with relevant landowners and recreational / tourism agencies, the maintenance of and enhanced access to the countryside, waterways, monuments, historic properties, for recreational and tourism purposes
- Policy CAEP-13 which recognises that the industrial peatlands in the midlands are a significant resource for transition to after uses ranging from amenity, tourism, biodiversity services, 'wild areas', flood management, climate mitigation, energy development, industry, education, conservation and many more; and
- Objective RDO-05 in Chapter 5 'Economic Development' to support the longer-term strategic planning for industrial peatland areas, to include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure which provides for as well as a range of uses including climate mitigation, tourism uses such as peatways, recreational forestry, biodiversity, and a designation of a National Peatlands Heritage Park.

No change proposed.

[Ref: CDP/MA/1462](#)**Person / Body:****CLlr Ken Smollen****Summary of submissions / observations:**

This submission proposes that the area known as Lemanaghan Bog be removed from the County Development Plan as an Area Open for Consideration for Wind Energy Development as the area is of major historical and archaeological importance not only in Offaly or Ireland but worldwide.

The submission refers to;

- (a) Concerns in relation to the impact of any disruptions on the Slí Mór Pilgrim Path Route which begins in Ballycumber and runs all the way through Boher and Lemanaghan Bog as far as Clonmacnoise;
- (b) The construction of wind turbines in Lemanaghan Bog would require hundreds of tonnes of concrete being poured into foundations which would lead to irreparable damage to the area;
- (c) The 'protected zone' Material Alteration was created without a site survey and with no specialist archaeological or historical expertise. Many recorded National Monuments in the bog were not affected any protection in this amendment;
- (d) Zoning the area for wind energy would cause severe risk to the preservation of existing and other potential archaeological discoveries in the bog; and
- (e) Lemanaghan Bog and the surrounding area has enormous tourism potential with the ancient Slí Mór pilgrim path linking St. Manchan's Shrine in Boher and to Clonmacnoise which has the second highest visitor numbers in Ireland.

**CE Response:**

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan; and
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I make the following observations;

- (a) It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;



- A sacred place of great antiquity;
- A place containing buildings of architectural significance;
- A place rich in documentary history and archaeological potential;
- A place where there is a long tradition of devotional practice; and
- A place 'apart', possessing a strong sense of being untouched by the modern world.

The Wind Energy Guidelines 2006 state that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development. The impacts of any windfarm development in the vicinity on these areas would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment. All planning applications affecting archaeological and natural heritage are referred to the Minister for Culture, Heritage and the Gaeltacht and a number of other prescribed authorities including the Heritage Council, An Taisce – the National Trust for Ireland, the Arts Council and Fáilte Ireland (the national tourism authority) for comments.

(b) It is considered that any issue relating to ancillary impacts to wind energy developments such as the pouring of concrete into the foundations of proposed turbines can be assessed at planning application stage with regard to;

- DMS 109 in Chapter 13 of the Draft Plan, including assessment of cumulative impacts of projects;
- DMS 112 in Chapter 13 of the Draft Plan relation to quarrying and ancillary developments;
- Policy CAEP-16 from Chapter 3 of the Draft Plan, which is subject to a proposed material alteration (additional text in red, deletion in strikethrough); "It is Council policy that planning applications for development on or immediately adjacent to peatlands shall be accompanied by assessments considering the following issues where relevant; peatland stability, hydrology, ~~and/or~~ carbon emissions balance **and ecological impact assessment.**"

(c) It is noted that the area removed from an Area Open for Consideration for Wind Energy Development in the County Wind Energy Strategy in the Draft Plan by the subject motion; an area 500 metres north of the disused railway line known locally as "The Banagher Line" and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane around the Lemanaghan Monastic Site, ensures that all of the monastic site area as shown on Figure 3 Site Map (page 19) and Figure 4 Geological Survey Map c.1840 (page 21) of the Lemanaghan Heritage Conservation Plan is excluded from a potential wind energy area in the Draft Plan.

(d) See response (a) above;

(e) The Draft Plan contains a number of policies and objectives which are conducive to developing links between the Lemanaghan and Clonmacnoise Monastic sites such as;

- Policy TRP-18 which supports in conjunction with relevant landowners and recreational / tourism agencies, the maintenance of and enhanced access to the countryside, waterways, monuments, historic properties, for recreational and tourism purposes

- Policy CAEP-13 which recognises that the industrial peatlands in the midlands are a significant resource for transition to after uses ranging from amenity, tourism, biodiversity services, ‘wild areas’, flood management, climate mitigation, energy development, industry, education, conservation and many more; and
- Objective RDO-05 in Chapter 5 ‘Economic Development’ to support the longer-term strategic planning for industrial peatland areas, to include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure which provides for as well as a range of uses including climate mitigation, tourism uses such as peatways, recreational forestry, biodiversity, and a designation of a National Peatlands Heritage Park.

No change proposed.

[Ref: CDP/MA/1464](#)

**Person / Body:**

**Agnes Doolan**

**Summary of submissions / observations:**

This submission states that it supports the people of Lemanaghan in asking for their area to be rezoned as not suitable for wind energy development. It states that;

- a) The 2006 Wind Energy Guidelines are totally out of date and “not fit for purpose”;
- b) The turbines of the enormity planned for Lemanaghan will have serious noise, shadow flicker and infrasound impacts on residents in the area. Reference is made to the updating of the World Health Organisation Environmental Noise Guidelines in October 2018 and recent legal cases regarding nuisance from noise and shadow flicker from turbines in Ireland;
- c) Wind is variable, intermittent and non-dispatchable and always needs back up from either fossil fuels or nuclear. The prospect of rolling black outs in the country is very real with 6 amber alerts on the grid in the last year;
- d) The Lemanaghan Conservation Plan, published by the Heritage Council, was sponsored by Offaly County Council and it outlined a plan to protect the area. A wind farm in such as area would be an obscenity.

**CE Response:**

It is important to make the point that the designation ‘Open for consideration for Wind Energy Development’ does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.

- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I make the following observations;

- (a) Under Section 28 of the Planning and Development Act 2000 as amended, planning authorities shall have regard to guidelines issued by the Minister to planning authorities in the performance of their functions. As such, the current Wind Energy Guidelines for Planning Authorities 2006 have informed the preparation of the Draft Plan and in particular the County Wind Strategy contained therein. Once the Draft Wind Energy Guidelines published for public consultation in December 2019 are adopted, the Council will have regard to its provisions in the performance of its functions.
- (b) Development Management Standard 109 in Chapter 13 of the Draft Plan outlines that planning applications for wind energy developments have to detail the impacts on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region) and shadow flicker. In assessing planning applications for windfarms, the Council will have regard to the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made. It should be noted in this regard that the noise and shadow flicker limits in the Draft Wind Energy Guidelines (WEGs) 2019 are more onerous than the 2006 WEGs and afford a higher level of protection to people who live in the vicinity of any future wind farm developments. It is noted that also that the Draft Wind Energy Guidelines state in Section 5.7.6.3 that modern wind turbines have the blades upwind of the tower which has effectively eliminated continuous infrasound elements from wind turbine noise during normal operation. The Draft Wind Energy Guidelines 2019 in Section 4.10 state that health and safety issues are generally covered by separate legislation and not by planning legislation however developers of wind energy developments should be aware of the requirements. The Health and Safety Authority (<https://www.hsa.ie/eng/>) can provide advice and guidance.
- (c) The Draft Plan recognises that whilst renewable energy sources have vast potential to reduce dependency on fossil fuels and GHG emissions, many of the resources have intermittent or variable output, therefore if they are not harnessed, the energy goes to waste and accordingly, includes a specific policy, CAEP-03, to promote the use of efficient energy storage systems and infrastructure that supports energy efficiency and reusable energy system optimization, in accordance with proper planning and sustainable development.
- (d) It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;
  - A sacred place of great antiquity;
  - A place containing buildings of architectural significance;
  - A place rich in documentary history and archaeological potential;
  - A place where there is a long tradition of devotional practice; and
  - A place 'apart', possessing a strong sense of being untouched by the modern world.

The Wind Energy Guidelines 2006 state that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development. The impacts of any windfarm development in the vicinity on these areas would be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment. All planning applications affecting archaeological and natural heritage are referred to the Minister for Culture, Heritage and the Gaeltacht and a number of other prescribed authorities including the Heritage Council, An Taisce – the National Trust for Ireland, the Arts Council and Fáilte Ireland (the national tourism authority) for comments.

No change proposed.

**Ref: CDP/MA/1466**

**Person / Body:**

**Charlie Flanagan TD**

**Summary of submissions / observations:**

This submission asks that consideration be given to the removal of Lemanaghan Bog from the County Development Plan as an Area Open for Consideration for Wind Energy Development due to the following reasons;

- (a) Environmental and heritage impact on the ecological landscape of the bog which is home to a number of birds, flora and fauna. Any disturbance to this area would be detrimental to the natural habitats and biodiversity of the bog.
- (b) Visual impact on the monastic settlement. The submission refers to studies showing that Lemanaghan was an important centre of Christian worship throughout the Middle Ages and a recent Irish Examiner article referring to the Slí Mór ancient pilgrim path as a mini Camino Route.

**CE Response:**

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I make the following observations;

- (a) It should be noted that;

- The Draft Plan contains a number of relevant objectives which address concerns relating to the preservation of biodiversity, such as Objective BLO-01 relating to the sustainable management of all of Offaly's natural capital, Policy BLP-01 which states that it is Council policy to protect, conserve, and seek to enhance the county's biodiversity and ecological connectivity and Policy BLP-30 which states that it is Council policy to support the aims and objectives of the All Ireland Pollinator Plan 2021-2025;
  - The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy;
  - All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from 'Areas Open for Consideration for Wind Energy Developments' in the County Wind Energy Strategy. **Lemanaghan Bog is not a European Designated Site;**
  - Development Management Standard 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments are required to detail the impacts of the proposed development on nature conservation (ecology, flora and fauna) including birds.
  - Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 site cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site would be required.
  - The following objective was proposed for inclusion by Material Alteration (MA108) in Chapter 4 Biodiversity and Landscape in regard to the protection of birds outside Special Protection Areas; "In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas."
- (b) It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;
- A sacred place of great antiquity;
  - A place containing buildings of architectural significance;
  - A place rich in documentary history and archaeological potential;
  - A place where there is a long tradition of devotional practice; and
  - A place 'apart', possessing a strong sense of being untouched by the modern world.

The Wind Energy Guidelines 2006 state that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development. The impacts of any windfarm development in the vicinity on these areas would

be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment. all planning applications affecting archaeological and natural heritage are referred to the Minister for Culture, Heritage and the Gaeltacht and a number of other prescribed authorities including the Heritage Council, An Taisce – the National Trust for Ireland, the Arts Council and Fáilte Ireland (the national tourism authority) for comments.

In addition, it is noted that the members passed a motion at the Special Council Meeting considering the Chief Executive’s Report on the Draft Plan which excluded from the designation ‘Open for Consideration for Wind Energy Development’ an area 500 metres north of the disused railway line known locally as “The Banagher Line” and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane around the Lemanaghan Monastic Site in addition to the monastic site. It is noted that the area removed by this motion ensures that all of the monastic site area as shown on Figure 3 Site Map (page 19) and Figure 4 Geological Survey Map c.1840 (page 21) of the Lemanaghan Heritage Conservation Plan is excluded from a potential wind energy area in the Draft Plan.

The Draft Plan contains a number of policies and objectives which are conducive to developing links between the Lemanaghan and Clonmacnoise Monastic sites such as;

- Policy TRP-18 which supports in conjunction with relevant landowners and recreational / tourism agencies, the maintenance of and enhanced access to the countryside, waterways, monuments, historic properties, for recreational and tourism purposes
- Policy CAEP-13 which recognises that the industrial peatlands in the midlands are a significant resource for transition to after uses ranging from amenity, tourism, biodiversity services, ‘wild areas’, flood management, climate mitigation, energy development, industry, education, conservation and many more; and
- Objective RDO-05 in Chapter 5 ‘Economic Development’ to support the longer-term strategic planning for industrial peatland areas, to include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure which provides for as well as a range of uses including climate mitigation, tourism uses such as peatways, recreational forestry, biodiversity, and a designation of a National Peatlands Heritage Park.

No change proposed.

[Ref: CDP/MA/2354](#)

**Person / Body:**

**CLlr Sean O’Brien**

**Summary of submissions / observations:**

This submission states that bullet point no. 2 of MA439 indicates a change from “are free from” to “have fewer” environmental and landscape constraints outlined in Section 5 and proposes that Area 5 on Map 10 should be considered as an area which has environmental and landscape constraints and thus should be removed as an Area Open for Consideration for Wind Energy Development.

**CE Response:**

It should be noted that Area 5 referred to in this submission is the 'Area generally west of Doon and north east of Ferbane'.

I am satisfied with the approach taken, comprehensiveness and robustness of the sieve mapping analysis in Section 5 and the Field Analysis and Desk Top Survey in Section 6 of the County Wind Energy Strategy in the Draft Plan, completed in line with the advice contained in Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6), which designated this area as 'Open for consideration for Wind Energy Development' as the area;

- has a viable wind speed and good access to the electricity grid;
- has fewer environmental and landscape constraints than other areas in the county;
- is characterised by dispersed or sparse patterns of rural housing;
- is of a sufficient size to accommodate commercial wind farms and associated infrastructure rather than a smaller remote and dispersed area.

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and
- Advice received from prescribed authorities.

No change proposed.

**Ref: CDP/MA/2355****Person / Body:**

**Cllr Sean O'Brien**

**Summary of submissions / observations:**

This submission states that the area generally to the north and north west of Ballycumber around Corracullin Bog, shown on a map attached to his submission, be removed as an Area Open for Consideration for Wind Energy Development.

(Please Note: submission erroneously refers to Area 4 instead of Area 5 in relation to Wind Energy Potential Areas from Table 3 of the County Wind Energy Strategy).

**CE Response:**

It is noted that Material Alteration MA440 (exclusion of Corracullin Bog from the Area deemed Open for Consideration in the County Wind Energy Strategy in the Draft Plan) was subject to a motion from members at the May Special Council meeting.

No change proposed.

**Ref: CDP/MA/2356****Person / Body:**

**ClIr Sean O'Brien**

**Summary of submissions / observations:**

This submission states that the Area 5 be removed as an Area Open for Consideration for Wind Energy Development for the following reasons;

- (a) Including Lemanaghan as an Area Open for Consideration for Wind Energy Development is contradictory to a statement in Chapter 4 of the Draft Plan that identifies the area as highly sensitive to new developments, which could potentially damage the historical character and the cultural and social importance of the area;
- (b) The Lemanaghan Conservation Plan, which was sponsored by Offaly County Council and published by the Heritage Council stated that “policies are set out for the care and management of the historic place within its setting ...provide a framework for decision making on future developments to infrastructure and land use”
- (c) Designating a small insignificant section of Area 5 to protect the heritage of the area will not achieve the intended objective. As the whole area is linked to monastic sites as far away as Clonmacnoise, it is clear that the whole of Area 5 should be included in the designation;
- (d) Area 5 is also home to varied wildlife and species which is under threat;
- (e) It is a special area of biodiversity which must be preserved.

**CE Response:**

It is important to make the point that the designation ‘Open for consideration for Wind Energy Development’ does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and
- Advice received from prescribed authorities.



In relation to the specific points raised in this submission, I make the following observations;

- (a) Whilst I note the contents of Table 4.21 ‘High Sensitivity Areas in County Offaly’ relating to Archaeological and Historical Landscapes, I emphasise that the Wind Energy Guidelines 2006 state that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development.

The impacts of any windfarm development in the vicinity on these areas would need be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment to determine the appropriateness of the development proposed.

- (b) It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;

- A sacred place of great antiquity;
- A place containing buildings of architectural significance;
- A place rich in documentary history and archaeological potential;
- A place where there is a long tradition of devotional practice; and
- A place ‘apart’, possessing a strong sense of being untouched by the modern world.

The impacts of any windfarm proposal in the vicinity of Lemanaghan Bog would be addressed in a detailed project level) Environmental Impact Assessment (either as part of a planning application or Strategic Infrastructure Development application with input from experts in the fields of archaeology, cultural heritage and landscape character assessment.

It is noted that the area 500 metres north of the disused railway line known locally as “The Banagher Line” and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane around the Lemanaghan Monastic Site proposed to be excluded from the Area Open for Consideration for Wind Energy Development following a motion passed at the Special Council Meeting considering the Chief Executive’s Report on the Draft Plan contains the monastic site area as shown on Figure 3 Site Map (page 19) and Figure 4 Geological Survey Map c.1840 (page 21) of the Lemanaghan Heritage Conservation Plan.

- (c) See response to (b) above.
- (d) The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy. It should be noted in this regard that;
- All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from ‘Areas Open for Consideration for Wind Energy Developments’ in the County Wind Energy Strategy;

- DMS 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments have to detail the impacts on of the proposed development on nature conservation, including birds;
- Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site would be required.

In addition, it is noted that the following objective was proposed for inclusion by Material Alteration in Chapter 4 Biodiversity and Landscape in regard to the protection of birds outside Special Protection Areas; “In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas.”

(e) It should be noted that;

- The Draft Plan contains a number of relevant objectives which address concerns relating to the preservation of biodiversity, such as Objective BLO-01 relating to the sustainable management of all of Offaly’s natural capital, Policy BLP-01 which states that it is Council policy to protect, conserve, and seek to enhance the county’s biodiversity and ecological connectivity and Policy BLP-30 which states that it is Council policy to support the aims and objectives of the All Ireland Pollinator Plan 2021-2025;
- The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy;
- All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from ‘Areas Open for Consideration for Wind Energy Developments’ in the County Wind Energy Strategy. **Lemanaghan Bog is not a European Designated Site;**
- Development Management Standard 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments are required to detail the impacts of the proposed development on nature conservation (ecology, flora and fauna) including birds.
- Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 site cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site would be required.
- The following objective was proposed for inclusion by Material Alteration (MA108) in Chapter 4 Biodiversity and Landscape in regard to the protection of birds outside Special Protection Areas; “In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas.”

No change proposed.

[Ref: CDP/MA/2357](#)

**Person / Body:**

**Aoife Phelan**

**Summary of submissions / observations:**

This submission states that Lemanaghan is an unsuitable site for the development of a windfarm for several reasons;

- (a) The original description of Area 5 in the County Wind Energy Strategy in the Draft Plan was geographically completely incorrect – and hence the people surrounding Lemanaghan Bog missed 2 rounds of public consultation due to this mis-direction. Public consultation is an essential part of the formation of a County Development Plan, changing direction to read from ‘West’ to ‘East’ in MA436 at the final stage of public consultation is very unfair.
- (b) Queries how the mapping used to represent Material Alteration MA443; “protection zone of 500 metres north of the disused railway line, known locally as ‘The Banagher Line’ and 700 metres in each direction from Lemanaghan/Pollagh junction east (towards Ballycumber) and west (towards Ferbane) was arrived at;
- (c) States that MA443 was created without any expert advice whereas the Lemanaghan Conservation Plan was written by a team of experts;
- (d) Lemanaghan Bog is highlighted as Medium Sensitive on Map No. 3 of the County Wind Energy Strategy yet Map No. 10 includes Lemanaghan Bog an Area Open for Consideration for Wind Energy Development;
- (e) Proposing that wind turbines be open for consideration in this area contradicts Chapter 4 of the Draft Plan that identifies the area as highly sensitive to new developments, which could potentially damage the historical character and the cultural and social importance of the area and also stating that the Council shall endeavour to ensure that planning applications for development, refurbishment and restoration works etc. within close proximity to these areas are sympathetic to the sensitivity of the area;
- (f) The Lemanaghan Conservation Plan, which was sponsored by Offaly County Council and published by the Heritage Council stated that “policies are set out for the care and management of the historic place within its setting ...provide a framework for decision making on future developments to infrastructure and land use” and that “it is important that the options considered for the post industrial use of the bog are sympathetic to the significance of the site”
- (g) A research document from UCD and WARP stated that surveys of the area identified over 630 archaeological sites making this one of the highest densities of wetland archaeology in the world;
- (h) Recently, the Slí Mór ancient pilgrim path from Ballycumber through the bog to Lemanaghan onto Clonmacnoise was listed in the Irish Examiners 2021 top 20 walk trails suggesting the Slí Mór is a mini Camino. The tranquillity of this area needs to be protected with the possibilities for tourism is massive. There is documentary evidence of several other roads through Lemanaghan Bog believed to lead from the monastery to Derravane.

- (i) Derravane House, located in an island in the centre of Lemanaghan Bog was a safe house during the War of Independence and the Civil War, a house in a remote location which acted as a field hospital;
- (j) The wildlife, biodiversity and the threat of Irish Birds in decline all need to be carefully managed;
- (k) Peatlands need to be thought of in the same way as we think about the world's rainforests, they soak up carbon. Funding is available from the EU for this and it would be a perfect fit for Lemanaghan;
- (l) An eco-tourism could be developed for the area, in harmony with the existing conservation plan as an alternative to the proposed wind energy development. Elements of an eco-tourism plan for the area are set forward in the submission.

### CE Response:

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I make the following observations;

- (a) Whilst Wind Energy Potential Area 5 in its title in Table 3 of the County Wind Energy Strategy in the Draft Plan erroneously described the area as generally 'west of Doon' and 'north west of Ferbane' when it should have in fact stated 'west of Doon' and 'north east' of Ferbane, this was a drafting error that was corrected by motion MA443 and the display of material alterations.

It should be noted that;

- Lemanaghan Bog was included in the 'Wind Energy Development Area' in the County Wind Energy Strategy in both the 2009-15 and the 2014-20 County Development Plans.
  - It can be observed from following the sequence of maps in the sieve mapping analysis in the County Wind Energy Strategy in the Draft Plan that the subject area was under consideration whilst the description of Area 5 made reference to 'Endrim Hill', 'Cor Hill' as well as the townlands of 'Clongawny', 'Clonlony' and 'Castletown'.
- (b) I consider that the map used to represent Material Alteration MA443 prepared by technical staff on the back of the wording of the subject motion which was passed at the Special Council

Meeting considering the Chief Executives Report on the Draft Plan is accurate and in line with the intention of the members who proposed and passed the motion.

- (c) It is noted that the area 500 metres north of the disused railway line known locally as “The Banagher Line” and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane around the Lemanaghan Monastic Site proposed to be excluded from the Area Open for Consideration for Wind Energy Development following a motion passed at the Special Council Meeting considering the Chief Executive’s Report on the Draft Plan contains the monastic site area as shown on Figure 3 Site Map (page 19) and Figure 4 Geological Survey Map c.1840 (page 21) of the Lemanaghan Heritage Conservation Plan.
- (d) Whilst Lemanaghan Bog is designated a ‘Medium Landscape Sensitivity’ Area in Figure 4.22 ‘Landscape Classification Areas in Co. Offaly’ in Chapter 4 of the Draft Plan, Step 2 of the sieve mapping analysis carried out in Section 5 ‘Identifying Suitable Areas in County Offaly for Wind Energy Development’ of the County Wind Energy Strategy in the Draft Plan excluded only high landscape sensitivity areas only from ‘Open for Consideration for Wind Energy Development’. It is noted in this regard that Table 4.20 ‘Moderate Sensitivity Areas in County Offaly’ of Chapter 4 the Draft Plan states that “some of these cutaway bogs may be appropriate for other sensitively designed and located developments including renewable energy (wind farms, biomass crops) and/or industrial use”.
- (e) Whilst I note the contents of Table 4.21 ‘High Sensitivity Areas in County Offaly’ relating to Archaeological and Historical Landscapes, I emphasise that the Wind Energy Guidelines 2006 state that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development.

The impacts of any windfarm development in the vicinity on these areas would need be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment to determine the appropriateness of the development proposed.

- (f) It is Council policy in the Draft Plan to support and promote the protection and appropriate management of all monastic sites in the county (BHP-42). As such, the Planning Authority will have regard to the Lemanaghan Heritage Conservation Plan (2007) when assessing applications that are within this area or in close proximity to this area. It is noted that the Lemanaghan Heritage Conservation Plan establishes that Lemanaghan is;
- A sacred place of great antiquity;
  - A place containing buildings of architectural significance;
  - A place rich in documentary history and archaeological potential;
  - A place where there is a long tradition of devotional practice; and
  - A place ‘apart’, possessing a strong sense of being untouched by the modern world.

The impacts of any windfarm development in the vicinity on these areas would need be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment to determine the appropriateness of the development proposed with regard to policy BHP-42 in the Draft Plan.

- (g) See response (f);
- (h) See response (f). In addition, it should be noted that The Council recognises the range of potential uses that can be accommodated on peatlands (such as the Leamanaghan Bogs) in Table 3.1 and Policy CAEP-13 above in Response 1 in addition to objectives TRO-09 relating to the development of outdoor pursuits and peatways on peatlands in the county and TRO-17 relating to the protection of potential peatway routes along and in proximity to abandoned rail lines and Midland Cycling Destination routes identified in the Draft Plan.
- (i) Apart from the monastic site, in relation to the reference to Recorded Monuments located elsewhere in the area, it should be noted that;
- Recorded Monuments are protected under the National Monuments Acts 1930 to 2014;
  - the impact of any wind farm development on natural heritage, built heritage and archaeological sites would likely to be detailed in an environmental impact assessment at planning application stage; and
  - all planning applications affecting archaeological and natural heritage are referred to the Minister for Culture, Heritage and the Gaeltacht and a number of other prescribed authorities including the Heritage Council, An Taisce – the National Trust for Ireland, the Arts Council and Fáilte Ireland (the national tourism authority) for comments.
- (j) It should be noted that;
- The Draft Plan contains a number of relevant objectives which address concerns relating to the preservation of biodiversity, such as Objective BLO-01 relating to the sustainable management of all of Offaly’s natural capital, Policy BLP-01 which states that it is Council policy to protect, conserve, and seek to enhance the county’s biodiversity and ecological connectivity and Policy BLP-30 which states that it is Council policy to support the aims and objectives of the All Ireland Pollinator Plan 2021-2025;
  - The Draft Plan and its policies and objectives have been subject to an Appropriate Assessment which did not identify any specific threats to protected birds or sites as a result of the County Wind Energy Strategy;
  - All European Designated sites including Special Protection Areas (habitats designated under Birds Directive (79/409/EEC) as being habitats for bird species listed in Annex I of the Directive) have been excluded from ‘Areas Open for Consideration for Wind Energy Developments’ in the County Wind Energy Strategy. **Lemanaghan Bog is not a European Designated Site;**
  - Development Management Standard 109 in Chapter 13 of the draft Plan outlines that planning applications for wind energy developments are required to detail the impacts of the proposed development on nature conservation (ecology, flora and fauna) including birds.
  - Section 13.5.1 of Chapter 13 of the draft Plan states that all plans or projects are subject to AA screening and potentially if significant effects on a Natura 2000 site cannot be ruled out, a full AA (i.e. a Natura Impact Statement) to ascertain whether the proposed development would adversely affect the integrity of a Natura 2000 site would be required.

- The following objective was proposed for inclusion by Material Alteration (MA108) in Chapter 4 Biodiversity and Landscape in regard to the protection of birds outside Special Protection Areas; “In accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas.”
- (k) It is Council policy in the Draft Plan to support the implementation and provision of the decarbonisation projects listed in Table 3.1 of the County Development Plan (Ref. CAEP-05) proposing a number of specific actions and projects relating to the creation and delivery of carbon sinks, afforestation and rewilding of peatlands. In addition, the Draft Plan supports the preparation of a comprehensive after use framework plan for the industrial peatlands and recognises that these peatlands are a significant resource relating to a range of uses including wild areas, flood management and climate mitigation in Policy CAEP-13 in Chapter 3 Climate Action and Energy.
- (l) The Draft Plan makes provision for a range of potential eco-tourism uses on cutaway bogs in the County through the following;
- Policy CAEP-13 which recognises that the industrial peatlands in the midlands are a significant resource for transition to after uses ranging from amenity, tourism, biodiversity services, ‘wild areas’, flood management, climate mitigation, energy development, industry, education, conservation and many more; and
  - Objective RDO-05 in Chapter 5 ‘Economic Development’ to support the longer-term strategic planning for industrial peatland areas, to include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure which provides for as well as a range of uses including climate mitigation, tourism uses such as peatways, recreational forestry, biodiversity, and a designation of a National Peatlands Heritage Park.

It should be noted that Section 12(10) (c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission.

No change proposed.

[Ref: CDP/MA/2359](#)

**Person / Body:**

**Maureen Byrne**

**Summary of submissions / observations:**

This submission is incomplete only containing a map showing Lemanaghan Bog without any accompanying written text.

**CE Response:**

No change proposed as nature of submission cannot be determined.

[Ref: CDP/MA/2360](#)**Person / Body:****Natasha Keoghan****Summary of submissions / observations:**

This submission states that;

- (a) Mapping this area as Open for Consideration for Wind Energy Development contradicts statements from Chapter 4 of the Plan which;
  - identifies Lemanaghan as highly sensitive to new developments which could potentially damage the historical character and the cultural and social importance of the area;
  - states that the Council shall endeavour to ensure that developments in this area are sympathetic to the sensitive nature of the landscape as the acceptability of development for consideration in this area is very limited;
- (b) The 'protected zone' in the material alterations was created without a site survey and with no specialist archaeological or historical expertise. Many recorded National Monuments in the bog were not afforded any protection in the material alteration MA443.

**CE Response:**

It is important to make the point that the designation 'Open for consideration for Wind Energy Development' does not imply automatic approval. Planning applications for wind farm developments in these areas will still be evaluated on a case by case basis having regard to the;

- Wind Energy Development Guidelines for Planning Authorities, DoEHLG (2006) (and any amendments to the Guidelines which may be made);
- extensive list of criteria contained in Development Management Standard 109 in Chapter 13 of the Draft Plan;
- requirements contained in Section 13.8 of the Draft Plan in relation to Appropriate Assessment, Environmental Impact Assessment, Traffic and Transport Assessment, Landscape Character Assessment and Visual Impact Assessment.
- Detailed site visits; and
- Advice received from prescribed authorities.

In relation to the specific points raised in this submission, I make the following observations;

- (a) Whilst I note the contents of Table 4.21 'High Sensitivity Areas in County Offaly' relating to Archaeological and Historical Landscapes, I emphasise that the Wind Energy Guidelines 2006 state that the designation of an area for protection of natural or built heritage or as an amenity area does not automatically preclude wind energy development.

The impacts of any windfarm development in the vicinity on these areas would need be addressed in a detailed project level (planning application or Strategic Infrastructure Development application) Environmental Impact Assessment with input from experts in the fields of archaeology, cultural heritage and landscape character assessment to determine the appropriateness of the development proposed.



- (b) It is noted that the area 500 metres north of the disused railway line known locally as “The Banagher Line” and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane around the Lemanaghan Monastic Site proposed to be excluded from the Area Open for Consideration for Wind Energy Development following a motion passed at the Special Council Meeting considering the Chief Executive’s Report on the Draft Plan contains the monastic site area as shown on Figure 3 Site Map (page 19) and Figure 4 Geological Survey Map c.1840 (page 21) of the Lemanaghan Heritage Conservation Plan.

In relation to the reference to Recorded Monuments located elsewhere in the area, it should be noted that;

- Recorded Monuments are protected under the National Monuments Acts 1930 to 2014;
- the impact of any wind farm development on natural heritage, built heritage and archaeological sites would likely to be detailed in an environmental impact assessment at planning application stage; and
- all planning applications affecting archaeological and natural heritage are referred to the Minister for Culture, Heritage and the Gaeltacht and a number of other prescribed authorities including the Heritage Council, An Taisce – the National Trust for Ireland, the Arts Council and Fáilte Ireland (the national tourism authority) for comments.

No change proposed.

**[Ref: CDP/MA/2361 and the following CDP/MA Reference Numbers 2362 to 2374](#)**

**Person / Body:**

**Peter Egan**

**Summary of submissions / observations:**

This submission is incomplete only containing a map showing Lemanaghan Bog without any accompanying written text.

**CE Response:**

No change proposed as nature of submission cannot be determined.

### 3.2.3 Utilities

[Ref: CDP/MA/341](#)

**Person / Body:**

**Irish Water**

**Summary of submissions / observations:**

- a) In respect of Proposed Material Alteration MA221, Irish Water acknowledges that its observation regarding the Irish Water Capital Investment Plan 2020-2024, where referenced under Section 11.2 of Chapter 11 of the draft Plan, has been taken into account.
- b) In respect of Proposed Material Alteration MA222, Irish Water acknowledges that its observation regarding the delivery of the Eastern and Midlands Water Supply Project, as covered by Objective WSO-03 (Section 11.4 of Chapter 11 of the draft Plan), has been taken into account.
- c) That WSO-04 will remain slightly inaccurate if not amended.
- d) In respect of Proposed Material Alteration MA260, which recommends the inclusion of an Infrastructural Assessment Report, Irish Water make the following comments:
  - i. Irish Water notes the introduction of an Infrastructural Assessment Report and agrees with the assessment with regards to changes to the Core Strategy;
  - ii. Irish Water agrees that where no Irish Water project exists, in an area where there may be a deficiency, infrastructure can be developer-led;
  - iii. Birr Treatment Works – provision of a Nature Based Solution / proposed wetland (in conjunction with other Irish Water works) should be sufficient to allow for growth over the period of the Plan.
  - iv. Under Water Deficiencies, on the 3<sup>rd</sup> last line of page 143 of the Material Alterations document, delete the words “(which is due to be published in 2021)”

**CE Response:**

- a) Noted. No further action required.
- b) Noted. No further action required.
- c) WSO-04 reads as follows:

**WSO-04** *It is an objective of the Council to engage with Irish Water to examine significant raw water sources which may be made redundant by the Water Supply Project for the Eastern and Midlands Region with a view to reserving and protecting them for future back up or ‘windfall’ type economic development opportunities where high water use is required.*

The wording of this objective comes directly from Regional Policy Objective RPO10.9 contained in the Eastern and Midland Regional Assembly RSES.

That aside, an amendment to Objective WSO-04 cannot be considered at this stage of the plan making process because it does not relate to one of the material alterations.

- d) The following is recommended:
- i. Noted. No further action required.
  - ii. Noted. No further action required.
  - iii. Noted. No further action required.
  - iv. The *National Water Resources Plan* was adopted in May 2021. It is recommended that the text which reads “(which is due to be published for consultation early 2021)” be deleted from the body of text under the sub-heading ‘Water Deficiencies’ in the Infrastructural Assessment Report (new Appendix 2 to Volume 1). It is also recommended that the paragraph be amended slightly to make reference to Phase 2 in terms of delivery of four Regional Water Resources Plans. Paragraph as follows:

*Where there are water supply constraints, the availability of water will be on a first come, first served basis with priority given to domestic customers. Non-domestic developments will be asked by IW to review their proposals to reduce water requirements. In the meantime, IW and Offaly County Council are continually progressing leakage reduction activities, mains rehabilitation activities and lead replacement activities. These are priorities based on leakage rates, water quality issues and ongoing disruption to customer’s supplies. IW and Offaly County Council will continue to monitor the performance of the network to ensure that the most urgent works are priorities as required. The National Water Resources Plan – Framework Plan ~~(which is due to be published for consultation early 2021)~~ was adopted in May 2021, with a subsequent Phase 2 to include delivery of four Regional Water Resources Plans which will develop a strategic plan for each water supply including short, medium and long term options to address risk across our water supplies. However according to IW although water is constrained in the above areas at critical times such as drought and freeze events, this need not necessarily halt growth.*

[Ref: CDP/MA/724](#)

**Person / Body:**

**EirGrid**

**Summary of submissions / observations:**

- a) EirGrid welcomes proposed amendments to bolster Chapter 3 Climate Action and Energy. This would refer generally to Proposed Material Alteration MA45 through to MA81.
- b) Referring to Proposed Material Alteration MA45, EirGrid notes the insertion of a strategic aim for Chapter 3.

EirGrid notes that the objectives of Chapter 3 are critical if Ireland is to achieve commitments set out in the Climate Action Plan 2019, published on June 17<sup>th</sup> 2019 by the Department of Communications.

- c) Referring to Proposed Material Alteration MA56, MA57, MA58, MA59 and MA60, EirGrid notes the textual changes to policies CAEP-01 and CAEP-02 specific to the remit of EirGrid as Transmission System Operator which are generally appropriate. The submission notes that EirGrid requires appropriate and robust policies and objectives for planning and national grid infrastructure and prioritising it appropriately in order to deliver national, regional and local benefit.

**CE Response:**

- a) Noted. No further action required.
- b) Noted. No further action required.
- c) Noted. No further action required.

**Ref: CDP/MA/995****Person / Body:****ESB****Summary of submissions / observations:****a) Energy Infrastructure**

The ESB supports Proposed Material Alteration MA60 as it further reinforces the importance of energy infrastructure, noting that the provision of a secure and reliable electricity transmission infrastructure and transmission grid is essential to meet the growth in demand and to ensure that a reliable electricity supply is available. The submission notes that Offaly has a very strong electrical grid and substation network and this network will be instrumental in supporting the development of the renewable energy industry in the county.

**b) Wind Energy**

The ESB welcomes Proposed Material Alteration MA65, which amends policy CAEP-35, and Proposed Material Alteration MA256, which amends Development Management Standard DMS-109, with both of these material alterations relating to the removal of the required 2 km separation distance from wind turbines to town and village settlement boundaries in the county.

**c) Economic Development**

- i. ESB acknowledge Proposed Material Alteration MA64 and recognise that the closure of power stations and associated cessation of peat harvesting in some areas of the County has economic and social impacts.
- ii. The ESB supports Offaly County Council initiatives to implement appropriate responses through application of the 'Just Transition' concept to assist the affected communities.
- iii. ESB recognise that due to its proximity to the electricity transmission and distribution network, the lands associated with the West Offaly Power Station (Shannonbridge) have the potential to provide for a number of future uses, such as electricity peaking plant, a location for hybrid renewables or other compatible uses.
- iv. In the context of the Rhode Green Energy Park, ESB welcome the identification of hybrid renewables as a strategic opportunity in Proposed Material Alteration MA125, noting that by developing hybrid renewables plant consisting of wind, solar and battery exporting from common point of connection, but at different times, the need for transmission infrastructure associated with new generation is minimised and grid stability can be improved on.
- v. ESB note the strategic opportunities identified for Rhode Green Energy Park (GEP) under Proposed Material Alteration MA125, which demonstrates the role former generation station lands with existing connections to transmission and distribution networks can play in

the diversification of energy production toward green energy. And further noting that this planned approach offers the potential for increased efficiencies through the co-location of related technologies that the opportunity to export renewable energy onto existing grid infrastructure to help the transition to a low-carbon and climate resilient economy.

d) **Electric Vehicles**

- i. ESB welcome Proposed Material Alterations MA68, which recommends the insertion of a new policy on smart city technologies including EV charging points, in Section 3.9 of the draft Plan, and Proposed Material Alterations MA259, which recommends the insertion of a table identifying policies, objectives and development management standards in the Plan that promote a transport modal shift, including reinforcing support for Electric Vehicles.
- ii. ESB propose that development management standard DMS-104 be amended as follows:

<b>3.2.3.1 DMS-104 Electric Vehicle Charging Points</b>	A minimum of <del>10%</del> 20% of the proposed car parking spaces required for the category of development listed in car parking standards contained in DMO-102 shall be provided with electrical connection points, to allow for functional electric vehicle charging. The remaining car parking spaces shall be fitted with ducting for electrical connection points to allow for the future fit out of charging points.
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The recommendation is made to ensure that the Development Standard Objective DMS-104 as set out in Chapter 13 and also in proposed Appendix 1 Transport Modal Shift align with the EU Energy Performance of Buildings Directive.

**CE Response:**

a) **Energy Infrastructure**

Noted. No further action required.

b) **Wind Energy**

Noted. No further action required.

c) **Economic Development**

- i. Noted. No further action required.
- ii. Noted. No further action required.
- iii. Noted. No further action required.
- iv. Noted. No further action required.
- v. Noted. No further action required.

d) **Electric Vehicles**

- i. Noted. No further action required.
- ii. This request for a minimum of 20% cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).

### 3.2.4 Transportation

[Ref: CDP/MA/264](#)

**Person / Body:**

**Transportation Infrastructure Ireland (TII)**

**Summary of submissions / observations:**

**a) MA43**

In relation to the Council's approach to the provision of rural housing in the open countryside included in Section 2.4.7 and associated policies in Section 2.5 of the Draft Plan, TII would welcome inclusion in this Section of the Development Plan, in the interests of clarification and as an advisory to potential applicants for development in rural areas, of the requirement to adhere to the provisions of official policy in relation to development accessing national roads. An appropriate cross reference with Policy SMAP-19, Policy SMAP-20 and Policy SMAP-21 of the Development Plan would be welcome and is considered important early assistance to applicants in the preparation of any subsequent planning application where there may be implications for the strategic national road network in the area.

**b) MA60**

TII would welcome an objective included in the adopted Development Plan in relation to renewable energy development grid connection proposals and in relation to safeguarding the national road network, indicating that grid connection routing options should be developed to safeguard the strategic function of the national road network in accordance with Government policy by utilising alternative available routes.

**c) MA64**

TII recommends that any future Peatlands Framework Plan and initiatives and supports associated with the after use of peatlands and associated works sites should have regard to the provisions of official policy relating to development management and access to national roads set out in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines' (DoECLG, 2012). TII is available for consultation with the Council in relation to any future peatlands after use framework plan and initiatives and supports associated with the after use of peatlands and associated works sites.

**d) MA187**

TII welcomes the clarification provided in proposed Material Alteration Reference MA187 that the additional Corridor and Route Selection Process outlined in Section 8.5.4 of the Draft Plan will not apply to national roads having regard to the established statutory processes and guidance that such national road schemes must observe in the first instance.

Notwithstanding, TII considers that proposed Material Alteration Reference MA187 would benefit from additional clarification, for example, the text of the proposed Material Alteration makes reference to 'TII Planning Guidelines' which is inaccurate.

TII would welcome consideration by the Council of the following:

To amend the proposed text associated with proposed Material Alteration Reference MA187 as follows;

*'The following Corridor and Route Selection Process will be undertaken for relevant new infrastructure, however this would not apply to national road schemes which are progressed in accordance with statutory processes and TII publications, including various TII Planning Guidelines for Assessment of Environmental Impacts under headings such as "Constraints Study", "Route Corridor Selection" and "Environmental Impact Assessment:'.*

**e) MA208**

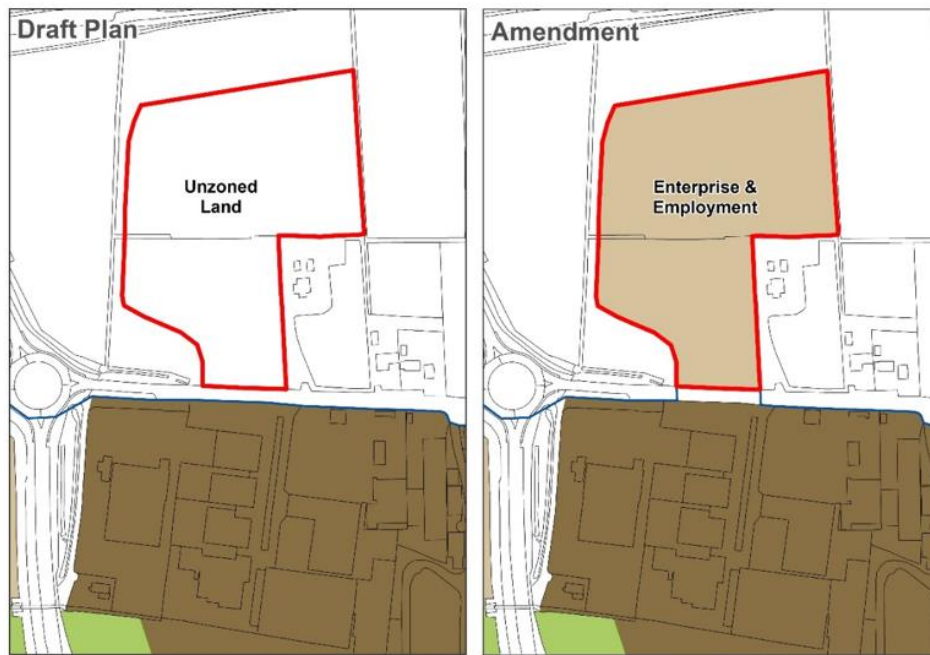
Similar to the above point in relation to Material Alteration Reference MA187, TII considers the text associated with Material Alteration Reference MA208 would benefit from additional clarification in relation to the approach to national road scheme planning, in particular, in relation to the text associated with the N52 national road improvement scheme. The proposed text amendment suggested below also ensures consistency with the approach of the Council outlined in proposed Material Alteration Reference MA187.

TII would welcome consideration by the Council of the following:

*'N52: To support the construction of a road between Tullamore and Kilbeggan (Link Road) in accordance with National Development Plan investment objectives taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, and in accordance with statutory processes and TII Publications subject to compliance with requirements of various TII Planning Guidelines for Assessment of Environmental Impacts under headings such as "Constraints Study", "Route Corridor Selection" and "Environmental Impact Assessment" including section 8.5.4 Corridor and Route Selection Process'.*

**f) MA210**

TII welcomes the proposed objective included in proposed Material Alteration Reference MA210 in the interest of safeguarding national road scheme planning in the County.

g) MA263

TII notes proposals to zone additional lands to the east side of the N52 opposite the Cappincur Industrial Estate outlined in proposed Material Alteration Reference MA263. The lands are in the vicinity of the N52 roundabout junction with local road L2025 (Ballinagar/Town Centre).

Section 2.7 of the Section 28 Ministerial Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) advise that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges/junction on national roads.

TII is not aware of any analysis undertaken by the Council to develop an evidence base, in accordance with the provisions of official policy, to establish potential implications for the strategic national road network in the area and to support the proposed zoning at this location.

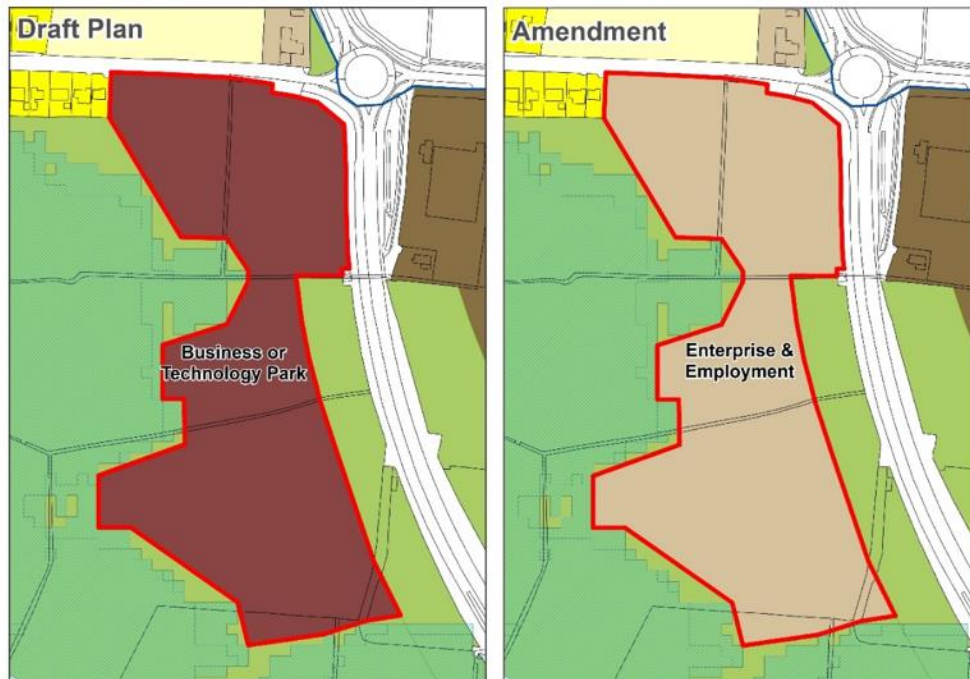
It is unclear if the zoning proposal adjoining the national road network and associated junctions has been subject to appropriate transport assessment or transport modelling or development of appropriate mitigation measures. This approach would be a basic requirement for any evidence based approach to demonstrate that proposed trip generation can to be catered for, while protecting the strategic function of the national road network.

TII would welcome consideration by the Council of the following:

Section 2.7 of the Section 28 Ministerial Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) advise that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges/junction on national roads.

States that the Proposed Material Alteration is not supported by the required evidence base and planned approach required by Section 28 Ministerial Guidelines on Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012).



h) **MA266**

Similar to comments above in relation to Material Alteration Reference MA263, TII is not aware of any analysis undertaken by the Council to develop an evidence base, in accordance with the provisions of official policy, to establish potential implications for the strategic national road network in the area and to support the proposed zoning amendment at this location.

Notwithstanding the above comment, unlike Material Alteration Reference MA263 it is acknowledged that Material Alteration Reference MA266 relates to an alteration of an established 'Business Park' zoning objective.

However, given the extent of lands concerned, the proximity of the subject lands to the N52 roundabout junction with local road L2025 (Ballinagar/Town Centre) and taken in conjunction with other proposed development lands in the vicinity of the N52 national road junction, TII considers that an appropriate plan-led approach to the zoning of the subject lands should be promoted.

TII would welcome consideration by the Council of the following:

Section 2.7 of the Section 28 Ministerial Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) advise that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges/junction on national roads.

The Proposed Material Alteration is not supported by the required evidence base and plan-led approach required by Section 28 Ministerial Guidelines on Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012). Such an approach would include appropriate transport assessment or transport modelling of the subject lands, the development of appropriate mitigation measures and consideration of the cumulative impact of the development of other lands in the vicinity of the N52/L2025 roundabout junction.

- i) The submission makes comments on issues not included in the MAs;
- Core Strategy Objectives concerning maintaining the strategic function and capacity of the national road network to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.
  - Proposals related to the Durrow Abbey Monastic Site accessing the N52, national road, and
  - Masterplan exercises included in the Development Plan and associated Settlement Plans.

#### CE Response:

##### a) MA43:

The submission is noted. The considerations in relation to access to national roads are addressed sufficiently in Chapter 8 Sustainable Transport Strategy for example:

**SMAP-19** It is Council policy to 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 will 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.

**SMAP-21** It is Council policy that development(s) requiring a new direct access or an intensification of an existing access onto a National Secondary road, or onto a privately owned road leading onto a National Secondary road where a speed limit greater than ~~50~~ 60 km/ph applies will be ~~restricted~~ avoided in accordance with the provisions of Spatial Planning and National Roads Guidelines for Planning Authorities, January 2012. Exceptional circumstances may be considered where the development is of national and regional strategic importance, is plan-led and complies with the criteria set out in the Spatial Planning and National Roads Guidelines in this regard.

(The above proposed changes are set out in Material Alteration Ref MA200).

Section 8.5.1 of the draft Plan states:

To ensure that past and future public investment in road improvements is not diminished in whole or in part and to ensure the safety and free flow of traffic, future development requiring direct access onto National Secondary routes will be restricted and assessed against the provisions of ~~Table 4.2 of~~ the Spatial Planning and National Roads - Guidance for Planning Authorities issued by the DoECLG in January 2012.

(The above proposed changes are set out in Material Alteration Ref MA186)

Recommendation: No Change to Material Alteration MA43.

##### b) MA60:

The submission is noted. The considerations in relation to access to national roads are addressed sufficiently in Chapter 8 Sustainable Transport Strategy as set out in (a) above. Also to note, that alternatives are addressed in Policy CAEP-20 of the draft Plan as follows:

**CAEP-20** It is Council policy to require that environmental assessments should address reasonable alternatives for the location of new energy developments, and where existing infrastructural assets such as sub-stations, power lines and roads already exist within the proposed development areas, then

such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development.

c) **MA64:**

The submission is noted. The considerations in relation to access to national roads are addressed sufficiently in Chapter 8 Sustainable Transport Strategy as set out in (a) above.

d) **MA187:**

This material alteration wording to be revised as follows:

*'The following Corridor and Route Selection Process will be undertaken for relevant new infrastructure, however this would not apply to national road schemes which are progressed in accordance with statutory processes and TII publications, including various TII Planning Guidelines for Assessment of Environmental Impacts ~~under~~ that include headings such as "Constraints Study", "Route Corridor Selection" and "Environmental Impact Assessment:'.*

**Recommendation:** Change to Material Alteration wording.

e) **MA208:**

This material alteration wording to be revised as follows:

*'N52: To support the construction of a road between Tullamore and Kilbeggan (Link Road) in accordance with National Development Plan investment objectives taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, and in accordance with statutory processes and TII Publications subject to compliance with requirements of various TII Planning Guidelines for Assessment of Environmental Impacts ~~under~~ that include headings such as "Constraints Study", "Route Corridor Selection" and "Environmental Impact Assessment" including section 8.5.4 Corridor and Route Selection Process'.*

**Recommendation:** Change to Material Alteration wording.

f) **MA210:**

Noted.

g) **MA263:**

Please refer to the response to the OPR Submission (Ref. CDP/MA/994) to the Material Alterations.

h) **MA266:**

It is noted that the change of use from *Business or Technology Park* to *Enterprise and Employment* is unlikely to generate a greater impact on the N52/L2025 roundabout junction. It is noted that TII made no submission on the lands at draft plan stage when the lands were proposed to be zoned as Business or Technology Park use. The lands are currently zoned in the Tullamore Town and Environs Development Plan 2010-2016 as extended as Industrial. A proposal would be assessed at planning application stage and referred to the relevant prescribed authorities. I recommend implementing the proposed material alteration.

i) This part of the submission relates to issues not included in the MAs; i.e. Core Strategy Objectives; Durrow Abbey Monastic Site Access and Masterplans, that cannot be considered at this stage of

the plan making process because they do not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).

[Ref: CDP/MA/1001](#)

**Person / Body:**

**National Transport Authority (NTA)**

**Summary of submissions / observations:**

- a) The NTA welcomes the significant number of proposed material alterations which largely reflect the issues raised in the NTA submission to the Draft Plan.
- b) The NTA welcomes **Proposed Material Alteration MA183** regarding modal share and the inclusion of analysis of baseline mode share data at County level.
- c) In respect of **Proposed Material Alteration MA187**, the NTA would recommend that specific reference to the TII publications is removed and rather that it reads that schemes will be progressed *'in accordance with statutory processes and TII publications'*.
- d) The NTA welcomes **Proposed Material Alteration MA189** to insert the following policy: *'It is Council policy to continue to work with the relevant transport providers, agencies and stakeholders to facilitate the integration of active travel (walking, cycling) with public transport. The analysis is welcome and the text which states that 'this data confirms and highlights the challenges facing the County with regard to promoting a modal shift away from the car. This Plan will strive to reduce reliance on the private car by promoting and facilitating more sustainable modes of transport and supporting development in locations that would reduce the need to travel.'*

While this material alteration is very welcome, the NTA would also recommend, as specified by the OPR, that the Development Plan could include mode share targets. It is welcome that as proposed in MA205 that mode share targets would be included in new/varied LAPs.

- e) The NTA welcomes **Proposed Material Alteration MA190** to amend the text of policy SMAP-04.
- f) The NTA welcomes **Proposed Material Alteration MA191** which alters policy SMAP-05.
- g) The NTA welcomes **Proposed Material Alteration MA192** which inserts that: *'It is Council policy that all proposed major employment developments and schools shall be subject to Travel Plans in a manner consistent with National Transport Authority Guidance.'*
- h) The NTA welcomes **Proposed Material Alteration MA193** which provides additional text to SMAP-06.
- i) The NTA welcomes **Proposed Material Alteration MA194** which inserts additional text in relation to the reduction in car parking standards in suitable town centre locations. The NTA welcomes the alterations to Table DMS-102 Car Parking Requirements which alters the text to refer to 'Maximum Car Parking Provision'.
- j) The NTA welcomes **Proposed Material Alteration MA195** which inserts additional text in relation to supporting and developing public transport routes throughout the County through collaboration with the National Transport Authority and other relevant statutory bodies.

- k) The NTA welcomes **Proposed Material Alteration MA197** and suggests that it could include reference to the Connecting Ireland: Rural Mobility Plan. The Plan is a major public transport initiative that will increase connectivity, particularly for people living outside the major cities.
- l) The NTA welcomes **Proposed Material Alteration MA204** to amend Objective SMAO-02 which includes ‘...to consider the preparation of Local Transport Plans for other towns that are subject to Local Area Plans...’. The NTA would suggest that the text could be altered to state that ‘...to prepare Local Transport Plans for other towns that are subject to Local Area Plans.’
- m) In respect of **Proposed Material Alteration MA205**, the NTA welcomes the insertion of the text of this amendment which provides for baseline figures and targets for modal share to be contained in Local Area Plans. As per the suggestion for MA204, the NTA would suggest that this would be done in the context of both a LAP and a LTP.
- n) In respect of **Proposed Material Alteration MA206**, the NTA welcomes the insertion of the text of this amendment which seeks to set modal share targets within the County. The NTA would suggest, in accordance with the request by the OPR, that mode share targets at a County level could be set as part of the making of this Development Plan.
- o) With regard to the proposed amended text under **Proposed Material Alteration MA208**, the NTA would recommend that specific reference to the TII publications is removed and rather that it reads that schemes will be progressed ‘in accordance with statutory processes and TII publications’.
- p) With regard to the proposed amended text **Proposed Material Alteration MA230**, the NTA would recommend that specific reference to the TII publication is removed. DMURS replaces existing national design standards that will be used throughout all urban areas in Ireland when designing/upgrading roads and streets. The use of DMURS is mandatory for all road authorities (Circular RW 6/2013) and (PL 17/2013) applies to all Roads and Streets in Urban Areas (except where specified).

#### CE Response:

- a) Noted. No further action required.
- b) Noted. No further action required.
- c) In response to the NTA submission and also the TII submission (see CDP/MA/264), it is recommended that the text under Section 8.5.4 of the draft Plan to which Proposed Material Alteration MA187 relates, be amended as follows (change underlined):
 

*‘The following Corridor and Route Selection Process will be undertaken for relevant new infrastructure, however this would not apply to national road schemes which are progressed in accordance with statutory processes and TII publications, including various TII Planning Guidelines for Assessment of Environmental Impacts under that include headings such as “Constraints Study”, “Route Corridor Selection” and “Environmental Impact Assessment:”.*
- d) Noted. Please see CE response to OPR submission (CDP/MA/994) which makes a recommendation in point 13.
- e) Noted. No further action required.
- f) Noted. No further action required.
- g) Noted. No further action required.

- h) Noted. No further action required.
- i) Noted. No further action required.
- j) Noted. No further action required.
- k) It is recommended that policy SMAP-16 to which Proposed Material Alteration MA197 relates, be amended as follows to include reference to the 'Connecting Ireland: Rural Mobility Plan'

**SMAP-16** It is Council policy to support the Local Link Rural Transport Programme 2018-2022 in County Offaly and subsequent programmes, including 'Connecting Ireland: Rural Mobility Plan', ~~which provides~~ providing for social and economic connectivity between settlements and rural areas.

- l) It is recommended that objective SMAO-02 to which Proposed Material Alteration MA204 relates, be amended as follows:

**SMAO-02** It is an objective of the Council to prepare a Local Transport Plan in accordance with 'Area Based Transport Assessment Guidance' by TII and NTA, for the Key Town of Tullamore in conjunction with the National Transport Authority and in tandem with the Local Area Plan, and ~~to consider the preparation of~~ to prepare Transport Plans for other towns that are subject to Local Area Plans, namely Birr, Edenderry and Portarlinton subject to the provision of funding and agreement with statutory agencies.

- m) Noted.
- n) Noted. Please see CE response to OPR submission (CDP/MA/994) which makes a recommendation in point 13.
- o) In response to the NTA submission and also the TII submission (see CDP/MA/264), it is recommended that objective SMAO-09 to which Proposed Material Alteration MA208 relates, be amended as follows:

**SMAO-09** It is an objective of the Council to facilitate the development of the national secondary road network in Offaly through the continued construction, upgrading and improvement of the national secondary roads in the county, the N62, the N52 and the N80 where on examination it is found to be feasible, including as outlined in the accompanying table:

**N52:** To support the construction of a road between Tullamore and Kilbeggan (Link Road) in accordance with National Development Plan investment objectives taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, and subject to compliance with requirements of various TII Planning Guidelines for Assessment of Environmental Impacts under that include headings such as "Constraints Study", "Route Corridor Selection" and "Environmental Impact Assessment" ~~including section 8.5.4 Corridor and Route Selection Process.~~

- p) The submission in this regard is noted. However, a submission received from the TII to the draft Plan, recommended the inclusion of a reference to The Treatment of Transition Zones to Towns and Villages on National Roads.

National Roads within 60km/h zones can traverse many areas with very different characteristics such as low density residential areas, industrial areas, mixed use neighbourhoods and town and village centres. This clearly requires different design solutions within each of these different contexts. The TII design standard supplements the information provided in the Department of

Transport, Tourism and Sport (DTTAS) Design Manual for Urban Roads and Streets (DMURS). It provides additional guidance for the treatment of the Rural Fringe and Transition Zones on National Roads entering towns and villages. Within the Centres of towns and villages that lie on National Roads, the treatments described in DMURS shall apply.

The TII document refers to DMURS the mandatory standard in Urban areas and states that their document is a supplementary standard (to be used in transition zones on national roads). It is recommended therefore that the text to which Proposed Material Alteration MA230 relates is implemented in the final Plan.

### 3.2.5 Other

#### [Ref: CDP/MA/421](#)

##### Person / Body:

Daniel Giraudon

##### Summary of submissions / observations:

This submission has been written in the French language.

##### CE Response:

The Official Languages Act 2003 was signed into law on 14 July 2003. The purpose of the Act is to promote the use of the Irish language for official purposes in the State, to provide for the use of both official languages of the State in parliamentary proceedings, in Acts of the Oireachtas, in the administration of justice, in communicating with or providing services to the public and in carrying out the work of public bodies.

Part 1, Section 2 of the Act defines ‘the official languages’ as meaning the Irish language (being the national language and the first official language) and the English language (being a second official language) as specified in Article 8 of the Constitution.

Part 3, Section 9 of the Act states ‘*Where a public body communicates in writing or by electronic mail with the general public or a class of the general public for the purpose of furnishing information to the public or the class, the body shall ensure that the communication is in the Irish language or in the English and Irish languages.*’

Schedule 1 of the Official Languages Act 2003 notes that a ‘public body’ includes ‘local authorities’.

The submission is in French, not being an ‘official language’ for the purpose of the local authority carrying out its functions. The submission, therefore, cannot be considered.

#### [Ref: CDP/MA/969](#)

##### Person / Body:

**The Irish Traveller Movement**

##### Summary of submissions / observations:

The submission does not refer to a specific Proposed Material Alteration. However, the submission does relate to the provision of housing (traveller accommodation), which is covered under the Housing Strategy and Housing Need and Demand Assessment, which forms part of the Proposed Material Alterations, together with the amended Core Strategy (Proposed Material Alteration MA19) and application of Section 28 Ministerial Guidelines, ‘*Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020*’ as introduced by Proposed Material Alteration MA12.

The submission makes the following comments:

- a) Traveller specific accommodation developments completed under the last development plan period should be outlined in the Development Plan.



- b) Projects committed to under the 2019-2024 Traveller Accommodation Programme should be listed as objectives in the Development Plan with clear timelines as per the Housing (Traveller Accommodation) Act 1998 PART III (27) (10) and Sites should be identified and zoning of land for Traveller specific accommodation, including transient accommodation, should be mapped and illustrated in the programme, in line with the Planning and Development Act, (2000) as amended, particularly s10(2)(i).

Consideration should also be given for how sites will be identified for the next Traveller Accommodation Programme, including transient sites. A system of monitoring and reviewing at regular intervals the provisions outlined in the Development Plans as they relate to Traveller accommodation should be included in the Development Plan.

- c) The Development Plan should identify Travellers as a priority group in its plans to address homelessness and identify what tangible steps will be taken to reduce the overrepresentation of Travellers in homeless figures.
- d) Appropriate baseline studies on Traveller accommodation needs should be carried out as part of integrated Housing Need and Demand Assessments for Development Plans, if this has not already occurred.
- e) Offaly County Council should consider, in this process, how future Development Plans could have their timelines aligned with the timelines of Traveller Accommodation Programmes, for a more integrated approach, in line with the recommendations of the Expert Review on Traveller Accommodation.
- f) The Development Plan should outline Offaly County Council's plans for retrofitting Traveller accommodation and timelines for this.
- g) The Development Plan should reference the work being done on a national level to implement the recommendations of the Expert Review on Traveller Accommodation and commit to incorporating the work and decisions of the programme board into its future processes.

#### CE Response:

- a) The Offaly Traveller Accommodation Programme 2019–2024, which is specifically referred to in section 2.6.3 of the draft County Development Plan and accompanying Housing Strategy, includes a section on 'Progress Made Under Previous Programmes', detailing the number of families accommodated under each programme.
- b) Section 10(2)(i) of the Planning and Development Act 2000 (as amended) requires that a development plan includes objectives for the provision of accommodation for travellers, and the use of particular areas for that purpose. The Council recognises the needs of the Travelling Community within the county. These are addressed and delivered within the context of an adopted Traveller Accommodation Programme 2019-2024 and subsequent programmes, subject to funding.

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

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

The Core Strategy under Chapter 2 of the draft Plan provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses in the Development Plan. It identifies the quantum, location and phasing of development for the Plan period linked back to a county population target, in the form of a settlement hierarchy. The population target for the county has been set by the NPF Implementation roadmap, together with structural housing demand set by the Section 28 Ministerial Guidelines, *'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'*.

The population target includes all sections of society including the Travelling Community. The housing needs of the Travelling Community is monitored through the Offaly Traveller Accommodation Programme 2019 – 2024, with anticipated growth and associated housing need provided for in the draft County Development Plan by way of policy which supports delivery of accommodation for the Travelling Community, in addition to the use of land for Traveller Accommodation being 'Open for Consideration' in the 'Town Centre/Mixed Use', 'Existing Residential' and 'New Residential' zones, as per the zoning matrix in Chapter 12 of the draft Plan.

- c) The following policies in the draft Plan address homelessness.

**HP-02** *It is Council policy to seek to ensure that groups with special housing needs, such as older people (in accordance with the Age Friendly Strategy for Offaly 2018-2021 and any subsequent editions), single person households, persons with physical and / or learning disabilities, the homeless, the travelling community, asylum seekers and refugees, and those in emergency accommodation are accompanied in a way suitable to their specific needs.*

**HP-12** *It is Council policy to work with all relevant stakeholders to implement the Midland Housing First Initiative 2020, and any subsequent initiatives to address the accommodation needs of homeless persons.*

- d) Baseline studies and assessment of accommodation needs are covered in the Traveller Accommodation Programme, the current one being 2019-2024, which in turn has been considered as part the Housing Strategy and Housing Need & Demand Assessment.
- e) Section 9 of the Planning and Development Act 2000 (as amended) sets out the statutory timeframe for commencing the review of a county development plan.
- f) Annual targets including refurbishments is set out in the Offaly Traveller Accommodation Programme, the current one being 2019-2024.
- g) The following relevant objectives are contained in the draft Plan:

**CSO-01** *It is an objective of the Council to monitor and manage the delivery of residential development in County Offaly through the development management process to ensure it is in line with the Core Strategy. In this respect, the Planning Authority shall maintain a record of residential development permitted in the open countryside, sráids and individual settlements in order to ensure compliance with the population allocations defined by the Core Strategy Table.*

**HO-03** *It is an objective of the Council to support the ongoing monitoring and review of the Housing Need Demand Assessment (HNDA) in accordance with a forthcoming HNDA methodology to be issued by Central Government. Furthermore, it is an objective of the Council to monitor and maintain a record of residential development permitted in the open countryside, sráids and individual settlements in accordance with forthcoming*

*Departmental guidance around the establishment of a Housing Need Demand Assessment Coordination and Monitoring Unit and related implementation of a centralised spatial database for local authority housing.*

### 3.3 Submissions – Volume 2

#### 3.3.1 Towns

Please note that towns are also addressed in the OPR section of this CE Report (Section 4).

##### 3.3.1.1 Tullamore

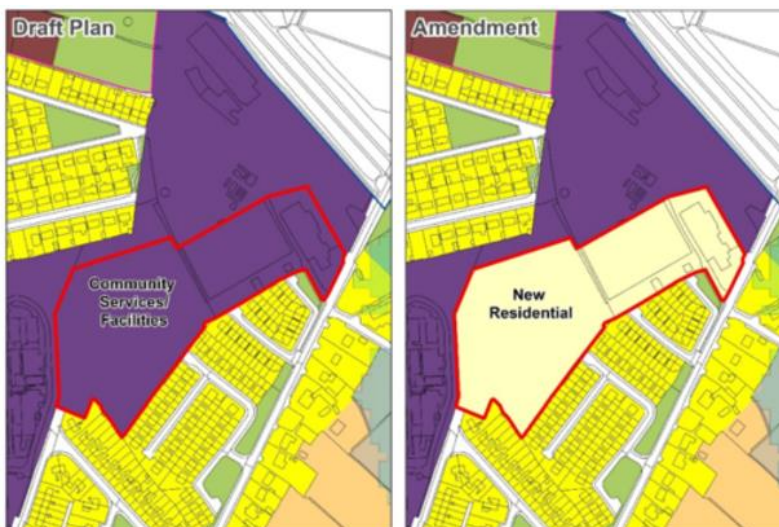
Ref: CDP/MA/342

Person / Body:

Tom McNamara

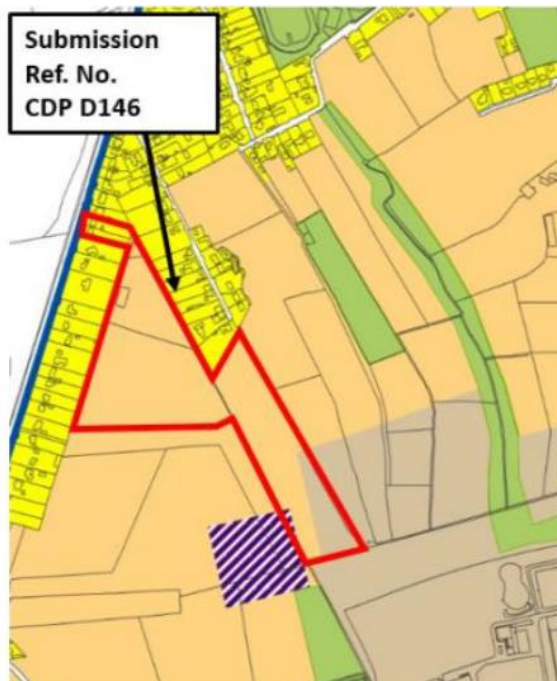
Summary of submissions / observations:

- a) States that there is no justification for the proposal to allow residential development at the site the subject of proposed material alteration **MA265** as outlined below:



- States that Tullamore is restricted as to lands that it can develop due to constraints on the Irish Water Network in the town.
- The site of MA265 is situated in the northern part of Tullamore Town where there is already an over-concentration of housing and proposed residential zoning where there are inadequate amenities and utilities infrastructure in order to support such a rezoning.
- 'Quotes' the CEO's Report-March 2021, that there was there was 'no justification' for these lands to be zoned residential.
- The proposed zoning would further push the planning of Tullamore Town northwards and away from the core of the town and away from essential transport links such as the train station and this is in contravention with National and Regional Planning Guidelines on sustainable development
- The Minister for Transport is on the public record as saying that we need transport-led planning.

- The Planning Regulator is also on record stating his office's support for sustainable, balanced development.
- b) Stated there is a need to rezone more lands in Tullamore for housing in the next County Development Plan, but in areas of the town that can support and sustain growth.
- c) Submits that there is a suitable 9.5ha parcel of land in the southern part of the town, in the ownership of Tom McNamara which would be suitable for low density residential development instead of the site of MA265. (These lands were subject to a submission by Tom McNamara Ref CDP/D/146 at the draft plan consultation stage as set out below):



#### CE Response:

- a) Noted. This proposed Material Alteration MA265 was made in accordance with a Motion from the members at the Special Council Meeting of the 24<sup>th</sup> of May 2021. A submission has been received by the OPR (Ref CDP/MA/994) which addresses this site also. I recommend the same CE response and recommendation in relation to this site as set out in the OPR submission in this CE Report.

- b) Please note the OPR Submission (Ref. CDP/MA/994) to the Material Alterations which requires a reduction in the overall zoning for New Residential as proposed.

The planning authority are restricted to considering only the proposed material alterations at this stage of the plan making process as required under Section 12(7) of the Planning and Development Act 2000 (as amended).

- c) This part of the submission relates to lands which were **not** included in the Material Alterations published as Material Alterations on 17<sup>th</sup> of June 2021, and is a repeat of a submission to the draft plan stage CDP/D/146 which was considered in the Chief Executive's report of March 2021. This part of the submission cannot be considered at this stage of the

process as required under section 12(7) of the Planning and Development Act 2000 (as amended).

**Ref: CDP/MA/420**

**Person / Body:**

**Vincent Hussey**

**Summary of submissions / observations:**

The Submission relates to proposed material alteration MA265, which proposed to rezone 4 ha. of land from Community Services/ Facilities to New Residential as set out below:



- a) This site was zoned 'Community services/ facilities' in the draft Plan presumably to respect its location beside the Regional Hospital, Tullamore and is now proposed as "New Residential".
- b) 'Health and Social Services' in the 2016 Census of Population accounted for 22% of Employment in Tullamore making the Hospital the single biggest employer in the town.
- c) The submission highlights the strategic nature of the site;
  - There are good prospects that the Hospital, which is also the Headquarters of the Midland Regional Nursing School will need land to expand further;
  - It is the site for the Midlands Level 3 Hospice and has links to St. James' Hospital group and the University of Limerick (UL).
  - The Council has been supportive of the Hospital in the past. The Council acquired land beside Arden Vale which it protected until the Hospital Authorities indicated that the land was needed for Hospital development.
- d) The submission states that the Council should, if necessary, acquire this site because of its unique location beside the Hospital, outlining that the Council has an enviable record of acquiring land and making it available for critical developments, citing examples.

- e) There are many sites that are more suitable for residential development including brownfield sites. There are other options for residential development that the Council could pursue, and accordingly, the development of the site of MA265 for housing is not warranted.

#### CE Response:

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

Objective LUZO-09 - Land Use Zoning Objective – Community Services/Facilities states: It is an objective of the Council to: Provide necessary community, social, health, public administration and educational services and facilities.

- b) The importance of the Health Service Sector to the town of Tullamore and wider county is recognised in the Economic Development Strategy, Chapter 5, as per proposed material alteration MA115, and in particular in the Economic Profile of the County.
- c) The strategic nature of the site is recognised in terms of its location adjacent to the existing Midlands Regional Hospital site and the adjoining site the recently granted planning permission of 15<sup>th</sup> July 2021 on an adjoining 10-acre site called ‘Wellwood Health Park’ for a 244-bed nursing home, rehabilitation and convalescence unit.

The Chief Executive’s Report on submissions received on the draft Plan, March 2021 stated that;

- *‘the lands are identified for future Community Services and Facilities, that would complement the existing hospital and future development in the area, which may lead to a consolidation of the important Health Care function of Tullamore as Key Town and also its employment generation role.’*
- also noted in **Table 2.3: Summary of criteria utilised to develop the settlement hierarchy for Offaly 2021-2027** of the draft Plan, that the Midland Regional Hospital Tullamore is a Teaching/University hospital for a number of institutions including University College Dublin and University of Limerick, acting as a strong economic driver for the town and also providing a springboard for further linkages to existing and new med-tech businesses and research facilities.
- In the context of the **Regional Spatial and Economic Strategy, Regional Policy Objective RPO 4.70**: *To examine the need for complementary third level outreach educational facilities at Tullamore, particularly with regard to support for Tullamore Regional Hospital and where appropriate, its continued development as a Teaching/University Hospital, together with potential for linkages to existing and new med-tech businesses and research facilities’.*
- **9.7 Other Education/Skills Training/Third Level**: *The Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-31 states that by 2031 there will be a significant increase in the number of people in the 15-24 years’ age cohort which will lead to greater demand for third level education. The*

*Council considers that Offaly has the potential to accommodate multiple campuses based on its sectoral strengths in areas such as food, energy, biodiversity, pharma and Medtech, engineering and advanced manufacturing. Tullamore can provide complementary third level outreach educational facilities supporting the Midland Regional Hospital and its continued development as a Teaching/University Hospital. There also exists an opportunity to develop a centre in the county for exploring/evaluating new technologies in energy provision with Research and Development components based on the expertise available in the Athlone Institute of Technology (AIT), University of Limerick (UL) and Maynooth University nexus.*

- **SICCDP-32** *It is Council policy to support the Health Service Executive and other statutory and voluntary agencies in the provision of appropriate healthcare facilities including the development of both the system of hospital care and the provision of community-based primary care facilities.*
  - **SICCDP-35** *It is Council policy to support the designation of the Midland Regional Hospital Tullamore as a major trauma centre, its continued development as a 'teaching' hospital and the potential of a 'regional' hospice at this location.*
  - **ENTP-22** *It is Council policy to encourage and establish links between County Offaly, Maynooth University, Trinity College Dublin, University of Limerick, Athlone Institute of Technology and Cork Institute of Technology and other higher level colleges as appropriate, which will improve the skills base/education of inhabitants within County Offaly.*
  - **ENTP-23** *It is Council policy to encourage third level education in County Offaly through the provision of outreach / campus facilities for the accommodation of courses.*
  - **ENTP-25** *It is Council policy to support the examination of a need for complementary third level outreach facilities in Tullamore, particularly with regard to support for Midland Regional Hospital Tullamore and where appropriate, its continued development as a Teaching / University Hospital, together with potential for linkages to existing and new med-tech businesses and research facilities.*
- d) Noted. There are no current proposals that the Council will purchase the site in question.
- e) Noted. This proposed material alteration was made in accordance with a Motion from the members at the Special Council Meeting of the 24<sup>th</sup> of May 2021. A submission has been received by the OPR (Ref CDP/MA/994) which addresses this site also. I recommend the same CE response and recommendation in relation to this site as set out in the OPR submission in this CE Report.



[Ref: CDP/MA/720](#)

**Person / Body:**

**Scott Hobbs Planning on behalf of Grapemont Ltd.**

**Summary of submissions / observations:**

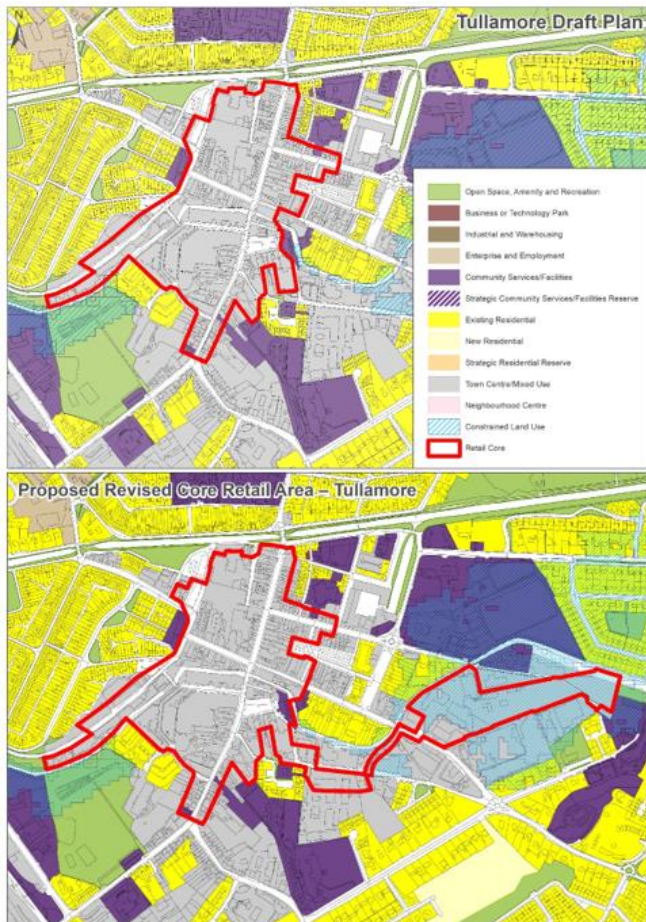
This submission refers specifically to the Core Retail Area: MA175 & MA274:

**MA175:**

**Core Retail Areas**

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

**MA274:**



- a) *‘Grapemont supports in principle the intentions to revise the Core Retail Area to include a wider part of the existing town and include part of its land at Riverside. However, Grapemont objects to the area shown on the Material Alteration, as it relates to Riverside’.*
- b) Highlights that the proposed revised Core Retail Area does not exactly align with the proposed development site Pl. Ref. 19/96. The proposed Core Retail Area boundary line bisects one of the anchor retail units (Unit E), proposed under the permitted planning permission Pl. ref. 19/96 and Grapemont Ltd. believes this approach to be illogical.
- c) It is noted that the Core Retail Area is defined in the Draft Plan *‘as that part of the town centre which primarily devoted to shopping and contain the primary retail streets of a centre where the main concentration of retail activity takes place’.*

On this basis; it is considered that the Core Retail Area should include the Dunnes Stores development and the Lidl store also, in the vicinity of the Church Road Area, as both contribute to the main retail streets in the area. Including the Dunnes Store’s site would also then ensure that the Core Retail Area coincides with the Opportunity Site, as identified in the Draft Plan.

#### CE Response:

- a) Noted. It is assumed this objection relates to the eastern tip of the proposed extended Core Retail Area as set out in MA274, which is outside the land ownership the planning application boundary of Grapemont Ltd. Ref PL19/96.
- b) Noted. This is acknowledged to be an error at drafting of the Material Alteration stage; It is accepted that the Material Alteration MA274 as proposed by the Motion of the Members at the special council meeting on the 24th of May 2021 was to include the full site of the Planning Permission Pl. Ref. 19/96.
- c) The submission is noted. Please note it was not intended to include Dunnes Stores or Lidl Store in the Core Retail Area as put forward by the Members on the 24<sup>th</sup> at the special council meeting of the 24<sup>th</sup> of May 2021.

#### Overall Recommendation:

I note the submission made by the OPR (CDP/MA/994) which requires the planning authority to remove the proposed material alteration extending the core retail area. For these reasons, I recommend not implementing MA274 and to revert to the original Core Retail Area boundary as per the Draft Plan.

[Ref: CDP/MA/721](#)

**Person / Body:**

**Scott Hobbs Planning on behalf of Flanagan Properties Ltd.**

**Summary of submissions / observations:**

**MA268:** Enterprise and Employment (E&E) to Open Space Amenity and Recreation as per maps below



- a) States that the site in question under MA268 has benefit of an extant planning permission for retail development on this land, granted in October 2019, reference 18/535, and which remains extant until 07 October 2024 and that it is Flanagan Properties intention to commence development on this site for substantial completion prior to this expiry date.
- b) Flanagan Properties objects to the Material Alteration which rezones lands from Employment and Enterprise to Open Space, Amenity and Recreation, for the following reasons;
  - The extant permission and the possibility of its construction means that the plan would effectively be out of date on its adaption and accordingly, introduces uncertainty, brings the concept of plan-making into disrepute and is contrary to the proper planning and sustainable development of the area
  - Riverview has long been recognised as suitable for development. Planning permission has been granted for retail development at the site since 1999, and most recently in 2019 (reference 18/535). Both Offaly County Council and An Bord Pleanála recognised that the land is constraint free. The entire southern part of the land has already been built out, and is now properly recognised as Employment and Enterprise.

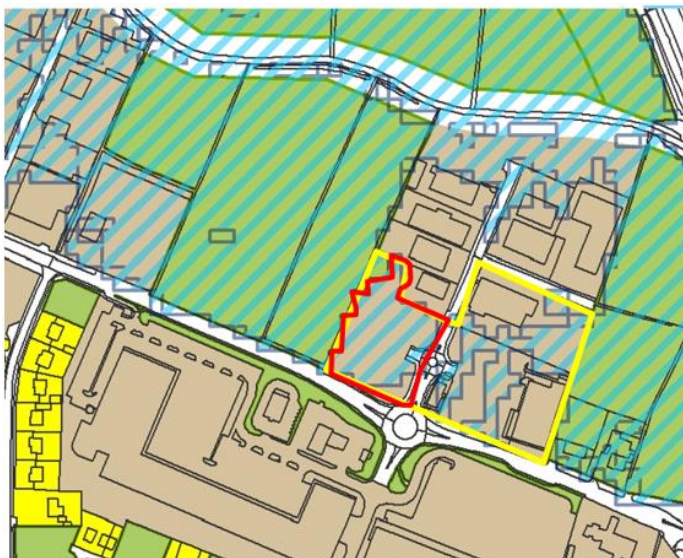
- The subject land, which forms part of that permission site has been regraded, in the past. It is therefore brownfield land with the benefit of planning permission for retail development
- The access road which serves the Riverview Estate was specifically constructed to accommodate development on this subject land by virtue of earlier planning permissions.



**CE Response:**

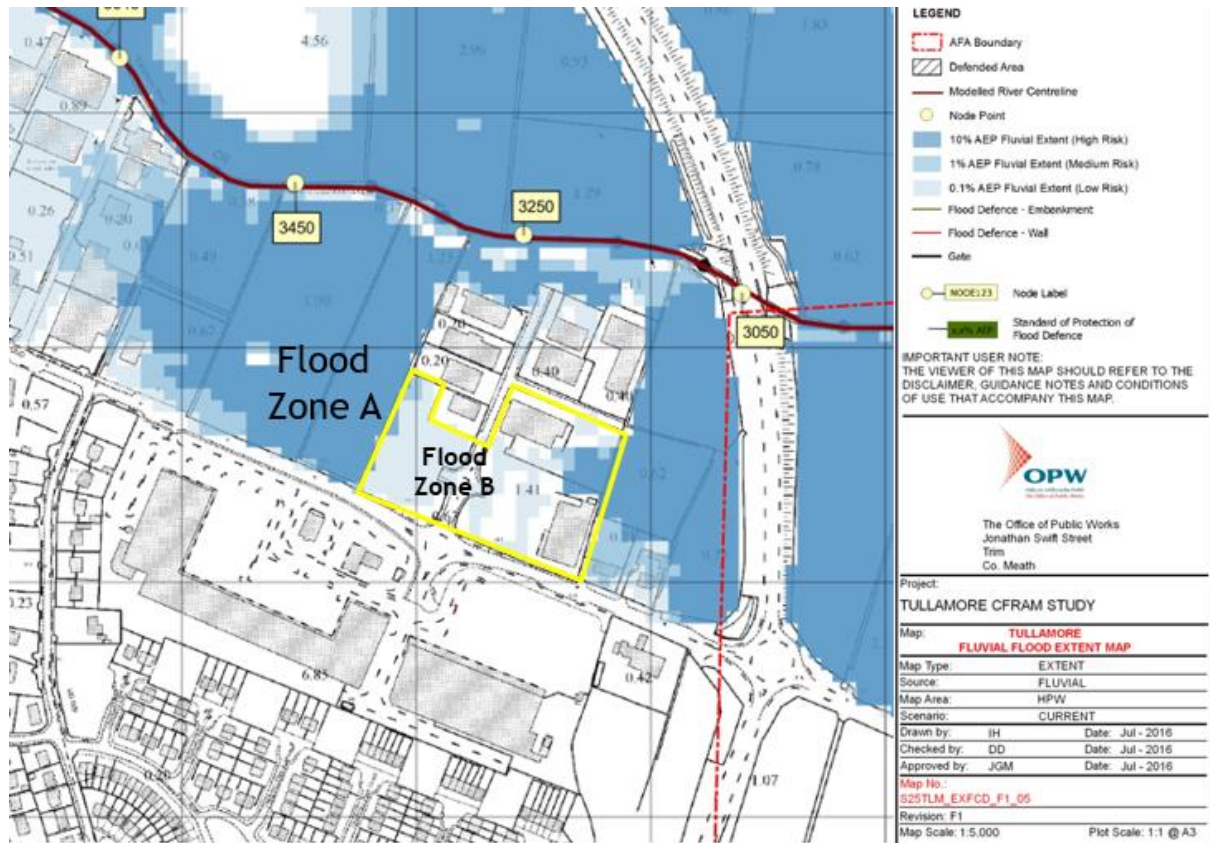
- a) Noted.
- b) This Material Alteration MA268 came about as a result of a submission (Ref. CDP/D/58), from the OPW to the Draft Plan as published in July 2020. The submission refers to the proposed ‘Strategic Residential Reserve’, undeveloped ‘Town Centre/Mixed Use’ and ‘Enterprise and Employment’ sites located within Flood Zone A in Tullamore.

The submission relates to the lands outlined in yellow below. Following consultation with CAAS, the part of the subject site which is located within Flood Zone B can be zoned for Enterprise and Employment as it allows for non-vulnerable uses (i.e. the area outlined in red).

**Recommendation:** Amend Zoning of the area outlined in red to Enterprise and Employment to reflect the Flood Zone B boundary at this location.



-  Submission from Scott Hobbs Planning on behalf of Flanagan Properties Ltd. CDP MA 721
-  Revised Amendment to Site MA268: Revert to Enterprise and Employment



Map showing Extract from OPW CFRAM Maps which indicate Flood Zone A & Flood Zone B in relation to the subject site.

[Ref: CDP/MA/723](#)

**Person / Body:**

Stephen Ward Town Planning & Development Consultants Ltd. on behalf of Steinfort Investments Fund.

**Summary of submissions / observations:**

- a) **Planning Chronology in relation to lands at Clonminch Road, Co. Offaly (Submission Ref. CDP/D/89 made at draft Plan consultation stage)**
  - At the time of the initial submission, to the draft plan, October 2020 a Strategic Housing Development (SHD) planning application for 358 no. residential units, childcare facility, neighbourhood centre and site development works was pending before An Bord Pleanála (ABP -307832-20).
  - By Order made by An Bord Pleanála on the 25th November 2020 permission was refused, for the two reasons stated therein;
    - Concerns relating to the design of the proposed Link Road linking Clonminch Road/R443 to the west and Chancery Lane to the north.
    - The proposed development did not adequately comply with the Guidelines for Sustainable Residential Developments in Urban Areas.

Both reasons for refusal relate to design choices that are readily addressed. Neither reason for refusal raises any systemic or fundamental issue with the principle of residential development on the site.

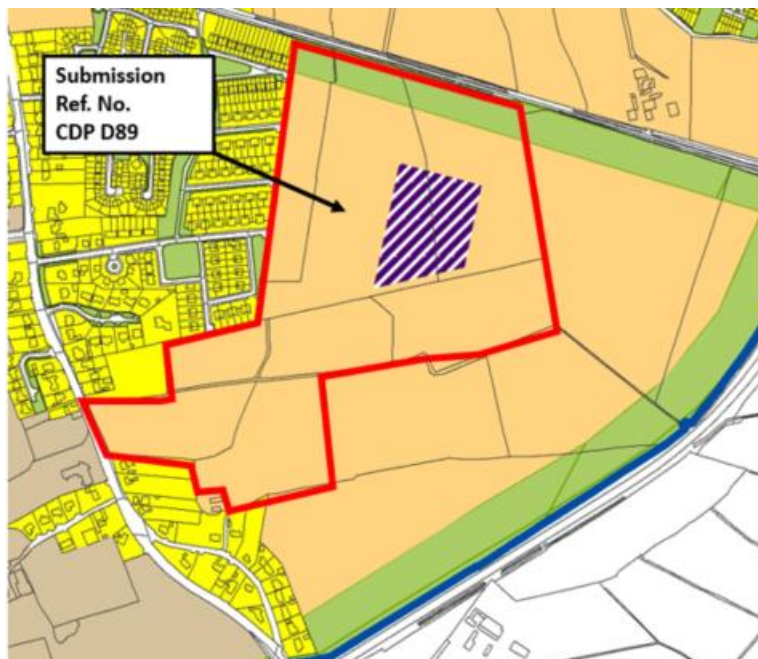
- A revised proposal has been redesigned such that the proposed development is fully compliant with the Guidelines and will deliver enhanced residential amenity to future residents. The revisions also include a redesigned Link Road so that it fully complies with all relevant standards and meets the concerns of the Board.
- The revised SHD proposal was lodged with An Bord Pleanála on 1st June 2021. A tri-partite meeting between the Board, the Developer and Offaly County Council took place on 17th May 2021 (APB-309529-21). At that meeting, the Board indicated that the proposed development required further consideration. The issues that require further consideration are in hand and a planning application is in the final process of being prepared. They anticipated that they would be in a position to lodge a new SHD application July 2021.
- Steinfort Investments Fund have a significant interest in the draft Tullamore Town revised zoning plan. For the reasons identified in their previous submission and herein, that plan as proposed is seriously deficient in terms of its content and should be subject to a Material Alteration such that it accurately reflects national and regional planning policy.

**b) Procedural Issue - Availability of Meeting Minutes**

- According to the meeting agendas issued by Offaly County Council online and summarised on their website, Special Council meetings were held on May 10th, 24th & 28th 2021, when Members of Offaly County Council considered the Draft Offaly County Development Plan 2021-2027 and the Chief Executive's Report in respect of submissions received and having resolved in accordance with Sections 12(6) and 12(7) of the Planning and Development Act 2000, as amended.
- The outcome of these meetings was that the draft Plan is proposed to be amended and that these amendments are material alterations of the draft plan.
- According to Offaly County Council website, *"a copy of the Material Alterations to draft Offaly County Development Plan 2021-2027 and all accompanying determinations and reports are available for public inspection from Thursday 17th June 2021 - 4pm Friday 16th July 2021 (both dates inclusive)"*.
- The minutes of the Special Meetings when the material alterations were decided on were not available. It is submitted that this is a significant omission that leaves the public unable to make a fully informed submission on the Material Alterations.
- It is also unclear without viewing the minutes if the elected members were updated on the status of lands relating to submission CDP/D/89 under which the Chief Executive in his report states that the SHD proposed under ABP-307832- 20 had been refused.
- A tripartite pre-application consultation was undertaken on the 17th of May 2021 for a new SHD planning application relating to the submission lands (APB- 309529-21) and a planning application is imminently to be lodged with An Bord Pleanála.
- This change in status could have had a material bearing on the consideration of this submission and proposed land-use zoning amendment by elected members and to consider whether a Material Alteration should be proposed in respect of the Tullamore Town revised zoning plan.

**c) The necessity for a Material Alteration at Clonminch**

As identified in the submission made in October 2020 (Ref CDP/D/89, site identified below), the draft Tullamore Town revised zoning plan does not comply with national and regional planning guidelines.



A further Material Alteration is required bring in line with those Guidelines; as outlined by the following concerns:

**(i) MA12 (reference to section 28 Guidelines: Housing Supply Target Methodology for Development Planning 2020) and MA19 (revised core strategy)**

It is acknowledged that the draft Offaly County Council Development Plan has been amended under MA12 to take account of the publication of the Section 28 Guidelines on Housing Supply Target Methodology for Development Planning (2020). It is also recognised that the housing targets for the County as proposed under MA19 increase the number of residential units required during the lifetime of the development plan to 3,978 to take account of undated information provided by ESRI.

As stated by the Section 28 Guidelines, population projections although important can only be assessed with one fixed date every five years and it is important to establish a system of monitoring whereby housing delivery can be benchmarked against identified housing demand projections (section 3.0).

As clearly stated in the Ministerial Letter to Local Authorities - Structural Housing Demand in Ireland and Housing Supply Targets (dated 18th of December 2020), the next six-year local authority planning cycle is critical to meeting national housing supply targets and recovery from the Covid-19 Pandemic.

The Core Strategy Table (MA19) outlines the Housing Supply Targets for the life of the Offaly County Development Plan. Tullamore is identified as the only Key Town in the County and has been allocated a Housing Supply Target 2021-2027 of 1,379. We note that this is a target and not a cap. In order to provide sufficient lands for 1,379 residential units to be provided, Offaly County Council propose to zone 48.01ha of land 'New Residential' taking account of the capacity of mixed use and town centre zoned lands to facilitate residential development and ensuring there are sufficient brownfield/infill sites to accommodate 30% of demand (MA19).

It is submitted that the simplified calculation outlined by MA19 will act as a constraint to residential development in the growth centres of Tullamore and is not based on an evidence approach, as required under the National Planning Framework.

**(ii) MA273: Draft Tullamore Town Plan Map:**

There has been no site based assessment of any of the lands identified on the Draft Tullamore Town Plan map (MA273) that are identified to fulfil the requirements of the Core Strategy Table. There is a complete disconnect between the demand for housing as a result of project population increase during the plan period identified through the HNDA and as set at a National and Regional level and how this is to be provided for in terms of land - use zoning.

The National Planning Framework (NPF) identifies that effective implementation of future land-use zoning will require substantially better linkage between zoning of land and the availability of infrastructure (page 137). A new standardised methodology is put forward at Appendix 3 of the NPF and is required to be applied by Planning Authorities under NPO 72a. It is intended that further guidance on the methodology for a tiered approach to land zoning will be provided in updated Statutory Guidelines that will be issued under Section 28 of the Planning and development Act 2000 as amended but these have not yet been published (NPF, Appendix 3). It is also acknowledged by the NPF that there are many other planning considerations relevant to land zoning beyond the provision of basic enabling infrastructure including overall planned levels of growth. This is provided for by the introduction of an order of priority to the delivery of planned growth and development. Guidance is also planned to be developed to enable planning authorities to apply an order of priority for development of land under NP073a.

It is submitted that in the absence of national guidance on preparing development plans and on the preparation of Core Strategies including the application of an order of priority that a very high degree of flexibility needs to be contained in terms of housing provision in the Development Plan especially for Tullamore. This has not been provided for by the Material Alterations as currently proposed. It is submitted that the lack of flexibility applied at a County level could have serious implications for the ability of Tullamore to achieve overall planned levels of growth under the NPF.

**(iii) MA260 Infrastructural Assessment (Offaly)**

The National Planning Framework (NPF) calls for a new approach to justify land use zoning objectives in local authority plans so that enough land is provide for future development but not so much that development becomes difficult to co-ordinate or undermines regeneration of existing, but under-occupied and run-down urban areas (page 137).

In accordance with National Planning Objective 72a *"Planning Authorities will be required to apply a standardised, tiered approach to differentiate between;*

- i) zoned land that is serviced and*
- ii) zoned land that is serviceable within the life of the plan".*

As part of the evidence based approach required by the NPF, local authorities must differentiate between zoned land that is able to connect to existing development services for which there is service capacity available and lands that are not currently sufficiently serviced but have potential to become fully serviced within the life of the plan as set out at Appendix 3 of the NPF. Only when it is identified that zoned lands cannot be serviced during the life of a development plan or area plan by reference to the infrastructural assessment of the planning authority should it not be zoned for development.



**(iv) MA260 Infrastructural Assessment (Tullamore)**

In a section titled 'Infrastructure Provision' MA260 states *"Zoning maps for each of the towns and villages that also identify the extent of existing water mains, waste water mains, footpaths and lighting are set out hereunder. These maps illustrate the proximity of infrastructure relative to a particular site and accordingly demonstrate whether a particular site is Tier 1 or 2"*. The location of existing water mains and waste water mains on the zoning maps included under MA260 does not give a clear indication of capacity, nor does it identify Tier 1 and Tier 2 lands in Tullamore.

It is submitted the Infrastructure Assessment Report on which land -use zoning has been decided is insufficient. There have been no site based assessments undertaken of the identified sites in Tullamore or justification provided for those not identified for development within the lifetime of the plan. There has been no assessment of location, suitability for the type of development envisaged under the HNDA, availability or proximity to amenities, schools, employment or accessibility to transport which many planning authorities have introduced in response to the NPF using a traffic light system that can inform an order of priority.

It would also appear that the Infrastructure Assessment Report does not contain the most up to date information from relevant delivery agency(ies), for example Irish Water, as required by the NPF (Appendix 3). For example, according to MA260 there are deficiencies in water supply identified in Tullamore with the problem identified on page 143 as *"very limited/constrained waters supply capacity"*. Under 'Investment up to the year 2027' no details are provided as to the capacity or constraints identified but the paragraph referred to states *"according to IW although water is constrained in the above areas at critical time s such as drought and freeze events, this need not necessarily halt growth"*. According to Irish Water's website, the contract has been awarded for the design, construction and commissioning of the water treatment plan in Tullamore which will significantly increase the future water supply in Tullamore. There is no constraint in terms of waste water treatment capacity identified in Tullamore by Irish Water (submission dated 6th of October).

As illustrated at MA18, Tullamore is the only Key Town in County Offaly and has been allocated 35% of projected growth during the plan period (MA19). MA260 does not provide adequate details of the availability of existing development services in Tullamore, future planned capacity or the potential for delivery of the required services and/ or capacity to support new development as required by the NPF (NPO72b & Appendix 3). According to MA260, "Irish Water are developing an additional Infrastructure Development Plan (expected to be completed December 2020). This will assess all zoned land in the Tullamore catchment and develop a flow profile from each site. This will identify the requirements to allow the site to develop and connect to the trunk network. The output of this study will outline any upgrades in the network as a result of the flow from each parcel of land individually and communally".

It is submitted that without this study being completed, there is insufficient basis on which to decide the future zoning of lands in Tullamore. This is a significant infrastructural investment in Tullamore that could release lands for development within the lifetime of the development plan and yet no lands are identified to the south of the railway line in Tullamore for residential development or supporting community services/facilities.

**(v) MA232 and MA19- Density**

The identification of a requirement for 48ha of lands to be zoned 'New Residential' in Tullamore is based on the assumption that as a Key Town, residential development will be provided at 35 units per hectare. As acknowledged in the recent Circular NRUP 02/2021 *"While the Sustainable Residential Development Guidelines clearly encourage net densities in the 35-50 dwellings per hectare range within cities and large towns, net densities of 30-35 dwellings per hectare may be*

*regarded as acceptable in certain large town contexts and net densities of less than 30 dwellings per hectare, although generally discouraged, are not precluded in large town locations"* (page 3). It is submitted that this range of densities should be provided for in the Plan and the Plan should be materially altered to reflect same.

#### CE Response:

- a) Noted.
- b) Noted. Section 12(7) of the Planning and Development Act 2000 as amended states that submissions in respect of the proposed amendments of the draft made to the planning authority shall be taken into consideration before the making of any amendments. There is no reference in the Planning Act to making submissions in respect of the minutes. The members consider the draft Plan and CE's Report before deciding to accept or amend the draft Plan by resolution (in accordance with section 12(6) of the Planning Act).

The minutes would include particulars of all resolutions passed as set out in section 14 of the Local Government Act 2001 as amended, e.g. proposer / seconder / result of a vote, which were based on the CE Response and recommendations of the CE Report which was itself available on the Council website for public viewing. It is expected that the minutes of the 3 Special Council Meetings will be put before the elected members at the September Council Meeting for adoption.

- c) A further alteration to the Plan to provide for the zoning of lands at Clonminch cannot take place, taking into account section 12 (10)(a) of the Planning and Development Act 2000 as amended which states that the members of the planning authority, shall by resolution, having considered this CE report, make the plan with or without the proposed amendment that would, if made, be a material alteration, except that where they decide to accept the amendment they may do so subject to any modifications to the amendments as they consider appropriate, which may include the making of a further modification to the alteration. In summary, this means that as there was no proposed amendment in the Material Alterations document in relation to these lands at Clonminch, they cannot be considered for zoning at this final stage of the process.
  - (i) Tullamore (Key Town) has been allocated a Housing Supply Target 2021-2027 of 1,379 dwelling units under MA19. The approach taken in MA19 has been welcomed by the OPR in their submission (CDP/MA/994); *'The county housing target has been apportioned across the settlement hierarchy to generally reflect the projected population growth envisaged up until the end of the plan period, and the quantum of 'New Residential' land use zoning required to accommodate the projected housing growth has been identified in addition to the quantum lands proposed to be so zoned. The Office welcomes this transparent approach'.*

There is a requirement arising from the OPR Submission to revisit the zoning plan for Tullamore with a view to a reduction in the overall area of New Residential as per the Material Alterations published in June 2021, in order to be consistent with the core strategy, the *Guidance Note on Core Strategies* (2010) and the achievement of the National Strategic Objective for compact growth (NSO 1) and Regional Strategic Objective (RSO 2).

Please note the application of the Core Strategy and Sequential approach determines that the subject lands are deemed to be appropriately zoned as Strategic Residential Reserve.

At the assessment stage for the subject site, the following considerations were taken in to account (as addressed in the CE report for the Draft Stage) in the context of the Core Strategy allocations for Tullamore;

- Peripheral nature of the site & potential for leapfrogging
- Application of Sequential Approach
- level of infrastructural investment required in southern part of Tullamore
- Requirement to comply with NSO 1 for Compact Growth.

**The following Material Alteration was included on the basis of the OPR submission at Draft Plan Stage;**

MA14: In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach was taken to the zoning of land for development: (i) Zoning extends outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes given preference (i.e. 'leapfrogging' to more remote areas has been avoided); (ii) A strong emphasis is placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas zoned are contiguous to existing zoned development lands.

(ii) MA273 Draft Tullamore Town Plan Map:

The National Planning Framework (and Appendix 3) and in particular NP072 and NP073a are all noted however there is no option for 'very high degree of flexibility', available, due to the requirements to comply with the following;

- Core Strategy, as per Material Alterations
- the *Guidance Note on Core Strategies* (2010)
- National Strategic Objective for compact growth (NSO 1)
- Regional Strategic Objective (RSO 2).

It is also noteworthy that the OPR have in their submission to the Material Alterations process called for a reduction in the overall area of New Residential zoning for Tullamore, as referred to above, in C (i).

(iii) MA260 Infrastructural Assessment (Offaly)

Noted. It is expected that the revised Development Plan Guidelines which are awaited, will provide guidance on implementing National Planning Objective 72a of the NPF.

(iv) MA260 Infrastructural Assessment (Tullamore)

Noted. It is expected that the revised Development Plan Guidelines which are awaited, will provide guidance on implementing National Planning Objective 72a of the NPF.

(v) Density

Noted. It is noted that the OPR in their submission has raised the issue of density also which is summarised as follows:

Having regard to the Sustainable Residential Densities for Urban Areas, Cities, Towns and Villages, Guidelines for Planning Authorities (2009), issued under section 28, the planning authority is advised to omit the density table included under the core strategy table (proposed amendment MA19), and to amend the development management standard

DMS-02 Density (proposed amendment MA232) to omit the fourth bullet point ‘Densities per settlement tier as shown in Table 2.2 Core Strategy Table in Chapter 2 of this Plan’. Accordingly, I recommend these density-related omissions in the final Plan, as noted in the CE Response to the OPR submission CDP/MA/994 in this CE’s Report.

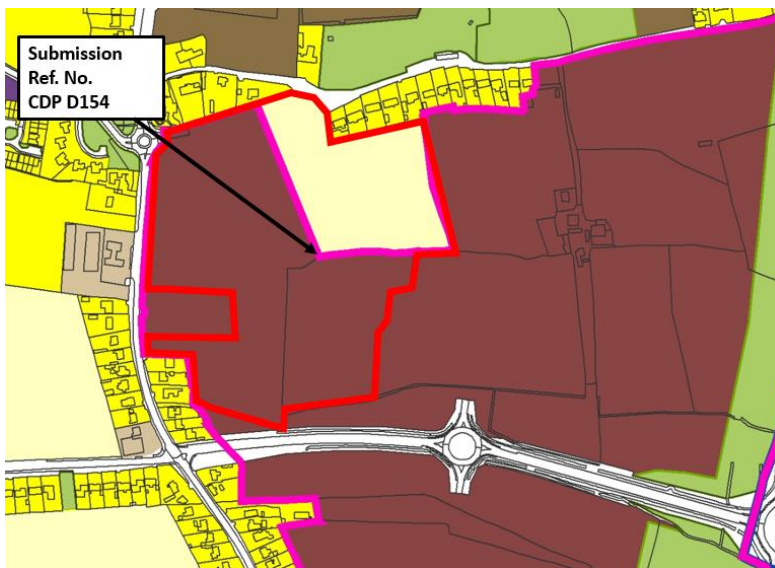
**Ref: CDP/MA/996**

**Person / Body:**

**Doorley Family**

**Summary of submissions / observations:**

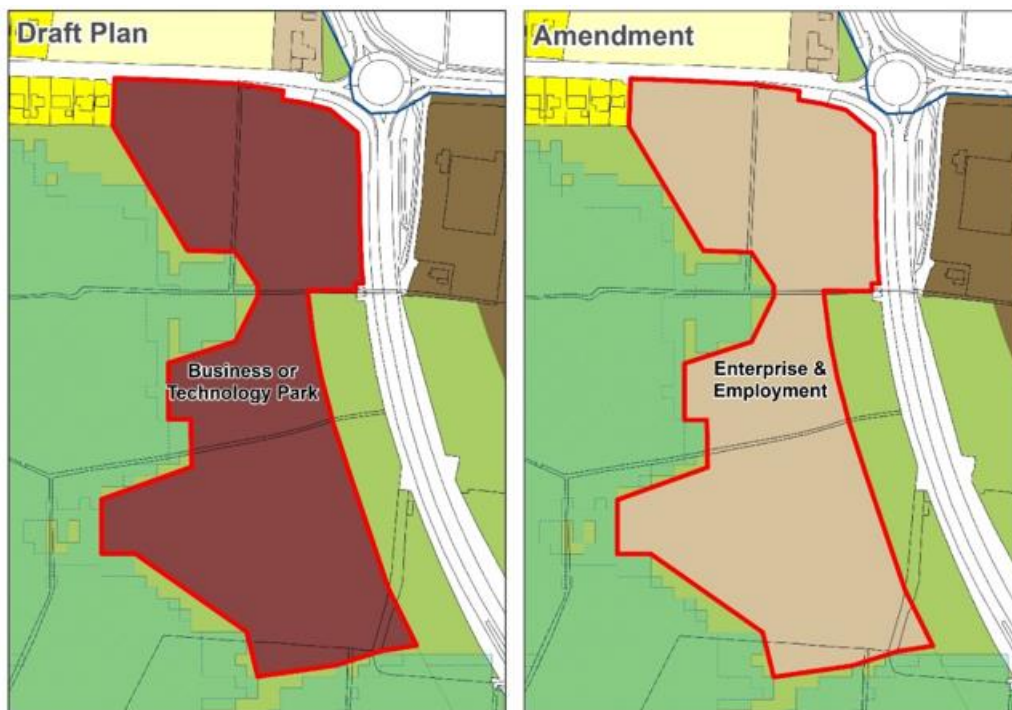
- a) States that it is the professional opinion that the rezoning of the subject lands as outlined in red below (extract from the previous CE Report, March 2021 in response to Doorley’s submission Ref CDP/D/154 on the draft Plan) and removal of the proposed distributor objective (see second image below) as shown in the Tullamore Town and Environs Development Plan 2010 – 2016 (as extended), should not proceed as planned.



- b) States that 2 No. Planning applications have been lodged for residential developments on the subject site in June 2021; Ref. 21/369 and Ref. 21/370 which were deemed invalid.
- c) States that there is an excessive scale of 'Business or Technology Park' zoning on the subject lands and that the existing character of the area may be negatively impacted by the future presence of business and technology park buildings in what is an established residential area.
- d) References Planning application Pl. Ref. 20/450 (ABP Ref. 310463) – Retirement Village Application, which is currently on appeal to An Bord Pleanála on a site which overlaps with this subject site of the submission. The submission states that the proposed rezoning to 'Business/Technology Park' has the potential to negatively impact the setting and operation of the proposed retirement village, as well as the ability of the forthcoming applications to be assessed against the subject lands' current zoning objective.
- e) **MA144** states: *"It is an objective of the Council to work alongside IDA to identify appropriately sized land banks and business premises at suitable locations in Tullamore in order to attract foreign direct investment."*

It is considered that the text in MA144 is indicative that the rezoning of the subject lands may be premature, insofar as it suggests that the process of identifying suitable locations for, *inter alia*, business and technology uses may not have been fully considered in the context of relevant data/information at the time of writing.

f) **MA266:**



MA266 arises from a submission on the draft Plan on behalf of Midland Town and Country Stores (Ref. CDP/D/150).

The proposed zoning at the subject lands was ‘Business/Technology Park’ in the draft Plan – however, the content of Ref. CDP/D/150 referred to an existing permission (Ref. No. PL11/47, as extended by EX16006) being unable to be completed in the event the proposed rezoning proceeded. The Doorley find themselves in a similar situation albeit at an earlier stage in the planning application process.

**CE Response:**

- a) Noted; in relation to the Distributor Route referenced in the submission; please note this has been addressed under Material MA273; whereby the Strategic Distributor Networks and Linkages Map has been included as a Material Alteration. The re-zoning of the lands cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).
- b) Noted.
- c) Noted. The re-zoning of the lands cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).

It is deemed that with appropriate, site specific screening, landscaping and separation distances the presence of Residential Land use side by side with Business / Technology will be acceptable. The Draft Development Plan has extensive standards that will alleviate concerns.

**DMS- 72, 73 & 74** of the Development Managements Standards, Chapter 13 all relate to **New Business and Technology Parks and Strategic Employment Zones**, for example see DMS -72 below:

<p><b>DMS-72 New Business and Technology Parks, and Strategic Employment Zones and Rhode Green Energy Park</b></p>	<p>Planning applications for new Business and Technology Parks and Strategic Employment Zones shall be brought forward in the context of a masterplan for the subject lands. The masterplan shall be consistent with the policies and objectives of the County Development Plan and shall include the following:</p> <ul style="list-style-type: none"> <li>• A Design Statement that ensures a strong visual presence for the park via high quality design and siting of buildings and which has regard to the sites location and neighbouring uses;</li> <li>• A comprehensive landscaping and boundary treatment plan for the overall site, with particular attention placed on boundaries facing public realm and roads;</li> <li>• A Green Infrastructure Plan which:             <ul style="list-style-type: none"> <li>➢ Retains and enhances where possible existing wetland habitat, hedgerow, woodlands, meadows and habitats of species protected under European legislation and National Wildlife Acts;</li> <li>➢ Creates new green infrastructure assets such as public open space, green roofs, green walls, tree planting and natural pollination zones;</li> </ul> </li> </ul>
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	<ul style="list-style-type: none"> <li>➤ Increases and improves ecological corridor connectivity and pedestrian and cycle path linkages with existing green infrastructure assets in the area. Where a large site adjoins a green corridor, a public open space or an area of high ecological value, any new public open space on the site should be contiguous to same to encourage visual continuity and expansion of biodiversity which can assist in expanding the green infrastructure network.</li> </ul>
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d) See C (above)

e) Noted. The selection of this site on first principles has a number of advantages that make it suitable for a SEZ and Business /Technology. These considerations include but are not confined to;

- Accessibility
  - proximity to Motorway Good road network
  - good road network
  - future proposed N52 bypass
- Proximity to Hospital
- Proximity to IDA and other Business Parks
- Greenfield site over 100 acres
- Relatively small number of landholdings
- Prominent location with potential for a campus style layout
- Physical attributes of the site
  - No known environmental constraints / designations
  - No flooding concerns
  - Topography of the site favourable

In relation to Material Alteration MA266; the consideration of planning history (Ref. No. PL11/47, as extended by EX16006, was only part of the assessment process.

The amount of Business / Technology in other areas of Tullamore was also a consideration as was the nature and configuration of the subject site itself.

*The nature of the submission site in terms of its size, configuration and location, and also having regard to the permissions on site would be more appropriately zoned as Enterprise and Employment. It is advised to amend the zoning from Business / Technology Park to Enterprise and Employment as per the submission. (CE report March 2021).*

The re-zoning of the Doorley lands cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).

### 3.3.1.2 Clara

[Ref: CDP/MA/344](#)

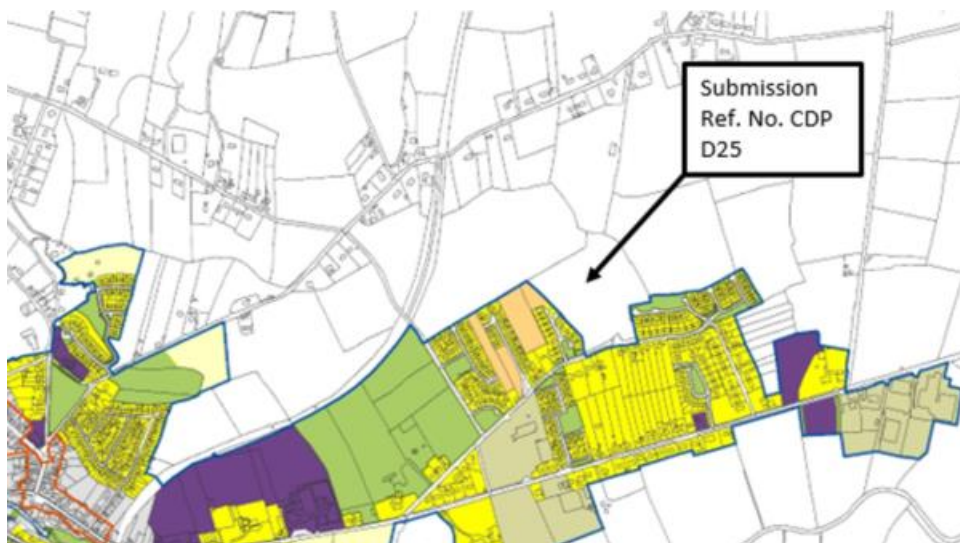
**Person / Body:**

**The Planning Partnership on behalf of West End Properties Ltd.**

#### **Summary of submissions / observations:**

This submission states that;

- a) The original submission made at Draft stage in relation to the subject lands at Kilcoursey. Clara (CDP/D/25)(see map below) were not properly understood and it did not seek a 'New Residential' zoning at all but a Specific Local Objective for 'serviced sites' to enable the planning authority to reduce pressure on isolated rural housing demands in the rural area directly in line with National Policy Objective 18b from the National Planning Framework: Project Ireland 2040; "Develop a programme for 'new homes in small towns and villages' with local authorities, public infrastructure agencies such as Irish Water and local communities to provide serviced sites with appropriate infrastructure to attract people to build their homes and live in small towns and villages." The presence of a 'Specific Local Objective' will restrict unnecessary and unwanted overdevelopment and ensure that the proposed development does not undermine the projections and objectives of the Development Plan Core Strategy and associated Settlement Hierarchy.

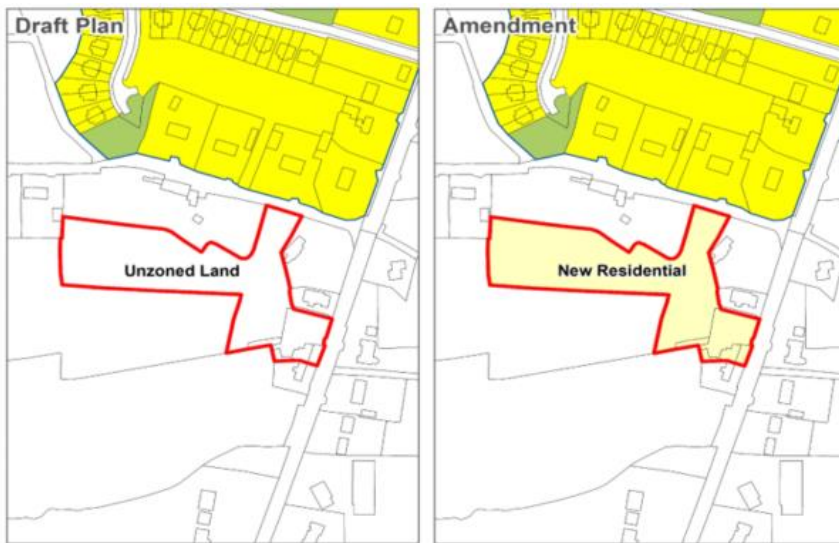


- b) Clara is significantly more strategically relevant than Banagher (its equal in Plan Hierarchy Status) and closer or if not equal to Edenderry in status as a self-sustaining town and seek the consideration of its more elevated status on the basis of its key midpoint location between the former ATM (Athlone-Tullamore-Mullingar Regional Gateway). It's Co. Westmeath equivalents, Moate and Kilbeggan are noted as designated Self Sustaining Growth Towns. Reference is made also to the towns location on a Strategic Rail Corridor (Dublin – Galway – Limerick).
- c) Proposed Material Alterations MA299 (New Residential) MA300 (Existing Residential) and MA301 (Existing Residential) do not outwardly offer such residential opportunities to present



in accordance with the NPF Objective 18b and the lands subject to this submission should be preferentially considered in addition and/or instead.

MA299:



MA300:



MA301:



The submission also contains an indicative site layout proposal for the subject site at Kilcoursey showing 24 individual sites.

#### CE Response:

No change proposed.

- a) Notwithstanding that Section 12(10) (c) of the Planning and Development Act 2000 (as amended) does not allow for a significant modification to a material alteration of a County Development Plan that is not minor in nature such as proposed by this submission, I confirm the nature of the designation sought in the submission submitted to the Draft County Development Plan was understood. The type of residential development sought on this site (24 serviced sites) would;
- result in population growth for the town significantly in excess of that allocated for Clara in the Core Strategy for the county in Chapter 2 of the Draft Plan;
  - not support compact growth having regard to the sites peripheral location as there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the development plan, consistent with NSO 1 and RSO 2; and
  - Would constitute undesirable urban sprawl having regard to the sites peripheral location.

It is not considered in the interests of proper planning and development to include a Specific Local Objective for 'serviced sites' separate to a 'New Residential' zoning as all land with the potential to be used for Residential purposes within the plan boundary of a town is provided for under zonings such as 'New Residential', 'Town Centre' or 'Existing Residential' (in limited circumstances such as small scale infill development), the expected residential yield of which over the plan period is required to comply with the growth parameters set out in the Core Strategy in the Draft Plan.

In addition, I do not consider that Objective 18b from the NPF is applicable to Clara due to its settlement typology as a 'Town' in the Core Strategy Table in Chapter 2 of the Draft Plan but rather to other settlements with 'Smaller Towns' and 'Villages' typologies in the Core Strategy Table.

- b) The typology of all settlements in the Core Strategy Table in Chapter 2 of the Draft Plan has taken cognisance of the;
- Guidance contained in Table 4.3 'Settlement Typologies and Policy Responses' along with the key criteria, data and indicators as outlined in Appendix A 'Asset Based Criteria and Settlement Profiles' from the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Authority 2019-31;
  - Socio economic profiles of settlements as outlined in the Town Plans in Volume 2 of the Draft Plan;
  - Populations of respective towns in the county.
- c) The proposed Material Alterations MA300 and MA301 simply updates the zoning map for the town to reflect developments as they exist on the ground.

Material Alteration MA299 was passed by the members against the advice contained in the Chief Executive's Report on submissions received to the Draft Plan (See Submission Ref. CDP/D/57, pages 116-117). It is noted that the Office of the Planning Regulator has requested in their submission CDP/MA/994 that this site not be zoned 'New Residential' taking into account the principle of compact growth, and accordingly it is recommended that that particular site not be zoned 'New Residential' in the Development Plan.

### 3.3.2 Villages

#### 3.3.2.1 Kinnitty

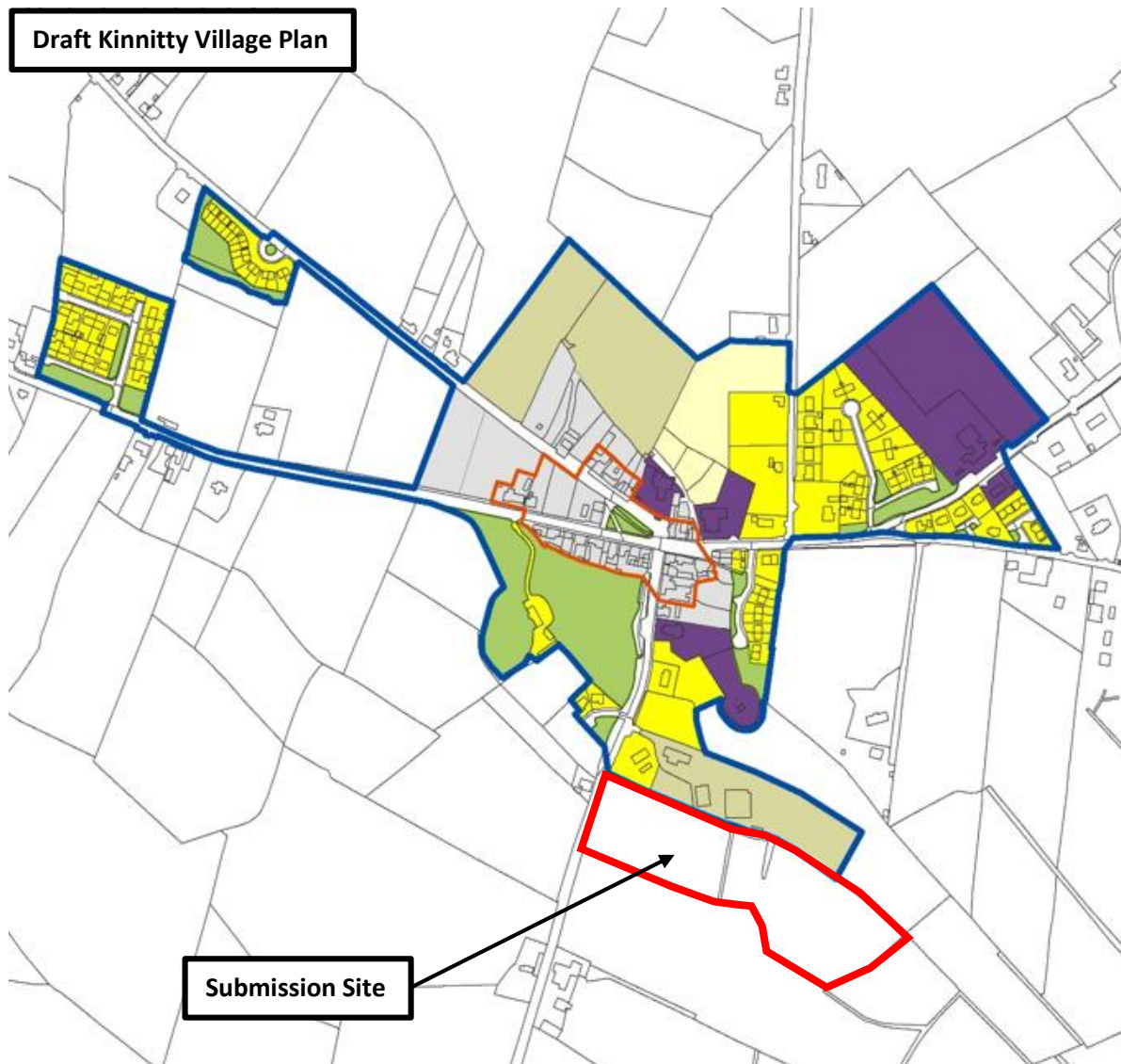
[Ref: CDP/MA/1467](#)

**Person / Body:**

**Michael O'Meara on behalf of James Corrigan**

#### **Summary of submissions / observations:**

That 3.28ha of land located to the south of Kinnitty Village be zoned 'New Residential' in the draft Plan. The land, identified on the draft Kinnitty Village Plan below, is not zoned in the draft Plan.



#### **CE Response:**

The submission request cannot be considered at this stage of the plan making process because it does not relate to one of the proposed material alterations, as required under Section 12(7) of the Planning and Development Act 2000 (as amended).

### 3.3.3 Sráids

#### 3.3.3.1 Rahan

[Ref: CDP/MA/1463](#)

**Person / Body:**

**Carol Nolan TD**

**Summary of submissions / observations:**

The submission supports Proposed Material Alteration MA404, which proposes that Rahan be changed from a 'Sráid' to a 'Village' under the county settlement hierarchy.

The submission notes that Rahan has a number of important amenities very similar to other settlements already classified as villages, including a primary school, a housing estate, a community centre and a GAA facility.

The submission also notes the historic association of the village with the Monastic Site and the tourism potential associated with the Grand Canal Greenway.

**CE Response:**

Support of Proposed Material Alteration MA404 is noted.

## 4 Summary of Office of the Planning Regulator Submission (CDP/MA/994)

This section examines the submission received by the Office of the Planning Regulator (OPR) by summarising the points raised and addressing them through the CE Responses.

[Ref: CDP/MA/994](#)

**Person / Body:**

**OPR**

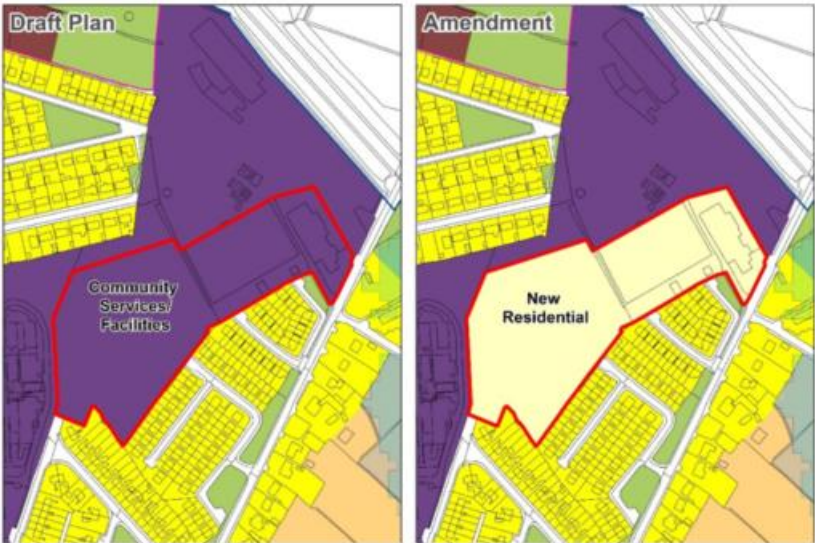
**Summary of submissions / observations:**

1. In response to MA19 (revised Core Strategy), the OPR requests the removal of either of the New Residential zonings under proposed amendment MA264 or proposed amendment MA265 for Tullamore, or both if proposed amendment MA267 is not retained, to ensure greater consistency with the core strategy requirements.

MA264 (Hand site):



MA265 (beside Hospital):

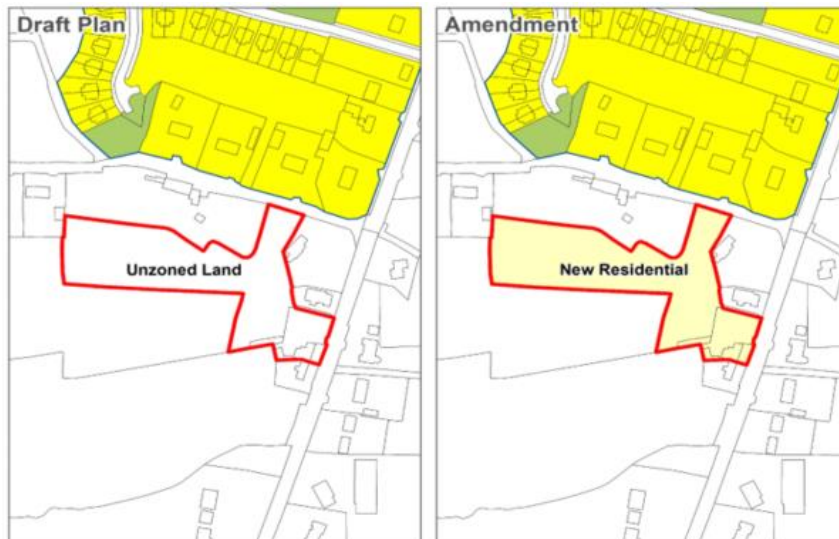


MA267 (part of former quarry site):



2. In response to MA19 (revised Core Strategy), the OPR requests the removal of the New Residential zoning under proposed amendment MA299 for Clara.

MA299:

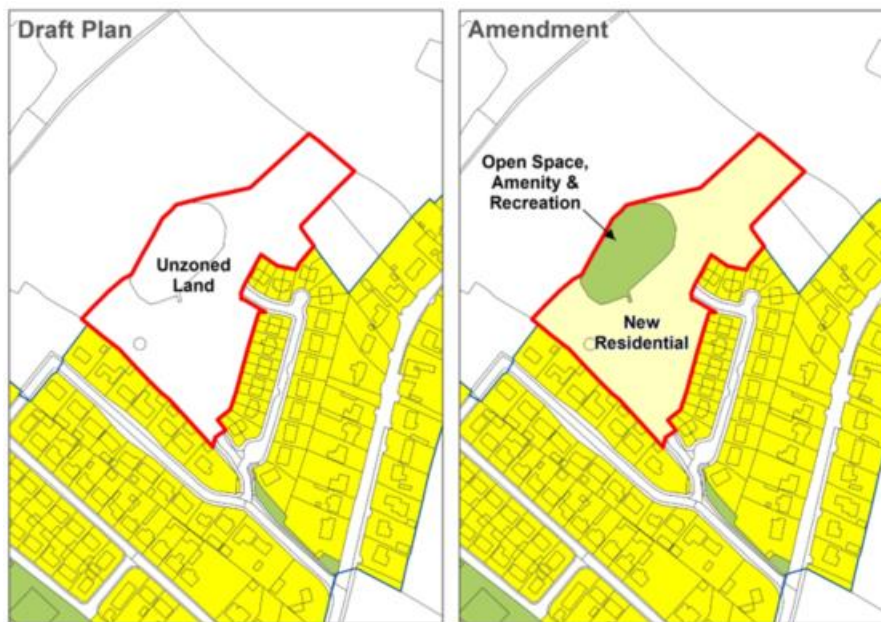


3. The OPR requests the removal of the New Residential zoning under proposed amendment MA330 for Ferbane which is inconsistent with compact growth and sequential development, in addition to the potential to affect Ferbane Bog SAC.

The Office notes that the Stage 2 Appropriate Assessment of the draft Plan recommends that the following text is integrated into the Plan at further modification stage in respect of proposed amendment MA330 Ferbane: *“Any proposal for development at these lands must demonstrate that it will not affect the nearby Ferbane Bog SAC, including as a result of changes to drainage patterns”*. In the event that the said proposed material alteration is adopted as part of the Plan, the planning authority must be satisfied that this zoning objective will not adversely affect the integrity of the SAC, having regard to the site’s conservation objectives, before making the plan.



MA330:



4. A number of additional material alterations also insert additional New Residential zonings for proposed for Villages which are not necessary to meet core strategy targets. However, it will be important that, in monitoring residential development in accordance with objective CSO-01 of the Plan (see below), the planning authority ensures that the level of housing permitted in any one village is not disproportionate and that the housing target for the Village tier is not exceeded.

**CSO-01** It is an objective of the Council to monitor and manage the delivery of residential development in County Offaly through the development management process to ensure it is in line with the Core Strategy. In this respect, the Planning Authority shall maintain a record of residential development permitted in **the open countryside, sráids and** individual settlements in order to ensure compliance with the population allocations defined by the Core Strategy Table. (MA23)

5. The OPR welcomes proposed material alteration MA24 of objective CSO-02 to commit to the variation or review of Edenderry and Portarlington Local Area Plans (LAP) to ensure consistency with core strategy within the period of the draft Plan. Having regard to the provisions of section 19(2B) of the Act concerning the time limit for ensuring consistency between existing LAPs and the development plan, the planning authority is advised to revisit the wording of proposed amendment MA24 of objective CSO-02 to ensure that any reference to timeframes for material alteration or review of the LAPs for Edenderry and the Joint LAP for Portarlington are not in conflict with the statutory provisions.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations **or reviews of Portarlington Joint Local Area Plan and Edenderry Local Area Plan during the plan period of the County Development Plan 2021-2027 if required**, to ensure consistency with the provisions of the Core Strategy. (MA24)

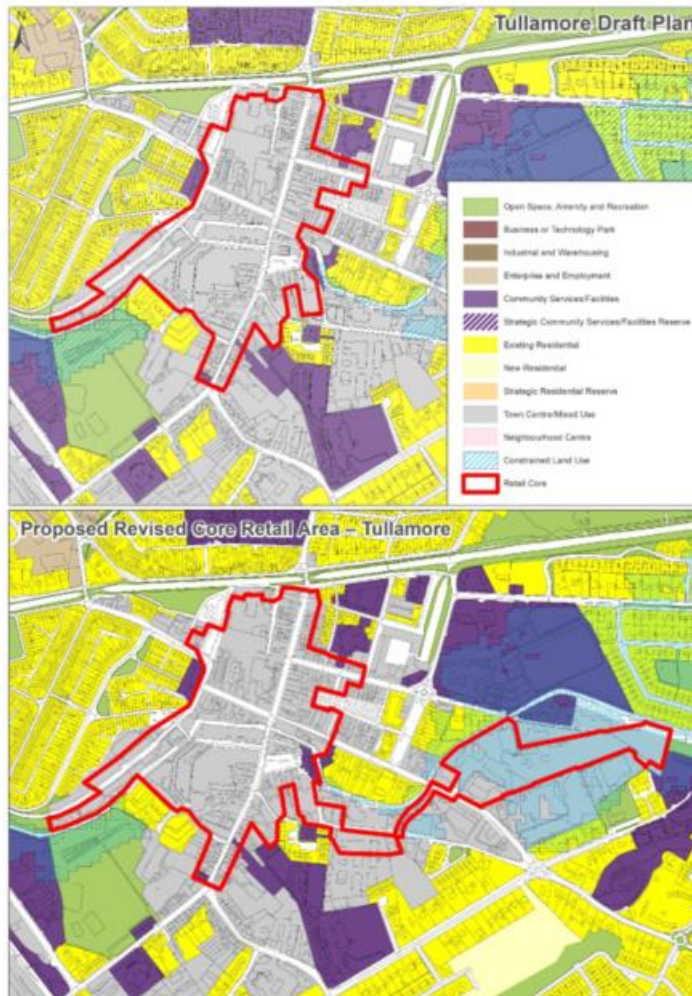
6. The settlement typologies have been re-ordered with Birr (and Crinkle) indicated as a lower order Self-Sustaining Settlement, and Edenderry and Portarlington indicated as higher order Self-Sustaining Growth Towns. This is inconsistent with the order of the settlement typology for the RSES (table 4.2). The Office assumes this is an error as no changes are proposed to table 2.4 Settlement Hierarchy, objective SSP-08 (Birr Self-Sustaining Growth Town) or SSP-09 (Self-Sustaining Towns Edenderry and Portarlington), and there is no reference to same in the Chief Executive's Report on Draft Consultation Stage (March, 2021). The Office would anticipate that this discrepancy would be corrected in the final version of the Plan. The Office notes that the Chief Executive's Report provided justification for the designation of Birr as a Self-Sustaining Growth Town and for Edenderry and Portarlington as Self Sustaining Towns in response to the submission of EMRA. This is considered reasonable in view of the settlement typologies in the RSES.
7. The Office is conscious of the higher designation assigned to Portarlington in the draft Laois County Development Plan and is concerned that the differing designations might have implications for the co-ordinated planning of the settlement between the two planning authorities. The Office would advise that, in the absence of application of the same settlement typology for Portarlington by the two planning authorities that the Plan should acknowledge the status assigned to Portarlington in the draft Laois County Development Plan and commit to supporting that designation in an appropriate manner.
8. Having regard to the Sustainable Residential Densities for Urban Areas, Cities, Towns and Villages, Guidelines for Planning Authorities (2009), issued under section 28, the planning authority is advised to omit the density table included under the core strategy table (proposed amendment MA19), and to amend the development management standard DMS-02 Density (proposed amendment MA232) to omit the fourth bullet point 'Densities per settlement tier as shown in Table 2.2 Core Strategy Table in Chapter 2 of this Plan'.
9. Having regard to the national and regional strategic outcomes for compact growth (NSO 1 and RSO 2), the planning authority is requested to remove proposed material alteration MA277 which extends the southern boundary for Crinkill.

MA277:



10. Having regard to the provisions of the Retail Planning Guidelines for Planning Authorities (2012), the planning authority is required to remove proposed material alteration MA274 extending the core retail area boundary for Tullamore as it is not supported by the required evidence-based approach, is considered to be inconsistent with the existing form and pattern of retail and services in the town, and has the potential to undermine the vitality and vibrancy of the existing town centre.

MA274:



11. The proposed amendment MA263 provides for an additional area of 3.65ha for 'Enterprise and Employment' zoning to the east of Tullamore, outside (east of) the N52 and the junction with L2025. The draft Plan, however, already includes extensive zonings for Employment and Enterprise, Industry and Warehousing (including 6.86ha zoned for the expansion of the adjacent Cappincur Industrial Estate) and 'Business / Technology', in addition to two Strategic Employment Zones. The Office is satisfied that these areas provide a substantial choice of locations for employment uses commensurate with Tullamore's role as a major employment centre.

The peripheral location of the land outside of the Bypass is also remote from the existing built-up area of the town and would result in car dependent development that is not consistent with a sequential approach to development, resulting in unnecessary sprawl on the edge of the town inconsistent with National Strategic Outcome 1 for compact growth.

Section 2.7 of the Spatial Planning and National Roads Guidelines (2021) (SPNRGs) require that planning authorities exercise particular care in their assessment of development plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges/junction on national roads. Due to the potential cumulative traffic impact of the site, taken with other proposed zoned lands and existing development in close proximity to the junction with the N52, Tullamore by-pass, the proposed amendment would be inconsistent with the requirement of the guidelines that investment in the capacity of national roads must be protected through appropriate policies and local planning in collaboration with TII.

Accordingly, the planning authority is required to remove proposed material alteration MA263.

MA263:



12. Section 4.1 of the OPR Submission refers to road design standards, Design Manual for Urban Roads and Streets (DEHGL and DTTS, 2013, updated 2019) (DMURS).

- i. Referring to Proposed Material Alteration MA230, and arising from Observation 3 of the OPR's submission on the draft Plan, the OPR welcomes MA230 which states the locational contexts to which the Design Manual for Urban Roads and Streets (DEHGL and DTTS, 2013, updated 2019) (DMURS) applies.
- ii. Referring to Proposed Material Alteration MA233, the OPR notes that development management standard DMS-03 - Layout only requires 'due regard' be had to DMURS.

The OPR advises the Planning Authority to revise Proposed Material Alteration MA233 and development standard DMS-03 - Layout to be consistent with DMURS Section 1.3 'Application of this Manual'.

- iii. The OPR notes that development management standard DMS-97 (referring to Proposed Material Alteration MA247) which sets the required sight distances for vehicular entrances onto the road network for the entire county, is not appropriate to urban areas where the 60kph or less applies and is inconsistent with DMURS. The application of such sight distances will act against the achievement of National Strategic Objective 1 (of the NPF) for compact growth and against the development of an urban environment that facilitates and encourages walking and cycling, with implications for achieving objectives for climate action as required under section 10(2)(n) of the Act.

The OPR advises the Planning Authority to amend DMS-97 to clarify that these standards apply only to locations other than those to where DMURS applies.

13. Section 4.2 of the OPR submission refers to Modal Share Targets covered by Proposed Material Alterations MA180 through to MA210.

The OPR notes that the material alterations include extensive proposed amendments MA180 to MA210 for chapter 8 Sustainable Transport Strategy in response to Recommendation 2 of the OPR's initial submission to the draft Plan. The OPR notes the introduction of:

- (MA183) baseline data for the county on mode share,
- (MA194) allows for a reduction car parking standards in town centres,
- (MA204) amending SMAO-02 to prepare Local Transport Plans (LTPs) in accordance with Area Based Transport Assessment Guidance of the NTA and TII and to supports consideration of LTPs for Birr, Edenderry and Portarlinton in addition to the Key Town of Tullamore,
- (MA205) includes an objective to specify baseline and target modal share for new/amended LAPs.

Arising from the planning authority's response to Recommendation 2 of the Office's submission on the draft Plan, which included setting out a strategic approach to the consideration of transport matters and the provision of detailed baseline data for mode share for the county and main settlements, and having regard to the requirements under section 10(2)(n) of the Act, **the planning authority is encouraged to set realistic targets for mode share for the end of the Plan period in consultation with the NTA**. It is noted that this is an observation rather than a recommendation.

The OPR also notes that the planning authority might also consider whether it is feasible at this stage of the plan preparation process to include reference in its sustainable transport strategy to the implementation of the Avoid-Shift-Improve (A-S-I) framework through the development plan, which may provide some additional direction to the planning authority to achieving more sustainable modal share targets.

14. The Office welcomes proposed amendment MA172 inserting an objective to examine the feasibility of identifying and mapping new public rights of way. In this regard the Office would direct the attention of the planning authority to 'Public Rights of Way and the Local Authority Development Plan' (OPR, 2021) for future reference.

MA172:

**It is an objective of the Council to examine the feasibility of identifying and mapping new Public Rights of Way in the recreational and amenity areas of the county in the context of emerging national guidance.**

15. The OPR requires the planning authority in accordance with the Specific Planning Policy Requirement for the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017)* to indicate how the Development Plan will contribute to realising overall national targets (under the *Climate Action Plan 2019*) on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts).

16. The Office requests that in finalising the Plan that the planning authority corrects the wording of proposed amendment MA53 of section 3.11.3 Strategic Flood Risk Management (last sentence of point 2) which incorrectly refers to 'constrained land uses designation' being applied only to 'undeveloped lands' when it applies, as is required under the Guidelines, to developed lands also. This is correctly stated in the SFRA accompanying the draft Plan.

MA53:

1. Areas at risk of flooding have been identified and there is a greater understanding of why flooding occurs in the general area.
  2. A precautionary approach has largely been employed to land use zoning to avoid directing development towards areas at risk of flooding. ~~Areas at risk of flooding as identified which are being put forward for land use zoning have been subject to assessment through the justification test.~~ Under the Plan, no highly or less vulnerable land uses are being proposed on undeveloped lands in Flood Zone A (high flood risk) and no highly vulnerable land uses are being proposed on undeveloped lands in Flood Zone B (moderate flood risk). This is because a Constrained Land Uses designation (see Section 12.6.1 and the SFRA that accompanies the Plan) is being applied through the Plan across all undeveloped lands within Flood Zones A and B.
  3. ~~Where particular areas identified as being liable to flood were examined as being strategically important for the consolidated and coherent growth of the county's settlements and zoned accordingly, a~~ A site-specific flood risk assessment will be required to accompany development proposals for these areas at risk of flooding (fluvial, pluvial or groundwater), even for developments deemed appropriate in principle to the particular Flood Zone and mitigation measures for site and building works will be required to be integrated.
  4. Policies and objectives have been devised in the SFRA for incorporation into this plan'.
17. Having regard to the commitment of the planning authority to securing and monitoring the implementation of the strategies, policies and objectives of the Plan, the Office would advise the planning authority to consider how chapter 14 Implementation and Monitoring could be amended to ensure that any monitoring is strategic in nature and practical to be carried out.
- In view of the constraints on resources it is unlikely to be practical for the planning authority to monitor the implementation of every policy or objective and therefore a more strategic approach to monitoring will be required to facilitate the planning authority in carrying out effective monitoring.
18. Regarding proposals for masterplans under the draft Plan, the Office would remind the planning authority of the importance of ensuring engagement with prescribed authorities as part of the plan making process and the potential implications for AA and SEA for non-statutory plans that determine spatial development of lands.
19. At the end of the process, your authority is required to notify this Office within five working days of the decision of the planning authority in relation to the draft Plan. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by this Office, then the Chief Executive must inform the Office and give reasons for this decision.

**CE Response:**

1. I recommend implementing proposed Material Alteration MA267 (Quarry site) from New residential in the draft plan to a split between Industrial and Warehousing and also Community Services Facilities zonings as per the previous CE Report March 2021 (page 484). Accordingly, in order to address the OPR’s request to remove the new residential zoning proposals from either MA264 (Hand site, 4.2 hectares) or MA265 (near hospital site, 4 hectares), I recommend the removal of the new residential zoning from the site the subject of MA265 for the reasons stated in relation to submission CDP/D129, page 54 of the previous CE Report, March 2021. It is noted that permission was granted 15<sup>th</sup> July 2021 on an adjoining 10-acre site called ‘Wellwood Health Park’ for a 244-bed nursing home, rehabilitation and convalescence unit. Although the site the subject of MA265 is constrained in part due to its configuration as set out in response to submission CDP/D/195, page 76 of the previous CE Report, March 2021, I consider that the site of MA265 is strategic and compatible with the hospital as a community services facilities zoning and lends itself for a use that would have synergies with the hospital and permitted Wellwood Health Park, and accordingly MA265 should not be implemented. In conclusion, I recommend that MA267 and MA264 should be implemented but that MA265 should not be implemented. Accordingly, the site of MA265 should be zoned in accordance with the draft Plan as follows:



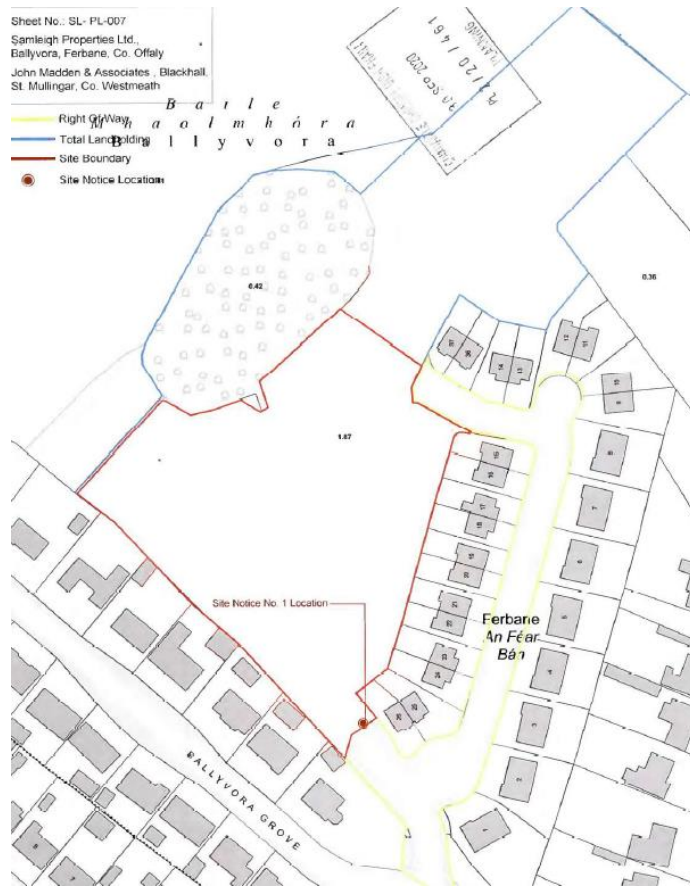
2. To comply with the request of the OPR, I recommend the removal of the new residential zoning as set out by MA299 to the south of Clara, which was proposed by motion. Accordingly, the development boundary of Clara should exclude the subject site and revert the land to being unzoned as per the draft Plan as set out below.



3. In response to the point made by the OPR regarding the planning authority being satisfied that the proposed material alteration will not adversely affect the integrity of the nearby Ferbane Bog SAC, the following is my assessment of the matter:

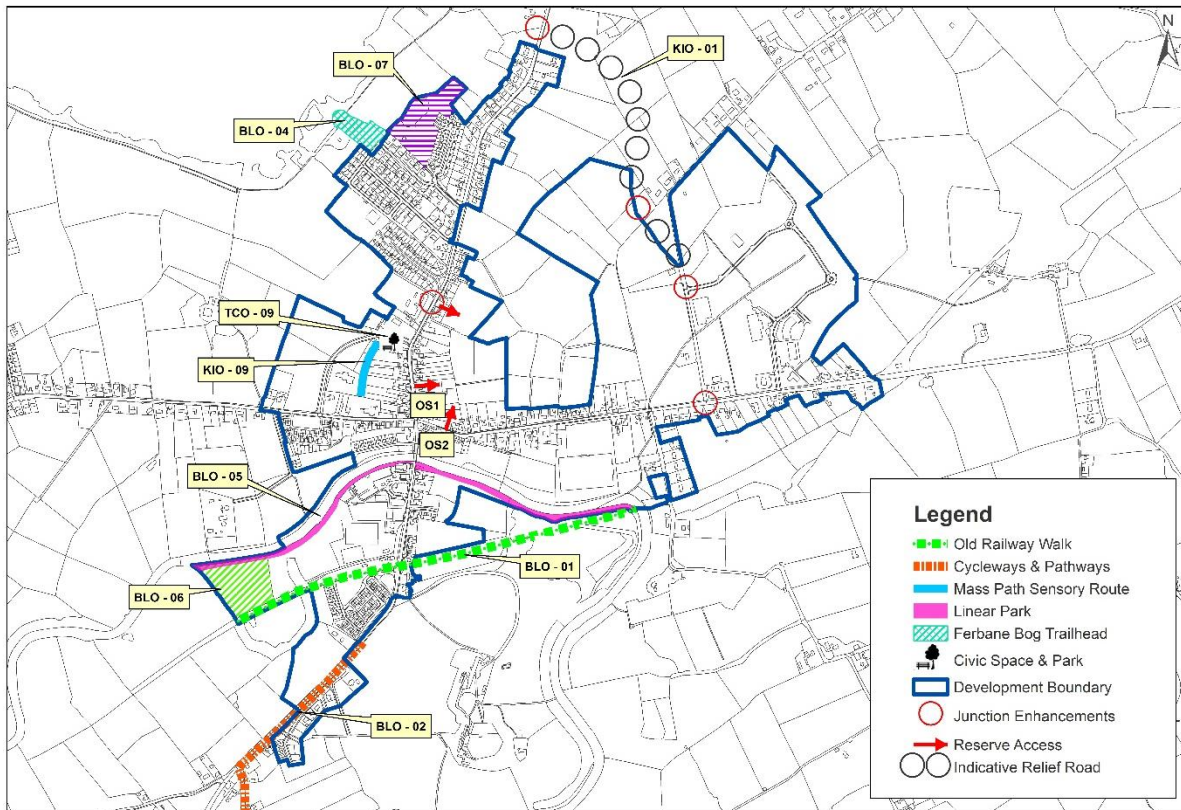
Part of the subject site was refused planning permission to Samleigh Properties on 4<sup>th</sup> June 2021 for 24 houses under Planning Ref PL20/461 based on failure of the applicant to demonstrate sufficient capacity and efficiency of water supply and waste water facilities to cater for the proposed development. It is noted in the planner's report that the proposed development was screened for Appropriate Assessment (AA) and determined not to have likely significant effects on the Ferbane Bog SAC. However, the planning application Ref PL20/461 related to the southern section only of the land subject to proposed material alteration MA330. See red boundaries of the application site below.





To comply with the request of the OPR, I recommend the insertion of the following objective (BLO-07) into the Ferbane Town Plan and the identification of the site and objective reference number as set out in the Objectives Map below, and the zoning of the site in accordance with MA330 as set out below also.

**BLO-07** – Any proposal for development at the lands to the north west of the town as shown in the Ferbane Town Objectives Map must demonstrate that it will not affect the nearby Ferbane Bog SAC, including as a result of changes to drainage patterns.



4. Noted. It is my intention that the housing target set for villages in the Core Strategy will not be surpassed during the plan period.
5. I note that the OPR request rewording of objective CSO-02 which was subject to MA24 in order to satisfy section 19(2B) of the Planning and Development Act 2000, as amended, which states:
 

*‘Where any objective of a local area plan is no longer consistent with the objectives of a development plan for the area, the planning authority shall as soon as may be (and in any event*

*not later than one year following the making of the development plan) amend the local area plan so that its objectives are consistent with the objectives of the development plan’.*

Accordingly, I recommend further amendment of CSO-02 as follows:

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

6. The OPR identified a discrepancy in some places where the titles ‘Self Sustaining Town’ and ‘Self Sustaining Growth Town’ were mixed up. However, the correct titles were predominantly used. It is clear from the reading of the justifications in the CE Report, March 2021 that Birr (including Crinkill) is correctly proposed to be a Self-Sustaining Growth Town and that Portarlington and Edenderry are correctly proposed to be Self-Sustaining Towns. Any such errors will be corrected in the final Plan. It is noted that the OPR consider these descriptions reasonable.
7. A clear justification was provided in the CE Report, March 2021 for the designation of Portarlington as a Self-Sustaining Town. This was not raised as a problem by the OPR in the submission made to the draft Plan. A material alteration was not proposed to change its designation. The draft Offaly Plan was published prior to the draft Laois Plan.
8. I recommend the removal of the density table as set out in conjunction with the core strategy table under MA19 and to amend the development management standard DMS-02 Density (proposed amendment MA232) to omit the fourth bullet point ‘Densities per settlement tier as shown in Table 2.2 Core Strategy Table in Chapter 2 of this Plan’.

Table under MA19 to be omitted:

Settlement Typology	Average Density Levels
Key Town	35/ha
Self-Sustaining (Growth) Towns	30/ha
Towns	25/ha
Smaller Towns	20/ha
Villages	15/ha

MA232: omit 4<sup>th</sup> bullet point:

<b>DMS-02 Density</b>	<p>The appropriate residential density of a site shall be determined with reference to;</p> <ul style="list-style-type: none"> <li>• Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009) and the accompanying Urban Design Manual (2009);</li> <li>• Sustainable Urban Housing: Design Standards for New Apartments <b>2018 2020; and</b></li> <li>• Urban Development and Building Heights Guidelines 2018;</li> <li>• <b>Recommended maximum Densities per settlement tier as shown in Table 2.2 Core Strategy Table in Chapter 2 of this Plan; and</b></li> <li>• the prevailing scale and pattern of development in the area.</li> </ul>
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- 9. I recommend the removal of the proposed zonings at the lands subject to MA277 in Crinkill as requested by the OPR. Accordingly, the land should appear in the Plan as shown in the draft Plan as follows:



- 10. In accordance with the request from the OPR, I recommend the removal of the extension to the core retail area of Tullamore as shown in MA274 and its return to the boundary as set out in the draft Plan as follows:



11. I recommend the removal of the proposed zonings at the lands subject to MA263 in Tullamore as requested by the OPR. Accordingly, the land should appear in the Plan as shown in the draft Plan as follows:



12.

- (i) Noted. No further action required.
- (ii) It is recommended that DMS-03 Layout (Chapter 13 – Development Management Standards) be amended as follows to ensure consistency with the DMURS manual.

DMS-03 Layout	<p>The layout of a new residential development shall be designed to achieve the following;</p> <ul style="list-style-type: none"> <li>• A strong sense of identity and a sense of place;</li> <li>• Permeable layouts, with multiple connections to adjoining sites/estates for pedestrians and cyclists;</li> <li>• A good sense of enclosure;</li> <li>• Active frontage and supervised spaces;</li> <li>• <del>Due regard to</del> All new developments should be designed to comply with the Design Manual for Urban Roads and Streets, (2013 as updated in 2019 and the complementary publication ‘The Treatment of Transition Zones to Towns and Villages on National Roads’ by Transport Infrastructure Ireland in relation to the design and use of urban roads and streets; and</li> <li>• High quality green infrastructure provision and linkages.</li> </ul>
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- (iii) It is recommended that DMS-97 (Chapter 13 – Development Management Standards) be amended to include the following sentence: ‘*DMS-97 standards apply only to locations other than those to where DMURS applies.*’ It is therefore recommended that Proposed Material Alteration MA233 be amended as follows:

<p>DMS-97 Safe Sight Distances required for access onto National, Regional and Local Roads</p>	<p>The following safe sight distances, shall be provided from vehicular entrances on the road network;</p> <ul style="list-style-type: none"> <li>• Local Tertiary Roads: 60 metres;</li> <li>• Local Secondary Roads: 90 metres;</li> <li>• Local Primary Roads: 120 metres;</li> <li>• Regional Roads: 150 metres; and</li> <li>• National Roads: 230 metres.</li> </ul> <p>As set out by <del>the NRA Design Manual for Roads and Bridges as updated design standards detailed in TII publications</del>, sight distances shall be measured from a point 2.4 metres from the road edge at the proposed access to a point at the near edge of the approaching carriageway. The standard for local roads is at the discretion of the Planning Authority and may be reduced where it would not give rise to a specific traffic hazard.</p> <p><b>DMS-97 standards apply only to locations other than those to where DMURS applies.</b></p>
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13. Following consultation with the NTA, it was agreed that proposed Material Alteration MA206 be amended to address the concerns of the OPR.

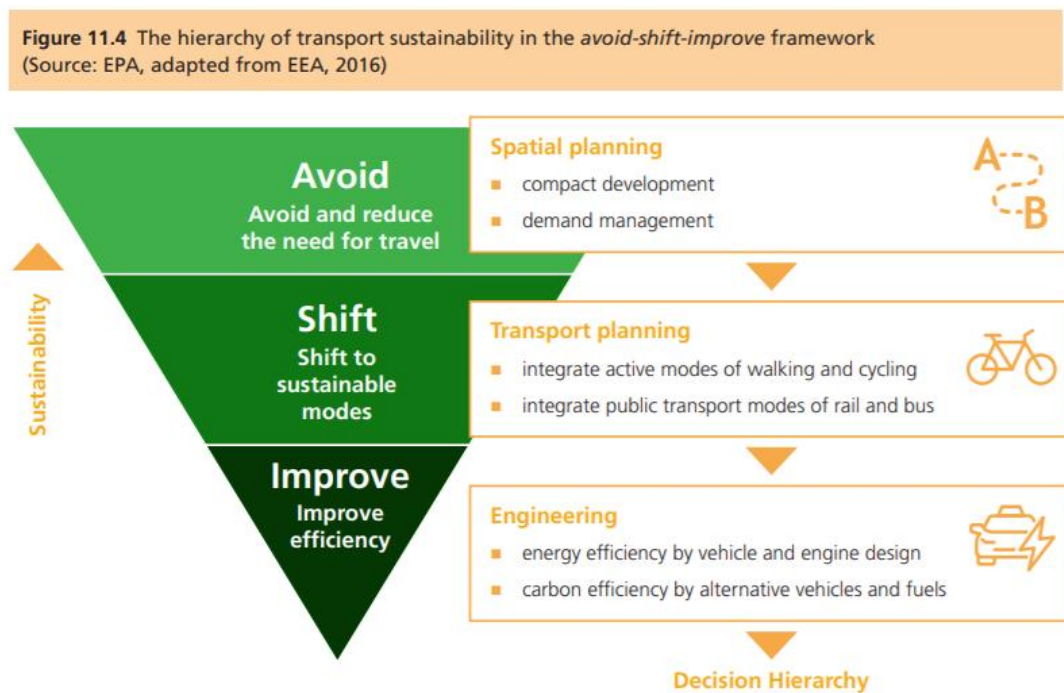
MA206:

It is an objective of the Council to set modal share targets within the county in cooperation with NTA, CARO, EMRA and other relevant stakeholders and in accordance with any relevant Guidelines that may come into effect.

I recommend that the objective proposed in MA206 be amended as follows (new text in red bold):

It is an objective of the Council **to improve the baseline modal share figures for the county that are set out in this Development Plan, in particular a reduction in the percentage usage of the car which shall be informed by measures set out in Appendix 1 of this Development Plan including the improvement of rural accessibility through rural transport systems, improvements in inter-settlement and intra- settlement accessibility and improvements advocated by Local Transport Plans, all in conjunction with setting ~~to set~~ modal share targets within the county in cooperation with NTA, CARO, EMRA and other relevant stakeholders and in accordance with any relevant Guidelines that may come into effect.**

In relation to the concept 'Avoid – Shift – Improve' as referred to in the OPR submission the following image explains its meaning:



Source: EPA document titled '*Ireland's Environment - An Integrated Assessment 2020*'

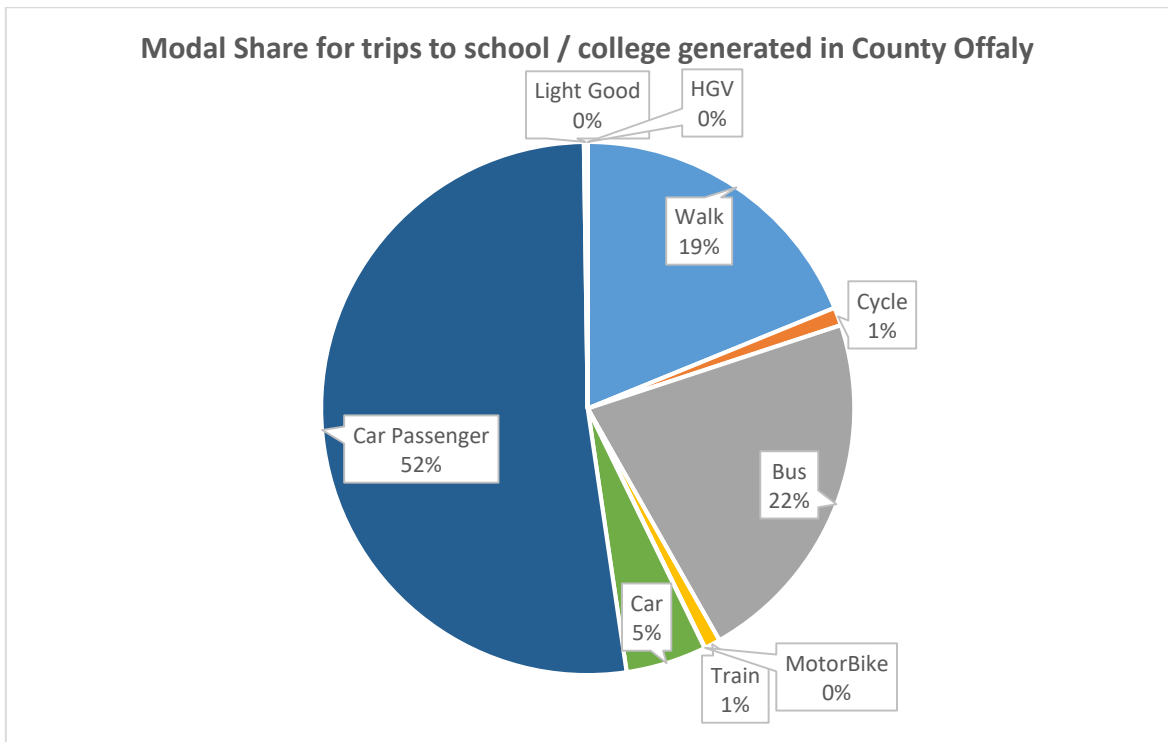
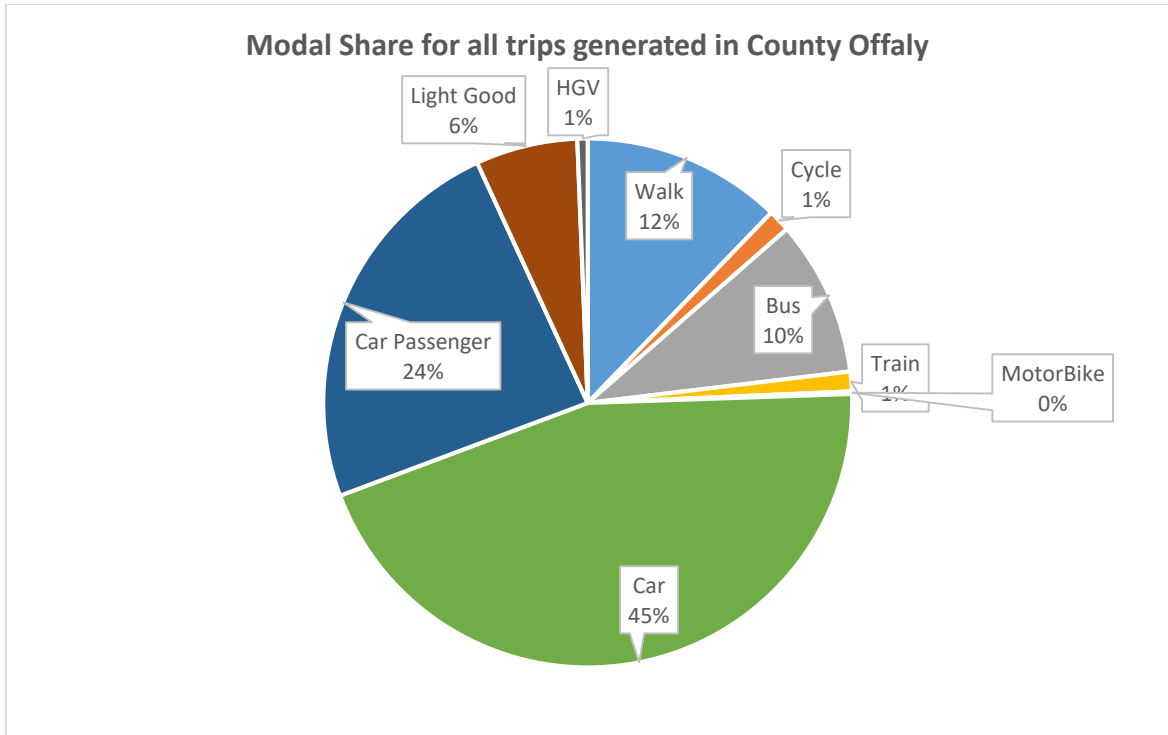
The above concepts are supported in many chapters in the draft Plan. However, I recommend referring to the phrase 'avoid – shift – improve' in the Plan by inserting the following red bold text into MA 183:

Proposed amendment to MA183:

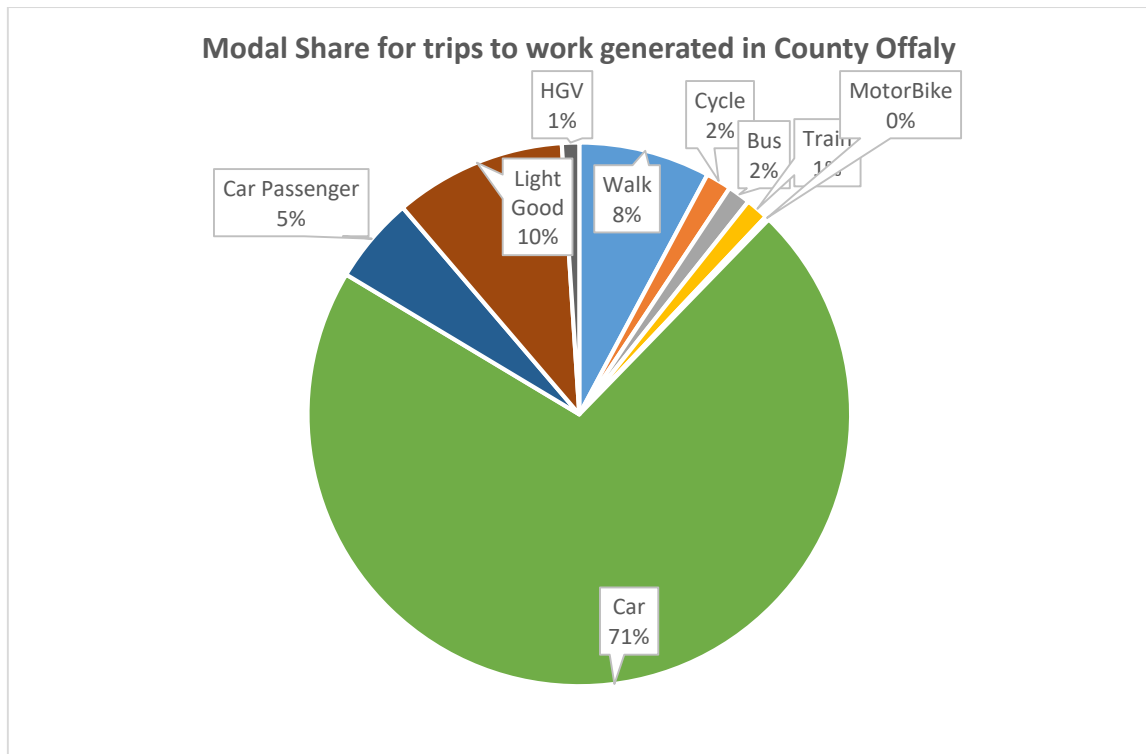
### **'Modal Share**

A summary of the travel patterns by all (only students and workers combined), students and workers in the County in 2016 is as follows based on the charts below.

- The car is the most popular mode of transport for students and workers combined with 69% of all trips made by car / car passenger (45% and 24% respectively)
- 57% of students are travelling to school by car / car passenger (5% and 52% respectively);
- The car is the dominant mode of transport for workers with 76% travelling to work by car / car passengers (71% and 5% respectively);
- There are a high proportion of students utilising available bus services at 22%;
- There are fewer workers travelling by bus (2%) than there are car sharing (5%);
- Travelling by train is low at 1% for each category namely students and workers;
- Only 1% trips made by students are by cycling. The figure is 2% for workers.

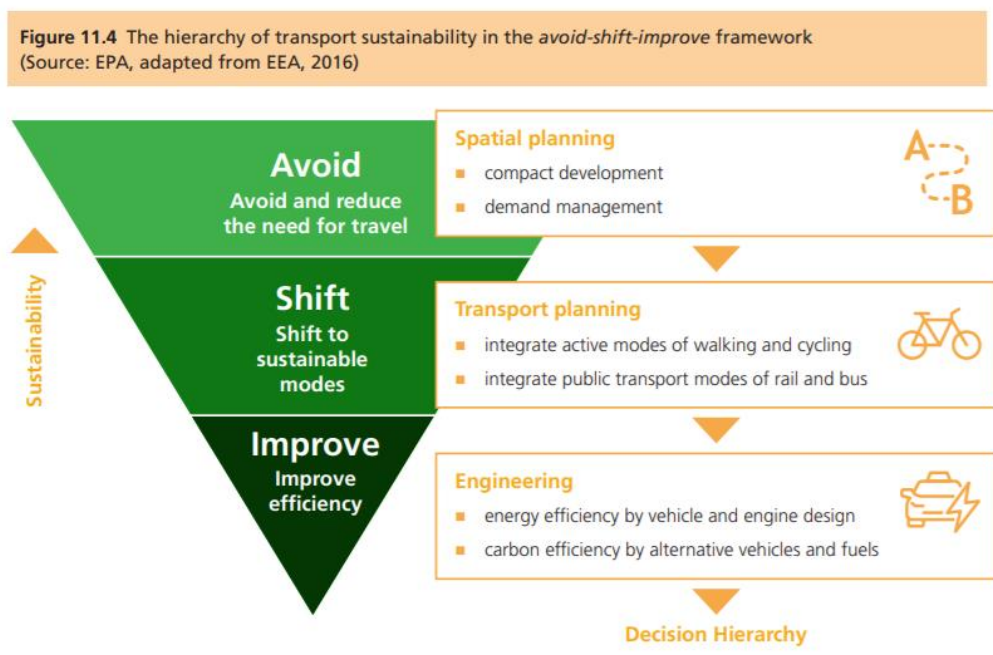






This data confirms and highlights the challenges facing the County with regard to promoting a modal shift away from the car. This Plan will strive to reduce the reliance on the private car by promoting and facilitating more sustainable modes of transport and supporting development in locations that would reduce the need to travel.

**The Council will, in improving the modal share shift away from the car, exercise an Avoid – Shift – Improve framework as set out hereunder:**



Source: EPA document titled 'Ireland's Environment - An Integrated Assessment 2020'

Appendix A of this Plan includes a list of policies, objectives and standards within many chapters of the Plan that strive to encourage a higher proportion of modal share for sustainable modes of travel such as walking, cycling, bus and rail.

Each town plan includes graphs depicting its baseline modal share figures with accompanying objectives tailored to its specific needs in an attempt to improve sustainable modal share’.

14. Noted. The planning authority is aware of the document ‘Public Rights of Way and the Local Authority Development Plan’ (OPR, 2021) and will use it in exercising the proposed objective as set out in MA172.

15. Noted.

a) It is proposed to add the following paragraph and table to Section 3.2 ‘Renewable Energy’ of Chapter 3 Climate Action and Energy of the Draft Plan; *“In accordance with the Specific Planning Policy Requirement for the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017), Table X demonstrates County Offaly’s contribution to realising overall national targets (under the Climate Action Plan 2019) on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts) during the Development Plan period. In setting these targets, the Council has had regard to wind farm and solar farm developments, permitted and undeveloped as well as those under construction, which have the potential to be delivered in the plan period. In addition, Table X sets a target for battery storage for the plan period.*

**Wind Energy Target by end of Plan Period: 466.3 MW**  
**Solar Energy Target by end of Plan Period: 145 MW**  
**Battery Storage Target by end of Plan Period: 445 MW**

b) On account of the proposed inclusion of the above table in Section 3.2 of the Draft Plan, it is proposed to make the following changes;

(i) Material Alteration MA76 in the Draft Plan relating to an objective to be included in Chapter 3 Climate Action and Energy to work with stakeholders with regard to carrying out an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change shall be omitted (the non-inclusion of MA76 is represented by strikethrough);

Reference Number	Section
MA76	<del>3.10</del>

**Insert:**

~~It is an objective of the Council to work with key stakeholders to carry out an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.~~

(ii) The following paragraph proposed in Material Alteration MA50 to be included in Section 3.2.6 of Chapter 3 Climate and Energy and Section 4 of the County Wind Energy Strategy should be deleted and replaced by the following;

~~Due to the absence of national guidance on how local authorities can set a target for wind energy generation within their functional area, it is not possible to set a specific target for renewable energy generation in the county during the plan period. However, as outlined in a specific objective in Chapter 4 Climate Action and Energy, the Council commits to working with key stakeholders in the carrying out of an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.~~

Table X in Section demonstrates County Offaly's contribution to realising overall national targets (under the *Climate Action Plan 2019*) on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource during the plan period.

16. I recommend making the correction to MA53 as requested by the OPR which will make the Plan consistent with the SFRA also, through the removal of the word 'undeveloped' below:

1. Areas at risk of flooding have been identified and there is a greater understanding of why flooding occurs in the general area.
2. A precautionary approach has largely been employed to land use zoning to avoid directing development towards areas at risk of flooding. ~~Areas at risk of flooding as identified which are being put forward for land use zoning have been subject to assessment through the justification test.~~ Under the Plan, no highly or less vulnerable land uses are being proposed on undeveloped lands in Flood Zone A (high flood risk) and no highly vulnerable land uses are being proposed on undeveloped lands in Flood Zone B (moderate flood risk). This is because a Constrained Land Uses designation (see Section 12.6.1 and the SFRA that accompanies the Plan) is being applied through the Plan across all undeveloped lands within Flood Zones A and B.
3. ~~Where particular areas identified as being liable to flood were examined as being strategically important for the consolidated and coherent growth of the county's settlements and zoned accordingly, a~~ A site-specific flood risk assessment will be required to accompany development proposals for these areas at risk of flooding (fluvial, pluvial or groundwater), even for developments deemed appropriate in principle to the particular Flood Zone and mitigation measures for site and building works will be required to be integrated.
4. Policies and objectives have been devised in the SFRA for incorporation into this plan'.

17. In response to the request by the OPR, I recommend the following wording be inserted into Chapter 14 Implementation and Monitoring:

'It is considered that the implementation of the plan would be best focused on anticipated / proposed key, strategic and practical outcomes of the plan.'

18. Noted.

19. Noted.

## 5 Protected Structures Submissions

Ref: CDP/MA/422

**Person / Body:**

**Atheer Al Mushhadani**

**Summary of submissions / observations:**

In respect of Proposed Material Alteration MA416, the submission requests that the property, namely 'Rosslyn', Ballycumber Road, Clara, is not placed on the Record of Protected Structures, with the following points made:

- a) Concerns that the value of the property may be impacted by the protected structure status.
- b) Possibility that the adjoining property may not carry out repairs due to protected structure status.
- c) Considers that protected structure status will prevent regular repairs and maintenance.
- d) Notes discrepancies in the description of the property as it appears in the 2004 record in the National Inventory of Architectural Heritage (NIAH).

**CE Response:**

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

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

- b) Items of routine repair and replacement may be carried out on protected structures using 'like-with-like', without the need for planning permission. As above, in terms of Built Heritage Investment Scheme (BHIS) and Historic Structures Fund.
- c) Items of routine repair and replacement may be carried out on protected structures using 'like-with-like', without the need for planning permission. As above, in terms of Built Heritage Investment Scheme (BHIS) and Historic Structures Fund.

A Section 57 Declaration may be provided for owners of protected structures, where minor alterations are proposed.

- d) It is recommended that the description of the property be amended as outlined below and that the Department of Housing, Local Government and Heritage, in respect of its remit for the National Inventory of Architectural Heritage (NIAH), be notified.

RPS Number	Structure	NIAH Ref	Rating	Description	Appraisal
12-35	Rosslyn, Ballycumber Rd, Erry (Armstrong), Clara	14802030	Regional	<p>Semi-detached four-bay single-storey house, built c.1880, <del>with later extension and</del> with porch to front.</p> <p>Set back from road.</p> <p>Shallow segmental felt roof with rendered chimneystacks with terracotta pots.</p> <p>Rendered walls with timber eaves boards.</p> <p>Replacement uPVC windows with painted sills.</p> <p>Square-headed door opening with replacement uPVC door.</p> <p><del>Timber battened gates to rear site.</del></p> <p>Site bounded to front by rendered plinth wall <del>with wrought-iron railings and gates.</del></p>	<p>One of a pair of experimental houses built by the Goodbody family as housing for their workforce. Over a period of a hundred years, an amount of worker's housing was constructed by the family but unlike the traditional pitched style utilised by them, these cottages have shallow segmental roofs covered with an experimental felt. This structure, along with its adjoining house, are unique in Clara and contribute positively to the streetscape.</p>

Rosslyn is listed on National Inventory of Architectural Heritage of Regional importance, number: 14802031. *This structure, along with its adjoining house, is unique in Clara and of technical interest, while containing many architectural features of note. Together they contribute positively to the streetscape.*

Both this property and the adjoining property, Grove Cottage, form part of the NIAH survey. Those structures which have been attributed a rating value of regional importance in the inventory are recommended by the Minister to the planning authority for inclusion.

It is recommended that the Proposed Material Alteration be adopted, and therefore that the property is included on the Record of Protected Structures, with minor amendment to the description, as outlined above, notified to the Department in due course.

## 6 Procedure Following CE's Report

Section 12(9) of the Planning Act states that the members of the planning authority shall complete their consideration of the proposed amendments and this CE Report not later than 6 weeks after the submission of the CE's report to the members. The CE report was issued to the members on 11<sup>th</sup> August 2021.

As set out in section 12 (10) (a) of the Planning Act, the members of the planning authority, shall by resolution, having considered this CE report, make the plan with or without the proposed amendment that would, if made, be a material alteration, except that where they decide to accept the amendment they may do so subject to any modifications to the amendments as they consider appropriate, which may include the making of a further modification to the alteration. A further modification to the alteration –

- May be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site,
- Shall not be made where it relates to:
  - (i) An increase in the area of land zoned for any purpose, or
  - (ii) An addition to or a deletion from the record of protected structures.

Where the planning authority makes a development plan, it shall publish notice of the making of the Plan in at least one newspaper circulating in the area.

As soon as may be after making an addition or deletion from the record of protected structures, the planning authority shall serve on the owner and on the occupier of the structure concerned a notice of the addition or deletion, including particulars.

A development plan made shall have effect 6 weeks from the day that it is made.

## Appendix A: Copy of Public Notice

Copy of the Public Notice published under section 12(7) of the Planning & Development Act 2000 (as amended).

### OFFALY COUNTY COUNCIL

### COMHAIRLE CONTAE UÍBH FHAILÍ

#### **NOTICE OF PROPOSED MATERIAL ALTERATIONS TO THE DRAFT OFFALY COUNTY DEVELOPMENT PLAN 2021-2027**

in accordance with:

**Planning and Development Act 2000, as amended**  
**Planning and Development Regulations 2001, as amended**  
**Planning and Development (Strategic Environment Assessment) Regulations 2004, as amended**

Notice is hereby given that the Members of Offaly County Council, having considered the Draft Offaly County Development Plan 2021-2027 and the Chief Executive's Report in respect of submissions received, have resolved in accordance with Sections 12(6) and 12(7) of the Planning and Development Act 2000, as amended, that the Draft Development Plan be amended. The proposed amendments constitute material alterations to the Draft Offaly County Development Plan 2021-2027.

In accordance with Section 12 of the Planning and Development Act 2000 (as amended), Offaly County Council has screened the Proposed Material Alterations and has determined that Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) are required with respect to certain Proposed Material Alterations.

#### **Submission Dates and Viewing Locations**

A copy of the proposed Material Alterations to the Draft Offaly County Development Plan 2021 -2027, the SEA and AA determinations in accordance with Section 12(7) (aa) of the Planning and Development Act 2000, as amended, and associated SEA and AA documents (including information on the likely significant effects on the environment of implementing the proposed Material Alterations that is included in the SEA Environmental Report on Proposed Material Alterations) will be available for public inspection from **Thursday 17<sup>th</sup> June to 4pm Friday 16<sup>th</sup> July 2021** (both dates inclusive) at the following locations during normal opening hours:

- Branch Libraries at Banagher, Birr, Clara, Daingean, Edenderry, Ferbane, Kilcormac, and Tullamore (during branch opening hours by appointment only where visits are limited to 30 minutes)

Visiting members of the public should be advised that the operation of Local Authority public counters and interaction with the public, in the context of ongoing COVID-19 public health requirements, is governed by Standard Operating Guidance (SOG) protocols applying in the local government sector. Please be advised that all visitors will be required to adhere to these protocols.

The proposed Material Alterations to the Draft Offaly County Development Plan 2021-2027 together with SEA and AA Determinations and Reports can also be viewed on Offaly County Council's website [www.offaly.ie/cdp2021-2027](http://www.offaly.ie/cdp2021-2027).

### **Submissions/Observations**

Written submissions or observations with respect to the Material Alterations to the Draft Offaly County Development Plan 2021-2027, the SEA and AA determinations in accordance with Section 12(7) (aa) of the Planning and Development Act 2000, as amended, and the associated SEA and AA documents (including information on the likely significant effects on the environment of implementing the proposed Material Alterations that is included in the SEA Environmental Report on Proposed Material Alterations) are invited from members of the public and other interested parties. Written submissions or observations must state the full name and address of the person or relevant body or agency making it, and should be clearly marked "*Proposed Material Alterations to the Draft Offaly County Development Plan 2021-2027*", and should quote the relevant material alteration reference number(s) (which commences with 'MA')

Please make your submission or observation by one medium only to avoid the duplication of submission reference numbers and to streamline the process i.e.:

- On-line at: <https://www.offaly.ie/cdp2021-2027> or,
- Hard Copy at: Forward Planning Section, Offaly County Council, Áras an Chontae, Charleville Road, Tullamore, County Offaly

Please note submissions or observations that are emailed **cannot** be considered and will be returned.

Submissions or observations shall be made between **Thursday, 17<sup>th</sup> June to Friday, 16<sup>th</sup> July 2021 (both dates inclusive). Please note submissions will be accepted up to 4pm on the 16<sup>th</sup> July 2021. Late submissions will not be accepted.**

Please include your name and address on a separate page to the content of your submission. This is to assist Offaly County Council in complying with the provisions of the Data Protection Act. Your assistance on these issues is appreciated. Please note that observations or submissions will be made public on the website.

All submissions or observations received during the above time period will be taken into consideration before the making of the Offaly County Development Plan 2021-2027.

Signed: Stephane Duclot  
Director of Services  
Planning Section  
17<sup>th</sup> June 2021



## Appendix B: List of Persons / Bodies who made submission / observation received within the stated timeframe

The following list of 2376 no. submissions / observations were received within the stated timeframe.

Ref. No.	Name of Person/Bodies
CDP/MA/01	Olive Maher
CDP/MA/02	Fiona Rigney
CDP/MA/03	Eddie Byrne
CDP/MA/04	Mary Connolly nee Lehane
CDP/MA/05	Peter Doolan
CDP/MA/06	Kitty Egan
CDP/MA/07	Sean Egan
CDP/MA/08	Oliver Egan
CDP/MA/09	Declan Egan
CDP/MA/10	Emma Egan
CDP/MA/11	Wendy Boyce
CDP/MA/12	Cian Egan
CDP/MA/13	Kieran Egan
CDP/MA/14	Mel McIntyre
CDP/MA/15	Michelle Corcoran
CDP/MA/16	Trevor Phelan
CDP/MA/17	Noel Murphy
CDP/MA/18	Ann Tierney
CDP/MA/19	Bobby Guilfoyle
CDP/MA/20	Irene Murphy
CDP/MA/21	Emily Guilfoyle
CDP/MA/22	Jack Guilfoyle
CDP/MA/23	Niall Murphy
CDP/MA/24	Pat Cornally
CDP/MA/25	Dylan O'Duffy
CDP/MA/26	Margaret Murphy
CDP/MA/27	Rian Murphy
CDP/MA/28	Nicole Lynch
CDP/MA/29	Rebecca Lynch
CDP/MA/30	Clive Devane
CDP/MA/31	Claire Murphy
CDP/MA/32	Chloe Mullen
CDP/MA/33	Mastas Rimeikis
CDP/MA/34	Mary Rosney
CDP/MA/35	Lorraine Rimeike
CDP/MA/36	Eoin Johnston
CDP/MA/37	Jack McEvoy
CDP/MA/38	Jacinta Halligan
CDP/MA/39	Tina Phelan
CDP/MA/40	Sean Halligan
CDP/MA/41	Molly Fennelly
CDP/MA/42	Damien Hickey
CDP/MA/43	Mary Egan

CDP/MA/44	John Carroll
CDP/MA/45	Edel Carroll
CDP/MA/46	Philip Keegan
CDP/MA/47	Sylvie Mulroy
CDP/MA/48	Eoin Mulroy
CDP/MA/49	Olivia Buckley
CDP/MA/50	Alvin Buckley
CDP/MA/51	Roy Buckley
CDP/MA/52	Jim Mulroy
CDP/MA/53	Mark Dolan
CDP/MA/54	M. Donoghue
CDP/MA/55	Mary B Hickey
CDP/MA/56	Martina Gaffey
CDP/MA/57	Mark Gaffey
CDP/MA/58	Niall Gaffey
CDP/MA/59	Hazel Gaffey
CDP/MA/60	Michael Gaffey
CDP/MA/61	Frank Bannon
CDP/MA/62	Kathleen Bannon
CDP/MA/63	Lorraine Walsh
CDP/MA/64	Donald Walsh
CDP/MA/65	Mary Walsh
CDP/MA/66	Ann Healy
CDP/MA/67	Bridget Healy
CDP/MA/68	Frank Healy
CDP/MA/69	Alan Kelly
CDP/MA/70	Pat J Kelly
CDP/MA/71	Aoibheann Murphy
CDP/MA/72	Martin Murphy
CDP/MA/73	Patrick Murphy
CDP/MA/74	EPA
CDP/MA/75	Stephen Higgins
CDP/MA/76	Maura Higgins
CDP/MA/77	Brendan Robbins
CDP/MA/78	Rose Cornally
CDP/MA/79	Patrick Kelly
CDP/MA/80	Liam Rigney
CDP/MA/81	Mary Halligan
CDP/MA/82	Mary Johnston
CDP/MA/83	James McEvoy
CDP/MA/84	Brenda Lynch
CDP/MA/85	Mary
CDP/MA/86	Sean Dunican
CDP/MA/87	Denis Rosney
CDP/MA/88	Elaine Gavin McCabe
CDP/MA/89	Eamon McCabe
CDP/MA/90	Kathryn Quinn
CDP/MA/91	Enda Buckley
CDP/MA/92	Deirdre Claffey
CDP/MA/93	Mary Condron

CDP/MA/94	Ray Scully
CDP/MA/95	Mick Cleary
CDP/MA/96	Joe Lambe
CDP/MA/97	Mick Scully
CDP/MA/98	Tom Dunne
CDP/MA/99	Anita Scully
CDP/MA/100	Helen Delaney
CDP/MA/101	Orla Daly
CDP/MA/102	Ann Creevy
CDP/MA/103	Joe Lowry
CDP/MA/104	Joseph Daly Lowry
CDP/MA/105	Emmet Kelly
CDP/MA/106	Margaret Sheeran
CDP/MA/107	William Sheeran
CDP/MA/108	John Seery
CDP/MA/109	Damien Seery
CDP/MA/110	Lourda Seery
CDP/MA/111	Mary Seery
CDP/MA/112	Jason Robbins
CDP/MA/113	Rose Mallon
CDP/MA/114	Donal Robbins
CDP/MA/115	Len Casey
CDP/MA/116	Christy Creevy
CDP/MA/117	Anne Molloy
CDP/MA/118	Bernie Johnson
CDP/MA/119	Helen Claffey
CDP/MA/120	John Claffey
CDP/MA/121	Paula Currams
CDP/MA/122	Dean Lowry
CDP/MA/123	Eamon Horan
CDP/MA/124	Christy Horan
CDP/MA/125	Liam Kelly
CDP/MA/126	Gerard Flanagan
CDP/MA/127	Leona Creevy
CDP/MA/128	Anne O'Meara
CDP/MA/129	Joe Stones
CDP/MA/130	Brendan Scully
CDP/MA/131	Ivor Scully
CDP/MA/132	Theresa Daly
CDP/MA/133	Kevin Delaney
CDP/MA/134	Kenneth Dunne
CDP/MA/135	Sandra Kelly
CDP/MA/136	Luciano Stiolla
CDP/MA/137	Caroline Seery
CDP/MA/138	Mary Scanlon
CDP/MA/139	Rachael Scanlon
CDP/MA/140	Peter Scanlon
CDP/MA/141	Teresa Ryan-Feehan
CDP/MA/142	Anthony Scanlon
CDP/MA/143	Glenn Halligan

CDP/MA/144	Catherine Mooney
CDP/MA/145	Tom Mooney
CDP/MA/146	Cian Clear
CDP/MA/147	Paul Bracken
CDP/MA/148	Geraldine Devery
CDP/MA/149	Noel Ryan
CDP/MA/150	Brendan Dunne Junior
CDP/MA/151	Thomas Murray
CDP/MA/152	PJ Kelly
CDP/MA/153	Catherine Reid
CDP/MA/154	Roisin Hannamy
CDP/MA/155	Anne Marie Ryan
CDP/MA/156	Lisa Duffy
CDP/MA/157	Siobhan Reynolds
CDP/MA/158	Kathleen Dunne
CDP/MA/159	Michael Kelly
CDP/MA/160	Sinead Dunne
CDP/MA/161	Alan Toughey
CDP/MA/162	Conal Hanamy
CDP/MA/163	Cian Hanamy
CDP/MA/164	John Hanamy
CDP/MA/165	Jane Conway
CDP/MA/166	Aisling Bracken
CDP/MA/167	Seamus Galvin
CDP/MA/168	Conor Galvin
CDP/MA/169	Suzanne McMullin
CDP/MA/170	Willie Vaugh
CDP/MA/171	John Kenny
CDP/MA/172	Kevin Kelly
CDP/MA/173	Ray Fleming
CDP/MA/174	Ashling Fleming
CDP/MA/175	Tracey Poland
CDP/MA/176	Conor Poland
CDP/MA/177	Shay Concannon
CDP/MA/178	Samantha Grennan
CDP/MA/179	Sharon Maloney
CDP/MA/180	Francis Gallagher
CDP/MA/181	Maria Hand
CDP/MA/182	Jeffery Murray
CDP/MA/183	Shauna Buckley
CDP/MA/184	Michael Clear
CDP/MA/185	Fiona Buckley
CDP/MA/186	Barbara Minnock
CDP/MA/187	Tanya Bracken Clear
CDP/MA/188	Anna Clear
CDP/MA/189	Liz Bracken
CDP/MA/190	Sinead Kelly
CDP/MA/191	Maggie Gilson
CDP/MA/192	Denise Hill
CDP/MA/193	Aaron Fleming

CDP/MA/194	Kian Fleming
CDP/MA/195	Pat Devery
CDP/MA/196	Rebecca Carey
CDP/MA/197	Caran Egan
CDP/MA/198	Ruth Keenan
CDP/MA/199	Breda Leonard
CDP/MA/200	Tony Campbell
CDP/MA/201	Brendan Regan
CDP/MA/202	Lisa Brereton
CDP/MA/203	Shannon Kenny
CDP/MA/204	WITHDRAWN
CDP/MA/205	Brendan Egan
CDP/MA/206	Tony Egan
CDP/MA/207	Barry Egan
CDP/MA/208	Una Mullin
CDP/MA/209	Conor Egan
CDP/MA/210	Irene Kelly
CDP/MA/211	Warren Walsh
CDP/MA/212	Nora Kenny
CDP/MA/213	Eilish Keyes
CDP/MA/214	Noel Coolahan
CDP/MA/215	Fergus Kelly
CDP/MA/216	Frank Kelly
CDP/MA/217	Yvonne Kelly
CDP/MA/218	Mary Kelly
CDP/MA/219	Maura Corcoran
CDP/MA/220	Dympna Rickard
CDP/MA/221	Emer Hayes
CDP/MA/222	Tom Dunican
CDP/MA/223	Mary Hayes
CDP/MA/224	Anthony Hayes
CDP/MA/225	Larry Dunican
CDP/MA/226	Helen Cornally
CDP/MA/227	Peter Cornally
CDP/MA/228	Lee Corcoran
CDP/MA/229	Lucy Roche
CDP/MA/230	Owen Hayes
CDP/MA/231	Marie Brennan
CDP/MA/232	Kathleen Guinan
CDP/MA/233	Catriona McCormick
CDP/MA/234	Yvonne Dunican
CDP/MA/235	Nikita Daly
CDP/MA/236	Brendan Monaghan
CDP/MA/237	Sophie Dunican
CDP/MA/238	Geraldine Mulligan
CDP/MA/239	Ruth Dunican
CDP/MA/240	Margaret Galvin
CDP/MA/241	Vera Corcoran
CDP/MA/242	Wayne Dunican
CDP/MA/243	Charles Daly

CDP/MA/244	Pat Mannion
CDP/MA/245	Vonn Mannion
CDP/MA/246	William Kennedy
CDP/MA/247	Mary Larkin
CDP/MA/248	Liz Dunican
CDP/MA/249	Michael Casey
CDP/MA/250	Amanda Cornally
CDP/MA/251	Laurence Dunican
CDP/MA/252	Lauren Dunican
CDP/MA/253	Sean Rickard
CDP/MA/254	Nora Scully
CDP/MA/255	Manchan Dunican
CDP/MA/256	Kieran Scully
CDP/MA/257	Jeff Daly
CDP/MA/258	John Harkin
CDP/MA/259	Danielle Harkin
CDP/MA/260	Tommy Guinan
CDP/MA/261	Aoife Hayes
CDP/MA/262	Sinead McPhillips
CDP/MA/263	Garreth McPhillips
CDP/MA/264	TII Transport Infrastructure Ireland
CDP/MA/265	Liz Daly
CDP/MA/266	Claire Keegan
CDP/MA/267	Mel McIntyre
CDP/MA/268	Seamus Coughlan
CDP/MA/269	Marie Lynch
CDP/MA/270	Damien Lynch
CDP/MA/271	Rory Lynch
CDP/MA/272	Dianne O'Brien
CDP/MA/273	Breda O'Brien
CDP/MA/274	Turlough O'Brien
CDP/MA/275	Claire O'Brien
CDP/MA/276	Brenda O'Brien
CDP/MA/277	Elma Kinahan
CDP/MA/278	Clodagh Flannery
CDP/MA/279	Catherine Kiveney
CDP/MA/280	Jeff Brennan
CDP/MA/281	Nicola Dowling
CDP/MA/282	Denise Brazil
CDP/MA/283	Aoife Lynam
CDP/MA/284	Enda Brazil
CDP/MA/285	Shane Halligan
CDP/MA/286	Rebecca Buckley
CDP/MA/287	Jennifer Coughlan
CDP/MA/288	Anne Dickinson
CDP/MA/289	Yvonne English
CDP/MA/290	Vincent Minnock
CDP/MA/291	Clare Dunican
CDP/MA/292	Thomas Dunican
CDP/MA/293	Denise Minnock

CDP/MA/294	Fiona Rigney
CDP/MA/295	Donnchadh Power
CDP/MA/296	Fiona Power
CDP/MA/297	Mary Power
CDP/MA/298	Diarmuid Power
CDP/MA/299	John Power
CDP/MA/300	James Power
CDP/MA/301	Maeve Power
CDP/MA/302	Dave Power
CDP/MA/303	Stephen Power
CDP/MA/304	Amy
CDP/MA/305	Michael Egan
CDP/MA/306	Liam Egan
CDP/MA/307	Rosaleen Gleeson
CDP/MA/308	Margaret Browne
CDP/MA/309	Michael Browne
CDP/MA/310	Elizabeth Browne
CDP/MA/311	Brendan Egan
CDP/MA/312	Ainne Finnegan
CDP/MA/313	Elizabeth Finnegan
CDP/MA/314	Kellie Finnegan
CDP/MA/315	Kathleen Finnegan
CDP/MA/316	Seamus Coughlan
CDP/MA/317	Jacinta Coughlan
CDP/MA/318	Thomas
CDP/MA/319	Olive Hanniffy
CDP/MA/320	Tracey McNamee
CDP/MA/321	Barry McNamee
CDP/MA/322	John Hanniffy
CDP/MA/323	Noleen Hamilton
CDP/MA/324	Sinead Rohan
CDP/MA/325	Jackie Egan
CDP/MA/326	Patricia Egan
CDP/MA/327	Emma Flynn
CDP/MA/328	Mary Fallon
CDP/MA/329	Lucy Fallon-Moran
CDP/MA/330	Jane Flaherty
CDP/MA/331	Lena Flaherty
CDP/MA/332	Aoife O'Looney
CDP/MA/333	Aisling Bracken
CDP/MA/334	Tom Gaffney
CDP/MA/335	Sr. Rosalen Berry
CDP/MA/336	Aine Moran
CDP/MA/337	Carol Slogan Kenny
CDP/MA/338	Darren Shaughnessy
CDP/MA/339	Cormac Moran
CDP/MA/340	Teresa Fallon
CDP/MA/341	Irish Water
CDP/MA/342	Tom McNamara
CDP/MA/343	Blaithin Wilson

CDP/MA/344	West End Properties
CDP/MA/345	Dolores Power
CDP/MA/346	Bridget O'Sullivan
CDP/MA/347	Eamon Maher
CDP/MA/348	Susan Moore
CDP/MA/349	James Brazil
CDP/MA/350	Martina Kenny
CDP/MA/351	Philip Kenny Junior
CDP/MA/352	Thomas Smollen
CDP/MA/353	Jean Spillane
CDP/MA/354	Kevin Rohan
CDP/MA/355	John Grace
CDP/MA/356	Cahol Mahon
CDP/MA/357	Rachel Ward
CDP/MA/358	Trina Daly
CDP/MA/359	Gary Daly
CDP/MA/360	Mark McCormack
CDP/MA/361	Chloe Daly
CDP/MA/362	Mairead Flynn
CDP/MA/363	Katriona Kenny
CDP/MA/364	Denis Brazil
CDP/MA/365	Marie Maher
CDP/MA/366	Philip Kenny
CDP/MA/367	Oliver Kenny
CDP/MA/368	Mary Grace
CDP/MA/369	Mary Gorman
CDP/MA/370	Stephen Kelly
CDP/MA/371	Conor McDermott
CDP/MA/372	Ciara Buckley
CDP/MA/373	Seamus Buckley
CDP/MA/374	Lily Farrell
CDP/MA/375	Seamus Farrell
CDP/MA/376	Grainne Dunican
CDP/MA/377	Brendan Flanagan
CDP/MA/378	Charles Brazil
CDP/MA/379	Mary Brazil
CDP/MA/380	Martin Kirwan
CDP/MA/381	Mary Kirwan
CDP/MA/382	Seamus Moore
CDP/MA/383	Liam Maher
CDP/MA/384	Jennifer Kelly
CDP/MA/385	Nuala Wynne
CDP/MA/386	Aine Maher
CDP/MA/387	Jessica Doyle
CDP/MA/388	Andrew Brazil
CDP/MA/389	Ann O'Keane
CDP/MA/390	Josephine Caufield
CDP/MA/391	Olive Maher
CDP/MA/392	Paul Cunningham
CDP/MA/393	Niamh Cunningham



CDP/MA/394	Aaron Maher
CDP/MA/395	Robyn Seery
CDP/MA/396	John Corcoran
CDP/MA/397	Sean Phelan
CDP/MA/398	Ciara Phelan
CDP/MA/399	John Phelan
CDP/MA/400	Patrick Maher
CDP/MA/401	Evie Maher
CDP/MA/402	Concepta Dolan
CDP/MA/403	Joe Cunningham
CDP/MA/404	Katie Cunningham
CDP/MA/405	Edel Cunningham
CDP/MA/406	Eileen Moore
CDP/MA/407	Agnes Egan
CDP/MA/408	Mary Cullinan
CDP/MA/409	Fintan Maher
CDP/MA/410	Stephen Spollen
CDP/MA/411	Tommy Corrigan
CDP/MA/412	John Kelly
CDP/MA/413	Mollie Keogh
CDP/MA/414	Sean Spollen
CDP/MA/415	Kieran Kenny
CDP/MA/416	Janet Claffey
CDP/MA/417	Noel Flynn
CDP/MA/418	Patrick Doyle
CDP/MA/419	Emer McCormack
CDP/MA/420	Vincent Hussey
CDP/MA/421	Daniel Giraudon
CDP/MA/422	Atheer Al Mushhadani
CDP/MA/423	Anne McCormack
CDP/MA/424	James Brazil
CDP/MA/425	Peter Moore
CDP/MA/426	Tony Griffin
CDP/MA/427	Deborah Moore
CDP/MA/428	William Holmes
CDP/MA/429	Loretta Wynne
CDP/MA/430	Caroline Reams
CDP/MA/431	Cahal Maher
CDP/MA/432	Patrick Claffey
CDP/MA/433	Margaret Brazil
CDP/MA/434	Principal Environmental Health Officer HSE
CDP/MA/435	Gillian Molyneaux
CDP/MA/436	Mary Buckley
CDP/MA/437	Sonya Tyrrel
CDP/MA/438	Patricia Tartaglia
CDP/MA/439	Michael Tartaglia
CDP/MA/440	Robert McNeill
CDP/MA/441	Mary McNeill
CDP/MA/442	Pat O'Reilly
CDP/MA/443	Sean Corcoran

CDP/MA/444	Megan O'Brien
CDP/MA/445	Therese Currams
CDP/MA/446	Mary Mulvihill
CDP/MA/447	Tara Mulvihill
CDP/MA/448	Rosie Horan
CDP/MA/449	Sheila Morgan
CDP/MA/450	Maureen Corcoran
CDP/MA/451	Dermot Horan
CDP/MA/452	Mary Horan
CDP/MA/453	John Horan
CDP/MA/454	Fiona Kelly
CDP/MA/455	Therese Cosgrove
CDP/MA/456	Tom Cosgrove
CDP/MA/457	Patrick Cosgrove
CDP/MA/458	Bernadette Cosgrove
CDP/MA/459	Monica Gleeson
CDP/MA/460	Lisa Grimes
CDP/MA/461	John Grimes
CDP/MA/462	Sinead Grimes
CDP/MA/463	Lorraine Grimes
CDP/MA/464	Liam Óg Grimes
CDP/MA/465	Aishling Grimes
CDP/MA/466	Aileen Grimes
CDP/MA/467	John Browne
CDP/MA/468	Sean Browne
CDP/MA/469	Colm Gleeson
CDP/MA/470	Joseph Gleeson
CDP/MA/471	David Mills
CDP/MA/472	Ella Spillane
CDP/MA/473	Laura Spillane
CDP/MA/474	Michael Spillane
CDP/MA/475	Eamon Spillane
CDP/MA/476	Michael Spillane
CDP/MA/477	John Hickey
CDP/MA/478	Eleanor Reynolds Hickey
CDP/MA/479	Karen Malone
CDP/MA/480	Katelyn Downes
CDP/MA/481	Hughie Downes
CDP/MA/482	Emily Downes
CDP/MA/483	Jennie Kennedy
CDP/MA/484	Sean Kennedy
CDP/MA/485	Rachel Meehan
CDP/MA/486	Darragh Gorman
CDP/MA/487	Liam Nolan
CDP/MA/488	Anne Nolan
CDP/MA/489	Tom Minnock
CDP/MA/490	Mary Minnock
CDP/MA/491	Lisa McKnight
CDP/MA/492	Liam McKnight
CDP/MA/493	Bernie Reilly

CDP/MA/494	Patrick Tyrrell
CDP/MA/495	Patrick Tyrrell
CDP/MA/496	Bridie Burke
CDP/MA/497	Edward Tyrrell
CDP/MA/498	Eve Downes
CDP/MA/499	Adam Cornally
CDP/MA/500	Alex Melnazch
CDP/MA/501	Josh Buckley
CDP/MA/502	Darren Buckley
CDP/MA/503	Eugene Moran
CDP/MA/504	Bernadine Moran
CDP/MA/505	Cait Caufield
CDP/MA/506	Paul Heneghan
CDP/MA/507	Thomas Caufield
CDP/MA/508	Emma Caufield
CDP/MA/509	Claire Caufield
CDP/MA/510	John Caufield
CDP/MA/511	David Caufield
CDP/MA/512	Sarah Caufield
CDP/MA/513	Pauline Phelan
CDP/MA/514	Tom Egan
CDP/MA/515	Mikey Dolan Egan
CDP/MA/516	Hilda Dolan
CDP/MA/517	Tom Hamilton
CDP/MA/518	Imelda Heneghan
CDP/MA/519	Emily Maher
CDP/MA/520	Keelin Maher
CDP/MA/521	Patsy Maher
CDP/MA/522	Peter McEvoy
CDP/MA/523	Brian McEvoy
CDP/MA/524	Diarmuid Daly
CDP/MA/525	Siobhan Delaney
CDP/MA/526	Bernie Delaney
CDP/MA/527	Bernie Delaney
CDP/MA/528	Kevin Delaney
CDP/MA/529	Bridie Birrane
CDP/MA/530	Ann McEvoy
CDP/MA/531	Casey Dunican
CDP/MA/532	Theresa Dunican
CDP/MA/533	Carol Flynn
CDP/MA/534	Joy Dunican
CDP/MA/535	Ava Flynn
CDP/MA/536	Carol Dunican
CDP/MA/537	Adam Greene
CDP/MA/538	Catherine Greene
CDP/MA/539	Damien Greene
CDP/MA/540	Colin Malone
CDP/MA/541	Emmett O'Brien
CDP/MA/542	Sheila McEvoy
CDP/MA/543	Ronan McGuire

CDP/MA/544	Aoife Grehan
CDP/MA/545	Clodagh O'Sullivan
CDP/MA/546	Niamh Kenny
CDP/MA/547	S Kelly
CDP/MA/548	Paul Egan
CDP/MA/549	Sarah Gaughan
CDP/MA/550	Fiachra Gaughan
CDP/MA/551	Charlene Hamilton
CDP/MA/552	Emmett Dooley
CDP/MA/553	Padraig Brazil
CDP/MA/554	Kathleen Brazil
CDP/MA/555	Sean Caufield
CDP/MA/556	Alma Egan
CDP/MA/557	Mary Dooley
CDP/MA/558	David Rohan
CDP/MA/559	Colette Revins
CDP/MA/560	Edel
CDP/MA/561	Della Rohan
CDP/MA/562	Keith Hamilton
CDP/MA/563	Annemarie and Ken Egan
CDP/MA/564	David Maher
CDP/MA/565	Margaret Doyle
CDP/MA/566	Mark Barrett
CDP/MA/567	Ken Doyle
CDP/MA/568	Liam Anderson
CDP/MA/569	Mary Brazil
CDP/MA/570	Tom Egan
CDP/MA/571	Caroline Egan
CDP/MA/572	John Doyle
CDP/MA/573	Kieran Caufield
CDP/MA/574	Mollie Pigott
CDP/MA/575	Hazel Boland
CDP/MA/576	Frank Connor
CDP/MA/577	Carol Nolan TD
CDP/MA/578	Mattie McGrath TD
CDP/MA/579	Kathleen Connor
CDP/MA/580	John Connor
CDP/MA/581	Jennifer Connor
CDP/MA/582	Colette Connor
CDP/MA/583	Ann Harkins
CDP/MA/584	Claire Harkins
CDP/MA/585	Valerie Connor Lowry
CDP/MA/586	Denis Kelly
CDP/MA/587	Aimee Kelly
CDP/MA/588	Melanie Tracey
CDP/MA/589	Fergus Kearney
CDP/MA/590	Dorothy Nolan
CDP/MA/591	Catherine Kenny
CDP/MA/592	Chloe Pigott
CDP/MA/593	Paul Pigott

CDP/MA/594	John Kelly
CDP/MA/595	Tim Bradley
CDP/MA/596	Sean Browne
CDP/MA/597	Dermot Creagh
CDP/MA/598	Pat Doolan
CDP/MA/599	Natasha Pigott
CDP/MA/600	Patrick Mahon
CDP/MA/601	Andrew Meacle
CDP/MA/602	Kieran Weir
CDP/MA/603	Tracy Pigott
CDP/MA/604	Kieran McEvoy
CDP/MA/605	Stephanie Bolger
CDP/MA/606	Kevin Devery
CDP/MA/607	Martina Daly
CDP/MA/608	Peter Daly
CDP/MA/609	Tommy Looby
CDP/MA/610	Jimmy Pior?
CDP/MA/611	Luke Grennan
CDP/MA/612	Hannah Grennan
CDP/MA/613	Maisey Grennan
CDP/MA/614	Ronan Guinan
CDP/MA/615	Christy Keyes
CDP/MA/616	Mary Keyes
CDP/MA/617	Mairead Keyes
CDP/MA/618	Michael Rohan
CDP/MA/619	Brigid Moore
CDP/MA/620	Deborah Moore
CDP/MA/621	Dolores Brazil
CDP/MA/622	Noel Brazil
CDP/MA/623	Sinead Kenny
CDP/MA/624	Shane Smyth
CDP/MA/625	K K Kenny
CDP/MA/626	Sandra Cullinan
CDP/MA/627	J P Kelly
CDP/MA/628	Madeline Smyth
CDP/MA/629	Noel Sheridan
CDP/MA/630	John Smyth
CDP/MA/631	Maria Egan
CDP/MA/632	Mary Kelly
CDP/MA/633	Karena Kelly
CDP/MA/634	Liam Cullinan
CDP/MA/635	Ken Casey
CDP/MA/636	Sean Cullinan
CDP/MA/637	Alison Sheridan
CDP/MA/638	Jack Cullinan
CDP/MA/639	Pat Moore
CDP/MA/640	Mairead Hennessy
CDP/MA/641	Siobhan Buckley
CDP/MA/642	Bridget Spollen
CDP/MA/643	Breda Kenny

CDP/MA/644	Oisin Kenny
CDP/MA/645	Paul Dunican
CDP/MA/646	Lena Sheridan
CDP/MA/647	Carmel Dunican
CDP/MA/648	Angela Kelly
CDP/MA/649	Sheila Corcoran
CDP/MA/650	Ursula Corcoran
CDP/MA/651	Bridie Corcoran
CDP/MA/652	Lisa Cantwell
CDP/MA/653	Lee Corcoran
CDP/MA/654	Clair Maloney
CDP/MA/655	Sarah Cantwell
CDP/MA/656	Gerry O'Connor
CDP/MA/657	James Hickey
CDP/MA/658	Darren Hickey
CDP/MA/659	James Whaley
CDP/MA/660	Erin Hickey
CDP/MA/661	Paul Coughlan
CDP/MA/662	Philip Buckley
CDP/MA/663	Edmund Healy
CDP/MA/664	Leagh Flannery
CDP/MA/665	Michelle Lawlor
CDP/MA/666	John Hickey
CDP/MA/667	Margaret Hickey
CDP/MA/668	Glenn Corcoran
CDP/MA/669	Ray Flannery
CDP/MA/670	Evan Bracken
CDP/MA/671	Darren Bracken
CDP/MA/672	Orla Corcoran
CDP/MA/673	Niamh Corcoran
CDP/MA/674	Kim Bracken
CDP/MA/675	Martha Devery
CDP/MA/676	Mary Corcoran
CDP/MA/677	Clare Murray
CDP/MA/678	Saoirse Egan
CDP/MA/679	Joseph Ryan
CDP/MA/680	Oisin Corcoran
CDP/MA/681	Helen Murray
CDP/MA/682	Lorraine Murray
CDP/MA/683	Vikki Gilchrist
CDP/MA/684	J Kearns
CDP/MA/685	Marie Fleming
CDP/MA/686	Rachel Hickey
CDP/MA/687	Marie Hickey
CDP/MA/688	Olive Bree
CDP/MA/689	Mary Bracken
CDP/MA/690	Michael Bracken
CDP/MA/691	Terence Norman
CDP/MA/692	Teresa Bracken
CDP/MA/693	Wayne Bracken

CDP/MA/694	Dervla Egan
CDP/MA/695	Paul Henson
CDP/MA/696	Karen Larkin
CDP/MA/697	Kieran Rigney
CDP/MA/698	Joe Murray
CDP/MA/699	Mick Dunican
CDP/MA/700	Jackie Egan
CDP/MA/701	Eugene Murray
CDP/MA/702	Kieran Egan
CDP/MA/703	Jack Jones
CDP/MA/704	Martin Larkin
CDP/MA/705	Kate Egan
CDP/MA/706	Seamus Fleming
CDP/MA/707	Padraig Corcoran
CDP/MA/708	Denis Corcoran
CDP/MA/709	Bridget Larkin
CDP/MA/710	Alan Gavin
CDP/MA/711	Robert Townsend
CDP/MA/712	Cathal Brazil
CDP/MA/713	Yvonne Corcoran
CDP/MA/714	Fiona Murray
CDP/MA/715	Eoin Corcoran
CDP/MA/716	Peter Egan
CDP/MA/717	Bosco Larkin
CDP/MA/718	Shane Larkin
CDP/MA/719	Office of Public Works
CDP/MA/720	Scott Hobbs Planning
CDP/MA/721	Scott Hobbs Planning
CDP/MA/722	Griffin Murray
CDP/MA/723	Stephen Ward Town Planning Consultants Ltd.
CDP/MA/724	Eirgrid PLC
CDP/MA/725	David Connolly
CDP/MA/726	Cronan Daly
CDP/MA/727	Mary Daly
CDP/MA/728	Brian Doherty
CDP/MA/729	Emer Doherty
CDP/MA/730	Regina Meacle
CDP/MA/731	James Grennan
CDP/MA/732	Delia Meacle
CDP/MA/733	Declan Leonard
CDP/MA/734	Caroline Larkin
CDP/MA/735	Alan Flanagan
CDP/MA/736	Nicola Larkin
CDP/MA/737	Brian Larkin
CDP/MA/738	Geraldine Kenna
CDP/MA/739	Stephen Quinn Jnr
CDP/MA/740	Amy Quinn
CDP/MA/741	Shane Monaghan
CDP/MA/742	Jim Kelly
CDP/MA/743	Elaine Kelly

CDP/MA/744	Rose Kelly
CDP/MA/745	Nancy Quinn
CDP/MA/746	Thomas Dunne
CDP/MA/747	Sylvia Dunne
CDP/MA/748	Declan Monaghan
CDP/MA/749	Madge Monaghan
CDP/MA/750	Simon Sheerin
CDP/MA/751	Danny Sheerin
CDP/MA/752	Ciaran Sheerin
CDP/MA/753	Paul Sheerin
CDP/MA/754	Johnny Brady
CDP/MA/755	Des Sheerin
CDP/MA/756	Kieran Sheerin
CDP/MA/757	Nigel Connell
CDP/MA/758	Tom Sheerin
CDP/MA/759	Joseph Keenan
CDP/MA/760	Johnny Devery
CDP/MA/761	Gerry Connaughton
CDP/MA/762	Robert Mizzel
CDP/MA/763	John Byrne
CDP/MA/764	Jimmy Keoghan
CDP/MA/765	Michael Shanley
CDP/MA/766	Con Finnerty
CDP/MA/767	Alicia Shanley
CDP/MA/768	Lorcan Shanley
CDP/MA/769	Denise Mitchell Gorry
CDP/MA/770	Rosemary Shanley
CDP/MA/771	Ava Shanley
CDP/MA/772	Liam Shanley
CDP/MA/773	Michael Kelly
CDP/MA/774	Vincent Kelly
CDP/MA/775	Aoife Coyne
CDP/MA/776	Thomas Guinan
CDP/MA/777	Marguerite Guinan
CDP/MA/778	Annette Hickey
CDP/MA/779	Aileen Shelly
CDP/MA/780	Thomas Rickard
CDP/MA/781	Frances Doyle
CDP/MA/782	Brid Cushen
CDP/MA/783	Catriona Rickard
CDP/MA/784	Chloe Egan
CDP/MA/785	Cormac Kirwan
CDP/MA/786	Kealan Egan
CDP/MA/787	Elma Kirwan
CDP/MA/788	Brigid O'Brien
CDP/MA/789	Olivia Dunican
CDP/MA/790	Claire Cornally
CDP/MA/791	Mike Collins
CDP/MA/792	Marie Collins
CDP/MA/793	Caroline Collins



CDP/MA/794	Michael Murphy
CDP/MA/795	Sean Fox
CDP/MA/796	Colin Fox
CDP/MA/797	Margaret Dempsey
CDP/MA/798	Irene Murphy
CDP/MA/799	William Ryan
CDP/MA/800	Nuala Flanagan
CDP/MA/801	Michael Walsh
CDP/MA/802	Mairead Seery
CDP/MA/803	Fiona Fox
CDP/MA/804	Mark Fox
CDP/MA/805	Rose Murphy
CDP/MA/806	Ronan McDonagh
CDP/MA/807	Paddy McDonagh
CDP/MA/808	Sean Dunne
CDP/MA/809	Dylan McDonagh
CDP/MA/810	Michael Heffernan
CDP/MA/811	Patrick Bracken
CDP/MA/812	Gerard Healy
CDP/MA/813	Pamela Daly
CDP/MA/814	Mark Dolan
CDP/MA/815	Veronica McCreedy
CDP/MA/816	Olive McCreedy
CDP/MA/817	Katie McCreedy
CDP/MA/818	Thomas McCreedy
CDP/MA/819	Jamie Lee Cooney
CDP/MA/820	Liam Delaney
CDP/MA/821	Elaine Bracken
CDP/MA/822	E Kelly
CDP/MA/823	Lindsey Dolan
CDP/MA/824	Lorraine McDonagh
CDP/MA/825	Breda Hill
CDP/MA/826	Rachel Bracken
CDP/MA/827	Brendan Hill
CDP/MA/828	Stephanie Hill
CDP/MA/829	Patrick Hill
CDP/MA/830	Agnes Keenan
CDP/MA/831	Alexey Feijoo Moscoso
CDP/MA/832	Mark Griffin
CDP/MA/833	John Gorman
CDP/MA/834	Gertie Dunican
CDP/MA/835	John Fogarty
CDP/MA/836	Niall Egan
CDP/MA/837	Christina Anderson
CDP/MA/838	Caroline Anderson
CDP/MA/839	Carol Anderson
CDP/MA/840	Phil Anderson
CDP/MA/841	Tommy Lucas
CDP/MA/842	Chris Lucas
CDP/MA/843	Oliver Flynn

CDP/MA/844	Emmet Molloy
CDP/MA/845	Willie Anderson
CDP/MA/846	Beirne Flynn
CDP/MA/847	Liam Madden
CDP/MA/848	Ann Madden
CDP/MA/849	Liam Lally
CDP/MA/850	Geraldine Maher
CDP/MA/851	Paul Maher
CDP/MA/852	Tony Concannon
CDP/MA/853	Alma Daly
CDP/MA/854	Noel Egan
CDP/MA/855	Declan Jordan
CDP/MA/856	Gail Delaney
CDP/MA/857	Elizabeth Jordan
CDP/MA/858	Tim Rohan
CDP/MA/859	Michael Flanagan
CDP/MA/860	Joe O'Brien
CDP/MA/861	WITHDRAWN
CDP/MA/862	Declan Kavanagh
CDP/MA/863	Mary Kavanagh
CDP/MA/864	Pauric Troy
CDP/MA/865	Frank Keenan
CDP/MA/866	Erin Maher
CDP/MA/867	Marian Kearns
CDP/MA/868	F Kearns
CDP/MA/869	Peg Maher
CDP/MA/870	Tom O'Malley
CDP/MA/871	Patrick J Dunne
CDP/MA/872	Margaret Dunne
CDP/MA/873	Iris Murray
CDP/MA/874	Karl Dunican
CDP/MA/875	Essie Dunican
CDP/MA/876	Olive Murray
CDP/MA/877	Giles Murray
CDP/MA/878	Jim Murray
CDP/MA/879	Florrie McLoughlin
CDP/MA/880	Catherine Murray
CDP/MA/881	Grace Kinahan
CDP/MA/882	Ollie Murray
CDP/MA/883	Shane Cotter
CDP/MA/884	Shane Flynn
CDP/MA/885	Patrick Doheny
CDP/MA/886	Alan Flynn
CDP/MA/887	Lorcan Halligan
CDP/MA/888	Ted Mulcahy
CDP/MA/889	David Mulcahy
CDP/MA/890	Ronan Mulcahy
CDP/MA/891	Justin Mulcahy
CDP/MA/892	Brian Moore
CDP/MA/893	Joe Kelly

CDP/MA/894	Orlaith Halligan
CDP/MA/895	Laura Doheny
CDP/MA/896	Ciaran Waters
CDP/MA/897	Maria Waters
CDP/MA/898	Mary Coughlan
CDP/MA/899	Ger Egan
CDP/MA/900	Kevin Waters
CDP/MA/901	Breda Flynn
CDP/MA/902	Pascal Flynn
CDP/MA/903	Liam P Mann
CDP/MA/904	Emmett Kelly
CDP/MA/905	Stephen Flynn
CDP/MA/906	Donal Moore
CDP/MA/907	Carragh Cotter
CDP/MA/908	Ian Coughlan
CDP/MA/909	Linda Coughlan
CDP/MA/910	Mark Coughlan
CDP/MA/911	Kevin Flynn
CDP/MA/912	Joe Regan
CDP/MA/913	Dympna Flynn
CDP/MA/914	Bernie Mann
CDP/MA/915	John Flynn
CDP/MA/916	Lily Regan
CDP/MA/917	Noel Flynn
CDP/MA/918	Sarah Cotter
CDP/MA/919	John O'Connor
CDP/MA/920	Maria Galvin
CDP/MA/921	Adrian Kelly
CDP/MA/922	Breege Kelly
CDP/MA/923	Brendan Scully
CDP/MA/924	John Egan and Danielle Lonergan
CDP/MA/925	Kim Dunne
CDP/MA/926	Shauna Daly
CDP/MA/927	Kathleen Dunican
CDP/MA/928	Lorraine Molloy
CDP/MA/929	Kathleen Buckley
CDP/MA/930	Shirley Walsh
CDP/MA/931	Peter Daly
CDP/MA/932	Mark Keenaghan
CDP/MA/933	Michael Molloy
CDP/MA/934	Brian Mooney
CDP/MA/935	Eamon Walsh
CDP/MA/936	Tommy Dolan
CDP/MA/937	Barry Murphy
CDP/MA/938	Martina Brennan
CDP/MA/939	Linda Mooney
CDP/MA/940	Sheila Walsh
CDP/MA/941	Kelly Walsh
CDP/MA/942	Shanna Earley
CDP/MA/943	Trevor Mooney

CDP/MA/944	Gary Farrell
CDP/MA/945	Desmond Baggot
CDP/MA/946	Patrick Finnerty
CDP/MA/947	Lauren Rudge
CDP/MA/948	Mandy Regan
CDP/MA/949	Miriam McEvoy
CDP/MA/950	Enda Heffernan
CDP/MA/951	Eamon Cooney
CDP/MA/952	Marian Corcoran
CDP/MA/953	Ann Marie Connor
CDP/MA/954	Peter Dunican
CDP/MA/955	Jim Heffernan
CDP/MA/956	Maria Dunican
CDP/MA/957	Martina Tierney
CDP/MA/958	Michael Daly
CDP/MA/959	Sonia Dunican
CDP/MA/960	Michael Daly
CDP/MA/961	Liz Dunican
CDP/MA/962	Michael McDonagh
CDP/MA/963	Ann Daly
CDP/MA/964	Rita McDonagh
CDP/MA/965	Majella Tracey
CDP/MA/966	Ciara Egan
CDP/MA/967	Cllr John Clendennen
CDP/MA/968	Clare Manning
CDP/MA/969	Irish Traveller Movement
CDP/MA/970	Debbie Carey
CDP/MA/971	Kathryn Kelly
CDP/MA/972	Martin Forde
CDP/MA/973	Eddie Forde
CDP/MA/974	Maura Higgins
CDP/MA/975	Tony Forde
CDP/MA/976	Paul English
CDP/MA/977	Celine Dunican
CDP/MA/978	Eamonn Cooney
CDP/MA/979	Caroline Cooney
CDP/MA/980	Ashley Devine
CDP/MA/981	Fergal Heffernan
CDP/MA/982	Sean Heffernan
CDP/MA/983	Mary McCarthy
CDP/MA/984	Martina O'Donnell
CDP/MA/985	Cathal O'Donnell
CDP/MA/986	Amanda Guinan
CDP/MA/987	Stephanie Costello
CDP/MA/988	Olive Delaney
CDP/MA/989	Jason Costello
CDP/MA/990	M Guinan
CDP/MA/991	Bridgie Lowry
CDP/MA/992	Lemanaghan Wind Farm Action Group
CDP/MA/993	Meath County Council

CDP/MA/994	Office of Planning Regulator
CDP/MA/995	ESB
CDP/MA/996	Doorley Family
CDP/MA/997	Bord na Móna
CDP/MA/998	Lemanaghan Graveyard & Heritage Site Group
CDP/MA/999	Not here not anywhere
CDP/MA/1000	Department of Education
CDP/MA/1001	National Transport Authority
CDP/MA/1002	Sean & Dora Corcoran
CDP/MA/1003	Ellen O'Carroll
CDP/MA/1004	Denise Casey
CDP/MA/1005	Simon Casey
CDP/MA/1006	Mella Casey
CDP/MA/1007	Evan Phelan
CDP/MA/1008	Oisin Phelan
CDP/MA/1009	Kathleen Buckley
CDP/MA/1010	Rita Buckley
CDP/MA/1011	Oliver Buckley
CDP/MA/1012	Linda McCormack
CDP/MA/1013	Terence Casey
CDP/MA/1014	James McCormack
CDP/MA/1015	Pete Keenan
CDP/MA/1016	Stephanie Casey
CDP/MA/1017	Kay Casey
CDP/MA/1018	Leonard Casey
CDP/MA/1019	Tom Halligan
CDP/MA/1020	Teresa Casey
CDP/MA/1021	Dan Halligan
CDP/MA/1022	Ben Halligan
CDP/MA/1023	Niamh Halligan
CDP/MA/1024	Grace Casey
CDP/MA/1025	John Casey
CDP/MA/1026	Suzanne Casey
CDP/MA/1027	Robbie Champ
CDP/MA/1028	Lucy Champ
CDP/MA/1029	Harry Champ
CDP/MA/1030	Ronan Halligan
CDP/MA/1031	Aoife Lynam
CDP/MA/1032	Brian Halligan
CDP/MA/1033	Emma Grennan
CDP/MA/1034	Joe Devery
CDP/MA/1035	Anne Devery
CDP/MA/1036	Marie Devery
CDP/MA/1037	Joseph Burke
CDP/MA/1038	Josephine Burke
CDP/MA/1039	Andrew Grennan
CDP/MA/1040	Joe & Josie Gallagher
CDP/MA/1041	Brendan McDermott
CDP/MA/1042	Joy Gallagher
CDP/MA/1043	Cathal Flynn

CDP/MA/1044	Ann Foran
CDP/MA/1045	Patrick Foran
CDP/MA/1046	John Devery
CDP/MA/1047	Jack Devery
CDP/MA/1048	Mary Devery
CDP/MA/1049	Damien Tierney
CDP/MA/1050	Deirdre Mitchell
CDP/MA/1051	Patricia Devery
CDP/MA/1052	John Meehan
CDP/MA/1053	Bridie Doolan
CDP/MA/1054	Breda Hill
CDP/MA/1055	Stephanie Hill
CDP/MA/1056	Winifred Doolan
CDP/MA/1057	Val
CDP/MA/1058	Deirdre Guinan
CDP/MA/1059	Pat Burke
CDP/MA/1060	Elizabeth Burke
CDP/MA/1061	Padraig Keyes
CDP/MA/1062	Peter Guinan
CDP/MA/1063	Teresa Ryan
CDP/MA/1064	Karla Ryan
CDP/MA/1065	Mel Ryan
CDP/MA/1066	Killian Ryan
CDP/MA/1067	Andrew Ross
CDP/MA/1068	Nigel Ross
CDP/MA/1069	Emily Ross
CDP/MA/1070	Mossy Kelly
CDP/MA/1071	Stephen Cassidy
CDP/MA/1072	Marie Cassidy
CDP/MA/1073	WITHDRAWN
CDP/MA/1074	Paul
CDP/MA/1075	Evie Halligan
CDP/MA/1076	Isla Halligan
CDP/MA/1077	Stephen Lonergan
CDP/MA/1078	Paulette Kenny
CDP/MA/1079	Aidan Egan
CDP/MA/1080	Charlie Walsh
CDP/MA/1081	Mairead Moore
CDP/MA/1082	Caroline Dolan
CDP/MA/1083	Liam Gleeson
CDP/MA/1084	David Sheils
CDP/MA/1085	Lillian Kenny
CDP/MA/1086	Aine Flaherty
CDP/MA/1087	David Flaherty
CDP/MA/1088	Edith Flaherty
CDP/MA/1089	Tom Murtagh
CDP/MA/1090	Marian Cornally
CDP/MA/1091	Noel Cornally
CDP/MA/1092	Tanya Cornally
CDP/MA/1093	Kenny Rasaki

CDP/MA/1094	Jamie Rigney
CDP/MA/1095	John Rigney
CDP/MA/1096	Edita Jurkeviaute
CDP/MA/1097	Clodagh Lowry
CDP/MA/1098	Marie Lowry
CDP/MA/1099	Joanne Lowry
CDP/MA/1100	Paul Bolger
CDP/MA/1101	Linda Egan
CDP/MA/1102	Alan O'Shea
CDP/MA/1103	Darragh Bolger
CDP/MA/1104	Gio Russo
CDP/MA/1105	Denis Hill
CDP/MA/1106	Denise Hill
CDP/MA/1107	Taiwo Adeniyi
CDP/MA/1108	Jamie Cleary
CDP/MA/1109	Catherine Kennedy
CDP/MA/1110	Joe Kennedy
CDP/MA/1111	Eoghan Jennings
CDP/MA/1112	Lavinia Molloy
CDP/MA/1113	Joleen O'Connor
CDP/MA/1114	Ted Cleary
CDP/MA/1115	Roisin Rizza
CDP/MA/1116	Frances Corcoran
CDP/MA/1117	M S Islam
CDP/MA/1118	Raffaella Russo
CDP/MA/1119	Moll Wynne
CDP/MA/1120	Alan O'Connor
CDP/MA/1121	Sean Buckley
CDP/MA/1122	Paddy O'Reilly
CDP/MA/1123	Megan Devine
CDP/MA/1124	Andrea Kidney
CDP/MA/1125	Demelza Fox
CDP/MA/1126	Michael Tierney
CDP/MA/1127	Kenny Raheem
CDP/MA/1128	Aideen Delaney
CDP/MA/1129	Edwina Delaney
CDP/MA/1130	Linda Cleary
CDP/MA/1131	Billy Wynne
CDP/MA/1132	Elvis Wynne
CDP/MA/1133	Mary K Buckley
CDP/MA/1134	Olive Tierney
CDP/MA/1135	Peter Cantwell
CDP/MA/1136	Geraldine Whelan
CDP/MA/1137	John Cullen
CDP/MA/1138	Patrick Cullen
CDP/MA/1139	Michael Cullen
CDP/MA/1140	Bernadette Cullen
CDP/MA/1141	Mary McEnery
CDP/MA/1142	Breann McGee
CDP/MA/1143	Margaret Cantwell

CDP/MA/1144	James Cantwell
CDP/MA/1145	Mary Rosney
CDP/MA/1146	Chelsea Tierney
CDP/MA/1147	Colin Delaney
CDP/MA/1148	Calvin Fox
CDP/MA/1149	Rachel Fox
CDP/MA/1150	Davyn Fox
CDP/MA/1151	Siobhan Egan
CDP/MA/1152	Nicholas Egan
CDP/MA/1153	Derek & Mary Storell
CDP/MA/1154	Fergal Daly
CDP/MA/1155	Aisling Rigney
CDP/MA/1156	WITHDRAWN
CDP/MA/1157	Jennifer Nagle
CDP/MA/1158	Sarah Nagle
CDP/MA/1159	Dale Nugent
CDP/MA/1160	Sinead McGrath
CDP/MA/1161	Cyril Egan
CDP/MA/1162	Shannon Mulpeter
CDP/MA/1163	Peggy Mulpeter
CDP/MA/1164	Mary Minnock
CDP/MA/1165	Brendan Minnock
CDP/MA/1166	Jennifer Crowley
CDP/MA/1167	Darren Bracken
CDP/MA/1168	Michael Egan
CDP/MA/1169	Marie Keyes
CDP/MA/1170	Gerard Keyes
CDP/MA/1171	Christy Willis
CDP/MA/1172	Victoria Galvin
CDP/MA/1173	Enda Carroll
CDP/MA/1174	Derek Coolahan
CDP/MA/1175	Elana Moran
CDP/MA/1176	Tasha Young
CDP/MA/1177	Edward Brady
CDP/MA/1178	Ted Brady
CDP/MA/1179	Paul Lloyd
CDP/MA/1180	Gwen Brady
CDP/MA/1181	Liam Byrne
CDP/MA/1182	Kian Mulpeter
CDP/MA/1183	Callum Mulpeter
CDP/MA/1184	Darragh Daly
CDP/MA/1185	D Daly
CDP/MA/1186	Aimee Fitzgerald
CDP/MA/1187	Dympna Fitzgerald
CDP/MA/1188	Luke Fitzgerald
CDP/MA/1189	Sarah Fitzgerald
CDP/MA/1190	Paul Fitzgerald
CDP/MA/1191	Michael Doyle
CDP/MA/1192	Anthony Phelan Jnr
CDP/MA/1193	Elaine Fleming



CDP/MA/1194	Ann Phelan
CDP/MA/1195	Peter Berry
CDP/MA/1196	Tara Phelan
CDP/MA/1197	Anthony Phelan
CDP/MA/1198	Tony & Phil Berry
CDP/MA/1199	Amy Fleming
CDP/MA/1200	Martin Cloonan
CDP/MA/1201	Dermot Recks
CDP/MA/1202	Emily Egan
CDP/MA/1203	Egan
CDP/MA/1204	Rose Cloonan
CDP/MA/1205	Neil Carroll
CDP/MA/1206	Jay Carroll
CDP/MA/1207	Lorraine Carroll
CDP/MA/1208	Aoife Hiney
CDP/MA/1209	Sean Keyes
CDP/MA/1210	Mary Egan
CDP/MA/1211	Dylan Kelly
CDP/MA/1212	Frank Egan
CDP/MA/1213	John Mulpeter
CDP/MA/1214	Lauren O'Sullivan
CDP/MA/1215	Francis Egan
CDP/MA/1216	James Egan
CDP/MA/1217	Margaret Jnr Kelly
CDP/MA/1218	Robert Brazil
CDP/MA/1219	Jean Kerrigan
CDP/MA/1220	Andre McQuaid
CDP/MA/1221	Vera Kelly
CDP/MA/1222	Linda Vaughn Ross
CDP/MA/1223	Elgan Ross
CDP/MA/1224	Charlie Ross
CDP/MA/1225	Brid Rigney
CDP/MA/1226	Michael Rigney
CDP/MA/1227	Lisa Quinn
CDP/MA/1228	Damien Dempsey
CDP/MA/1229	Roisin McArdle
CDP/MA/1230	Conor McNally
CDP/MA/1231	Michael Kelly
CDP/MA/1232	Joseph Kelly
CDP/MA/1233	Dara Rigney
CDP/MA/1234	Ciaran Rigney
CDP/MA/1235	Valerie Rigney
CDP/MA/1236	Ruth Rigney
CDP/MA/1237	Henry Rigney
CDP/MA/1238	Elise Rigney
CDP/MA/1239	Nicola Kilmartin
CDP/MA/1240	Connor Kilmartin
CDP/MA/1241	Nora Meaney
CDP/MA/1242	Deirdre Mooney
CDP/MA/1243	Trevor Delaney

CDP/MA/1244	Michael Garvey
CDP/MA/1245	Aisling Delaney
CDP/MA/1246	Karen Rigney
CDP/MA/1247	Paul Daly
CDP/MA/1248	Katie Kelly
CDP/MA/1249	Annita Daly
CDP/MA/1250	D Kelly
CDP/MA/1251	James Egan
CDP/MA/1252	Ronald Belnavis
CDP/MA/1253	Jean Egan
CDP/MA/1254	O Ptoninskis
CDP/MA/1255	Monica Belnauis
CDP/MA/1256	Yvonne Garvey
CDP/MA/1257	Ann Keena
CDP/MA/1258	Noel Keena
CDP/MA/1259	Helen Claffey
CDP/MA/1260	Cathal Scott
CDP/MA/1261	Basil Richard
CDP/MA/1262	William Keena
CDP/MA/1263	Louise Daly
CDP/MA/1264	Laura Keena
CDP/MA/1265	Adrian Egan
CDP/MA/1266	Christy Grennan
CDP/MA/1267	Patrick Scott
CDP/MA/1268	Ann Scott
CDP/MA/1269	Michael Dolan
CDP/MA/1270	Ciara Dolan
CDP/MA/1271	Tony Kerrigan
CDP/MA/1272	Liz Kerrigan
CDP/MA/1273	Pamela McQuaid
CDP/MA/1274	Paddy Galvin
CDP/MA/1275	Francis McLoughlin
CDP/MA/1276	Sean McQuillan
CDP/MA/1277	Nora Bracken
CDP/MA/1278	Ann Corcoran
CDP/MA/1279	Gerard Ennis
CDP/MA/1280	Killian Leonard
CDP/MA/1281	Ethna McLoughlin
CDP/MA/1282	Noel Bracken
CDP/MA/1283	Damien Cornally
CDP/MA/1284	Karl Daly
CDP/MA/1285	Mary Galvin
CDP/MA/1286	Sheila Guinan
CDP/MA/1287	Brigid Kelly
CDP/MA/1288	Conor Kelly
CDP/MA/1289	Ger Kelly
CDP/MA/1290	Kenneth Corcoran
CDP/MA/1291	Ciara Rigney
CDP/MA/1292	Patrick Corcoran
CDP/MA/1293	Emily Galvin

CDP/MA/1294	Seamus Corcoran
CDP/MA/1295	Katie O'Reilly
CDP/MA/1296	Colm O'Reilly
CDP/MA/1297	Breige Rosney
CDP/MA/1298	Kieran Rosney
CDP/MA/1299	Geraldine Gill
CDP/MA/1300	Edel Bolger
CDP/MA/1301	Malinda Carroll
CDP/MA/1302	James Rosney
CDP/MA/1303	Grainne Gill
CDP/MA/1304	James Rosney
CDP/MA/1305	Isobel Daly Rosney
CDP/MA/1306	Imelda Daly
CDP/MA/1307	Des Egan
CDP/MA/1308	Mairead Feighery
CDP/MA/1309	Aoife Egan
CDP/MA/1310	Dolores Egan
CDP/MA/1311	Desmond Egan
CDP/MA/1312	William Burgoyne
CDP/MA/1313	Sylvia Gill
CDP/MA/1314	Padraic Flood
CDP/MA/1315	Deirdre Byrne
CDP/MA/1316	Emma Quinn
CDP/MA/1317	Philip Turner
CDP/MA/1318	Laura Flood
CDP/MA/1319	Kevin J O'Dwyer
CDP/MA/1320	Breda Flaherty
CDP/MA/1321	Hannah Rigney
CDP/MA/1322	Nora Brady
CDP/MA/1323	Caroline Seery Boylan
CDP/MA/1324	David Seery
CDP/MA/1325	Mary Lowry
CDP/MA/1326	Kevin Lowry
CDP/MA/1327	Catherine Rudge
CDP/MA/1328	Paul Rudge
CDP/MA/1329	Karla Ryan
CDP/MA/1330	Bernadette Ryan Keegan
CDP/MA/1331	Sean Brazil
CDP/MA/1332	Kieran Rigney
CDP/MA/1333	Ailish Kelly
CDP/MA/1334	Shane Kelly
CDP/MA/1335	Rose Kelly
CDP/MA/1336	Emma Anderson
CDP/MA/1337	Daniel Hiney
CDP/MA/1338	Liam Anderson
CDP/MA/1339	Patricia Anderson
CDP/MA/1340	Kate Hiney
CDP/MA/1341	Camillus Hiney
CDP/MA/1342	Brian Anderson
CDP/MA/1343	Lisa Mulpeter

CDP/MA/1344	Ger Devery
CDP/MA/1345	S N
CDP/MA/1346	Tina Rafferty
CDP/MA/1347	Jason Rafferty
CDP/MA/1348	Michelle Seery
CDP/MA/1349	Barbara Bracken
CDP/MA/1350	Josephine Wren
CDP/MA/1351	Gary Murphy
CDP/MA/1352	Aine Brady
CDP/MA/1353	Ann Murphy
CDP/MA/1354	Aimee Kelly
CDP/MA/1355	Jack Tierney
CDP/MA/1356	Lar Tierney
CDP/MA/1357	David Tierney
CDP/MA/1358	Grainne Tierney
CDP/MA/1359	Niamh Dunican
CDP/MA/1360	Sinead Dolan
CDP/MA/1361	Adrian Coolahan
CDP/MA/1362	Brendan Grennan
CDP/MA/1363	Catriona Grennan
CDP/MA/1364	Niamh Seery
CDP/MA/1365	Peter Rafferty
CDP/MA/1366	Emma Seery
CDP/MA/1367	Tony Coolahan
CDP/MA/1368	Marie Seery
CDP/MA/1369	Alan Coolahan
CDP/MA/1370	Maisie Coolahan
CDP/MA/1371	Josephine Seery
CDP/MA/1372	Anne O'Shea
CDP/MA/1373	Ciaran Brazil
CDP/MA/1374	Jay Brazil
CDP/MA/1375	Deirdre Brazil
CDP/MA/1376	Kathleen Rigney
CDP/MA/1377	Eamon Brady
CDP/MA/1378	Anne Brady
CDP/MA/1379	Frank Guinan
CDP/MA/1380	P Guinan
CDP/MA/1381	Carmel Kelly
CDP/MA/1382	Ross Garvey
CDP/MA/1383	Ben Dillon
CDP/MA/1384	Clodagh Kelly
CDP/MA/1385	Emer Kelly
CDP/MA/1386	Edwena Tyrrell
CDP/MA/1387	Corey Tyrrell
CDP/MA/1388	Dean Tyrrell
CDP/MA/1389	Laura Phelan
CDP/MA/1390	Eddie Hiney
CDP/MA/1391	Christina Keegan
CDP/MA/1392	Michael Keegan
CDP/MA/1393	Emma Phelan

CDP/MA/1394	Michael Kelly
CDP/MA/1395	Pat Kelly
CDP/MA/1396	Mark Rafferty
CDP/MA/1397	Laura Seery
CDP/MA/1398	Paula Carroll
CDP/MA/1399	Oisin Carroll
CDP/MA/1400	Eimear Carroll
CDP/MA/1401	Don Carroll
CDP/MA/1402	Joe Daly
CDP/MA/1403	Stephanie Brady
CDP/MA/1404	Cormac O'Shea
CDP/MA/1405	John Boylan
CDP/MA/1406	Genevieve Ripley
CDP/MA/1407	Saoirse Ripley
CDP/MA/1408	Brady Ripley Brazil
CDP/MA/1409	Reece Boylan
CDP/MA/1410	Ronan Boylan
CDP/MA/1411	Annie Gorman
CDP/MA/1412	Michael Ward
CDP/MA/1413	Kelsey Leavy
CDP/MA/1414	Cathriona Seery
CDP/MA/1415	Mairead Leavy
CDP/MA/1416	Robbie Leavy
CDP/MA/1417	Niamh Dunican
CDP/MA/1418	Abbie Leavy
CDP/MA/1419	Leah Seery
CDP/MA/1420	Kay Blackwell
CDP/MA/1421	James P Brazil
CDP/MA/1422	Kate Carberry
CDP/MA/1423	Mary Gavin
CDP/MA/1424	Mark Dolan
CDP/MA/1425	Kieran Gavin
CDP/MA/1426	Claire Seery
CDP/MA/1427	Jim Seery
CDP/MA/1428	Pat Seery
CDP/MA/1429	Peter Greville
CDP/MA/1430	Mary A Corcoran
CDP/MA/1431	Nora Corcoran
CDP/MA/1432	Cormac Gavin
CDP/MA/1433	Cella Guinan
CDP/MA/1434	D Temple
CDP/MA/1435	Emanuele Rizza
CDP/MA/1436	Ian Gavin
CDP/MA/1437	Kasey Brady
CDP/MA/1438	Brian Claffey
CDP/MA/1439	Marian Corcoran
CDP/MA/1440	Terry Kelly
CDP/MA/1441	Aisling Gallagher
CDP/MA/1442	Andrew Sheridan
CDP/MA/1443	Keith Merchant

CDP/MA/1444	Lori Rickard
CDP/MA/1445	Thomas Mahon
CDP/MA/1446	Noelle Egan
CDP/MA/1447	Dermot Egan
CDP/MA/1448	Liz Egan
CDP/MA/1449	Lorraine Dormer
CDP/MA/1450	David Egan
CDP/MA/1451	Declan Monaghan
CDP/MA/1452	Sarah Mahon
CDP/MA/1453	Martina McDermott
CDP/MA/1454	Mary bolger
CDP/MA/1455	Denise Minnock
CDP/MA/1456	Vincent Minnock
CDP/MA/1457	David Rickard
CDP/MA/1458	Mark Bolger
CDP/MA/1459	Paula Rickard
CDP/MA/1460	Martin Meehan
CDP/MA/1461	Cllr Noel Cribbin
CDP/MA/1462	Cllr Ken Smollen
CDP/MA/1463	Carol Nolan TD
CDP/MA/1464	Agnes Dolan
CDP/MA/1465	Valdas Bockus
CDP/MA/1466	Charlie Flanagan TD
CDP/MA/1467	Michael O'Meara on behalf of James Corrigan
CDP/MA/1468	Sharon Doyle
CDP/MA/1469	Deirdre Carroll
CDP/MA/1470	Pat Doyle
CDP/MA/1471	Stephen Carroll
CDP/MA/1472	Anthony Quinn
CDP/MA/1473	Liam Browne
CDP/MA/1474	Alan Rafferty
CDP/MA/1475	Sandra Doyle
CDP/MA/1476	Arlene Ryan
CDP/MA/1477	John Doyle
CDP/MA/1478	David Doyle
CDP/MA/1479	Gerry Dunican
CDP/MA/1480	Michael Moylan
CDP/MA/1481	Marie Loonam
CDP/MA/1482	G Loonam
CDP/MA/1483	Des Loonam
CDP/MA/1484	Liam Hackett
CDP/MA/1485	Liam Hackett Jnr
CDP/MA/1486	Mary Hackett
CDP/MA/1487	Lily Coughlan
CDP/MA/1488	Teresa Coughlan
CDP/MA/1489	A Power
CDP/MA/1490	Bridie Corcoran
CDP/MA/1491	Michael Daly
CDP/MA/1492	Karen Tighe
CDP/MA/1493	James Tighe

CDP/MA/1494	Sandra Reams
CDP/MA/1495	James Browne
CDP/MA/1496	Martina Moore
CDP/MA/1497	Dylan Moore
CDP/MA/1498	Christy Doolan
CDP/MA/1499	Amy Tighe
CDP/MA/1500	Zoe Tighe
CDP/MA/1501	Pat O'Shea
CDP/MA/1502	Ronan McEvoy
CDP/MA/1503	Ollie Daly
CDP/MA/1504	Brigid Kelly
CDP/MA/1505	Christy Kenny
CDP/MA/1506	John Spollen
CDP/MA/1507	Eamon Flynn
CDP/MA/1508	Siobhan Bell
CDP/MA/1509	Daniel Nagle
CDP/MA/1510	Richard Bell
CDP/MA/1511	Jack Clancy
CDP/MA/1512	Carmel Egan
CDP/MA/1513	Paddy Dolan
CDP/MA/1514	Des Rosney
CDP/MA/1515	Patrick Sheridan
CDP/MA/1516	Frank Dolan
CDP/MA/1517	Jackie Kenny
CDP/MA/1518	Bernie Kenny
CDP/MA/1519	Catherine Sheridan
CDP/MA/1520	Mary Duffy
CDP/MA/1521	Sean Flynn
CDP/MA/1522	Denis Loonam
CDP/MA/1523	Sean Connolly
CDP/MA/1524	Padraig Moore
CDP/MA/1525	Danny Connolly
CDP/MA/1526	Stephen Kenny
CDP/MA/1527	Trevor Fletcher
CDP/MA/1528	Sean Keegan
CDP/MA/1529	Phil Carroll
CDP/MA/1530	Gerry Carroll
CDP/MA/1531	Jason Daly
CDP/MA/1532	Shauna Buckley
CDP/MA/1533	Darren Kelly
CDP/MA/1534	Deirdre Connolly
CDP/MA/1535	Amanda Blake
CDP/MA/1536	Patricia Maher
CDP/MA/1537	Kieran Kenny
CDP/MA/1538	Katherine Kenny
CDP/MA/1539	Rosario Kenny
CDP/MA/1540	Louise Anderson
CDP/MA/1541	Martin Donnelly
CDP/MA/1542	James P Kenny
CDP/MA/1543	Ann Scott

CDP/MA/1544	Sean O'Cuannaigh
CDP/MA/1545	Robert Campbell
CDP/MA/1546	Therese Moran
CDP/MA/1547	Sharon Dunican
CDP/MA/1548	Maggie Donnolly
CDP/MA/1549	Bernie Doolan
CDP/MA/1550	Tommy Dolan
CDP/MA/1551	David Cracknell
CDP/MA/1552	Kathleen Keegan
CDP/MA/1553	Mary Campbell
CDP/MA/1554	Cathal Devery
CDP/MA/1555	Mary Devery
CDP/MA/1556	Sophie Devery
CDP/MA/1557	Carmelita Dunican
CDP/MA/1558	Matthew Cowman
CDP/MA/1559	Garry Cassidy
CDP/MA/1560	Breda Connolly
CDP/MA/1561	Kyle Higgins
CDP/MA/1562	Matthew Flaherty
CDP/MA/1563	Sarah Flaherty
CDP/MA/1564	Katie Flaherty
CDP/MA/1565	Mikey Flaherty
CDP/MA/1566	Sandra Flaherty
CDP/MA/1567	Conor Flaherty
CDP/MA/1568	Brendan Flaherty
CDP/MA/1569	Ger Murray
CDP/MA/1570	Sarah Nagle
CDP/MA/1571	Ella Cassidy
CDP/MA/1572	PJ Flynn
CDP/MA/1573	Fergal McGuire
CDP/MA/1574	Brendan Daly
CDP/MA/1575	Martin Dolan
CDP/MA/1576	Dorothy Finnerty
CDP/MA/1577	Tommy Kenny
CDP/MA/1578	Brigid Kenny
CDP/MA/1579	Kieran Rohan
CDP/MA/1580	Rob Rohan
CDP/MA/1581	Mary Kenny
CDP/MA/1582	Adrian Hynes
CDP/MA/1583	Ciaran Guinan
CDP/MA/1584	T Caufield
CDP/MA/1585	WITHDRAWN
CDP/MA/1586	George Phibbs
CDP/MA/1587	Tom Molloy
CDP/MA/1588	Stephen Kenny
CDP/MA/1589	Emma O'Brien
CDP/MA/1590	Oisin Kelly
CDP/MA/1591	David Kelly
CDP/MA/1592	Colin Malone
CDP/MA/1593	Martin Byrne



CDP/MA/1594	Maria Egan
CDP/MA/1595	Eimear Higgins
CDP/MA/1596	Shane Murphy
CDP/MA/1597	Eddie Nally
CDP/MA/1598	Gabriel Fox
CDP/MA/1599	Bridie Maher
CDP/MA/1600	David Nagle
CDP/MA/1601	WITHDRAWN
CDP/MA/1602	Marie O'Shea
CDP/MA/1603	Seamus Dooley
CDP/MA/1604	Peggy Nagle
CDP/MA/1605	Phil Byrnes
CDP/MA/1606	Betty Murphy
CDP/MA/1607	Maureen Loonam
CDP/MA/1608	Stephen Wren
CDP/MA/1609	Sean Ibbotson
CDP/MA/1610	Ann Corcoran
CDP/MA/1611	Tom Berry
CDP/MA/1612	Mary Finn
CDP/MA/1613	Mike Berry
CDP/MA/1614	Rosaleen Berry
CDP/MA/1615	Ann Marie Collins
CDP/MA/1616	Lily Kelly
CDP/MA/1617	Ronnie O'Connor
CDP/MA/1618	Paddy O'Connor
CDP/MA/1619	Emily O'Connor
CDP/MA/1620	Ann Collins
CDP/MA/1621	Sandra Vaughn Ross
CDP/MA/1622	Trevor Ross
CDP/MA/1623	Thomas Ross
CDP/MA/1624	Caroline Creevy
CDP/MA/1625	Brendan Egan
CDP/MA/1626	Gerard Nolan
CDP/MA/1627	Tommy Cantwell
CDP/MA/1628	Jimmy Cantwell
CDP/MA/1629	Ann Cantwell
CDP/MA/1630	Triona Cantwell
CDP/MA/1631	Anne Farrell
CDP/MA/1632	Ann Duffy
CDP/MA/1633	Rosemary Bradley
CDP/MA/1634	Diarmuid Lowry
CDP/MA/1635	Rose McKeown
CDP/MA/1636	Jimmy McLoughlin
CDP/MA/1637	Caroline McLoughlin
CDP/MA/1638	Stephen Grennan
CDP/MA/1639	Catherine Grennan
CDP/MA/1640	Michael Grennan
CDP/MA/1641	Emmett Moran
CDP/MA/1642	Bridget Molloy

CDP/MA/1643	Paddy Grennan
CDP/MA/1644	Ray McKeown
CDP/MA/1645	Jean Halligan
CDP/MA/1646	Tom Halligan
CDP/MA/1647	Grace Clear
CDP/MA/1648	Marcel Gheorghe
CDP/MA/1649	Mirela Gheorghe
CDP/MA/1650	Barry Mooney
CDP/MA/1651	Rosaleen Halligan
CDP/MA/1652	Michael Halligan
CDP/MA/1653	Camillus Finnerty
CDP/MA/1654	Rosaleen Finnerty
CDP/MA/1655	Alan Rigney
CDP/MA/1656	Sonia Lynam
CDP/MA/1657	Mary Rigney
CDP/MA/1658	Joe Rigney
CDP/MA/1659	Chloe Rigney
CDP/MA/1660	Faye Rigney
CDP/MA/1661	Caroline Clear
CDP/MA/1662	Katie Rigney
CDP/MA/1663	Rebecca Doorley
CDP/MA/1664	Donal Lynam
CDP/MA/1665	Daniel Lynam
CDP/MA/1666	Enda Lynam
CDP/MA/1667	E Dunican
CDP/MA/1668	Jean Adzangda
CDP/MA/1669	Nicola Lennon Lynch
CDP/MA/1670	Calum Lennon Lynch
CDP/MA/1671	David Lynch
CDP/MA/1672	PJ Allen
CDP/MA/1673	Louise Allen
CDP/MA/1674	Niamh Allen
CDP/MA/1675	Anthony Allen
CDP/MA/1676	Aoife Toolis
CDP/MA/1677	Eddie Commins
CDP/MA/1678	Brian Butler
CDP/MA/1679	B Glennon
CDP/MA/1680	R Glennon
CDP/MA/1681	Michelle Glennon
CDP/MA/1682	Michael Glennon
CDP/MA/1683	Dympna Daly
CDP/MA/1684	David Doyle
CDP/MA/1685	Martin Doyle
CDP/MA/1686	Terri Carey
CDP/MA/1687	Angela Coughlan
CDP/MA/1688	Padraig Coughlan
CDP/MA/1689	Elena Coughlan
CDP/MA/1690	Adam Reams
CDP/MA/1691	Gerald Duffy
CDP/MA/1692	Aine Daly

CDP/MA/1693	Agnes Flynn
CDP/MA/1694	James Whearty
CDP/MA/1695	Desmond Whearty
CDP/MA/1696	John O'Shea
CDP/MA/1697	Christine Duffy
CDP/MA/1698	Martin Kirwan
CDP/MA/1699	Shane Coughlan
CDP/MA/1700	Thomas P Coughlan
CDP/MA/1701	Mary Kirwan
CDP/MA/1702	Nuala Farrell
CDP/MA/1703	Jane Anne Whearty
CDP/MA/1704	Mary Lowry
CDP/MA/1705	Albert Lowry
CDP/MA/1706	Anthony Murtagh
CDP/MA/1707	Karen Rainey
CDP/MA/1708	Gabriel Mulrooney
CDP/MA/1709	John Harkin
CDP/MA/1710	Geraldine Harkin
CDP/MA/1711	Niall Moore
CDP/MA/1712	Alan Curley
CDP/MA/1713	Anne Curley
CDP/MA/1714	Brendan Reams
CDP/MA/1715	Gemma Reams
CDP/MA/1716	Rose Cassidy
CDP/MA/1717	Hilary Cornally
CDP/MA/1718	Maurice Cornally
CDP/MA/1719	Kay Cooney
CDP/MA/1720	Sarah Cooney
CDP/MA/1721	Tara Cooney
CDP/MA/1722	Ciara Cooney
CDP/MA/1723	Jimmy Cooney
CDP/MA/1724	Fiacra Cooney
CDP/MA/1725	Lisa Cooney
CDP/MA/1726	Gerard Dunne
CDP/MA/1727	Kevin Casey
CDP/MA/1728	Enda Keegan
CDP/MA/1729	Shane Kearney
CDP/MA/1730	Amanda Adzangda
CDP/MA/1731	Sandra Smollen
CDP/MA/1732	Joe Bruder
CDP/MA/1733	Mary Kelly
CDP/MA/1734	Gerry Kelly
CDP/MA/1735	Siobhan Corcoran
CDP/MA/1736	Ciara Egan
CDP/MA/1737	Roisin Ennis
CDP/MA/1738	Chris Hogan
CDP/MA/1739	Sarah Ainsworth
CDP/MA/1740	Paddy Joe Bermingham
CDP/MA/1741	John Bermingham
CDP/MA/1742	Mary Bermingham

CDP/MA/1743	Katie Bermingham
CDP/MA/1744	Patricia Coffey
CDP/MA/1745	Joe Carroll
CDP/MA/1746	Marian Carroll
CDP/MA/1747	Daniel Cunningham
CDP/MA/1748	Kathleen Egan
CDP/MA/1749	Teresa Kavanagh
CDP/MA/1750	Padraic Kavanagh
CDP/MA/1751	Carol Cunningham
CDP/MA/1752	Deirune Dempsey
CDP/MA/1753	Ciaran Coffey
CDP/MA/1754	Pam Carroll
CDP/MA/1755	WITHDRAWN
CDP/MA/1756	Declan Fallon
CDP/MA/1757	Elizabeth Fallon
CDP/MA/1758	Aoife Geraghty
CDP/MA/1759	Jimmy O'Donoghue
CDP/MA/1760	Philomena Carroll
CDP/MA/1761	Stephen Geraghty
CDP/MA/1762	Regina Geraghty
CDP/MA/1763	Sinead Geraghty
CDP/MA/1764	Peter Geraghty
CDP/MA/1765	Cristianne Cornally
CDP/MA/1766	Denise Hill
CDP/MA/1767	Mervyn Cornally
CDP/MA/1768	WITHDRAWN
CDP/MA/1769	Madeline Regan
CDP/MA/1770	Mick Regan
CDP/MA/1771	John Coughlan
CDP/MA/1772	John Regan
CDP/MA/1773	Imelda Rosney
CDP/MA/1774	Jackie Troy
CDP/MA/1775	Gerard Murray
CDP/MA/1776	Bernie Murray
CDP/MA/1777	Ray Murray
CDP/MA/1778	Margaret Regazzoli
CDP/MA/1779	Graham Cornally
CDP/MA/1780	Nicola Fallon
CDP/MA/1781	Damien Murray
CDP/MA/1782	Darragh Spollen
CDP/MA/1783	John Hickey
CDP/MA/1784	Fr PJ Hughes PP
CDP/MA/1785	Niall Daly
CDP/MA/1786	Danny O'Brien
CDP/MA/1787	Tilly Dawson Stanly
CDP/MA/1788	Carol Daly
CDP/MA/1789	Mary Hanamy
CDP/MA/1790	Sean McEvoy
CDP/MA/1791	Helen Hanamy
CDP/MA/1792	Garreth Healy

CDP/MA/1793	Jack Bracken
CDP/MA/1794	Roary Kelly
CDP/MA/1795	Paul Mollen
CDP/MA/1796	Fr James McKiernan PP
CDP/MA/1797	Fergal Spollen
CDP/MA/1798	Philomena Spollen
CDP/MA/1799	Laura O'Shea
CDP/MA/1800	Aoife Costello
CDP/MA/1801	Hannah Lynam
CDP/MA/1802	Rebecca Healy
CDP/MA/1803	Caoimhe Cantwell
CDP/MA/1804	John Mollen
CDP/MA/1805	John Daly
CDP/MA/1806	Niamh Cantwell
CDP/MA/1807	Annette Mollen
CDP/MA/1808	Eabha Greville
CDP/MA/1809	Cara Greville
CDP/MA/1810	Debbie Stones
CDP/MA/1811	Anne Hickey
CDP/MA/1812	Alan McGovern
CDP/MA/1813	Michael Grennan
CDP/MA/1814	Joy Dunican
CDP/MA/1815	Sharon Hynes
CDP/MA/1816	Inga Brazil
CDP/MA/1817	Colm Walsh
CDP/MA/1818	Declan Brazil
CDP/MA/1819	Maureen Killian
CDP/MA/1820	Sylvia Murray
CDP/MA/1821	Dawn McGovern
CDP/MA/1822	Melissa Hynes
CDP/MA/1823	Shauna McGovern
CDP/MA/1824	Philip McCormack
CDP/MA/1825	Sean Gardener
CDP/MA/1826	Anne Galvin
CDP/MA/1827	Declan McAree
CDP/MA/1828	Gavin McCormack
CDP/MA/1829	Geraldine & Anthony Dolan
CDP/MA/1830	Rachel O'Connor
CDP/MA/1831	Irene Reams
CDP/MA/1832	Molly McEvoy Jordan
CDP/MA/1833	Kenneth Reamsbottom
CDP/MA/1834	Rosemary Cloonan
CDP/MA/1835	Mark Ahern
CDP/MA/1836	Niamh Hiney
CDP/MA/1837	W Nolan
CDP/MA/1838	Maureen Nolan
CDP/MA/1839	Sharon Lally
CDP/MA/1840	Brian Lally
CDP/MA/1841	Nicola McEvoy
CDP/MA/1842	Noah Smollen

CDP/MA/1843	Anthony Byrne
CDP/MA/1844	Shane Hynes
CDP/MA/1845	Leah McGovern
CDP/MA/1846	Siobhan McKenna
CDP/MA/1847	Declan Rafferty
CDP/MA/1848	Noeleen O'Rourke
CDP/MA/1849	Leanne Higgins
CDP/MA/1850	Herbie Murray
CDP/MA/1851	Deborah Collins
CDP/MA/1852	Mary Egan Collins
CDP/MA/1853	Anne Galloway
CDP/MA/1854	Frank Egan
CDP/MA/1855	Daniel Collins
CDP/MA/1856	Gerard Collins
CDP/MA/1857	Paudie Egan
CDP/MA/1858	Geraldine Collins
CDP/MA/1859	John Collins
CDP/MA/1860	Ian Conroy
CDP/MA/1861	Paul McCartney
CDP/MA/1862	Annette Curtain
CDP/MA/1863	Phyllis Conroy
CDP/MA/1864	Olivia Horan
CDP/MA/1865	Noelle Horan
CDP/MA/1866	Eoghan Kerin
CDP/MA/1867	Noelle P Horan
CDP/MA/1868	Hanna Daly
CDP/MA/1869	Seamus Daly
CDP/MA/1870	Pauline Daly
CDP/MA/1871	Shane Butter
CDP/MA/1872	Elaine Butter
CDP/MA/1873	Fiona Brennan
CDP/MA/1874	James Danagher
CDP/MA/1875	Hazel Kilduff
CDP/MA/1876	Joe Grennan
CDP/MA/1877	Roisin Grennan
CDP/MA/1878	Grainne Higgins
CDP/MA/1879	Peter Auvet
CDP/MA/1880	Tadhg Mulrooney
CDP/MA/1881	Simon Healy
CDP/MA/1882	Frankie O'Callaghan
CDP/MA/1883	Pat Duffy
CDP/MA/1884	Helen Browne
CDP/MA/1885	Bernard Lowry
CDP/MA/1886	William Lowry
CDP/MA/1887	Mary Lowry
CDP/MA/1888	Bernard Kinahan
CDP/MA/1889	Sean Browne
CDP/MA/1890	Patrick Kinahan
CDP/MA/1891	Andrew Duffy
CDP/MA/1892	Kathleen Duffy

CDP/MA/1893	Liam Coughlan
CDP/MA/1894	Susan Kilduff
CDP/MA/1895	Amy Wilson
CDP/MA/1896	Ena Wilson
CDP/MA/1897	Ben Wilson
CDP/MA/1898	Bridget Birrane
CDP/MA/1899	Rose Gavin
CDP/MA/1900	Tom Corcoran
CDP/MA/1901	Patricia Collins
CDP/MA/1902	John Collins
CDP/MA/1903	Sarah Collins
CDP/MA/1904	Breda Murray
CDP/MA/1905	Laura Collins
CDP/MA/1906	Siobhan Collins
CDP/MA/1907	Tommy Joe Murray
CDP/MA/1908	Catherine Collins
CDP/MA/1909	Tom Corcoran
CDP/MA/1910	Eleanor Naughton
CDP/MA/1911	Maisie Corcoran
CDP/MA/1912	Brian Daly
CDP/MA/1913	Tom Daly
CDP/MA/1914	Tom McEvoy
CDP/MA/1915	Thomas McEvoy Jnr
CDP/MA/1916	Paul Gavin
CDP/MA/1917	Marie Guinan
CDP/MA/1918	Ellen Gavin
CDP/MA/1919	Kim Gavin
CDP/MA/1920	Tom Tague
CDP/MA/1921	Paul Gavin Jnr
CDP/MA/1922	Anthony Higgins
CDP/MA/1923	Fergus Daly
CDP/MA/1924	Noel Lee
CDP/MA/1925	Sean Rigney
CDP/MA/1926	Paul Daly
CDP/MA/1927	Fergal Spollen
CDP/MA/1928	James Bracken
CDP/MA/1929	Donal McEvoy
CDP/MA/1930	Brian Moore
CDP/MA/1931	Rosaleen Rourke
CDP/MA/1932	Roisin Brazil
CDP/MA/1933	Marie Brazil
CDP/MA/1934	Paddy Brazil
CDP/MA/1935	Aidan Moore
CDP/MA/1936	John McEvoy
CDP/MA/1937	Elaine McEvoy
CDP/MA/1938	Andrew McEvoy
CDP/MA/1939	James Bermingham
CDP/MA/1940	Cathal Bermingham
CDP/MA/1941	Laura Bermingham
CDP/MA/1942	Sinead McGuire

CDP/MA/1943	Olivia Horan
CDP/MA/1944	Niall Conroy
CDP/MA/1945	Shane Brazil
CDP/MA/1946	Deirdre McEvoy
CDP/MA/1947	Robert Wilson
CDP/MA/1948	Anne Grennan
CDP/MA/1949	Martina McCormack
CDP/MA/1950	Jimmy Spollen
CDP/MA/1951	Aoife Spollen
CDP/MA/1952	Orla Mollen
CDP/MA/1953	Angela McEvoy
CDP/MA/1954	James Carroll
CDP/MA/1955	Rosie Higgins
CDP/MA/1956	Olive Brazil
CDP/MA/1957	John Hanamy
CDP/MA/1958	Kevin Dooley
CDP/MA/1959	Eoin Corrigan
CDP/MA/1960	Thomas O'Meara
CDP/MA/1961	Corrine O'Meara
CDP/MA/1962	Sean Brazil
CDP/MA/1963	Lisa Hanamy
CDP/MA/1964	Sabrina Fallon
CDP/MA/1965	Denis Francis
CDP/MA/1966	Catherine O'Connor
CDP/MA/1967	Mary Walters
CDP/MA/1968	Jason O'Shea
CDP/MA/1969	Sinead O'Shea
CDP/MA/1970	John O'Shea
CDP/MA/1971	Yvonne O'Shea
CDP/MA/1972	Marie O'Shea
CDP/MA/1973	Claire Geraghty
CDP/MA/1974	PJ Maleny
CDP/MA/1975	Charles Boland
CDP/MA/1976	A Butler
CDP/MA/1977	Dan Egan
CDP/MA/1978	Mae Grennan
CDP/MA/1979	Danielle Lonergan
CDP/MA/1980	Cormac Quinn
CDP/MA/1981	Jack Quinn
CDP/MA/1982	C Dunne
CDP/MA/1983	Paul Gavin
CDP/MA/1984	Nuala Daly
CDP/MA/1985	Noel Kenny
CDP/MA/1986	Joe Bradley
CDP/MA/1987	Marius Egan
CDP/MA/1988	Ann Candais
CDP/MA/1989	Alberto Candais
CDP/MA/1990	Hazel Egan
CDP/MA/1991	Kathleen Boland
CDP/MA/1992	Deirdre Hanamy



CDP/MA/1993	Blaine Rigney
CDP/MA/1994	Kieran Rigney
CDP/MA/1995	Regina Rigney
CDP/MA/1996	Kaitlin Rigney
CDP/MA/1997	Pamella Rooney
CDP/MA/1998	Aaron Rigney
CDP/MA/1999	Seamus Egan
CDP/MA/2000	Marie Mills
CDP/MA/2001	David Mills
CDP/MA/2002	Kathleen Ryan
CDP/MA/2003	Tom Ryan
CDP/MA/2004	John Lyons
CDP/MA/2005	Pat Lyons
CDP/MA/2006	Geard Lynam
CDP/MA/2007	John Harmon
CDP/MA/2008	Eimear Harmon
CDP/MA/2009	Gillian Feighery Neville
CDP/MA/2010	Gary Kavanagh
CDP/MA/2011	Gemma Brady
CDP/MA/2012	Ronan Higgins
CDP/MA/2013	Mairead McLoughlin
CDP/MA/2014	Paul Dunican
CDP/MA/2015	Frances Martyn
CDP/MA/2016	Vykintas Cepiauskas
CDP/MA/2017	Rachel Ward
CDP/MA/2018	Celine Flannery
CDP/MA/2019	Marcella Walsh
CDP/MA/2020	Rachel Walsh
CDP/MA/2021	Claire Walsh
CDP/MA/2022	April Ward Walsh
CDP/MA/2023	Nora Coughlan
CDP/MA/2024	John O'Shea
CDP/MA/2025	Anne O'Shea
CDP/MA/2026	Monaghan Dunican
CDP/MA/2027	Kenneth Keane
CDP/MA/2028	Tina Dunican Charles
CDP/MA/2029	Philip Charles
CDP/MA/2030	Patrick Molloy
CDP/MA/2031	Anne Molloy
CDP/MA/2032	Annette Sheridan
CDP/MA/2033	Brendan Hogan
CDP/MA/2034	James Sheridan
CDP/MA/2035	Mairead Sheridan
CDP/MA/2036	Ann Sheridan
CDP/MA/2037	Miriam Deegan
CDP/MA/2038	Noel Sheridan
CDP/MA/2039	Marie Hogan
CDP/MA/2040	Donal Sheridan
CDP/MA/2041	Tommy Bracken
CDP/MA/2042	Jimmy Bracken

CDP/MA/2043	Alan Cornally
CDP/MA/2044	Eileen Deegan
CDP/MA/2045	Annemarie Hogan
CDP/MA/2046	Phyllis Judge
CDP/MA/2047	Caroline Dolan
CDP/MA/2048	Mary Kenny
CDP/MA/2049	Mary Egan
CDP/MA/2050	Mary Kenny
CDP/MA/2051	Pauline Egan
CDP/MA/2052	Noleen O'Rourke
CDP/MA/2053	Brigid Buckley
CDP/MA/2054	Pattie O'Neill
CDP/MA/2055	Kathleen Concannon
CDP/MA/2056	Colette Keenaghan
CDP/MA/2057	Hazel Boland
CDP/MA/2058	Bernadette McTague
CDP/MA/2059	Chris Daly
CDP/MA/2060	B Doolan
CDP/MA/2061	Enda Murphy
CDP/MA/2062	Jackie Egan
CDP/MA/2063	Des Kelly
CDP/MA/2064	Niall Kelly
CDP/MA/2065	Dermot McEvoy
CDP/MA/2066	Tom McEvoy
CDP/MA/2067	Breda Smith
CDP/MA/2068	Arlene Ryan
CDP/MA/2069	Pat Keegan
CDP/MA/2070	Jane Clancy
CDP/MA/2071	Bertie Guinan
CDP/MA/2072	Liam Clancy
CDP/MA/2073	Cormac McIntyre
CDP/MA/2074	Marian Kenny
CDP/MA/2075	Ita Coffey
CDP/MA/2076	Catherine Healy
CDP/MA/2077	Gerard O'Neill
CDP/MA/2078	Anna Parkinson
CDP/MA/2079	Margaret McCormack
CDP/MA/2080	Kevin Fitzpatrick
CDP/MA/2081	Fiona Devine
CDP/MA/2082	Margaret McEvoy
CDP/MA/2083	Paul Byrne
CDP/MA/2084	Teresa Byrne
CDP/MA/2085	Ronan Byrne
CDP/MA/2086	Lisa O'Leary
CDP/MA/2087	Bert Watson
CDP/MA/2088	Paddy Clear
CDP/MA/2089	Loretta Clear
CDP/MA/2090	T Donnellon
CDP/MA/2091	Thomas Donnellon
CDP/MA/2092	Brendan Cassidy

CDP/MA/2093	Mary Egan
CDP/MA/2094	Dolores Parish
CDP/MA/2095	Pearl Maher
CDP/MA/2096	Rose Reams
CDP/MA/2097	Colette Kavanagh
CDP/MA/2098	Cyril Kavanagh
CDP/MA/2099	Pat Wynne
CDP/MA/2100	Tristan Auret
CDP/MA/2101	Sophie Campbell
CDP/MA/2102	Margaret Healy
CDP/MA/2103	Charlie Healy
CDP/MA/2104	Evan Healy
CDP/MA/2105	Olivia McCarthy
CDP/MA/2106	Brian McCarthy
CDP/MA/2107	Tony Rosney
CDP/MA/2108	Maureen Rosney
CDP/MA/2109	Anthony Carroll
CDP/MA/2110	Theresa Carroll
CDP/MA/2111	Ray Carroll
CDP/MA/2112	Darragh Carroll
CDP/MA/2113	Maree Harte
CDP/MA/2114	Maureen Cassidy
CDP/MA/2115	Jim Cassidy
CDP/MA/2116	Larry Wynne
CDP/MA/2117	Michael Curley
CDP/MA/2118	Patrick Curley
CDP/MA/2119	Mary Curley
CDP/MA/2120	Sheila Rowley
CDP/MA/2121	Alfred Rowley
CDP/MA/2122	William Boland
CDP/MA/2123	Patrick Boland
CDP/MA/2124	Mary Boland
CDP/MA/2125	Breda Boland
CDP/MA/2126	Conor Rushe
CDP/MA/2127	Aine Flynn
CDP/MA/2128	Avril Flynn
CDP/MA/2129	Grainne Finnerty
CDP/MA/2130	Ita Keary
CDP/MA/2131	Paul Finnerty
CDP/MA/2132	Angela Finnerty
CDP/MA/2133	Claire Finnerty
CDP/MA/2134	Adrian Goodings
CDP/MA/2135	John Kearney
CDP/MA/2136	Olive Kearney
CDP/MA/2137	Con Junior Finnerty
CDP/MA/2138	Michelle Fox
CDP/MA/2139	Rita Gavin
CDP/MA/2140	Mairead O'Shea
CDP/MA/2141	PJ Fitzpatrick
CDP/MA/2142	Helen Murray

CDP/MA/2143	Aishling Stones
CDP/MA/2144	Fiona Guinan
CDP/MA/2145	Eoghan Donoghue
CDP/MA/2146	May Fitzpatrick
CDP/MA/2147	Liam Fitzpatrick
CDP/MA/2148	Alexandra Fitzpatrick
CDP/MA/2149	Keith Lawlor
CDP/MA/2150	Dorothy Gavin McCabe
CDP/MA/2151	Alexander McCabe
CDP/MA/2152	Cormac Fitzpatrick
CDP/MA/2153	Gary Fitzpatrick
CDP/MA/2154	James Flynn
CDP/MA/2155	Joe Flynn
CDP/MA/2156	Loyola Flynn
CDP/MA/2157	Kaytlin Flynn
CDP/MA/2158	Claire Flynn
CDP/MA/2159	Aida Peckyte
CDP/MA/2160	Patricia Dunican
CDP/MA/2161	Marion Dunican
CDP/MA/2162	PJ Byrne
CDP/MA/2163	Ruairi Carroll
CDP/MA/2164	Colin Finnerty
CDP/MA/2165	Gerard Higgins
CDP/MA/2166	Isabella Molloy
CDP/MA/2167	Jonathan Dillon
CDP/MA/2168	Aphra Fitzpatrick
CDP/MA/2169	Nina Molloy
CDP/MA/2170	Conor Molloy
CDP/MA/2171	Robert Mooney
CDP/MA/2172	Jane Rothwell
CDP/MA/2173	Tina Fitzpatrick
CDP/MA/2174	Jane Enright Mooney
CDP/MA/2175	Derek Fitzpatrick
CDP/MA/2176	L Lyster
CDP/MA/2177	John Banny
CDP/MA/2178	Rob Wakefield
CDP/MA/2179	P
CDP/MA/2180	Brendan Phelan
CDP/MA/2181	Aileen Phelan
CDP/MA/2182	Tommy McIntyre
CDP/MA/2183	Liam McIntyre
CDP/MA/2184	Bernadette McIntyre
CDP/MA/2185	Billy McIntyre
CDP/MA/2186	Mary McIntyre
CDP/MA/2187	James Brophy
CDP/MA/2188	Mary Byrne
CDP/MA/2189	David S
CDP/MA/2190	Fiona Boland
CDP/MA/2191	Frank Feery
CDP/MA/2192	Rose Feery

CDP/MA/2193	Lucy Dolan Egan
CDP/MA/2194	Emma Murray
CDP/MA/2195	Elizabeth Scully
CDP/MA/2196	Thomas Scully
CDP/MA/2197	Margaret O'Connor
CDP/MA/2198	Olivia Corcoran
CDP/MA/2199	Gearoid Corcoran
CDP/MA/2200	Amanda Scully
CDP/MA/2201	Arleigh Scully
CDP/MA/2202	Tommy Flaherty
CDP/MA/2203	Olivia Coughlan
CDP/MA/2204	Ruth McTague
CDP/MA/2205	Nancy Guinan
CDP/MA/2206	Laura Spollen
CDP/MA/2207	Pat Spollen
CDP/MA/2208	Michelle
CDP/MA/2209	Amanda Cornally
CDP/MA/2210	Joe Cornally
CDP/MA/2211	Patricia Keenaghan
CDP/MA/2212	Nora Kennedy
CDP/MA/2213	Josie Costello
CDP/MA/2214	Eamon Fleming
CDP/MA/2215	Loretta Fleming
CDP/MA/2216	Kevin Dalton
CDP/MA/2217	Noel
CDP/MA/2218	Michael Keegan
CDP/MA/2219	Sabrina Irwin
CDP/MA/2220	Bernadette Flynn
CDP/MA/2221	Ger Flynn
CDP/MA/2222	Marian Guinan
CDP/MA/2223	Stephen Moore
CDP/MA/2224	Rita & Teresa Moore
CDP/MA/2225	Eoin Longworth
CDP/MA/2226	Maureen Halligan
CDP/MA/2227	Beatrice Foley
CDP/MA/2228	Martin Geraghty
CDP/MA/2229	Margaret Dunican
CDP/MA/2230	Marie Dunican
CDP/MA/2231	Lorraine Dunican
CDP/MA/2232	Josh Dunican
CDP/MA/2233	Sinead Dunican
CDP/MA/2234	Dave Dunican
CDP/MA/2235	Helena Egan
CDP/MA/2236	Lucy McLoughlin Keating
CDP/MA/2237	John Keating
CDP/MA/2238	Julie McLoughlin
CDP/MA/2239	Rae Farrell
CDP/MA/2240	Frank McHugh
CDP/MA/2241	Ciaran Corcoran
CDP/MA/2242	Kieran Gaffey

CDP/MA/2243	Carmel Rohan
CDP/MA/2244	Denis Rohan
CDP/MA/2245	Teresa Kelly
CDP/MA/2246	Liam Kelly
CDP/MA/2247	Michael Dunican
CDP/MA/2248	Seamus Dunican
CDP/MA/2249	Rosaleen Dunican
CDP/MA/2250	Agnes Gorman
CDP/MA/2251	Ann Dunican
CDP/MA/2252	Patrick Ballesty Jnr
CDP/MA/2253	Nicky Greene
CDP/MA/2254	Ciaran Grennan
CDP/MA/2255	Lynne Grennan
CDP/MA/2256	Lisa Ballesty
CDP/MA/2257	Amy Ballesty
CDP/MA/2258	Lorraine Farrell
CDP/MA/2259	Steven Farrell
CDP/MA/2260	Claire Farrell
CDP/MA/2261	Ciaran Henson
CDP/MA/2262	Karen Kelly
CDP/MA/2263	Bridgie Butler
CDP/MA/2264	Kieran Butler
CDP/MA/2265	Patrick Kilduff
CDP/MA/2266	Tara Kilduff
CDP/MA/2267	Rory Kilduff
CDP/MA/2268	Susan Kilduff
CDP/MA/2269	Lee Moore
CDP/MA/2270	Laura Egan
CDP/MA/2271	Pauric Egan
CDP/MA/2272	Peter & Maura Sullivan
CDP/MA/2273	Richard Quirke
CDP/MA/2274	Liam Kilduff
CDP/MA/2275	Tara Moore
CDP/MA/2276	Rian Moore
CDP/MA/2277	Patrick Moore
CDP/MA/2278	Sandra Hassett
CDP/MA/2279	Paddy Farrell
CDP/MA/2280	Sarah Hassett
CDP/MA/2281	Holly Moore
CDP/MA/2282	Liam Flaherty
CDP/MA/2283	Keelin McCourtney
CDP/MA/2284	Olivia Flaherty
CDP/MA/2285	Paudie Molloy
CDP/MA/2286	Cliona Molloy
CDP/MA/2287	Pat Molloy
CDP/MA/2288	Ita Farrell
CDP/MA/2289	Padraig Farrell
CDP/MA/2290	James O'Neill
CDP/MA/2291	Sandra Carroll
CDP/MA/2292	Frank Kennedy

CDP/MA/2293	Fiachra Carroll
CDP/MA/2294	Pauline Phelan
CDP/MA/2295	Patrick Phelan
CDP/MA/2296	Oisin Carroll
CDP/MA/2297	Ann Flaherty
CDP/MA/2298	Olivia Egan
CDP/MA/2299	Dylan McEvoy
CDP/MA/2300	Noel Lehane
CDP/MA/2301	Lynne Devery
CDP/MA/2302	Maryann Grennan
CDP/MA/2303	Aidan Grennan
CDP/MA/2304	Aron Grennan
CDP/MA/2305	Bridie Smollen
CDP/MA/2306	Aisling Kemmy
CDP/MA/2307	Adrian Kemmy
CDP/MA/2308	Antoinette Kemmy
CDP/MA/2309	Geraldine Kemmy
CDP/MA/2310	Kevin Kelly
CDP/MA/2311	Ann Rosney
CDP/MA/2312	Chantel Rosney
CDP/MA/2313	Sedelva Rosney
CDP/MA/2314	Adam Rosney
CDP/MA/2315	Damien Casey
CDP/MA/2316	Crystal Casey
CDP/MA/2317	Brendan Rosney
CDP/MA/2318	Inese Rusmare
CDP/MA/2319	Brendan Kenny
CDP/MA/2320	Catherine Rosney
CDP/MA/2321	Bernie Devine
CDP/MA/2322	David Allen
CDP/MA/2323	Niamh O'Brien
CDP/MA/2324	Willie Keenaghan
CDP/MA/2325	Lisa Keenaghan
CDP/MA/2326	Beanie Kenny
CDP/MA/2327	Catherine Rosney
CDP/MA/2328	Paul Kidney
CDP/MA/2329	Maggie Grennan
CDP/MA/2330	Joe Grennan
CDP/MA/2331	Kim McEvoy
CDP/MA/2332	Rechel Lonigan
CDP/MA/2333	Kevin Spollen
CDP/MA/2334	Kevin Grennan
CDP/MA/2335	Conner Poland
CDP/MA/2336	John Holloway
CDP/MA/2337	Lisa Daly
CDP/MA/2338	Eoin Hardyman
CDP/MA/2339	Gordon Healy
CDP/MA/2340	Helena Healy
CDP/MA/2341	Conal Daly
CDP/MA/2342	Killian Daly

CDP/MA/2343	Stephen Healy
CDP/MA/2344	Claire Cantwell
CDP/MA/2345	Joey Stones
CDP/MA/2346	Ciaran McEvoy
CDP/MA/2347	Ronan Byrne
CDP/MA/2348	Donal O'Brien
CDP/MA/2349	Linda O'Brien
CDP/MA/2350	Michael O'Brien
CDP/MA/2351	Greame Healy
CDP/MA/2352	Lorraine Spollen
CDP/MA/2353	Margret McEvoy
CDP/MA/2354	Cllr Sean O'Brien
CDP/MA/2355	Cllr Sean O'Brien
CDP/MA/2356	Cllr Sean O'Brien
CDP/MA/2357	Aoife Phelan
CDP/MA/2358	Enda Gallagher
CDP/MA/2359	Maureen Byrne
CDP/MA/2360	Natasha Keoghan
CDP/MA/2361	Peter Egan
CDP/MA/2362	Emma Egan
CDP/MA/2363	Francis Egan
CDP/MA/2364	James Ennis
CDP/MA/2365	Paul Carroll
CDP/MA/2366	Paul Maloney
CDP/MA/2367	Cormac Kenny
CDP/MA/2368	Patrick Seery
CDP/MA/2369	Josephine Seery
CDP/MA/2370	Kathleen Seery
CDP/MA/2371	Joseph Seery
CDP/MA/2372	Rosemary Kenny
CDP/MA/2373	Padraig Kenny
CDP/MA/2374	Edward Galvin
CDP/MA/2375	Maura Byrne
CDP/MA/2376	Serena Byrne



## Appendix C: Prescribed Authorities notified

The following prescribed authorities were notified of the material alterations under section 12(7)(a) of the Planning & Development Act 2000 (as amended).

<b>Prescribed Authorities</b>
Health Services Executive
The Heritage Council
Transport Infrastructure Ireland
Shannon Group
An Taisce
Office of Public Works
Eastern & Midland Regional Assembly
Southern Regional Assembly
Enterprise Ireland
IDA Ireland
Northern & Western Regional Assembly
The Minister for Tourism, Culture, Arts, Gaeltacht, Sport & Media
The Minister for Department of Agriculture, Food and the Marine
Minister for Defence
The Minister for Education & Skills
The Minister for Transport
Dublin Airport Authority
Fáilte Ireland
Irish Water
Offaly LCDC (S.E.O)
Arts Council
ESB Head Office
Minister for Enterprise, Trade and Employment
Health and Safety Authority
Inland Fisheries Ireland
Minister for Housing, Local Government and Heritage
Department of Housing, Local Government and Heritage
Minister for the Environment, Climate and Communications
Eirgrid PLC
Galway County Council
Roscommon County Council
Westmeath County Council
Meath County Council
Kildare County Council
Laois County Council
Tipperary County Council
Offaly LCDC
An Bord Pleanála
Office of the Planning Regulator

EPA Regional Inspectorate
EPA Head Office
Minister for Rural and Community Development
Asset Strategy – Irish Water

## Appendix D: Late Submissions Received

Late submissions could not be considered, as listed below.

<b>Ref No.</b>	<b>Name of Persons / Bodies</b>
CDP/MA/L01	Stephanie Higgins
CDP/MA/L02	Serena Byrne
CDP/MA/L03	Social Enterprise Republic of Ireland