

SUBMISSION TO LOUTH DRAFT PLAN

The scope of our submission is limited to access to the countryside and directly related issues.

Other county plans

While you are obliged to have regard to plans in adjoining counties as per the Planning and Development Act 2000 Sec 9 (4), you may care to take into account plans in other counties particularly those within the **Eastern and Midland Region**.

We notice that ***subject to availability of resources*** are added as a rider to several Pol Objs. We submit that as many Pol Objs carry a financial implications it is invidious to single out any particular Pol Objs.

We presume that you will be monitoring the provisions in the Plans which have commenced in Cavan, DLR, Laois, Longford, Meath, Offaly, Sth Dublin, Westmeath and Wicklow which have commenced and in Fingal and Kildare **which are imminent** and that you will **liaise with their planners** to ensure that the plans are compatible, where appropriate.

Counties in **bold** are **adjoining** or in the **Eastern and Midland Region**.

The mention of a provision in the Draft, without comment, indicates our support.

We are concerned that **many of the excellent provisions in the 2013 Plan have not been carried forward to the Draft without any apparent reason**. We will be referring to them in the course of our Submission. Therefore, we would ask you to look again to see if they could be included.

FORMAT

Index, as recommended in the Development Plan Guidelines (5.15), and that the page numbers where topics are primarily

dealt with should be bolded. See Sth Tipp Clare DLR & Waterford.

DEVELOPMENT MANAGEMENT GUIDELINES We submit that these should be dealt with at the end of each Chpt as this would make the plan more user friendly. At the very least the Pol Chpts and Chpt 13 should be cross referenced.

Layout We submit that this can be improved by sub-numbering or sub-lettering lists of points and paragraphs. The present layout creates difficulties when referring to particular points. Also the Chpt numbers should be placed on each page.

Volume 1 - Written Statement

4 Community Facilities

4.16 Burial Grounds

Policy Objective SC 45 We submit that **this should be repositioned in Chpt: 9 - Built Heritage and Culture as a separate Sub Sec and replaced by:** *Protect, preserve, enhance, conserve and maintain archaeological/historic graveyards and their settings and historic burial grounds (including those identified in the RPM) and those in the guardianship of the Council through improved access and preserve their heritage value Encourage and promote local involvement and community stewardship in the care, upkeep, maintenance, management rehabilitation and conservation of these graveyards in accordance with legislation, best conservation and heritage principals and best practice guidelines. Maintain all burial grounds in the Council's charge in good condition.* Based on **Laois** 4.2.4 BG3 and many other plans.

Proposed additional Chapter: Rural Economy

1.0 Agriculture

Text

Commonage and other rough grazing land should be regarded primarily as **an important recreational, environmental and amenity resource.**

Based on Galway City 4.6.2 1st para 1st sentence 1st phrase & Kilkenny 6.2 Commonage Land 2nd sentence.

Policy Objectives

AG 1 *Recognise and support the role of **farmers as custodians** of the natural resources of the countryside and of rural landscapes.* Taken from **Cavan** 3.5 EDO6 1st sentence 1st phrase.

2 *Promote, at national level, the adoption of a **Land Use Strategy**.*

Note: All EU countries(including Ireland) are under increasing pressure from the EU to comply with various EU Directives. In response to this Scotland adopted a Strategy in 2011. See the 2014 Report of the Joint Oireachtas Committee on Agriculture, Food and Marine page 10.

3 *Protect and conserve **rural amenities**, archaeological and natural heritage, visual amenities, landscape and the environment generally, from **adverse impacts of agricultural practices** and development particularly in high amenity areas and ensure that it is appropriate in nature and scale, ensure that they do not have an undue negative impact on the visual/scenic amenity of the countryside and its appearance and character and integrate into the landscape. Developments and practices must be necessary for the efficient use of the farm and must ensure that they are conducted in a manner consistent with the protection of the environment and in line with national legislations and relevant guidelines. Identify mitigating measures where required. Based on **Laois** 5.10 RUR13, **Offaly** 10.6 RDO4, **Meath Draft** 9.6 .RUR POL 25 last phrase and other plans.*

Note Louth is virtually the only county not to have provisions on Agriculture.

2 Commercial Developments in the Countryside

Policy Objectives

CD 1 *Only grant **planning permission** for new buildings or the expansion of existing industrial business enterprises in the countryside where the location is suitable and that the proposal would not be viable at an alternative location and where the development would not cause a detrimental impact, erode rural character and is compatible with neighbouring land use. Any new building will be required to respect the appearance of and character of the landscape not be acceptable where it is unduly prominent in the landscape, where it results in build-up of development when viewed with existing and/or approved building or where the impact of the ancillary works, including the creation of visibility splays would damage rural character or impact negatively on the environment or which fails to protect Natura Sites, conservation areas,*

natural heritage or the environment or fails to protect and improve or is injurious to amenities(including visual amenities) . Buildings should be kept simple and finished with material appropriate to rural settings and should reflect the size, scale and pattern of development in the area. Buildings of excessive height will not be permitted and should be sited to make use of existing hedgerows and topography to provide natural screening. Based on Laois 5.9 RET18 last phrase & 8.DM25(1) to (3), Monaghan 4.9 BRP 2 last phrase & 15.16 RCP 1 1st, 2nd & last pts, Westmeath 3.2.8 1st pt and many other plans.

2 Ensure that economic *development that is urban in nature should be located in urban areas.* Taken from **RSES EMR RPO 4.82.**

3 Forestry

Policy Objectives

F1 *Recognising the contribution that forestry makes to well being, develop, promote, provide, protect, improve and encourage the provision of greater **public access** to new and existing forestry, both state and private, for recreational activities such as walking, hiking, cycling, and other non-noise generating activities and the provision of nature trails, as part of connected network of walking and cycle routes in cooperation/consultation with Coillte, the Forest Service, private landowners, local interest groups and other relevant stakeholders and agencies.* Based on **Smarter Travel 2009-2020 Act 17 2nd sentence** page 45, **Cavan 3.9 2nd para 2nd para 5th pt 1st phrase, EDP14 1st phrase & 8.5.3 NHEP17 Woodlands 1st phrase, Monaghan 4.6.1 AGR P8, Westmeath 3.41 P 4, 6.21 P 10 & 6.23 P 12 1st phrase, Laois 5.10 RUR4, Meath 9.7.8 OBJ7, Sth Dublin 4.3.9.x** and many other plans

2 Retain existing rights of way and identify them and established walking routes before planting commences and maintain them as rights of way/walking Routes. Taken from **Cavan 3.9 EDP15 & EDO 31.**

Note If this isn't done walking routes tend to become subsumed into the network of forest roads thus making it very difficult, over time, to establish the existence of these routes.

3 Ensure that existing **public rights of way, traditional walking routes are not obstructed.** Taken from **Carlow 3.5.12 E.D 18 3rd pt, Sligo 4.3.2 P 3 2nd sentence & Roscommon 3.4.2 Pol 3.44 1st sentence.** See also **Westmeath 3.41 5, Kildare 10.5.5 FT5 2nd phrase & Monaghan 15.15 AGP 4.**

4 Forestry must not be visually obtrusive in the landscape so as to ensure that development is appropriate in its character, nature and scale and that it is carefully managed to so that it doesn't result in damage to visual amenity or have a negative visual effect on the rural environment and character of the countryside or degradation of wildlife habitats and that it must enhance and be in harmony with the landscape. Protect and safeguard scenic and exposed/elevated landscapes, nature conservation areas, geological sites, monuments, NHAs, European and other designated Sites, archaeological or other historical or heritage features. Based on **Cavan** 3.9 EDP13 1st phrase, **Monaghan** 4.6.1 AGP 7 & 15.15 AGP 4, **Laois** 5.10 Afforestation last sentence, **Wicklow** Vol 1 5.6 Forestry FYP2 1st to 3rd pts, **Westmeath** 3.41 PF3 1st phrase, **Meath** 10.10 POL 16 & **Draft** 9.7 RUR POL 27 & 29, **Fingal** 5.3 Obj RF86, **Kildare** 10.4.5 last para 2nd sentence and many other plans.

5 No new or replacement coniferous forests will allowed on summits generally above 250 mtrs. Taken from **Laois** 7.19 LS37 2nd sentence.

4 Extractive

Repositioned from 11.4.2 Extractive Industry

Policy Objectives

ENV 40, 41 & 43

44 We submit that this should be replaced by: *Recognising that the development for aggregates/mineral extraction, processing and associated developments can impose adverse impacts on amenities, ensure the **protection**, conservation, preservation and safeguarding of recorded monuments and areas in their vicinity, World Heritage Sites(including Tentative Sites), existing and proposed NHA's, Euro Sites, Nature Reserves archaeological sites and features, areas of significant archaeological potential, natural heritage, natural environment, features of natural beauty or interest and prescribed sites, geological sites and areas of geological/geomorphological or historic interest, areas of high scenic amenity and other areas of importance for the conservation of flora and fauna from inappropriate development that might be detrimental to them. Applicants must recognise that the aggregates(stone and sand/gravel deposits and mines) concrete products industry have a particularly sensitive role. Development must be carried out so that it minimises adverse effect on the environment and visual and natural amenities to the greatest possible extent must be carried out during all life cycle stages, whether in respect of new quarries or extensions to existing ones and development will be*

prohibited if the quality of the environment or landscape, particularly sensitive landscape, is adversely affected or there is a reduction of the visual amenity of areas of high amenity. All working should be landscaped either by the retention of existing vegetation or by screening. Based on **Sth Dublin** 4.7.0 Objs 1 & 2, **Laois** 8.5 DM69 f), **Meath** 10.12 RD POL 27 & 11.14 1st para 2nd sentence, **Longford** 4.6 MA 2m), **Kildare** 10.7.8 3 to 5, **Cavan** 3.8 EDP6 & 7 **Offaly** 2.8.6 3rd para & 2.9 RDP 14 1st & 2nd sentences, **Wicklow** Vol 1 5.6 Wicklow Extractive industry Strategic Obj EX1 & Vol 3 App 13 Extractive 1 Industry 1st para and many other plans.

45

We submit that **you should include additional Pol Objs:**

1 *Applications for new development for aggregate extraction, processing and associated processes, shall **identify existing public rights of way** and walking routes which may be impacted on or are adjacent to the development site. They shall be kept free from development as a Rights of Way/Walking Route.* Taken from **Cavan** 3.8 EDO25.

Note

Pending a complete listing of public rights of way, walking routes, as prospective rights of way, should be protected.

2 *Restrict development of aggregate extraction, processing and associated concrete production which could impinge or impact on matters of public importance, **public rights of way** or walking routes and satisfactorily address the potential impact on recreational activities.* Based on **Monaghan** 15.25 EIP 4, **Kildare** 10.7.8 EI 5 last pt, **Westmeath** 3.43 P 11 last pt (Draft 9.15 CPO 9.58 last pt) and many other plans.

3 *Require that **development proposals** on or in proximity to a quarry site should investigate the nature and extent of the risks **associated with the development together with appropriate mitigation.*** Taken from Roscommon 3.4.4 Pol 3.56.

4 *In assessing applications the council will have regard to visual impact on sensitive landscapes.* Taken from **2013 Plan** 3.8.1 Development Management Criteria 1st para 2nd pt.

6 TOURISM

We submit that:

1 and Recreation and Sport should be affixed to the Title to better reflect its Contents AND

2

it should be divided into 3 Sub Sec:

A Tourism

B Recreation and Sport

C Tourism and Recreation and Sport

A Tourism

6.2 POLICY CONTEXT

6.2.1 Boyne Valley Tourism Strategy 2016 to 2020

6.2.2 People, Places and Policy - Growing Tourism to 2025

6.2.3 Tourism Development and Innovation A strategy for Investment 2016 - 2022

6.2.4 Regional Spatial Economic Strategy 2019-2031

6.25 County Louth Tourism & Heritage Plan

6.26 Boyne Valley Strategy Working Group

6.3 TOURISM ATTRACTIONS

6.3.2 Heritage Tourism

6.3.3 Food and Craft

6.3.4 Beaches We submit that this should be repositioned in Chpt 11 THE ENVIRONMENT, NATURAL RESOURCES & THE COAST AND

that the 1st phrase should be merged with 11.5 THE COAST Pol Obj 56 AND

that the last phrase should be merged with 11.5 THE COAST Pol Obj 60

6.3.5 Events and Festivals

6.3.6 Additional Tourism Experiences

6.3.8 Carlingford Lough Ferry

6.4 FAILTE IRELAND STRATEGIES

6.5 TOURISM ACCOMODATION

We submit that **you should include additional Pol Objs:**

1 Protect the landscape from inappropriate development by ensuring that developments and other activities associated with tourism or recreational activity do not cause damage, be detrimental to or detract from the traditional character or appearance of areas of scenic or visual amenities and ensure that the layout, design and associated infrastructure are of highest quality. Developments must be sensitively located, and be sympathetic in manner with the environment, heritage and amenities. They must ensure the protection, maintenance and conservation of amenities, be compatible with their intensity, scale, and balance and ensure that are not located where they would be detrimental to environmentally sensitive landscapes. Ensure the highest quality standards of design and materials so that there are no significant adverse impact on the coastal areas, Natura 2000 sites, historic or archaeological sites, maritime heritage or the countryside generally.. They must be integrated, assimilated and absorbed into the landscape to take advantage of natural screening and topography. Based on **Sth Dublin** 4.50 ET Pol 5 Obj 1 last phrase, **Cavan** 9.7 RTO27, **Longford** 6 TOU 1 & **Kildare** 5.22 ECD40, **Fingal** 5.3 Rural Tourism Obj RF112 1st sentence, **Wicklow** Vol 1 7.4 T2, **Westmeath** 3.14 P 3 last phrase, **Meath** 4.6.8 ED POL 27 1st phrase(Draft 4.27 ED POL 40 in 4th line) and many other plans.

2 Tourism and recreational development shall be assessed against the nature and scale appropriate to the character of the area and shall be located to be visually sympathetic to its surroundings. Taken from **Wicklow** Vol 3 App 1 4 Tourism & Recreation, General criteria for tourism and recreational development 1st pt 1st sentence & 2nd pt 1st sentence.

B Recreation and Sport

We submit that **you should include Policy Objectives:**

1 Support development, in co-operation with various stakeholders to promote, preserve, improve, encourage public access to lakes,

beaches, coastal, riversides, uplands and other areas that have been traditionally used for outdoor recreation and extend **recreational amenities** including riverside and canal walks and walking and cycling routes. Based on **2000 Planning and Development Act** Sec 10(2)(j), **Meath** 4.6 POL 40 & **Westmeath** 3.14 P 7 down to recreation on line 3 & 7.13 P 1 3rd line and many other plans

2 Promote and encourage the **recreational use** of coastline, rivers and the development of blueways which provide opportunities for walkers, cyclist and canoers. Taken from **Wicklow** Vol 1 7.4 T34 1st sentence 1st phrase.

3 Protect and preserve recreational attractions such as scenic beauty, woodlands and waterways, coastal areas and beaches, natural heritage, the character and distinctiveness of scenic landscape and the environmental quality. It will normally only permit development where it won't result in damage to sites of nature conservation or important features of archaeological heritage, will not cause harm to the appearance and character of the landscape and can be readily absorbed into its surroundings by taking advantage of existing vegetation and/or topography, where the enjoyment of the countryside isn't adversely affected by the nature, scale, extent, frequency or timing of the proposed activities including any noise likely to be generated and any ancillary development shall be small in scale, designed to a high standard and sympathetic to environment in its setting, layout and landscaping. Based on **Wicklow** Vol 1 7.3 Strategic Objs 8th & last pts and other plans

4 Ensure that golf course development does not impinge on existing public rights of way and walking routes by identifying them prior to development. Taken from **Sth Dublin** 11.5.5(ii) last para & **Kildare** 14.12.2 RW 3.

Note Recreational users and golfers don't mix! While there are rights of way over golf courses, they aren't satisfactory as walkers run the risk of being hit by golf balls and golfers are distracted by people talking and moving about.

5 Development proposals for Noise Generating Sports will not normally be permitted unless there is no conflict with the enjoyment of areas used for informal recreation. Taken from **Kilkenny** 7.7.2 last para 3rd pt.

6 Support developments which will **enable** and encourage countryside recreation through facilitating the development of community walks, off road walks road trails. Taken from Meath Draft 4.2.8.5 Walking and Cycling Routes ED POI 58 1st phrase.

C Tourism and Recreation and Sport

6.2.8 Mourne-Cooley Geotourism Project

All

6.3.1 Greenways - Walking and Cycling Routes

Text

Policy Objectives

TOU 8 We submit that **this should be repositioned in Chapter 7 Movement 7.5 SUSTAINABLE TRANSPORT 7.5.10 Cycling and Walking as an additional Pol Obj.**

9 We submit that **this should be repositioned as above as an additional Pol Obj.**

10 1st sentence

11 We submit that **this should be repositioned as in 8 above and replaced by:** *Support, promote, facilitate and develop a comprehensive network of greenways in accordance with the Strategy for the Future Development of of National and Regional Greenways linking parks and public open spaces to regional and national Greenway Networks and work with the NTA, adjoining councils and all stakeholders to develop a co-ordinated approach to the selection, delivering and servicing of future greenway, in order to achieve improve external linkages, to achieve maximum impact and connectivity and to provide alternative routes for pedestrians and cyclists.* Based on **NPF** App 1 Obj 22, **Kildare** 5.19 EO 49, **DLR** 4.2.2.7 Pol OSR8, **Laois** 4.2 OBJ6 and many other plans.

6.3.4 Beaches We submit that **this should be repositioned in Chapter 11 Environment, Natural - Resources and The Coast 11.5 THE COAST** and that:

A The Text should be included as additional Text in **11.5.1 Introduction**

B Policy Objective **TOU 15 1st phrase** should be repositioned in **11.5.6 Coastal Tourism and Recreation as an additional Pol Obj**

C 2nd phrase should be repositioned as above and replaced by:

Provide, support, actively promote, maintain, protect, improve and enhance public access to the coast, beaches, seashore, coastal heritage and scenic landscapes in co-operation with landowners, relevant stakeholders and local groups and with statutory and relevant organisations for recreational activities including walking and cycling and examine the designation of traditional walking routes thereto as public rights of way. Where feasible, develop walkways/cycleways between the coast and green spaces in built-up areas. Based on Wicklow Vol 1 7.4 T33 & 10.3.6 NH37 1st phrase, Fingal 9.5, DLR 4.1.2.9 2nd para below para last sentence and many other plans.

6.3.7 Narrow Water Bridge

All

7 MOVEMENT

7.5 SUSTAINABLE TRANSPORT

7.5.10 Cycling and Walking

Policy Objectives

MOV 22 We submit that **this should be replaced by:** *Walking and Cycling will be promoted, developed, facilitated and encouraged in accordance with initiatives contained in "Smarter Travel 2009" by improving existing cycleways and by developing a network of safe maintained and guarded cycle routes and footpaths on existing roads. Ensure, where possible, that cycleways and footpaths are effectively separated from major vehicular carriageways. Provide, promote, improve and extend the network of off road cycle and walking routes on all new road improvement/redesigned schemes including regional, local distributor and local collector roads and on roads being up-graded, to ensure personal safety, particularly at night and a more convenient, healthy, efficient, pleasant, attractive and environmentally friendly mode of transport for all age groups. Support the installation of infrastructure measures e.g new/wider pavements, road crossings, retrofitted, if necessary, which would facilitate and encourage safe walking and cycling. Based on Smarter Travel 2009 - 2020 Cycling and Walking 1st para 2nd sentence last phrase, Cavan 9.6.1 RTO20 1st & 2nd sentences, Laois 6.1.1 TRANS40 & 41, Kildare 6.5 WC 2, 2013 Plan 7.4 TC 22, Carlow 5.3.2 Pol 8 13th pt, Meath 6.9 POL 22, Wicklow Vol 1 9.1.3 and many other plans.*

23 We submit that **this should be replaced by:** *Provide, create, promote, plan, support, maintain, enhance, encourage, extend, facilitate*

*and support the development and improvement of walking, rambling and cycling in conjunction/co-operation/engaging with the Irish Sports Council, NTA, the Dept of Transport, Tourism and Sport, other agencies walking and cycling groups, landowners, farmers, local groups and communities by identifying/defining more dedicated walking and cycling routes(named) to enable the creation of a high quality, coherent, pleasant, integrated and comprehensive dedicated off road countryside joined up modern network of local and regional cycling/walking routes, footpaths, greenways, particularly in rural areas between settlements and other infrastructure that link communities to key destinations and amenities, including looped walks, local walks, community walks medium/long distance walks and established rights of way, through open spaces, strategic green corridors(including river corridors) and other off-road routes), particularly those with historic associations or other areas of interest and maximise their potential. Expand and extend existing routes by utilising links from residential areas to provide access to coasts, mountains, rivers and scenic areas. Bring mountain amenities closer to residential communities by promoting the establishment of a network of formal footpaths, off road paths and cycleways that are attractive and facilitate casual walkers and cyclists. Investigate the provision of dedicated cycle and pedestrian routes along routes of high amenity. Based on **DPG 3.5 Box 3 B Infrastructure 3rd pt, Dev Smarter Travel 2009 - 2020** Cycling and Walking 1st para in line 6, **Cavan 9.6.1 RTO3 1st phrase, Laois 4.3 NRA21 1st phrase, 5.11 TM20 & 7.19 LS5, Kildare 14.12.1 CR 4, Meath 4.6.8 2nd para 1st & 2nd sentences, 4.6 POL 40 1st sentence 2nd line & 4.6.8 ED OBJ9(Draft 4.28.5 Ed OBJ 76), Westmeath 3.14 P 7 5th line, Longford 4.5 Tourism Product 2nd para, 5.1.3 & PED 3 & 5, Sth Dublin 4.5.0 Pol 6.1, 6.3.0 Pol 3.1 & 9.4.0. Pol 16.5, Wicklow Vol 1 7.4 T29 1st phrase & 9.1.3 TR11 1st phrase, Offaly 7.14 LAO 03, Carlow 8.11.10 Obj 3 1st pt, 2013 Plan 7.4 TC 24 and many other plans.***

24 & 26

We submit that **you should include additional Pol Objs:**

WALKING

Table We submit that you should include a **Table with maps of Way-marked Ways** of medium/long-long distance walking routes, Greenways, Sli na Slainte, heritage/historic walking trails, pilgrim paths, paths to mass rocks and holy wells, looped walks, hillwalks, forest walks and other defined walking trails with accompanying maps and a data base should be set-up and up-dated as new trails emerge. See **DLR App 8, 2013 Plan Map 7.2** and many other counties. To this you should add: *Following the adoption of the Plan a temporary register of additional routes shall be maintained and should be included in the web site pending inclusion in the next Plan.*

1 *Promote and facilitate the continuing development of a regional and local **network of Ways and Permissive Access Routes** that provide a network of long distance walking, running and hiking trails and routes. Encourage the re-routing of existing trails off public roads.* Based on **Sth Dublin 9.4.0.3 1st sentence 1st phrase & 2nd sentence, DLR 4.1.2.16 Pol LHB17 1st sentence 1st phrase** and other plans.

Note *In contrast to public rights of way, **long distance walking routes exist on a permissive access basis** and are not to be confused with designated public rights of way as consent can be withdrawn at any time by the landowner.* Taken from Sligo 6.7.4 Permissive Trails.

2 *In view of the obesity and diabetes crisis, support, improve, develop, upgrade and facilitate **Slí na Sláinte** routes. These should be waymarked/signposted, where feasible.* A Table should be included. Based on **Kildare 6.5 WCO 5 last pt, DLR 4.1.2.16 Pol LHB17 last phrase & Text below Pol 2nd sentence, Westmeath 8.13 O 13 last phrase.**

3 *Promote walking through the development and expansion of a network of **safe walking trails** within towns and villages and their environs. Such routes can link with existing waymarked trails, Sli na Slainte and the Green Infrastructure Network and existing or new public rights of way.* Taken from **Fingal Chpt 5 Obj RF113.**

4 *Support the provision of proposed long distance walking trails that **provide access to scenic uplands, riverine and coastal features.*** Taken from **Fingal Chpt 5 Obj RF115.**

5 *Research and map existing network of traditional paths used for leisure purposes to determine their legal status.* Taken from Carlow 8.11.10 Obj 3 2nd pt.

6 *Employ a full time **Walks Officer** at an appropriate senior level.*

Note Many counties employ one.

7 *The Council will co-operate with relevant agencies, both public and private, including the National Trails Office, NWMWAC, Coillte, the Heritage Council, adjoining councils and local landowners, to **support the development**, maintenance, facilitation and enhancement of medium and long distance **hiking/walking routes**, community walks and off-road trails particularly in the uplands. This will include consultation with adjoining councils with a view to promoting routes extending beyond the county boundary. Based on **DLR** 4.1.2.16 para under Pol 2nd & 3rd sentences, **Laois** 5.13 TM21 1st sentence, **Meath** 4.6.8 ED OBJ9 & **Westmeath** 3.14 P-GT 7 5th line.*

8 *Lobby the appropriate Government Department to agree and implement a scheme to **indemnify private landowners** with regard to recreational users of their land. Taken from **Action Plan for Rural Development** 2017 Pillar 3 Act 176.*

9 *Ensure the **protection** of and co-ordinate the continuation of **strategic walking routes** and trails. Taken from **Cavan** 9.6.1 RTO3 10 1st phrase.*

10 *Preserve and **protect** the integrity of existing public walking and access routes(including long distance walking routes) which contribute to the general amenity by prohibiting the intrusion of development along these routes particularly those in scenic and high amenity areas and along inland waterways. Based on **DLR** 4.1.2.14 LHB15, **Kildare** 14.12.2 RW 2 and many other plans.*

11 ***Protect listed walks** from development that creates or has the **potential to create dis-amenities**. Taken from **Cavan** 9.6.1 2nd para.*

12 *Take the potential **impact of proposed development** into account when considering/assessing applications for permission in the vicinity of established walking routes that might impinge on walking routes(including long distance) or potential walking routes. Taken from Sligo 6.7.4 Established walking routes 2nd & 3rd sentences.*

13 ***Protect access routes** to upland walks and public rights of way. Taken from **Laois** 5.10 RUR14.*

CYCLING

14 Following the adoption of the Plan a **temporary register of additional cycling routes** shall be maintained and should be included on the web site pending inclusion in the next Plan.

15 Promote, facilitate, support and encourage the development, enhancement and expansion of **safe** cycle routes by facilitating the construction of cycleways. Support the development of the National Cycle Network and The National Cycle Network Scoping Study(2010) and enhance and maintain these routes with better signposting, lighting and road surfaces separated from vehicular traffic. Encourage the development of off-road cycling. Ensure that the upgrading of roads will not impact negatively on the safety and perceived safety of cyclists. Ensure that any dedicated cycle routes which are developed away from the main public carriageway are well lit. Routes should, where possible, follow off-road tracks and quiet country roads. Based on **FI's Strategy for Development of Cycling Tourism Executive Summary(2007)** 01 the Mori Survey 3rd pt 4.2.3, **DoTT's NCPF(2009)** OO Breadth of Interventions page 7 6th pt on right hand col & 7th & 8th pts, Pol 3.4, Obj 5 & Pol 5.6, **Offaly** 4.6 STAP 08 1st line & 7.14 LAO 03, **Westmeath** 8.13 O 8 1st sentence 1st phrase, 2nd sentence last phrase, last sentence 1st & last phrases and many other plans.

16 **Cycle routes should be designed** using current thinking and best practice from experience in other locations, lower speed limits and priority over motorised transport to ensure road safety for pedestrians and cyclists. Taken from Roscommon 8.7.1 42 2nd sentence.

17 Assign an officer at appropriate senior level as a "**Cycling Officer**". Taken from **DoT's NCPF(2009)** Pol 17.3.
To which you should add before officer, full-time
Has: Fingal(part time), **Meath** and other counties.

18 Promote and facilitate the **development of cycle routes** in accordance with the **National Cycle Network Scoping Study 2010**. Taken from **2013 Plan** 6.5.11 EDE 21.

19 Support the development, maintenance and enhancement of trails and routes in co-operation with Sports Council, NTA, NTO, NWMWAC, Heritage Council and other bodies to **develop cycle touring routes** including those linking with adjoining counties particularly in areas of high amenity. Based on **Westmeath** 8.13 O 8 1st sentence last phrase, **Kildare** 14.12. 1 CR12 and many other plans.

20 Produce cycle maps. Taken from **NCPF 2009** Pol 6.2 1st sentence & **Westmeath** 8.13 O 8 last sentence 2nd phrase.

21 Support community, authority or agency led projects that would deliver identified strategic cycling links. Taken from **Laois** 6.1.1 TRANS38 1st phrase.

22 Develop a Cycling Strategy during the lifetime of the Plan. Taken from Cork City Obj 5.7.

23 Support the policies of the National Cycle Framework 2009. Taken from Limerick County 6.10.3 Obj COM 026.

REGIONAL

24 Develop NCN Corridors: See Corridor 1 Sligo to Dundalk.

WALKING & CYCLING

25 Support, promote, establish and actively encourage the provision, development, extension and design of off road interlinked cycleways and walkways, (mention routes) as part of including medium and long distance walkways and particularly those with historic associations in, conjunction with the Irish Sports Council, IW and other stakeholders to link with a strategic network of trails from residential areas, open spaces and existing or new public rights of way to facilitate the creation of a secure and safe greenways network to provide access to scenic, mountain and river features and to link with adjoining counties, including cross border counties in partnership with their councils, the state, private and voluntary sectors. Based on **Cavan** 9.6.1 RTO19 1st para 1st phrase & 2nd para, **Westmeath** 3.16 O 3, **2013 Plan** 6.5.11 EDE 23 1st sentence, **Longford** 5.1.3 PED 3 2nd sentence 1st & last phrase, **Wicklow** Vol 1 7.4 T29, **Meath Draft** 5.7.6 MOV POL 18 and many other plans.

26 Encourage and support the enhancement and extension of existing walking and cycle routes by utilising links from residential areas, parks and open spaces and existing and new public rights of way to facilitate the creation of a secure green network to provide access to scenic mountain, lakeshore and river features. Taken from **Cavan** 9.6.1 RTO 19 1st phrase.

27 Signpost and waymark walking and cycle routes with appropriately designed quality signage and information boards. Based on **Wicklow** Vol 1 7.4 T29 2nd line, **Kildare** 14.12 CR 10 and many other plans.

28 Encourage and support sensitive development which provides for the provision of **access** to natural habitats and heritage features. Taken from **Meath** 4.6 Obj 42 1st phrase.

29 Seek opportunities for the development of suitable walking routes, cycle tracks and bridle paths along historic access routes. Explore the potential of inter-county trails(named). Augment existing networks and trails at key heritage sites. Based on **Action Plan for Rural Development** 2017 Pillar 3 Action 200, **Longford** 4.5 Mid-Shannon Wilderness Park(sic) last para & 5.1.3 PED 3: 2nd sentence 1st phrase and other plans

30 Support the policies of National Cycle Policy Framework- DoTT's Smarter Travel. Taken from Limerick County 6.10.3 Obj COM 026.

31 Provide adequate car parking and/or lay-bys for walkers and cyclists, (from your local knowledge name important locations) and other appropriate points to facilitate access to amenity/scenic areas from 9am until dark. Based on **Lois** 5.11 TM20, **Kildare** 14.12.1 CR 14 1st phrase and many other plans

Notes

- 1 The absence of car parks can cause unnecessary friction between landowners and recreational users.
- 2 The primary responsibility for the provision of car parking lies with councils

32 Establish new Walkways and cycle routes on a legal and permanent basis. Taken from **Sth Dublin** 2.2.14 2nd 15th para 1st line.

33 Develop a strategy to underpin the funding for the development and extension and enhancement of walking/cycling trails, greenways, including off-road trails, inter-county waymarked walking and cycle routes and the Tain Trail, through the Action Plan for Rural Development 2017, DoTTS, NTA, Heritage Council and associated transport agencies and LEADER. Based on **Action Plan for Rural Development** 2017 Pillar 3 Action 167, **Lois** 5.11 TM25 3rd phrase, **Westmeath** 3.14 O 6, **Sth Dublin** 4.5.0 Action and many other plans.

34 Ensure that walking and cycling routes and the public footpaths network are maintained and where feasible improved. Based on

Meath 4.6.8 2nd para 1st sentence, **Cavan** 9.6.1 RTO3 last phrase and many other plans.

35 *Protect the integrity, extent, scenic quality, visual setting and functionality of Greenways and **walking and cycle routes**.* Based on **2013** 6.5.11 EDE 22 and other plans

36 *Protect the routes of, and **prohibit development** which would hinder the creation and development of future Greenways, **walking and cycling** routes including those identified in the Plan.* Taken from Donegal 11.3 P 13 2nd pt.

37 *Ensure that development proposals **protect the routes of potential linkages** such as linear paths footpaths trails, greenways and cycleways through a site where the Council considers that an opportunity to provide a linkage to or between adjoining areas.* Taken from Donegal 5.1.2 P31.

38 *Protect established **walking and cycling routes** and keep them free from development which would adversely impact upon them.* Taken from **Cavan** 9.8.1 RTO18 1st phrase.

DISUSED RAILWAYS

39 *Actively encourage, **support, promote** and facilitate the development of the disused railway from Dundalk to Castleblaney in Co Monaghan for a **greenway**, walkway and cycleway and other recreational including medium and long-distance walking and cycling routes and bridle paths with related signage and waymarking.* Based on **Smarter Travel 2009-2020** Act 17 2nd sentence page 45, **Kildare** 14.12 CR5, **Westmeath** 8.13 O 4 1st sentence and many other plans.

40 ***Protect and preserve** routes of former railway lines for recreational development free from development by protecting, enhancing, conserving, safeguarding and preserving potential greenway routes as long distance walking and cycling routes along or near these rail lines which could compromise their development as walking/cycle routes in the future. Along these corridors other uses shall not be considered. Where these corridors have been compromised by development, adjacent land which could provide opportunities to bypass such an impediment and reconnect these routes for walking/cycling shall be*

protected for this purpose. Based on **Offaly** 7.17 ROWO 02 and many other plans.

41 *While it should be possible to provide most routes along the existing track alignment, there may be a need for **diversions** and deviations following detailed survey and design work and consultation with landowners. The aim is to include these routes in a map in the Plan. Meanwhile adequate protection needs to be given to abandoned rail lines so as to avoid inappropriate development that could compromise their viability.* Taken from Cork County 8.7.6.5.

42 *Where feasible, provide separate trails for walkers and cyclists in the interests of safety and convenience with appropriate surfaces for each type of user.* Taken from **Sligo** 8.3 P CW 8 2nd sentence 1st phrase

Note

The separation of walkways and cycleways is the practice in other countries particularly in Austria, Germany and Switzerland.

7.5.11 Greenways

Text

Map 7.1 Existing Greenways

Policy Objectives

MOV27 We submit that **this should be replaced by:** *Support, promote, facilitate and continue the development of a comprehensive network of Greenways in accordance with **the Strategy for the Future Development of National and Regional Greenways**, linking parks and public open spaces to Regional and National Greenways. Work with the NTA, adjoining councils and all stakeholders to develop a co-ordinated approach to the selection, delivering and servicing of future greenway, in order to achieve improve external linkages, to achieve maximum impact and connectivity and to provide alternative routes for pedestrians and cyclists.* Based on **NPF** App 1 Obj 22, **Kildare** 5.19 EO 49, **DLR** 4.2.2.7

We submit that **you should include additional Pol Objs:**

1 *Actively encourage, **support, promote** and facilitate the development of disused railways (named) for **greenways**, walkways and cycleways and other recreational activity to develop a network including medium and long-distance walking and cycling routes and bridle paths in accordance with the **DTT Strategy for the Future Development of Greenways**, to improve access to rural tourist attractions, with related signage and waymarking.* Based on **Smarter Travel 2009-2020** Act 17 2nd sentence page 45, **Kildare** 14.12 CR5, **Westmeath** 8.13 O 4 1st

sentence & Pol OSR8, **Laois** 4.2 OBJ6, **Meath Draft** 5.7.6 MOV OBJ 31 and many other plans.

28 to 32

7.11 PUBLIC RIGHTS OF WAY

Text

1st para We submit that this should be replaced by: *PROW or highway is a physically defined route over which the public have a **right of passage** along a road or path even if the route is not in public ownership. It is described as “a user as of right” and confers an unrestricted right of the general public to pass and repass at all times of the day or night and at all seasons without notice to, or permission from the landowner. The most common characteristic of a PROW is that it follows a defined route which may be sub-divided amongst different branches. They facilitate enjoyment of the landscape and are an important for tourism and recreation.* Based on **Wicklow** Vol 1 10.3.8 2nd para 2nd & 4th sentences & last sentence 1st pt and other plans

last para 1st sentence

2nd sentence We note the **commitment to commence a review to see if a list of public rights of way can be include in the Plan.** We submit that **you should put this in train as soon as possible by following the provisions of the proposed additional Text 7.**

We submit that **you should include additional Text:**

1 *Public Rights of Way have existed over the centuries constitute an important **recreational amenity**. They enable the enjoyment of high quality landscape, natural and archaeological heritage and provide links to valuable amenities such as rivers lakes, bogs, forests and places of natural beauty.* Based on **Monaghan** 5.11 2nd sentence & 7.4.1 last sentence 1st phrase, **Fingal** Chpt 5 5.3 Public Rights of Way 2nd para 1st sentence and many other plans.

2 *The **listing** and mapping of public rights of way will **preserve Public Rights of Ways for recreational** purposes.* Taken from Kerry 9.10 2nd

3 *The Planning and Development (Amendment) Act 2000) makes it mandatory that the preservation of a public right way which give access to seashore, mountain, lakeshore, riverbank and other place of natural beauty or recreational utility which public right of way shall be identified*

both by marking them on at least one of the maps forming part of the development plan and by indicating their location on a **list** **approvisions of the proposed additional ended to the development plan.** Based on **Planning and Development(Amendment) 2010, Cavan 8.10 1st para last sentence & Sth Dublin 9.4.0 Text 1 st para 1st sentence.**

4 Section 14 of the Planning and Development Act 2000 sets out the formal process for designating rights of way in development plans. The scope of these statutory provisions is grounded on identification of existing routes over which PROWS are deemed to exist. The inclusion of PROW objectives for their preservation provides greater protection for such routes under development management provisions of planning legislation whilst also restricting the scope of certain exempt development. Taken from **Wicklow Vol 1 10.3.8 3rd para.**

5 The listing of public rights of way is an urgent matter as the lack of certainty on access has not only affected the rights of local people but has been the major cause of *the failure of walking tourism* to reach its full potential in this country.

6 The county development plan will include a *list of public rights of way* in accordance with the **2010 Planning and Development (Amendment) Act Sec 7(b)(ii)(o). The list must be drawn up in accordance with the wording in the Act.**

Notes:

1 The wording in the Planning Act is quite clear: Each new development plan must fulfil the above requirement and no deferment will be permitted. See DOCELG letter to all Councils of 25/10/12 (PL 09/12).

2 Counties who have complied so far: Cavan 8.10 Table 8.4, Clare App 6, DLR App G, Donegal Part B App 3 T 15, Meath App14, Kerry Vol 2 App 6, Kilkenny App D, Roscommon 8.7 Map 19, Sligo 6.7.4 Public rights of way Table 6.A, Sth Tipp 6.3.7 3rd para, Westmeath App 8, Wicklow Vol 1 Table 10.3.

2 The recently published *Draft Plan for Offaly* includes a *List*. See 6.6 public Rights of Way Table 6.1 Public Rights of Way and Fig 6.19 Public Rights of Way.

7 It is suggested that the list of public rights of way should be compiled by following this modus operandi: *Place an advert in local papers*

seeking submissions from the public to identify public rights of way which give access to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational utility.

Identify existing rights of ways, paths, and access points to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity.

Identify access points to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity which the Council have maintained or repaired with a view to identifying public rights of way.

Carry out a desktop analysis of public records, maps, aerial photographs and newspaper accounts to identify reputations of public rights of way.

Once the list is compiled, advertise and put it on display. The public will be invited to make submissions on the validity of the public rights of way. Endeavor to verify and list the public rights of way and begin the formal process for designating rights of way under Section 14 of the Planning and Development Act 2000 (as amended).

*Vary the Plan to include the list and map showing the public rights of way. Taken from **Cavan** 8.10 NHEO45.*

8 If an **Interim list** is included in the Plan the following should be appended to the list or provided in the written statement: *This is not an exhaustive list and the omission of a right of way from this list shall not be taken as an indication that such a right of way does not exist.* Taken from **Meath** 9.7.9 2nd para 2nd sentence & **Cavan** 8.10 last para last sentence.

Policy Objectives

MOV 49 We submit that this should be replaced by: *Promote the identification, preservation, protection, enhancement, maintenance and improvement, for the common good, all public rights of way and existing assesses, particularly those giving access to seashores, mountains, river banks, geomorphological features of heritage value and other places of natural beauty or recreational utility/activity by ensuring that development doesn't impinge thereon.* Based on **Sth Dublin** 9.40 OBJ 1 1st phrase, **DLR** 4.1.2.3 LHB14 1st pt, **Meath Draft** 8.16 HER POL 51 and other plans.

40 We submit that **this should be deleted as it clearly conflicts with the last para last phrase above.** If, however you do not agree, then we submit that **you should substitute *within one year for during the lifetime of the plan.*** As it stands this Pol Obj is a typical example of

prevarication or as they say nowadays *kicking the can down the road.*

We submit that **you should include additional Pol Objs:**

1 Identify Public Rights of Way prior to any new planting, infrastructural development of any new energy/telecommunications developments. Taken from Carlow 8.12 pol 6 2nd pt.

2 Identify and map, on an ongoing basis, public rights of way and incorporate them in the Plan by way of a **Variation**. Where appropriate links to established public rights of way in adjoining counties will be identified. Taken from **Westmeath** 7.15 O 1.

3 In accordance with the provisions of either Sections 206 or 207 of the Planning and Development Act 2000 encourage and facilitate the creation of additional rights of way and extend existing ones for pedestrian or amenity reasons, by investigating named areas to facilitate the development of waymarked ways and looped walks, by undertaking a review/survey of green links and cycling routes and by bringing forward proposals within two years of the adoption of the Plan, either by agreement or by the use of compulsory powers, for the creation of public rights of way, particularly in areas of high amenity and recreational importance and to the coast, uplands, seashores, river banks, forests, heritage and scientific sites, areas of historic, archaeological and recreational importance and National Monuments, to create a meaningful network. Promote their greater use. Provide linkages from built up areas to the countryside and the coast and link with public rights of way in adjoining counties. Based on **Wicklow** Vol 1 10.3.8 NH47 last sentence, **Sth Dublin** 9.4.0 Action, **Westmeath** 7.15 O 3 1st sentence and excluding 2nd phrase, **Longford** 6.4 AM 6 1st sentence 1st line, **DLR** 4.1.2.13 LHB14 2nd & 3rd pts, **Fingal** 5.2 Obj RF118 1st line and many other plans.

4 Ensure the provision of, and where necessary, improve signposting and waymarking on all public rights of way. Based on **Westmeath** 7.15 O 4, **Fingal** 5.2 Obj RF120 and many other plans

Note It is most important that public rights of way are marked on the ground because:

- 1 Walkers need to know of their existence to encourage usage
- 2 Signage would alert local residents to planning applications affecting the integrity of rights of rights of way

3 Directional signage during the course of the route would prevent involuntary trespass on private property and prevent walkers getting lost which might impinge on walker safety.

5 Designate Pilgrim Paths as public rights of way.

Note We submit that as these Paths have been walked for many centuries their case for designation is surely irrefutable.

6 Identify mass paths and routes to holy wells, mass rocks and penal mass stations and consider designating them as public rights of way.

7 Encourage the provision, for the common good, of a network of Public Rights of Way to traditional outdoor amenities, including heritage sites and features of archaeological interest, national monuments, mountains, hills, rivers, forests, lakes, geological and geomorphic systems, water corridors, places of natural beauty and other natural amenities. Taken from **Westmeath** 7.15 P 1 1st sentence 2nd phrase.

8 Prohibit development and keep free from obstruction public walking routes and public rights of way, particularly those at seashores, mountains riverbanks or other places of natural beauty or recreational activity and take legal action if necessary, to prevent any attempt to close them off. Based on **DLR** 4.1.2.13 LHB14 4th pt and other plans.

9 Look favourably on planning applications which include proposals to improve the condition and appearance of existing rights of way. Taken from **DLR** 4.1.2.13 LHB14 6th pt, **Laois** 7.21 PRW5 2nd phrase & **Kildare** 14.12.2 RW 4.

10 Existing Public Rights of Way and established walking routes shall be identified prior to any new forestry planting, new infrastructural, energy/telecommunications or golf course developments. Taken from **Kildare** 14.12.2 RW 3 & **Offaly Draft** 6 Pols TRP-33.

11 Development will not be permitted where a public right of way might be prejudiced, unless specific arrangements are made for suitable alternative linkages and that the developer can demonstrate that the level of amenity is maintained by:

- (i) the footpath/bridleway being diverted by the minimal practical distance and the route continues to be segregated from vehicular traffic;
- (ii) Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it.

(iii) the diverted route is of at least equal character and convenience.
Based on **DLR** 4.1.2.3 LHB14 5th pt,(i) & ii), **Laois** 7.21 PRW6,
Fingal 5.2 Obj RF118 2nd phrase and many other plans.

12 *Where, in the interests of proper planning and development, the **extinguishment** of an existing right of way becomes expedient, the Council may require the provision of a suitable alternative.* Taken from Galway City 4.5.1 4th para 3rd sentence.

13 *The Council will utilise its relevant statutory powers to **preserve** as practicable the **character** of listed public rights of way for amenity purposes.* Taken from **Wicklow** Vol 1 10.3.8 NH46 1st sentence.

14 *Protect and promote **Greenways and consider designating them as public rights of way.*** Taken from **Laois** 7.21 PRW5 1st phrase.

15 *Preserve and maintain existing **public rights of way** in order to link **amenities.*** Taken from **Sth Tipp** 6.3.7 Access and Public Rights of Way 1st sentence.

8 Natural Heritage, Green Infrastructure and Biodiversity

8.2.1 Heritage Plan

Policy Objective

NBG 1 We submit that **this should be replaced by:** *Support, deliver and promote the implementation of the County Heritage Plan and work in partnership the Heritage Council, NPW, the relevant Government Department, the Heritage Forum(if any) and the community.* Based on **Sth Dublin** 9 Pol1 Obj 2 **Meath** 9.4 last para 1st 1st sentence(**Draft** 8.6 HER OBJ 1) & **Laois** 7.2 last sentence 1st phrase.

We submit that yozu should include additional Pols Objs:

1 *Appoint a **Heritage Forum** on a permanent basis to assist the heritage officer in implementing the actions and objectives of the heritage plan.*

Cos who have one: **Kildare, Laois, Meath, Westmeath** and many other counties.

2 *Review the County Heritage Plan in partnership with the County Heritage Forum (if any), relevant stakeholders and the community.* Based on **Meath** 9.4 last para, **Kildare** 13.3.3 last sentence & **Longford** 6.2 HER 2.

We submit that **you should include an additional Sub Sec: Heritage Policies Objectives**

H1 Publish a list with maps of heritage sites which are open to the public. Taken from **Westmeath Heritage Plan 4.2.**

You should add: *and post on the Council's web-site.*

2 Prepare and implement a strategy for access to heritage routes by identifying, promoting and supporting the development of a network of heritage trails, with a focus on publicly accessible heritage sites and attractions in co-operation community groups, landowners and other stakeholders incorporating features of heritage interest. Based on Heritage Plans in **Sth Dublin 2.4.(i), Westmeath 4.4 & 3.2.10 & Wicklow 2.1.**

8.2.3 European 2000 Sites

Text

Policy Objectives

1 & 2

3 We submit that **this should be replaced by:** *Protect, maintain, and where necessary, restore, the conservation value of sites designated under the EU Habitats and Birds Directives. All developments, plans and projects that have the potential to have a negative/adverse impact on the integrity or coherence of a Natura Site will be subject to Habitats Directive Assessment and should be in accordance with best practice and guidance. Comply fully with Art 6(3) & (4) of the Habitats Directive(as transposed into Irish law by the EU Habitats Regulations 1997 and subsequent amendments) and S.177A of the Planning and Development Act(2000 – 2010) or any superseding legislation to ensure the protection, management, enhancement and improvement of the network of Euro Sites, including any additional Sites that may be proposed during the lifetime of the Plan, by assessing and screening and, where warranted, by prohibiting developments or projects within, near or immediately adjacent, which could have significant adverse direct, indirect or secondary impacts,(either individually, cumulatively or in combination with other plans) on the conservation objectives and qualifying interest of a Site, due to their size, scale or land take unless there imperative reasons such as overriding public interest of a social economic nature and adequate compensatory measures have been identifies and put in place to ensure and that it can be established that there is no feasible alternative or less damaging solutions. Sites should be afforded the highest level of protection in accordance with the relevant Directives and legislation. Promote the favourable conservation*

status of habitats and protective species including those listed under the Birds Directive, the Wildlife Acts and the Habitats Directive. Based on Planning and Development Act 2000 Part 11 Plans and Guidelines Chpt 1 Development Plans 10.(c) 3rd line, Sth Dublin 9.3.1 Objs 1 & 2, Kildare 13.5 NH4 & 5, Cavan 8.4.2 NHEP9, Offaly 7.3 NHP-04 1st phrase, 2013 Plan 5.4 Pol HER 5, Longford 6.2.2.3 NHB 6 1st & 2nd paras and many other plans.

4 to 6

7 We submit that **this should be repositioned in a proposed additional Sub Sec: Natural Heritage, Environment and the Uplands and Access to the Countryside and merged with proposed Pol Obj 2.**

8.3 Protected Plant and Animal Species

All

8.4 Protecting Biodiversity Value in Non- Designated Sites

All

8.5 Invasive Species

All

8.6 Natural Heritage Areas

Policy Objectives

NBG 14 We submit **that this should be replaced by:**

*Recognising their importance, and in accordance with relevant legislation, actively promote the conservation and protection of the proposed or designated NHA's and only consider development proposals within or affecting a Site if it can clearly demonstrate that the development will not have a significant adverse effect on it. Protect, enhance **and** conserve the character and integrity of designated or proposed NHAs including those that may be identified and designated during the lifetime of the Plan and maintain the conservation value of those features or areas of ecological interest , by avoiding/resisting inappropriate development in, near or adjacent to Sites which could result in their deterioration or which are likely to have a significant adverse effect (direct, indirect or cumulative) on features for which the sites were designated or prosed for designation. Ensure the protection of the ecological, visual, recreational, environmental and amenity values. Ensure that any development is designed and sited as to minimise its*

*impact on landscape values. Maintain the conservation value of Council owned land within designated or proposed Sites and promote the conservation value of adjoining council-owned land. Based on **Sth Dublin** 9.3.2 Text & Obj 2, **Laois** 7.10 OBJ1, **Monaghan** 6.10 Heritage, Conservation and Landscape Policies HLP 14 1st sentence 1st phrase, **Kildare** 13.5 NH 7 1st phrase & 8 1st phrase, **Westmeath** 5.6.1 P- NHA-1 & 4 and many other plans.*

We submit that you should **include an additional Pol Obj: Assess all proposed developments in order to determine if they are likely to impact directly, indirectly or cumulatively on designated natural heritage sites in accordance with relevant legislation.** Taken from Waterford City 10.4.2 Objs 6th pt & Carlow 9.1.1 Pol 2 5th pt.

We submit that **you include additional Pol Objs: Combined Natura Sites and NHAs Policy Objectives**

1 Protect, *conserve, preserve, enhance, maintain and, where necessary restore the integrity of all Sites, including areas adjacent thereto, designated or proposed, under National and European legislation and in other relevant International Conventions and Agreements and Processes by prohibiting development which might damage or be harmful to or result in serious dereliction or disturbance or which could have a significant adverse effect on the integrity of a Site and maintain and develop linkages between them. Support in co-operation with statutory authorities the management of proposed or designated sites to achieve conservation objectives. Protect and maintain the favourable conservation status/value and where necessary the restoration of designated or proposed sites. When assessing development proposals ensure the protection and conservation and enhancement of wildlife habitats.* Based on **Cavan** 8.4.2 NHEP9, **Monaghan** 6.10 Heritage, Conservation and Landscape Policies HLP 13, **Meath** 9.7.2.2 POL 5, **Offaly** 7.3 NHP-01 **Longford** 6.2.2.3 NHB 6 1st para Preamble and many other plans.

2 Apply the precautionary principle in relation to proposed developments in environmentally sensitive areas to ensure that all potential adverse impacts on a designated NHA or Natura 2000 Site arising from any proposed development or land use activity are avoided, remedied or mitigated. Taken from Limerick City 11 Pol LBR 8.

3 Maintain or restore the favourable **conservation condition** of designated or proposed site **under the control of the Council**. Taken from Roscommon 7.1 Obj 1.

4 When assessing development proposals provide for the **protection, conservation and enhancement of wildlife habitats and designated sites**. Taken from Nth Tipp 4 Pol HERT 29: Designated Sites last phrase.

Other Sites

Protect, conserve, . protect the integrity of and maintain the favourable conservation status and conservation value of Ramsar Sites, Statutory Nature Reserves, Biogenetic Reserves, and Wildfowl Sanctuaries under National and European legislation and International Agreements and maintain and /develop **linkages** between them. Prohibit development which would damage or threaten their integrity. Based on **Fingal** 9.2 OBJ NH17 1st phrase, **Kildare** 13.5 NH 8 1st phrase, **Offaly** 7.4 NHO-02 and many other plans.

8.7 Sites of Geological Interest

Policy Objectives

NBG 16

17 We submit that **this should be replaced by:** *Recognising the importance of Geological Sites, work with stakeholders and in consultation with the GSI to protect sites or features of geological or geomorphological interest or importance from inappropriate development by prohibiting development at, or in their vicinity, or which threaten their existence, integrity or conservation value. Identify, **protect**, enhance, maintain, manage, conserve, and where appropriate, restore their character and promote their preservation (including areas of geological interest listed in Table 8.4 or sites that may become designated during the lifetime of the Plan, in interest of protecting our geological heritage.* Based on **Planning and Development Act 2000 1st Sch Part IV Environment and Amenities 6, DLR 4.1.3.9 Pol LHB27, Kildare 13.9 NH 9, Cavan 8.5 NHEO12, Westmeath 5.8 P2, Fingal 9.3 Obj NH30, Monaghan 6.12 GEP 3, Fingal 5.3 COUNTY GEOLOGICAL SITES Text & 4th sentences** and many other plans.

18 While we support this we submit that **the reference to access in line 2 should be dealt with an additional Pol Obj as follows:** *Promote awareness, where appropriate, of areas of geological interest and*

promote, encourage, facilitate and support access for and public rights of way to geological and geo-morphological features of interest(including walkers and cyclists) in consultation with landowners(where appropriate). Based on **Monaghan** 6.12 GEP 1 1st phrase, **DLR** 4.1.3.19 last para, **Offaly Draft** 4 4.17 BLO 06, **Westmeath Draft** 12.13 CPO 2.32 1st phrase and many other plans.

We submit that **you should additional Pol Obj:** *Co-ordinate the continuing development of strategic **walking routes**, trails and other countryside recreational opportunities.* Taken from **Cavan** 8.5 NHEO11.

8.8 Wetlands Policy Objectives NBG 19 to 21

22 We submit that this should be repositioned in an additional Sub Sec: Peatlands

We submit that **you should include additional Pols Objs:**

1 *In partnership with the NPWS, WI and other stakeholders facilitate **public access** to wetlands and support and protect the recreational and amenity potential of wetlands.* Based on **Meath** 9.7.10 POL21 and many other plans.

2 ***Protect**, conserve, preserve, manage and enhance wetlands(including fens) from infilling, fragmentation, degradation and protect and conserve their quality, character and features. Resist development (including land reclamation) which would destroy, fragment and degrade wetlands, coastal wetlands, estuarine marshland and control adjacent development by the use of buffer zones.* Based on **Offaly** 7.3 NHP 11, **Fingal** 5.3 Obj RF 98 1st sentence & 7.2 Obj SW01, **Cavan** 8.5.2 NHEP16 & NHEO16, **DLR** 4.1.3.7 1st para 6th pt **Longford** 5.3.2 SFRA 3, **Sth Dublin** 7.2.0.9 and many other plans.

8.9.1 Landscape Character Assessment

All

9.9.2 Landscape Conservation Area

All

Policy Objectives

All

We submit that **you should include additional Pol Objs:**

1 *Provide and increase managed public access to interesting and attractive landscapes or to semi-natural and landscape amenity areas for recreational purposes. Based on Fingal 9.2 High Amenity Zoning last pt, Dublin City 10.5.2 GIO9 and other plans.*

2 *Preserve, maintain, enhance important landscapes and protect the amenity value, visual integrity of **upland areas**. Discourage inappropriate development in open countryside and prohibit developments which are likely to have material adverse visual impacts, either individually or cumulatively, on the character of the uplands. Ensure that development will not materially interfere or detract from scenic uplands and that particular regard is had to potential impacts of new developments and require that proposed developments demonstrate that every effort has been made to reduce visual impacts(including excessive bulk and inappropriate siting) and that visually prominent sites have been avoided to minimise visibility from scenic routes, walking trails, public amenities, settlements and roads. Have particular regard to the potential impacts of development on sensitive upland areas and consider the difficulty of establishing and maintaining screening vegetation. Based on Laois 7.19 LS01 1st phrase & 30, Kildare 14.8.3 LU 1, 4 & 5 and many other plans.*

3 *Preserve the status of traditionally **open/unfenced landscapes** including commonages and other hill land. Based on Wicklow Vol 1 10.3.7 NH42 1st phrase and other plans.*

4 *Protect, conserve, preserve, maintain, safeguard, identify and enhance the visual integrity,, scenic quality, general amenity and the visual quality of areas of intrinsically important and outstanding, **highly sensitive**, designated, natural, unspoilt and open **landscapes**(named), scenic areas, high amenity areas and the environs of archaeological or historic sites(named) from intrusive, inappropriate, injurious or unsympathetic new, or additions to, existing developments and reinforce their character and promote their distinctiveness by prohibiting development where it could unduly impinge or impact on or be detrimental to such landscapes or would be injurious to, or detract from natural amenities or introduce incongruous landscape elements. Based on Longford 6.1.1 2nd para 1st sentence, Monaghan 6.5 HLP 9, Fingal Chpt 9 Obj 36, 2013 Plan 3.10.7 1, Sth Dublin 9.20 Pol 7, Kildare 14.8.1 LA 1 1st phrase, Westmeath 6.23 P HAA1 & 5, Cavan 8.7 NHEO25 1st sentence & 2nd sentence 1st phrase, Meath 9.8.6 OBJ 1 2nd phrase and many other*

plans.

5 Adopt a regional approach to the protection of the landscape in co-operation with neighbouring counties. Taken from Leitrim 1.10.2 g) 1st phrase.

We submit that **you should include an additional Sub Sec: Fencing of Hitherto Open Land**

Text

1 *It is a requirement of the Planning Regulations 2001 Art 9(l)(a)(x) that the **fencing or enclosure of land open to or used by the public** during the ten years preceding such fencing or enclosure for recreational purposes or as a means of access to any seashore, mountain or other place of natural beauty or recreational utility, requires planning permission.* Taken from Kilkenny 6.2 Fencing 1st sentence. See also **DLR 8.2.7.5 1st para & Sth Dublin 11.5.5(iii) 1st sentence.**

2 ***Wire fencing** constitutes visual pollution and destroys the “away from it all” feeling which makes upland areas such an attraction.* Taken from Kilkenny 6.2 Fencing 2nd sentence.

3 *There has been a **large increase in the amount of new fencing in upland areas.** Barbed wire has been used in most of this new fencing, which, in the absence of stiles or gates, makes access for recreational users of our countryside almost impossible. Traditional hill-sheep farming rarely required fencing, but since the introduction of AEOS, sheep-farmers must, in certain circumstances, stock-proof their land. The challenge is to ensure that such fencing will be done in a manner that will meet the requirements of AEOS without impinging on access for walkers and other recreational users.*

Policy Objective

F 1 *As new **fencing of land open to or used by the public** during the ten years preceding is not exempt development in accordance with Art 9(l)(a)(x) of the Planning and Development Regulations the following criteria will be used when considering planning applications for new fencing of hitherto open land : Fencing, particularly in upland, highly scenic or amenity areas, will not normally be permitted unless such fencing is essential to the viability of the farm. The nature of the material to be used, the height of the fence, and in the case of a wire fence the type of wire to be used will be taken into account. Stiles or gates at*

appropriate places will be required. Barbed-wire will not be used for the top line of wire. Based on **Fingal** Chpt 5 Obj RF1 and many other plans. **Note** As fencing may have a cross-county dimension it is important that this development plan should be in conformity with those in adjoining counties.

8.10 Trees, Woodlands and Hedgerows

The topic of forestry and woodlands can be dealt with in a number of different ways. Probably the best way of dealing with it is to consider the primary function of a forest/wood. We suggest that coniferous forestry should be regarded primarily as commercial forestry and deciduous forestry as amenity. We have divided this topic into three sections:

- A Commercial forestry**
- B Amenity woodlands**
- C Provisions dealing with both**

A Commercial Woodlands

We submit that **this should be included in a proposed additional Chpt: Rural Economy**

B Amenity Woodlands

Policy Objectives

All

We submit that **you should include additional Pol Objs:**

1 *Protect woodlands and groups of trees from inappropriate development that would impact adversely on them and affect their amenity value. Manage and promote the **preservation** and enhancement of the existing network of **woodlands** as they contribute to the environment including landscape character and landscape conservation. Where appropriate, protect mature groups of significant trees that are not protected under TPOs.* Based on **Laois** 7.13 NH 22 1st phrase, **Kildare** 9.2 Obj NH27, **Fingal** 9.2 Obj NH27 and many other plans.

8.11 Environment and Amenities

All

8.11.3 Views and Prospects of Special Amenity Value

All

8.12 Scenic Routes

All

8.13 Green Infrastructure

13.1 introduction

All

8.13.2 Planning for Green Infrastructure

All

8.1.3 3 Green Infrastructure Strategy

All

Policy Objectives

41 to 55

57 We submit that **this should be repositioned in a proposed new Sub Sec: Inland Waterways as an additional Pol Obj.**

We submit that **you should include additional Sub Secs:**

A INLAND WATERWAYS

Note This is a recommended topic under the **Heritage Act 1995** Sec 6(1).

Table

We submit that you should include a Table of: **Existing or potential** riverside and lakeside walks/cycle routes. See **Kildare 5.9.5 ECD 29.**

Policy Objectives

IW 1 *In partnership with the NPWS, WI, Councils, community groups, recreational agencies and other relevant stakeholders, provide, protect, promote, encourage, develop, maintain, facilitate, increase and improve **public access** to the inland waterways and inter-related recreational opportunities, including riparian/waterway corridors.* Based on **National Heritage Plan 4.17, Fingal 9.2 Obj NH25 1st phrase, RSES EMR REGIONAL POLICYOBJECTIVES RPO 4.4, Longford 6.2.2.7 ILW 3 2nd line, DLR 4.1.3.7 Pol LHB25 2nd sentence, Westmeath Draft 12.16 CPO 12.48 1st phrase, Offaly Draft 6.7 TRP-18 1st sentence in line 2 and many other plans.**

2 *Recognising the importance of rivers and riparian corridors and buffer zones for their natural amenity and scenic values, **provide** promote, develop and facilitate/accommodate **access for walking, cycling tracks***

and other compatible activities along inland waterways including rivers facilitate the creation of linear parks, in co-operation with landowners, WI, NPWS, Government Departments, community groups and other councils. Based on Laois 7.19 LS17 1st phrase, 2013 Plan 7.4 TC 25 & Kildare 14.12.1 CR 7.

3 Support and facilitate the development of Greenways and Trails along (named) rivers. Taken from **Sth Dublin** 4.5.0 Pol 6 Obj 1.

4 Identify existing accesses to riverbanks within the life time of the Plan. Taken from Mayo Vol 1 Chpt 4 Access to Heritage & Amenities AC 01a.

5 Require that land adjacent to rivers be reserved/preserved for public access as an undisturbed buffer zone between new development and river corridors and other water bodies to encourage increased public access and recreational opportunities. Based on **Longford** 6.2.2.7 ILW 7 and other plans. 7,

6 Seek to enhance public access to inland waterways as a condition of any development granted. Taken from Roscommon 7.4 Obj 7.32 1st phrase.

7 Recognising the importance of inland waterways, both navigable and non-navigable, work with State Agencies, landowners, local communities and other relevant groups/stakeholders to protect, manage, maintain, preserve, conserve, improve and enhance waterbodies and watercourses, rivers(named), streams, river valleys, springs and associated undeveloped riparian strips/zones, buffer zones distinctive linear sections of water corridors and the amenity of the shoreline of river corridors and river banks, river and stream valleys and riverine wetland areas, fens and wildlife habitats from degradation and damage and the visual impact of dispersed and highly visible development that could adversely affect them by compromising their visual integrity, recreational, amenity, natural heritage, geological or landscape character values and the natural characteristics and features and recognise and promote them as natural environmental assets, and maintain them free from inappropriate development to ensure that public use is not prejudiced by incompatible uses. Keep them in an open state and in a natural condition by discouraging land filling culverting or realignment and in certain instances by uncovering existing culverts. Any existing blockages to permeability such as redundant buildings should be resolved where possible. Based on **Dublin City** 23.9 2nd para 2nd

sentence, **Kildare** 14.8.5 WC 3 & 14.9.2 WV 3, **Sth Dublin** 8.2.0 Obj 4 1st phrase, **Cavan** 8.9 NHEP21 1st phrase, phrase, **Fingal** 9.2 Obj NH24 & 25 3rd line, **DLR** 4.1.3.7 LHB25 1st sentence 1st phrase, 1st para below Pol 1st sentence last phrase & 1st para below Pol 4th pt, **Westmeath** 5.16 P RLC3, **Longford** 5.3.2 SFRA 3, 6.2.2.7 ILW 3 1st phrase, 8 & 9 1st sentence.

8 All proposed developments shall be in accordance with the Birds and Habitats Directives and other relevant EC Directives. Taken from Clare CDP.9.13.

9 Protect the recreational and amenity potential of navigational and non-navigational waterways and adjacent wetlands. Taken from **Meath Draft** 8.13 HER POL 47.

10 Protect and maintain the amenity and recreational value of walking and cycling routes by prohibiting the intrusion of development along these routes. *Seek to ensure that new development will not have a negative impact on established walking routes and public rights of way along inland waterways.

*It would be better if *Seek to* was omitted. Based on **Westmeath** 5.16 P RLC14 2nd sentence, **Kildare** 14.12.2 RW 2 and other plans.

11 Normally only permit proposals for development associated with water sports adjacent to waterways, where the proposed facilities are compatible with existing use of water including non-recreational uses, which will not result in damage to important features of archaeological heritage or Natura Sites, can be satisfactorily integrated into the landscape or will not have an unacceptable impact on visual or environmental amenities especially in areas of high amenity or scenic importance. Based on **Lois** 8.5 DM 34, 1, 2 1st phrase, 3 1st phrase & 4 and many other plans.

12 As Water sports cover a wide range of activities from tranquil uses such as sailing, canoeing, rowing and sail boarding to powered activities such as water-skiing and powerboat uses, the Council may require management plans for particular areas to address the compatibility of such varying demands. Taken from Carlow 8.11.9 2nd para 1st sentence & Kilkenny 7.3.4.1 2nd para.

13 Adopt bye laws prohibiting or restricting jet-skiing, water skiing and any other noise generating activities within one year of the adopt of

the Plan. Adapted from Leitrim 3.10.3 4th para & Carlow 8.11.9 1st para 6th pt,

*14 When considering development applicants relating to activities such as the use of **jet-skis and power boats** have regard to the recommendations of any **national guidelines** which may come into force with respect their potential impacts on nature conservation. Taken from Roscommon 7.3 Obj 7.14.*

*15 In areas adjacent to inland waters including rivers, where **planning permission** is sought, the applicant must ensure that full **public access** to waterways is retained or conditions may be attached requiring retention of this access to facilitate creation or extension of walking/cycle routes. Taken from **Longford** 6.2.27 ILW 5 2nd sentence.*

*16 Adopt a **regional approach** to the **protection** of watercourses in co-operation with neighbouring counties. Taken from Leitrim 1.10.2 g) 1st phrase.*

*17 Require that **development along rivers** set aside land for **pedestrian routes** that could be **linked** to established **settlements**. Taken from Carlow 8.11.10 Pol 5 2nd pt 1st phrase.*

*18 The line of development within river valleys shall be strictly controlled so as to maintain the integrity of the natural topography. The maintenance of natural river banks shall be required to be without physical or visual encroachment. Taken from **Dublin City** 23.9 1st para 2nd sentence.*

*19 Potential applicants will ensure that full public **access** to lands along waterways which are in **private ownership**. Taken from **Dublin City** 23.9 2nd para last sentence.*

*20 Protect, enhance and improve **existing public rights of way** and, where possible, provide additional access to inland waterways including river banks, through the acquisition of land for public rights of way and parking and lay-by facilities, through agreement with existing landowners*. Taken from **Longford** 6.2.2.7 ILW 5 1st sentence & 6*You should add: *or by the use of compulsory powers**

*21 Reserve land adjacent to river banks and other waterbodies to **promote and facilitate the creation of waterside linear parks** to link with existing parks and open spaces and to facilitate the provision of*

walking/cycling routes along canals and watercourses. Based on **Dublin City** 23.9 1st para 1st sentence, **Westmeath** 3.16 P 8 1st phrase & 6.2.7 O 5 1st phrase and other plans

22 Promote the natural, historic and amenity value of watercourses to address the long term management and protection and strengthen regional links. Taken from **Sth Dublin** 8.20 Pol 3.

23 Seek to* ensure that new development will not have a negative impact on established walking routes/public rights of way. Taken from **Offaly Draft** 6 Pol TRP-

B NATIONAL PARKS

Text

National Parks provide major recreational amenities allow access to wilderness and highly scenic areas which would otherwise might have limited access rights.

Policy Objective

NP1 Promote the designation of the Cooley Mountains a National Park in collaboration/partnership with the appropriate Government Department, landowners, local communities and other stakeholders.

C NATURAL HERITAGE, ENVIRONMENT and the UPLANDS and ACCESS to the COUNTRYSIDE

Policy Objectives

NHE 1 *Recognizing the role played by natural amenities and landscapes as major resources as part of our heritage, identify, provide, support, maintain, actively promote, encourage, protect, preserve, prove, safeguard, manage and enhance public access to heritage sites and features, natural heritage and amenity areas, including Natura 2000 sites, nature reserves, mountains, uplands, moorlands, forests, rivers, lakes, valleys, scenic areas, areas of natural beauty and other natural amenities for active recreational activities such as mountaineering and hill-walking, which have been traditionally used for outdoor recreation, and to the countryside generally, by creating a meaningful network of access routes as the opportunity or need arises. This will be done in co-operation, consultation and consensus with state and recreational agencies, landowners, community groups other interested bodies.*

Based on **Meath** 4.6 ED POL 42 1st phrase, **Lois** 4.3 NRA6 1st phrase, 9 & 5.11 TM29 1st phrase, **Longford** 6.2.2 NHB 3, **DLR** 4.1.1.1 LHB 1, **Wicklow** Vol 1 10.3.7 NH40 1st phrase, **Offaly Draft** 6. 7 TRP-18 1st sentence in 2nd line and many other plans.

2 Designate traditional walking routes to the uplands as public rights of way. Taken from Sligo 6.7.4 POR 16 last phrase. See also **DLR** 4.1.1.1 Pol LHB1& **Kildare** 14.12.2 CR 11.

3 Recognising the important role of the environment through diversity, quality, integrity and quality of life by promoting the protection, conservation and enhancement of the natural environment by prohibiting intrusive development that would detrimentally impact on natural heritage which could or might have a negative impact on natural amenity and recreational assets, natural heritage features or archaeology or might unduly damage or take away from its character and by implementing the provisions of the Planning and Development Act 2000(as amended). Promote appropriate enhancement of the natural environment as an integral part of development. Engage with stakeholders, including local communities and statutory authorities to identify, protect, conserve, preserve, manage, enhance, maintain, safeguard, facilitate, maintain and, where appropriate, restore, visual and scenic amenities, the rich quality and character of the natural heritage features and the natural environment including rivers, streams, wetlands and woodlands, scenic areas and the general amenity of the countryside and in recognition of its importance as a non-renewable resource, from intrusive development that would detrimentally impact on it, while maximising the recreational amenity and quality of life by the provision of visual relief from the built environment. Avoid unnecessary harm and reduce its effect where it cannot be avoided by replacing like with like. Promote best practice with regard to heritage conservation and management. Based on **DPG** 3.5 Box 3: Suggested Structures and Content of Development, **2000 Planning & Development Act** Part 11 *Development Plans* Chapt 1 Sec 10(2)(c) 1st phrase, **NPF** Pol Obj 60, **Kildare** 13.4 NH 1 1st sentence & 2nd sentence 1st phrase, **Offaly** 7.4 NHO-02 1st phrase, **2013 Plan** 5.7 HER 10, **Meath** 4.6.8 POL 29, **DLR** 4.1.3.1 Pol LHB19 1st sentence 1st phrase, **Longford** 6.2.2 NHB 1 1st sentence & NHB 2, **Wicklow** Vol 1 10.3 Natural Heritage Strategy 4th pt and many other plans.

4 Impose “Precautionary Principles” which are an integral component of planning policies on environmental and heritage matters. Where uncertainty exists regarding the potential impact of a proposed development on natural heritage, full account shall be taken of these Principles. Taken from Carlow 9.1 Heritage Pol 1 5th pt.

5 Adopt a **regional approach to the protection**, conservation and management of the environment in co-operation with neighbouring counties. Taken from Leitrim 1.10.2 g) 1st phrase.

6 **Preserve the open character of commonage land** and other hill land and **secure access** over paths and tracks through consensus with landowners, particularly in mountain areas. Taken from **Wicklow** Vol1 10.3.7.

7 Encourage and **support sensitive development** which provides **access** to natural habitats subject to nature conservation considerations. Taken from **Meath** 4.6 POL 42.

D PEATLANDS

Policy Objectives

PE 1 **Protect**, conserve and manage the character, appearance, heritage and amenity values of peatland landscapes by promoting high environmental standards in **conjunction** with the BnM, NPWS, Coillte, IPCC and NGOs. Based on **Laois** 7.19 LS44, **Meath** 9.7.6 1st para 2nd sentence, **Offaly** 2.12 TP 06, **Westmeath** 5.12 P O 3 and many other plans.

2 The Council recognises the importance of **raised bogland** as a major natural, archaeological and amenity resource and will liaise with the relevant Government departments and NGOs to try to secure the conservation of original peatland areas. Taken from **Nth Tipp** 4.8 Peatlands 2nd para.

E MASS ROCKS and HOLY WELLS

Policy Objective

MR 1 Preserve, **protect** and, where necessary, enhance mass rocks and holy wells. Taken from **Nth Tipp** 8.4.5(iii).

F Special Amenity Area Orders

Policy Objective

SAAO 1 Actively **propose the designation** of the **Cooley Mountain Area** as a Special Amenity Area and seek an Order to that effect as per section 202 of the Planning and Development Act 2000(as amended) and undertake a feasibility study to report on other areas considered worthy of designation, to report within one year of the adoption of the

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Plan. Based on **Cavan** 8.8 last sentence, **Kildare** 14.8.5 WC 7, **Laois** 7.19 LS39 & **Dublin City** 10.5.3 GIO14.

Note An Order has already been made covering the Liffey Valley, the Howth peninsula (both in Dublin) By all accounts they are working very well.

9 - BUILT HERITAGE AND CULTURE

We submit that **you should include ARCHAEOLOGY in the Title to better reflect its Contents**

9.3 ARCHAEOLOGICAL HERITAGE

All

9.3.1 Zones of Archaeological Potential

All

Policy Objectives

BHC 1 1st phrase We submit **that this should be replaced by:**

Council recognises the importance of promoting, encouraging and securing/ensuring the protection, conservation, preservation, enhancement, safeguarding and appropriate management of sites, settings and features of archaeological/historic interest including the protection of their intrinsic value, character, integrity, context and settings of National/Recorded Monuments or newly-discovered archaeological sites and/or sub-surface archaeological remains, known and unknown, including those identified in the RMP, RHM & SMR and sites and features of historic interest and National Monuments that are the subject to Preservation Orders, in the ownership or guardianship of the State or the Council and by implementing the provisions of the Planning and Development Act 2000(as amended) and other statutory and other relevant policy decisions. Development, either above or below ground, taking place within or adjacent to sites should be designed to ensure that it will not seriously detract from, impact upon or damage features of historic or archaeological interest, shall respect their character and settings. Proposed developments which would be seriously injurious to the settings, character of sites or RPMs, including in particular, those within a 20m radius of National Monuments, will not be permitted and those within 75m will be discouraged. Ensure that development, within adjacent to or in the vicinity of an archaeological monument or a Zone of Archaeological Potential(including formerly walled towns) shall not detrimental to its character be or setting by reason of its bulk or detailing and shall be sited and designed in a

manner which minimises its impact settings, is resisted. Extend this protection to cover additions or alterations that may arise during the adoption of this Plan and to newly discovered remains and features. Protect and preserve all archaeological sites and monuments included in the RMP, any sites of and features of historic or archaeological interest and any subsurface e arch features that may be discovered during the development. Protect, where appropriate, the character and setting of any unrecorded archaeological site from inappropriate development.

Based on **2000 Planning & Development Act** Part 11 Development Plans Chapt 1 Sec 10(2)(c) 1st phrase, **DPG** Archaeological Heritage 4.26 1st para last sentence last phrase & 4.28 General Policies on Archaeology 2nd para last sentence, **Sth Dublin** 9.1.0 Archaeological Heritage Pol 2 & Obj 2, **Laois** 7.4 OBJ3 1st phrase, **Westmeath** 5.33 8, **Offaly** 7.19 AAH P08 1st sentence, **Longford** 6.2 HER 1 & 8.2.1 1 ARC 1 last sentence 1st phrase, 3, 11 & 12, **2013 Plan** 5.9.1 HER 21 1st sentence, **Meath** 9.6.9 OBJ 7 1st sentence, **Meath Draft** 8.6 HER OBJ 2 and many other plans.

last phrase We submit **that this should be replaced by:** *Protect and secure the preservation in situ, or in exceptional cases, preservation by record through the planning process and having regard to to the advice and recommendations of the NMS of the Department of Culture, Heritage and the Gaeltacht of all archaeological remains and sites of historic importance such as National Monuments, Recorded Monuments, their settings, caves, features and context in accordance with Sec 12 of the National Monuments(Amendment) Act 1994 and in accordance with the recommendations of the Framework and Principles for the Protection of Archaeological Heritage DAHG(1999) or any superseding national policy document.* Based on **Planning and Development Act 2000 1st Sch Part IV Environment and Amenities 6, Sth Dublin** 9.1.0 Pol 2 Obj 1 and many other plans.

2 1st sentence We submit that this should be merged with 1.

2nd sentence

3 to 6

We submit that **you should include additional Pols Objs:**

1 *Recognising the importance of archaeology and National Monuments as part of our heritage, promote, enhance, facilitate, encourage, support, improve and protect **public access** to National Monuments,*

Archaeological Sites, castles, sites of historic interest and to archaeological landscapes, in the direct ownership, guardianship or control of the Council, and/or the State or private ownership, including those listed in the RMP, in co-operation/conjunction with relevant and landowners and recreational agencies Based on **Laois** 7.4 1 OBJ1, 2 1st sentence & 7.9 ARC 12, **Sth Dublin** 9.4.0 Pol 16 Obj 4, **Meath** 9.6.9 POL 6(Draft 8.6 HER OBJ 5), **Offaly** 7.19 AAHP-07, **DLR** 6.1.2.1Pol AH1 last para, **Wicklow** Vol1 10.2.2 BH4, **Longford** 6.2.1 ARC 4 & 8, **Kildare** 12.9.1 AH 8, Offaly Draft 6.7 TRP-18 1st sentence in line I and many other plans.

2 *Promote, provide and encourage signage to archaeological sites and National Monuments listed in the RMP.* Based on **DLR** 6.1.2.1 1st para, **Kildare** 12.8.4 AH 9 & **Laois** 7.4 OBJ 2 last sentence.

3 *Traditional access routes will be designated as public rights of way. In other cases, routes will be acquired by agreement with landowners or by way of compulsory powers.* Taken from **Laois** 7.4 OBJ2 2nd & 3rd sentences.

4 *The council will continue to develop a programme of survey and management of Council-owned monuments and structures of historic interest.* Taken from **Sth Dublin** 9.1.0 Pol 2 Action.

5 *Protect and preserve in situ all archaeological sites and features of historic interest discovered/identified subsequent to the publication of the RMP.* Taken from Limerick County 7.5.2 Obj EH 026 & **Meath Draft** 8.6 HER POL 2 1st phrase.

9.3.3 Battlefield Sites **All**

9.3.4 UNESCO World Heritage Site **Policy Objectives** **BHC 9**

10 We submit that **you should include an additional sentence:** *Protect, preserve and enhance the Outstanding Universal Value of the Site in accordance with relevant guidelines and national legislation, so that its integrity, authenticity and significance are not adversely affected by cumulative inappropriate change and development and enhance within and adjacent to the Site.* Based on **Meath** 9.6.7 OBJ 1(Draft 8.6 HER POL 6) & **2013 Plan** Pol 3.10.7.6.

11 & 12

13 1st phrase

last phrase We submit **that this should be repositioned in 9.5 TENTATIVE WORLD HERITAGE as an additional Pol Obj.**

We submit that **you should include additional Pol Objs:**

1 *Ensure that **residential extensions** within the Site are in character with the original buildings.* Taken from **Meath Draft 8.6 HER POL 10.**

2 *Support the DCH & G and all stakeholders in implementing the **2017 Management Plan.*** Taken from **Meath Draft 8.6 HER POL 11.**

3 *Work in partnership with the community and all other relevant stakeholders to promote, **conserve** and sustainably manage the Site.* Taken from **Meath Draft 8.6 HER OBJ 7.**

4 *Refer all planning applications within the Site to the DCH & G for their comment, which will be considered in the assessment of planning applications.* Taken from **Meath Draft 8.6 HER OBJ 9.**

9.4 EXEMPTED DEVELOPMENT

1st Para

2nd Para We submit that **this should be upgraded to a Pol Obj and included in 9.3.4 UNESCO World Heritage Site - Bru na Boinne**

9.5 TENTATIVE WORLD HERITAGE SITES

Text

Policy Objective

BHC 14 We submit that **this should be replaced by:** *Recognising and respecting potential Sites, support, pursue, progress, facilitate, maintain and promote the designation/nomination of Monasterboise and the Battle of the Boyne as UNESCO WHS in collaboration/partnership with the appropriate Government Department, landowners, local communities and other stakeholders, to assist in the preservation of the natural heritage.* Based on **Action Plan for Rural Development 2017 Pillar 3 Act 190, Wicklow Vol 1 10.2.2 BH 6, 2013 Plan 5.9.9 HER 32, Meath 9.6.8 POL 5** and many other plans.

We submit that **you should include additional Pol Objs:**

1 Protect, preserve protect them and maintain the Outstanding Universal Value of Sites at Monasterboise included in tentative list of WHS from inappropriate development. Based on **2013 Plan** 3.10.7 and many other plans.

2 Support and promote the candidature(named site) for inclusion in the "Tentative List". See Kerry 5.12 T 55.

9.6 ARCHITECTURAL HERITAGE

All

9.6.1 Architectural Conservation Areas

All

9.7 HISTORIC AND DESIGNED LANDSCAPES

All

9.8 VERNACULAR HERITAGE

All

9.9 HISTORIC BUILDING STOCK

10 INFRASTRUCTURE & PUBLIC UTILITIES

10.1 IRISH WATER

10.2.6 Riparian Corridor

Policy Objective IU 23 We submit that **this should be repositioned in Chpt 8 Natural Heritage, Biodiversity & Green Infrastructure in a new Sub Sec: Inland Waterways as an additional Pol Obj.**

10.4 COMMUNICATIONS We submit that the Title should be prefixed by TELE to better reflect its contents

Policy Objectives

IU 36, 37 & 39 to 41

We submit that **you should include additional Pol Objs:**

1 Require the identification of *Public Rights of Way* and established walking routes prior to any new telecommunication developments(including associated processes) which will be prohibited if they impinge or impact thereon or on recreational amenities or public

access to the countryside or on the natural environment. Taken from **Sth Dublin 7.4 Obj 6.**

Note Pending a complete listing of public rights of way, walking routes, as prospective rights of way, should be protected.

2 *The Council shall, in **assessing an application**, take into account the impact on established **walking routes**.* Taken from Mayo Vol 2 55.3 4th pt.

10.4.2.5 Domestic Satellite Dishes Policy Objective IU 43

10 5 ENERGY

105.2 Renewable Energy Policy Objectives

We submit that **Pol Obj IU 47 should be repositioned in a new Sub Sec: Renewal Energy**

We submit that **you should include additional Pol Objs:**

1 *Developments must be **appropriately located**.* Taken from Sligo 11.1 SP EN 2 1st para 4th line, Limerick County 8.5.4 Obj IN 056 1st phrase & **Meath Draft** 6.15 INF OBJ39 in 6th line.

2 *The development including any ancillary facilitates or buildings, considered individually or taking into account their scale and layout, their incremental/cumulative effect due to other proposals, the degree to which negatively impacts are highly visible over a vast area, their visual impact on scenic landscape as well as local visual impacts, impacts on archaeology, **should not create a hazard or nuisance**, including the risk land instability and take into account the character and appearance of the surrounding area, the openness and **visual amenity** of the surrounding environment, countryside, landscapes, protected areas such as NHA's, SPA,s SAC's and sites of historic or archaeological interest or in proximity to National Monuments. Development will be subject to suitable locations and will only be permitted where they will not have an adverse impact on the environment including natural heritage and the protection of local amenities and landscapes. Where impacts are inevitable what mitigation features have been taken into account or in the case of European conservation sites, facilities can only be accepted if they comply with Art 6 of the Habitats Directive. Based on **Fingal** 12.10 DMS138 1st sentence 2nd phrase(ii), (iii) (v) & (vi), **Meath***

8.1 EC POL 3 last phrase & 11.15.1 2nd 3rd & 6th pts & Meath Draft 6.15 INF OBJ 39 & 11.10, **DLR** 8.2.10.1 2nd para last sentence 2nd, 3rd & 4th pt 1st phrase, **2013 Plan** 9.4 Pol EnCo 9 2nd phrase, **Offaly** 3.7 EP 02 and many other plans.

3 *In assessing development proposals the Council will take into account/take cognisance of public access to the countryside and the impact on **public rights of way** and walking routes.* Based on **Fingal** 12.10 DMS138 (iv) 2nd phrase & **Meath** 11.15.1 All Renewable Energy Developments 1st para 4th pt.

10.6 WIND ENERGY

Map 10.1 Areas suitable for Wind development

We submit that you should include a **Map** showing the degree of acceptability from prohibition to preferred including areas in adjoining counties considered unsuitable: See Cork County Fig 9.2.

Policy Objectives

All

We submit that you **should include additional Pol Objs:**

1 *Prepare a **Wind Energy Strategy** within the one year of the adoption of the adoption of the Plan.* Taken from **Wicklow** Vol1 9.5.3 Wind Energy CCE 6 1st phrase and many other plans

2 *Identify existing public rights of way and established walking routes and maintain and **preserve them free from development.*** Taken from **Cavan** 4.73 PIO 117.8.

3 *Restrict large scale wind energy structures in the rural hinterland and mountain areas to protect their overriding visual and environmental values.* Taken from **Sth Dublin** 10.27 Pol 9.

4 *All applicants should include a LIA dealing with possible **impacts on any existing rights of way** or established walking routes.* Taken from **Kilkenny** 10.5.3 Landscape Impact Assessment 1st para 1st sentence.

10.7 SOLAR ENERGY

Policy Objectives

IU 57 We submit that **this should be replaced by:** *Support the development of solar energy infrastructure including the commercial scale solar ground mounted PV "Solar Farms" subject to environmental*

*safeguards and the protection of **protection** of the natural heritage and must have no significant adverse impact on the surrounding natural and built heritage features , biodiversity and views and prospects or on the visual character of the landscape and amenities. There is a presumption against their being located in sensitive areas such as Natura 2000 sites, scenic routes. Have regard to the cumulative effect and the potential for mitigation through screening with hedges. Based on **Sth Dublin** 11.7.5 3rd pt, **Laois** 6.6.1.3 Ground Mounted Arrays last para las sentence 1st phrase, **Fingal** 7.3 Obj EN12 last phrase, **Kildare** .7 SE 2 5th pt, 8th pt 5th line and 10th pt 5th line and other counties.*

We submit that **you should include an additional Pol Obj:**
*Make representations to the appropriate government department to make **Planning Guidelines** for ground mounted solar farms.*

10.9 HYDRO ENERGY

Policy Objective

IU 64 We submit that you **should delete lakes on 2nd line as we understand that there are no lakes in the County.**

We submit that **you should include an additional Pol Obj:** *In assessing hydro energy schemes proposals the Council will take into account the **impact on public rights of way** and walking routes. Taken from Carlow 6.3.2 Pol 6 2nd pt.*

10.10 SMALL SCALE RENEWABLE ELECTRICITY GENERATION

Policy Objective IU 66

1010.2 Electricity Supply and Infrastructure

We submit that **the Title should include Telephone & TV cables & Gas Infrastructure to better reflect its Contents.**

Policy Objectives

IU 67

69 1st sentence We submit **that you should add: and least environmental impact in the interests of landscape protection.**
Taken from **Meath Draft** 6.15 INF POL48.

2nd sentence We submit that **this should be replaced by:** *Recognising that overhead powerlines can have a significant impact on the visual*

character of an area, ensure that lines do not **impact** on the natural environment. Minimise their obstructive impact and obtrusiveness by avoiding areas of high amenity, high landscape value, scenic importance, sensitivity or sites and areas of nature conservation and areas of archaeological interest, NHAs, Natura 2000 sites National Monuments and mountains areas, by integrating with their surroundings. Safeguard Natura sites and the sensitive, open character of high amenity and mountain areas. Ensure that where impacts are inevitable mitigation factors have been included. Based on **Kildare** 6.12.2 TN 4 last phrase, **Sth Dublin** 10.2.10 Obj 1, **Westmeath** 10.14 P ELE1 **Monaghan** 15.22 EGP 2 last sentence last phrase, **Longford** 5.5.1 3rd pt 1st phrase, **Meath** 11.15.4 2nd & 4th pts(Draft 6.15 INF POL 52 1st phrase), **Laois** 6.6.3 ELEC 4 ii, **Longford** 5.5.1 2nd pt and many other plans.

last sentence We submit that **this should be replaced by:** *The undergrounding or re-routing of transmission lines (including telephone and TV cables) shall be considered first as part of a detailed consideration and evaluation of all available options. Where technically feasible and environmentally appropriate, HV and other powerlines(including existing powerlines) and associated equipment should be placed underground to reduce the visual impact on the natural environment especially in sensitive areas or areas of high visual amenity to preserve significant landscape, impact on Euro sites, NHAs, sites of nature conservation, possible interference with or damage to areas of archaeological importance or significant views from the visual intrusion of energy infrastructure and cooperate with other agencies as appropriate. Protect areas of recognised landscape importance and significant views from visually intrusive large scale energy transmission infrastructure by using alternative routing. They shall be designed so as not to cause to or minimise as far as practicable, detrimental harm to scenic areas or designated vulnerable landscapes. Development must be consistent with international best practice and national guidance. Integrate with surface treatment schemes where possible. Demonstrate that where impacts are identified mitigation feature have been provided/included.* Based on **Kildare** 8.12.2, **Meath** 8.1.10 EC POL 19 and many other plans.

We submit that **you should include additional Pol Objs:**

1 *Power lines must be **designed** to have regard to possible interference with or damage to heritage sites, areas of archaeological importance pNHAs, SACs, SPAs or sites of nature conservation. Minimise as far as*

practicable, harm to areas of scenic or vulnerable landscapes. Taken from Nth Tipp 7.13.7 2nd sentence.

2 *Ensure that **development** must integrate with their surroundings and must not result in **negative/adverse impact** on visual amenities or the natural environment. Where impacts are inevitable mitigation has been taken into account must be provided for in, in respect of Natura Sites and networks must comply with Art 6 of the Habitats Directive. Based on **Sth Dublin** 10.2.10 Obj 2 and many other plans.*

3 *A **VIA shall be submitted**. Taken from Galway County 13.9 DM Standard 31a) last sentence.*

4 *A **Landscape Impact Assessment shall be submitted** where a proposed **development** is located in lands in **high amenity and mountain areas** and shall be screened for potential impacts **on Natura 2000 sites**. Taken from **Sth Dublin** 10.2.10 Pol 12.*

5 *In assessing individual proposals the **impact on public rights of way** and walking routes will be taken into account. Taken from **Meath Draft** 11.10.3 5th pt.*

11 ENVIRONMENT & NATURAL RESOURCES & THE COAST

11.1.1 Policy Context

Policy Objectives

All

11.1.2 Climate Action

Policy Objectives

All

11.1.3 Noise Emissions

Policy Objectives

All

11.1.4 Light Pollution

Policy Objectives

All

11.4 1 Forestry

We submit that this **should be repositioned in proposed additional Chp: Rural Economy**

Policy Objectives

ENV 30 & 31

33 We submit that this **should be repositioned in Chpt 8 Natural Heritage, Biodiversity & Green Infrastructure 8.10 Trees, Woodlands and Hedgerows**

33 We submit that this **should be replaced by:** *Recognising the recreational potential of forestry, including Coillte's "open forest" policy, protect and encourage access to forestry and woodlands, in co-operation with Coillte, private landowners and other stakeholders for walking routes (including long distance and looped walks), bridle paths, mountain biking, nature walks/trails, orienteering, hiking, recreation areas and other similar facilities.* Based on **Westmeath** 3.41 P F4 and many other plans.

Note: This Pol Obj also deals with Commercial Forestry. See proposed additional Chpt: Rural Economy 3 Forestry Pol Obj F

34 We submit that this **should be repositioned in Chpt 8 Natural Heritage, Green Infrastructure and Biodiversity 8.2.3 European Sites as an additional Pol Obj.**

36 to 38

11.4.2 Extractive Industry

We submit that this **should be repositioned in proposed additional Chpt: Rural Economy**

11.5 THE COAST

11.5.3 Coastal protection and Flooding

Figure 11.3 Coastal Erosion along the Coast Line

Policy Objectives

All

11.5.5 Development in Coastal Areas

Policy Objectives

ENV 55

56 We submit that **this should be replaced by:** *Prohibit inappropriate development and strictly control its nature and pattern, particularly on the seaward side of coastal roads, where such development which could cause damage to, or degradation of, beaches, estuaries or sand dunes, protected/designated landscapes, amenity areas and their recreational and leisure functions and amenity values or where it might affect the special character, quality and distinctiveness of seascapes. Protect, conserve, safeguard and preserve the character, visual, environmental and amenity values, quality and distinctiveness of coasts, landscapes and seascapes as valuable local, enhance their visual and scenic qualities by protecting the skyline. Strictly control the nature and pattern of development and ensure that it is designed and landscaped to the highest standards and sited so as not to detract from the visual amenities. Development must accord with its surroundings in scale, density, height, massing, layout and must not have a detrimental impact on skylines or important views. Development shall be prohibited where development poses a significant or potential threat to coastal features and/or where the development is likely to result in altered patterns of erosion or deposition. New development, where possible, shall be accommodated within existing developed areas. Protect the structure and function of sand dunes and prohibit development that would damage their visual integrity or prevent compliance with the Habitats and Birds Directives. Based on NPF National Policy Obj 41a, Fingal 9.5 Obj NH 60 & 67, Wicklow Vol 11.2 CZM5, Meath Draft 6.13 INF OBJ 33 and many other plans.*

57

We submit that **you should include additional Pol Objs:**

1 *Prohibit development of facilities for fishing and leisure developments where the siting of such installations and their supporting infrastructure could cause landscape and environmental degradation or instability, have adverse effect natural heritage or designated sites or detract from the visual amenity of an area or **public access to beaches**. Based on Fingal 9.5 Obj NH66 and other plans.*

2 Protect established rights of way to coastal areas. Taken from 2013 Plan 2.7 CON33.

Note This Pol Obj anticipates their possible designation. However none have so far been listed. We live in hopes!

3 In assessing proposals for Water Sports Development ensure that the following criteria are satisfied: that *proposals are fully compatible with existing use, will not result in damage to nature conservation or archaeological features, can be fully integrated into its seascape landscape, or will not have an unactable impact on visual amenity or important scenic areas, or unduly restrict access.* Taken from **DLR** 8.2.10.5 st para & 1st pt 1st phrase, 2nd pt, 3rd pt 1st phrase & 6th pt.

4 Work to protect beaches, within dunes and in other vulnerable areas manage and control car parking and vehicular movements. Based on **Meath** 9.7.11 POL 23 and other plans.

5 Protect the character, visual and recreational value of the coast and the provision of public access in assessing development proposals. Taken from **Meath Draft** 8.15 HER POL 49.

11.5.6 Coastal Tourism and Recreation

Policy Objectives

59 We submit that **you should delete river systems in line 2.**

60 We submit that **you should add:** *Provide, support, actively promote, maintain, protect, improve and enhance public access to the coast, beaches, seashore, coastal heritage and scenic landscapes in co-operation with landowners, relevant stakeholders and local groups and with statutory and relevant organisations for recreational activities including walking and cycling and examine the designation of traditional walking routes thereto as public rights of way. Where feasible, develop walkways/cycleways between the coast and green spaces in built-up areas.* Based on **Wicklow** Vol 1 7.4 T33 & 10.3.6 NH37 1st phrase, **Meath** 9.7.11 OBJ9, **Fingal** 9.5, **DLR** 4.1.2.9 2 2nd para below para last sentence and many other plans.

62 to 64

We submit that **you should include additional Pol Objs:**

1 *Promote, plan, develop and support, in conjunction with the Councils in adjoining counties and other partner agencies the development and use of a strategic waymarked **coastal path/greenway** along the entire coastline.* Based on **2013 Plan** 7.4.1 TC 28 1st phrase and many other plans

Notes

In **England, the Cornwall/Devon cliff path** brings in annual revenue of £325M and in Wales there is a coastal path around entire 870 mile-long coastline which attracts 100,000 tourists annually.

2 *Proposals for tourism development in coastal areas must demonstrate that there will be no **negative impacts** on amenities or the integrity of the natural environment.* Taken from Clare CDP 9.12 in line 2.

3 *Maintain **beaches** to a high standard and develop their **recreational potential**.* Taken from **Meath Draft** 8.15 HER OBJ 40 1st phrase.

13 DEVELOPMENT MANAGEMENT GUIDELINES

13.3 ENVIRONMENTAL ASSESSMENTS

All

13.9 HOUSING

13.9.38 Housing in the Open Countryside

All

13.9.42 Ribbon Development

13.15 ENVIRONMENT

13.15.1 Extractive Industry

All

13 16 ENERGY AND TELECOMMUNICATIONS

All

13.17 HERITAGE

All

OVERVIEW

The Draft fails to comply with, have regard to or take into account:

Planning & Development Acts
Plans in adjoining counties(including Drafts)
DoECLG Guidelines
Heritage Act 1995
RSES Eastern and Midlands
Development Plan Guidelines
National Planning Framework
National Heritsge Plan

KEEP IRELAND OPEN

Dec 2020

