

PDI,

McDonnell, Padraic

From: Padraic Cafferty [REDACTED]
Sent: 23 April 2018 20:59
To: countydevplan@mayococo.ie
Subject: Greenway for wheelchair safety

Hi,

I'd like to suggest that Mayo County Council develop a Greenway on the redundant Sligo to Claremorris railway line. The line is in public ownership and I believe Irish Rail are in favour of a Greenway on the line, to preserve the alignment.

It is well known that Sligo County Council are being lobbied for, and seriously investigating putting a Greenway on their piece of this line. This will terminate in Bellaghy, connecting Charlestown to it. The benefit will be seen by the people of Charlestown, and the communities further along the line into Mayo will want the same.

I am aware that there is resistance to this in Claremorris, but the Greenway can terminate there. They can press for a reopening of the line from Tuam separately.

My interest in this is because we have an 8 year old daughter who is confined to a wheelchair. We recently moved from Dublin to Mayo to build a home for her care. The truth is, although we live in a rural location, with quiet roads etc, we actually got out for more walks as a family in Dublin. The roads around our house in Meelick are too bumpy for long wheelchair journeys, and it is impossible to safely and quickly move a wheelchair out of the way of an oncoming tractor or creamery truck. It is not safe to walk around our own area.

Please consider adding a plan to create a Greenway on the line from Charlestown to Claremorris - For recreational use, and for the safety of wheelchair bound children.

Thanks,

Padraic Cafferty,
[REDACTED]
[REDACTED]
[REDACTED]

Sent from my iPhone

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

PD2

McDonnell, Padraic

From: Ronan Mac Gearailt [REDACTED]
Sent: 27 April 2018 10:19
To: McDonnell, Padraic
Subject: Re: FW: Review of Mayo County Development Plan 2014 - 2020

Mary, a chara,
Find below submission and address details.
Every good wish,
Ronan

Mayo Co council have led the way in Ireland regarding the successful development of greenways. The Westport-Achill greenway is arguably the best on this island and is contributing significantly in tourist revenues to rural areas. There are other opportunities where MCC can revitalise unused infrastructure to the benefit of all. The closed railways from Claremorris / Charlestown / Collooney will never be used again for its original purpose. This is a brilliant opportunity to extend the greenway network in County Mayo (and Sligo). I urge MCC to build on their success. This enhanced offering will attract even more visitors from Ireland and beyond. In addition, it will serve local schoolchildren and commuters.

Other greenway sections could be developed between Kiltimagh and Sligo along a parallel route to the velo-rail. This route should be utilised as a greenway.

Please consider these ideas in draft of the new the county plan.

Miss le meas,
Rónán Mac Gearailt,

[REDACTED]

On 27 April 2018 at 09:53, McDonnell, Padraic [REDACTED] wrote:

Dear Sir/Madam,

I refer to the above matter and to your recent email.

Please see attached copy of the Notice of the review of Mayo County Development Plan, setting out the requirements for making a submission, which contains a requirement to **"include your name and address and, if applicable, details of any organisation, community group or company etc. represented."**

Therefore, as is not possible to validate the authenticity of a submission from an email address, you should submit your name and full postal address, in order to have your submission validated.

|||

PD3

McDonnell, Padraic

From: Seamus O Dowd [REDACTED]
Sent: 27 April 2018 10:32
To: countydevplan@mayococo.ie
Subject: Re: Mayo County Plan

Hi Mayo CoCo

The closed railway from Claremorris to Charlestown (and on to Collooney) is not going to be re-opened. This route should be utilised as a greenway.

On the 12km section near Kiltimagh on which the council is promoting a velo-rail and has already spent €300,000 granted from Minister Michael Ring we are asking for a parallel greenway to be put in place so that Kiltimagh can benefit from the tourism this will generate and connect Kiltimagh to the Sligo greenway from Collooney to Charlestown which is currently supported by Sligo county council and the proposed Athenry- Tuam -Milltown greenway on the closed railway in Galway.

The parallel greenway next to the Kiltimagh velorail will ensure free and open access to this route rather than just pay per usage which Mayo county council and Kiltimagh IRD are proposing.

Please adopt these ideas in the county plan.

I have cycled and walked throughout Europe, I would love to be able to walk or cycle on a greenway from Collooney to Athenry and beyond.

All over the world Greenway's and such are a huge tourist boom not to mention the health and wellbeing of local people.

Thank you.

Name and Address below.

Seamus O Dowd

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[Redacted]

1111

PD 4

27th April 2018

Dear Ms. Killoran Coyne,

COUNTY DEVELOPMENT PLAN MAYO CO.CO.

Thank you for your email today.

As you will see from my address i do not live in the West of Ireland but I am a native of Tubbercurry Co. Sligo and I have family and property there and I am a regular visitor there and to Mayo and west of Ireland and I am passionate about the welfare and progress and tourism in that area.

I am writing with regard to the closed railway line from the Mayo County border at Milltown to Charlestown, which is not going to be re-opened.

The route north of Claremorris in particular will never be re-opened

I would strongly advocate that this route should be utilised as a greenway as part of the National Cycle Network.

The Mayo section of greenway on the closed railway would connect with the Sligo greenway from Collooney to Charlestown, which is currently supported by Sligo county council and the proposed Athenry- Tuam -Milltown greenway on the closed railway in Galway which is also under consideration. This would be a massive boost to tourism in the West of Ireland and as a facility to the local community along the route and promote family outing and strong communities. It is vital the West take action on this front before being completely overtaken by similar facilities throughout Ireland and the West will be left behind again.

In Kiltimagh where the council is promoting a velorail on 12km of the closed railway, for this section a parallel greenway should be put in place.

I implore you to adopt these ideas in your county plan.

Kind regards

Vincent Brett

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]



Regional Inspectorate,
Inniscarra,
County Cork, Ireland
Cigireacht Réigiúnach, Inis Cara

Chontae Chorcaí, Éire
T: +353 21 487 5510
F: +353 21 487 5545
E: info@epa.ie
W: www.epa.ie
LoCall: 1890 33 55 99

Forward Planning Section
Mayo County Council
Aras an Chontae
The Mall
Castlebar
Co. Mayo

14th May 2018

Our Ref: SCP180406.1

Re: SEA Scoping for the Review of the County Development Plan

Dear Ms. Killoran Coyne,

I refer to and acknowledge your correspondence, dated 26th April 2018, in relation to the Strategic Environmental Assessment Scoping for the preparation of the Mayo County Development Plan 2020-2026 (the Plan).

The Environmental Protection Agency (EPA) is one of five statutory Environmental Authorities under the SEA Regulations. Our role in SEA focuses on promoting full integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland for addressed, with a priority focus on key national and regional plans. It is not the function of the EPA to either approve or enforce the Plan or SEA.

We acknowledge that the information contained within the current Plan (in 2014) will be used as basis for the new environmental report and updated accordingly. In this context, there is merit in reviewing whether environmental improvements or deterioration have occurred over the last Plan period, with a view to reviewing the robustness of existing mitigation measures or Plan Policies / objectives and strengthening where necessary.

Transition to low carbon climate resilient economy and society

Urgent action is needed to address climate change and to move Ireland towards a low carbon, climate resilient economy and society. Climate change adaptation and mitigation measures should be included in the Plan as appropriate. The Plan should also be consistent with the National Policy Position on Climate Action and Low Carbon Development, the National Mitigation Plan, the National Adaptation Framework and the National Planning Framework, as well as relevant sectoral, regional and local adaption plans.

Specific Comments to be considered

Some key aspects to be considered are outlined below and should be taken into account in preparing the draft Plan and SEA ER.



Several key aspects to be consider in preparing the Plan and SEA include

- Protecting European and nationally designated sites including SPC / SACs and associated habitats, species and ecological linkages.
- Maintain and improve water quality status and protect high status waters
- Supporting the need for integrated catchment management of river basin catchments / sub catchments in collaboration with other key stakeholders.
- Areas of extreme - high groundwater vulnerability
- Ensuring land use zoning/development is appropriate to risk of flooding identified
- Linking development to the ability to provide adequate critical service infrastructure
- Protecting and where possible enhancing non-designated biodiversity including ecological corridors/linkages, hedgerows and wetlands
- Historic landfills within and adjacent to the Plan area
- Control and management of alien invasive species
- Control and management of noise
- Assessing/mitigating the potential for cumulative environmental effects

Some key plans to consider in preparing the Plan

- National Planning Framework
- Regional Spatial and Economic Strategy for Western & Northern Region (commenced)
- National River Basin Management Plan for Ireland
- National Mitigation Plan
- National Climate Adaptation Plan
- Irish Water's Capital Investment Plan, Water Services Strategic Plan and Draft National Water Resources Plan (under preparation)
- Western CFRAMS (and associated relevant Flood Risk Management Plans)
- Wild Atlantic Way
- Offshore Renewable Energy Development Plan
- Grid 25 Implementation Programme
- Pollution Reduction Programmes for Shellfish Waters
- Freshwater Pearl Mussel Sub Basin Management Plan / Forestry and Freshwater Pearl Mussel Plan

Further comment on the Plan will be provided upon receipt of the Draft Environmental Report and Plan and associated documents during the next statutory consultation phase of the SEA Process.

Scoping Process Guidance / Resources

Guidance on the SEA Scoping Process, Integration Guidance, including an SEA Pack, SEA Checklist, SEA Spatial Information Sources and guidance on Integrating Climate Change into SEA, is available on the EPA website and should be considered in the preparation of the SEA. This can be consulted at the following address: <http://www.epa.ie/pubs/advice/ea/>

Guidance on *Developing and Assessing Alternatives in SEA* (EPA, 2015) is also available at: <http://www.epa.ie/pubs/advice/ea/developingandassessingalternativesinsea.html>

EPA State of the Environment Report 2016


The EPA published our most recent State of the Environment Report in 2016 *Ireland's Environment – An Assessment* (EPA, 2016). The recommendations, key issues and challenges described within this report should be considered, as relevant and appropriate to the Plan area in preparing the Draft Plan and associated SEA. This report can be consulted at: <http://www.epa.ie/irelandsenvironment/stateoftheenvironmentreport/>



SEA WebGIS Search and Reporting Tool

The EPA SEA WebGIS Search and Reporting Tool is a GIS based web application that allows users to explore, interrogate and produce an indicative report on key aspects of the environment in specific geographic areas. These reports are indicative and will provide an overview of key aspects of the environment within a specific plan area. This may be used to inform the SEA screening and scoping stages for Plans and Programmes with reference in the first instance to the land use sector, though it is also applicable to other sector plans. It may be accessed via www.edenireland.ie

River Basin Catchment Management Tool

The EPA WFD Application provides a single point of access to catchment data which will be useful for a range of catchment science and management purposes, not just those that are specific to the Water Framework Directive. The Application is accessible through EDEN  <https://wfd.edenireland.ie/> and is available to public agencies.

Environmental Authorities

Under the SEA Regulations (S.I. No. 436 of 2004, as amended by S.I. No. 201 of 2011), notice should also be given to the following:

- The Minister for Housing, Planning and Local Government
- Minister for Communications, Climate Action and Environment, where it appears to the planning authority that the plan or programme, or modification of the plan or programme, might have significant effects on fisheries or the marine environment
- where it appears to the competent authority that the plan or programme, or modification to a plan or programme, might have significant effects in relation to the architectural or archaeological heritage or to nature conservation, the Minister for Culture, Heritage and the Gaeltacht), and
- any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

Should you have any queries or require further information in relation to the above please contact the undersigned. I would be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours Sincerely,

Cian O'Mahony
Scientific Officer
SEA Section
Office of Evidence and Assessment
Environmental Protection Agency
Regional Inspectorate
Inniscarra, County Cork





GUIDANCE FOR INTEGRATION OF ENVIRONMENTAL CONSIDERATIONS

The Environmental Protection Agency (EPA) is one of five statutory Environmental Authority under the SEA Regulations. Our role in SEA focuses on promoting full integration of the findings of the Environmental Assessment into the Plan. It is not the function of the EPA to either approve or enforce Plans or SEAs. The EPA is focusing our efforts/resources in influencing the preparation of key national and regional plans within the planning hierarchy. This guidance document is updated on a regular basis and recent updates/additions are highlighted in red font.

In light of the above, we intend to provide a 'self-service approach' to responding to submissions on plans lower in the planning hierarchy through use of this template. In this respect, where specific comments are not provided on this particular Plan (and at this stage of the SEA process), we recommend that you take this guidance document into account, and also incorporate the more detailed available guidance and other available resources on our website at <http://www.epa.ie/pubs/advice/ea/>. These resources include:

- SEA process guidance,
- Integration of environmental considerations in land use planning guidance,
- List of available environmental spatial data sets.
- SEA GIS Search and Reporting Tool for local authority plan-makers which may be useful in the preparation of the SEA and Draft Plan.
- Recent EPA SEA related guidance on *Integrating Climate Change into SEA, Developing and Assessing Alternatives in SEA, Local Authority Adaptation Strategy Development Guidelines*, and *GIS SEA Manual*.

The Plan should be consistent with key relevant higher level plans / programmes in the planning hierarchy (at a regional and national level) and be set in the context of national SEA Regulations, Planning & Development Regulations and associated DECLG Guidelines including *Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment – Guidelines for Regional Authorities and Planning Authorities* (DECLG, 2004) and the *Development Plans - Guidelines for Planning Authorities* (DECLG, 2007).

Ireland's environment is a key national strategic and valuable asset which needs to be protected and proactively managed to ensure it forms the basis of Ireland's economic wellbeing and a healthy society. The Plan should ensure that the natural resources and environmental conditions that are fundamental to the economic and social wellbeing of future generations are protected and are not degraded or exhausted. Seven Key Actions for Ireland are identified in the EPA's recent state of the environment report '*Ireland's Environment 2016 -An Assessment*' (EPA, 2016) to be taken into account in the Plan. These relate to the following: *Environment, Health and Wellbeing, Climate Change, Implementation of Legislation, Restore and Protect Water Quality, Sustainable Economic Activities, Nature and Wild Places, Community Engagement*. The integration of these actions will be important to deliver environmental protection and sustainable development.

Section II of *Ireland's Environment 2016* describes the key thematic areas to be considered and assessed, as appropriate. These are: *Air Quality & Transboundary Air Emissions, Climate Change, Nature, Inland & Marine Waters, Waste and Land Use & Soil*. The relationship between the Environment, Health and Wellbeing (Section III) and between the Environment and the Economy (Section IV) are also discussed.

The Plan should consider how to implement the above key actions, taking into account the thematic areas described, to ensure proper planning and sustainable development is promoted in the lifetime of the Plan. The EPA website includes an '*Ireland's Environment*' section that provides an overview of the key issues in each thematic area with links to specific environmental indicator data.



In addition to the high-level goals and challenges described above, the EPA has summarised the key environmental aspects which should be incorporated, as appropriate, in the preparation of the SEA and Draft Plan.

Summary of Latest Updates in 2018

Changes	Comments
16/03/18	Added reference to Biodiversity Action Plan 2017-2021 (DCHG, 2017)
16/03/18	Updated link to Air Quality in Ireland 2016 (EPA, 2017)
16/03/18	Added link to EPA Map resources in Appendix I

KEY SIGNIFICANT ENVIRONMENTAL ASPECTS TO CONSIDER

Water

Support the Provision of a Safe and Secure Drinking Water Supply

In considering additional zoning/development and growth of settlements within the Plan area, it is critical that development be closely linked to the ability to provide a safe and secure supply of drinking water and related critical service infrastructure. In this context, the Plan should include a commitment to collaborate with Irish Water and other relevant stakeholders, in the provision of an adequate and appropriate drinking water supply.

The EPA series of drinking water quality reports, including the *Drinking Water Report for Public Water Supplies – 2016* (EPA, 2017), should be consulted in the context of ensuring the relevant recommendations are implemented in relation to improving drinking water quality. Key issues identified with particular supplies, including significant issues identified through (Irish Water) Drinking Water Safety Plans, should be highlighted for individual plans. The Plan should include, where relevant, specific objectives to support the improvement of any water supplies in the Plan area, in collaboration with Irish Water.

A Remedial Action List (RAL) of problematic drinking water supplies is released by the EPA on a quarterly basis. It is a dynamic list which records identified and reported issues. Once appropriate mitigation measures are established and implemented, supplies are removed from the RAL. The Plan should commit to supporting Irish Water, in addressing issues where water supplies servicing the Plan area are included on the RAL. Further information can be found at: <http://www.epa.ie/downloads/pubs/water/drinking/>.

Support the Provision of Adequate and Appropriate Waste Water Treatment

As referred to in the *Water Quality in Ireland 2010 – 2012* (EPA, 2015), one of the key causes of water pollution is from point sources including discharges from waste water treatment plants. The need to provide and maintain adequate and appropriate wastewater treatment infrastructure to service zoned lands and developments over the lifetime of the Plan should be included as a specific Policy/Objective in the Plan.

Where agglomerations with treatment or poorly performing (or at capacity) treatment plants within the Plan area are highlighted in the *Urban Waste Water Treatment in 2016* (EPA, 2017), the Plan should include a commitment to support the provision of appropriate measures to address these issues as a priority, in collaboration with Irish Water. The Plan should also include as appropriate, measures to ensure that combined storm water overflows, sewers and trade effluent in the area covered by the Plan is also managed properly.

With regard to any proposed rural residential development which may arise, or development proposals in un-sewered rural area, or areas where connection to the public sewer is not feasible, the Plan should include a commitment to implement, as appropriate, the EPA's *Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e < 10)*, (EPA, 2009). The EPA has also published the *2015 National Inspection Plan for Domestic Wastewater Treatment Systems Implementation Report* (EPA, 2016), which should also be taken into consideration, as appropriate.

Water Framework Directive



Protection of Surface and Ground Water Resources

Protecting our valuable surface and ground water resources is of vital importance to protect both human health and provide for a healthy environment. In this context, the Plan should provide clear commitments to protect surface water, groundwater and coastal/estuarine resources and their associated habitats and species, including fisheries within and adjacent to the Plan area. Where specific recommendations/concerns for water bodies within the Plan area are identified in EPA water quality reports, including the *Water Quality in Ireland 2010 – 2015* (EPA, 2017) and relevant regional water quality reports, these should also be addressed/considered at an appropriate level in the Plan.

The Plan should also ensure that any specific relevant objectives and measures for individual water bodies, within the Plan area as set out in the existing relevant Water Framework Directive River Basin Management Plan, are provided for in order to ensure water quality is protected/improved/maintained. The Plan should also consider that subsequent water management plans (including catchment management plans) may arise out of current review of the second cycle of WFD River Basin Management Planning should be integrated as appropriate upon their adoption. The 'integrated catchment management' approach for protecting and managing water resources, should also be supported in the Plan. The EPA's www.catchments.ie website provides useful resources such as GIS mapping and related information that should be useful in preparing the Plan.

The *European Union (Water Policy) Regulations 2014 (S.I. No. 350 of 2014)* sets out the roles and responsibilities of the various stakeholders and the associated requirements in relation to river basin management planning and should be integrated as appropriate. These responsibilities should be reflected in the Plan and the associated environmental monitoring.

Protection of Groundwater Resources

Groundwater aquifers form important sources of drinking water both locally and regionally. Much of the summer seasonal flow in many rivers is also derived from groundwater sources. To maintain high quality water resources within the Plan area, it is important that development is controlled and managed appropriately, in particular in areas of high groundwater vulnerability to avoid transmission of pollutants into important aquifers.

The Plan should include a clear Policy / Objective for the protection of groundwater resources and associated habitats and species. The Plan should also include a commitment to integrate any existing Groundwater Protection Schemes and Groundwater Source Protection Zones, as relevant and appropriate within the Plan area. The Plan should also include a commitment to comply with the *European Communities Environmental Objectives (Groundwater) Regulations 2010 (S.I. No. 9 of 2010)*.

Issues to consider relating to protection of groundwater include; *enforcement of planning conditions related to installation, operation and maintenance of on-site wastewater treatment / septic tank systems, connection of all remaining houses within settlement boundaries to wastewater treatment plant, the development of a wastewater leak detection programme* and the implementation and enforcement of the *European Communities (Good Agricultural Practice for Protection of Waters) Regulations 2009* and associated *European Communities (Good Agricultural Practice For Protection Of Waters) Regulations 2010 (S.I. No 610 of 2010)*.

Protection and Management of Bathing Waters

The obligation to protect bathing waters within (and adjacent to) the Plan area should also be reflected in the Plan. Bathing Waters are afforded protection under Directive 2006/7/EC, known as the '*Directive on bathing water*', which is transposed into National legislation by the *Bathing Water Quality Regulations 2008 (S.I. No. 79) of 2008*. In addition, under the Water Framework Directive, recreational waters/bathing water areas are included on the Register of Protected Areas. The Plan should provide for the protection of any waters which are used for bathing within or adjacent to the Plan area.

The EPA's most recent report on bathing water quality '*Bathing Water Quality in Ireland – A Report for the Year 2016, (EPA, 2017)*' sets out the status of Irish Seawater and Freshwater Bathing areas and should be



Plans should be supported / informed by available habitat mapping (including wetland mapping) and other ecological surveys as relevant. The Plan should refer to and reflect the relevant commitments in Ireland's *National Biodiversity Action Plan 2017-21* (DCHG, 2017). Local Heritage/Biodiversity plans should be highlighted and should promote the implementation of key actions set out in these plans. Where not established, commitments should be included to prepare these plans.

Appropriate Assessment

The Plan should promote the application of the guidance set out in the DECLG Publication '*Appropriate Assessment of Plans and Projects in Ireland- Guidance for Planning Authorities*' (2009; revision 2010), in relation to the requirements of Article 6 of the Habitats Directive.

The Plan should include a commitment to ensure compliance with the requirements of Article 6 of the Habitats Directive. The Plan should also be subject to Appropriate Assessment (AA). The Plan should include a clear Policy/Objective that sets out a requirement for AA Screening for new, reviewed or amended Plans and proposed projects, which may have the potential to impact on European sites. Potential for cumulative/in-combination effects associated with other relevant Plans/Programmes/Projects should also be determined.

Climate Change / Climatic Factors

Urgent action is needed to address climate change and to move Ireland towards a low carbon, climate resilient economy and society. Climate change adaptation and mitigation measures should be included in the Plan as appropriate and the Plan should be consistent with the *National Policy Position on Climate Action and Low Carbon Development*¹, the *National Mitigation Plan*² and the *National Adaptation Framework*, as well as relevant sectoral, regional and local adaptation plans.

The EPA has published a good practice guidance note on how to incorporate climate change into plans and programmes falling under the remit of the SEA Directive – *Integrating Climate Change into SEA* (EPA, 2016³). Key aspects to be considered in the Plan and SEA, where relevant, include:

- Direct and indirect impacts of the Plan on greenhouse gas emissions and removals (Mitigation)
- Direct and indirect impacts of climate change on the implementation of the Plan, e.g. the resilience of critical water service infrastructure to flooding and drought (Adaptation)
- The linkages between mitigation and adaptation (inter-relationships)

Mitigation

To fulfil national commitments on greenhouse gas emissions reduction, Ireland must effectively switch away from fossil fuel sources of energy by 2050. The Plan should reflect the need to reduce greenhouse gas emissions and to protect, maintain and enhance carbon stocks. The National Mitigation Plan (NMP) identifies 106 actions to decarbonise electricity generation, the built environment and transport and to move towards carbon neutrality for agriculture, forest and land use sectors. Relevant actions in the NMP should be integrated into the Plan as appropriate. The inclusion of specific policies/objectives which promote the integration of climate change mitigation measures at a regional and local level in land use planning within the Plan area should also be considered. In developing and implementing mitigation-related measures, opportunities should be sought to maximise the potential co-benefits of for the wider the environment and society, such as improvements in air quality, water quality, biodiversity, public amenity, renewable energy, tourism etc.

Appendix III contains some climate mitigation-related aspects to consider when preparing the SEA / Draft Plan.

Adaptation

¹ <http://www.dccae.gov.ie/en-ie/climate-action/publications/Pages/National-Policy-Position.aspx>

² <http://www.dccae.gov.ie/documents/National%20Mitigation%20Plan%202017.pdf>

³ <http://www.epa.ie/pubs/advice/ea/Climate-Change-SEA-Ireland-Guide-Note.pdf>



The EPA has published guidelines to support local authorities in developing local climate adaptation strategies (EPA, 2016⁴). Climate change is already discernible in Ireland, especially within the temperature record, and projected climate change impacts include higher intensity rainfall events, more intense storms and storm surge, sea level rise, warmer temperatures and longer periods of low rainfall.

In preparing the Plan and associated SEA, the degree to which climate change impacts, individually and in combination, are likely to influence its implementation and operation should be considered. Aspects to be considered include the resilience of existing and proposed infrastructure and systems to climate variability. This analysis may include an assessment of responses to recent extreme weather events and the adequacy of existing systems and procedures. Other climate change impacts to be considered include changes in native species and habitats and the spread of invasive species, pests and pathogens. To minimise any adverse impacts identified in the SEA, the Plan should include appropriate climate change adaptation measures that can be implemented either directly or through relevant land use plans and/or specific plans e.g. Flood Risk Management Plans, Integrated Coastal Zone Management Plans etc.

The 'Climate Ireland' website provides information, support and advice to help local authorities, sectors and government departments to adapt to climate change and includes a Local Authority Adaptation Support Wizard. It can be consulted at <http://www.climateireland.ie/#/>

Monitoring

The Plan and SEA should consider monitoring for both climate mitigation and climate adaptation monitoring aspects, where relevant and appropriate. Appendix III of this guidance document provides climate-related baseline information and questions to consider.

Air and Noise-related Factors

Noise

The objectives of EU and Irish noise legislation is “to avoid, prevent or reduce harmful effects on human health and the environment as a whole”, and this includes noise nuisance. To this effect the Plan should ensure this requirement is complied with. The assessment and management of noise from the main infrastructural transport sources (roads, rail, and airports) are governed by the Environmental Noise Directive and associated 2006 Environmental Noise Regulations (S.I. 140 of 2006). In this context, as appropriate, the Plan should promote the implementation of Environmental Noise Directive and associated national regulations. <http://www.environ.ie/environment/noise/si-140-2006-environmental-noise-regulations-2006>

Available Noise Action Plans should be taken into account also and reviewed as required, to reflect the Plan period and associated development proposals. Consideration should be given to any relevant noise maps, and action plans. Strategic noise maps are designed to assess noise exposure resulting from major roads, railways and airports. Noise action plans are designed to act as a means of managing environmental noise through land use planning, traffic management and control of noise sources. The third round of noise mapping is currently underway in Ireland and will be completed in 2018. <http://noise.eionet.europa.eu/help.html>.

Consideration should be given to protect, where relevant, any designated quiet areas in open country. In 2003, the EPA commissioned a research project to establish baseline data for the identification of quiet areas in rural locations. Quiet Areas are defined as “an area in open country, substantially unaffected by anthropogenic noise.” A range of minimum distance criteria from man-made noise sources such as urban areas, industry and major road sources were defined, and the report includes a number of key recommendations for the identification and control of Quiet Areas.

Air

Air quality legislation in Ireland highlights the need “to avoid, prevent or reduce harmful effects on human health and the environment as a whole”. In addition, it requires that Local Authorities where appropriate “shall

⁴ http://www.epa.ie/pubs/reports/research/climate/EPA_Research_Report164.pdf



promote the preservation of best ambient air quality compatible with sustainable development.”. These requirements should be incorporated by means of a specific plan objective / policy.

It is also worth noting that the *National Clean Air Strategy* (DCCA) is currently being prepared, with the intention of developing the necessary policies and measures to comply with new and emerging EU legislation, in addition to supporting climate change mitigation.

Recent EPA reports on air quality include the *Air Quality in Ireland 2016 Report*, (EPA, 2017) which sets out the most recent status in each of the four air quality zones in Ireland.

The EPA manages the national ambient air quality monitoring network and measures the levels of a number of atmospheric pollutants. The pollutants of most concern are those whose main source is traffic such as Particulate Matter and Nitrogen Dioxide should to be taken into account. Information in relation to these aspects is available at: <http://www.epa.ie/air/quality/monitor/#>

Waste Management

The Plan should promote the integration of land use zoning and development to existing and planned availability of waste infrastructure and capacity. The Plan should also refer to and incorporate the relevant aspects of the relevant Regional Waste Management Plan.

In addition, the Plan should promote and incorporate the relevant recommendations in the following series of EPA reports including:

- *The Nature and Extent of Unauthorised Waste Activity in Ireland* (EPA, 2005)
- *National Waste Report 2012* (EPA, 2014)
- *National Hazardous Waste Management Plan 2014-2020* (EPA, 2015)

These and other waste related resources are available at: <http://www.epa.ie/pubs/reports/waste/stats/>

Radon

Where significant concentrations of radon occur within the Plan area, these should be taken into account in the Plan or associated development control measures, as appropriate. Radon Maps are available at <http://www.epa.ie/radiation/radonmap/> which should be useful in identifying potential for significant radon accumulations within the Plan area.

Energy Conservation/Renewable Energy

When considering energy conservation / renewable energy aspects of the Plan, where relevant, the recently published *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (DHPCLG, 2017) should be taken into account. The Government White Paper - *Ireland's Transition to a Low Carbon Energy Future 2015-2030*, (DCENR) should also be taken into consideration.

The relevant renewable energy / energy conservation actions in the National Mitigation Plan should be integrated. Additionally, the Plan should, where relevant, include a commitment to prepare and implement an 'Energy Conservation Strategy' and associated awareness campaign within the lifetime of the Plan where feasible.

The Plan should also support and promote the need for energy conservation measures to be incorporated into buildings. Relevant guidance in this regard, can be found on the website of Sustainable Energy Ireland: www.sei.ie.

There is merit in including a commitment where relevant and appropriate, to use energy derived from renewable energy systems (e.g. solar, wind, bioenergy, geothermal etc.) and energy storage networks and systems within the Plan area.



Landscape

The Plan should provide for the protection of designated scenic landscapes, scenic views, scenic routes and landscape features of national, regional, county and local value. The Plan should also take into account the landscape character adjoining the Plan area. Visual linkages between established landmarks and landscape features and views should be taken into account when land is being zoned and when individual development proposals are being assessed / considered. The *National Landscape Strategy* (DECLG, 2015) should be taken into account and integrated as appropriate into the Plan.

Geology / Geomorphology

The Plan should protect any designated Geological and Geomorphological NHAs/pNHAs, which may be present/designated within or adjacent to the Plan area in consultation with the Geological Survey of Ireland.

Human Health / Quality of Life

The Plan should ensure provision of adequate and appropriate infrastructure and to serve both the existing community and likely future predicted increases in population within the Plan area. In preparing the Plan, there is merit in exploring current practice and opportunities with respect to promote the protection and, as appropriate, improvement of “Quality of Life”. Where relevant, the application of existing “Quality of Life Indices” would be considered in consultation with relevant statutory and non-statutory bodies/organisations. We also refer you to the relevant aspects already referred to above under water, biodiversity, air, energy.

Transportation

The Plan should promote and as appropriate, provide for the provision of sustainable modes of transport. The Department of Transport Tourism and Sport ‘*Smarter Transport – A Sustainable Transport Future*’ (DTTAS, 2009) should be referred to, in the context of possible initiatives which could be included as objectives within the Plan. The Plan should include and provide support for appropriate access to public transport, dedicated cycleways and pedestrian pathways, access to rapid charging infrastructure etc.

The transport-related actions in the National Mitigation Plan, should also be considered and integrated, as appropriate in the Plan. In seeking to support achieving a low carbon economy, it is important to consider and manage transport related emissions within the Plan area. In this regard the Plan should promote, and as appropriate provide for sustainable modes of transport.

Promoting the development of traffic management measures to reduce the potential for traffic congestion and associated vehicular emissions should be considered. In particular, it would be useful to prepare (and review existing) Integrated Traffic Management Plans, where relevant and appropriate, for the existing urban areas and proposed new urban developments to consider and address the short, medium and long-term traffic management requirements within the Plan area.

Infrastructure Planning

Where zoning/rezoning of lands and the introduction of new development is being proposed within the Plan area, the Plan should promote the need for an integrated planning approach to service any development proposed and authorised during the lifetime of the Plan in collaboration with key stakeholders.

The Plan should, (when considering additional development proposals), support and promote the provision of adequate and appropriate critical service infrastructure, surface and storm water drainage, public transport, waste management, community services and amenities etc. on a planned and phased basis. This is in the context



of taking into account and addressing existing infrastructural inadequacies to meet the expected needs of predicted increases in population associated with the Plan implementation.

The potential impact on human health, habitats and species of ecological importance, flood risk and water quality should be taken into account in considering proposed additional infrastructure or in proposed upgrading of existing infrastructure.

Environmental Impact Assessment (EIA)

The Plan should highlight that, under the EIA and Planning & Development Regulations, certain projects arising during the implementation of the Plan may require an EIA. It should be noted that projects may also require Appropriate Assessment screening, as required by Article 6 of the Habitats Directive. It should be noted that the EPA's role in relation to EIA relates only to facilities/sites which are licensable by the EPA, namely IPPC, waste water and waste sites.



Appendix I: Some Useful Environmental Resources

Environmental Criteria	Selected Resources
State of Environment	http://www.epa.ie/irelandsenvironment/stateoftheenvironmentreport/
Surface Water	http://www.wfdireland.ie/index.html http://www.catchments.ie http://www.epa.ie/pubs/reports/water/waterqua/
Ground Water	http://i.mp/gsigroundwater http://www.epa.ie/downloads/pubs/water/ground/ http://www.epa.ie/hydronet/#Water%20Levels
Drinking Water	http://www.epa.ie/pubs/reports/water/drinking/
Waste Water	http://www.epa.ie/pubs/reports/water/wastewater/
Bathing Water	http://www.epa.ie/pubs/reports/water/bathing http://www.beaches.ie
Marine	http://www.marine.ie/Home/site-area/home/home
Biodiversity	http://www.npws.ie/guidance-appropriate-assessment-planning-authorities http://www.npws.ie/publications http://maps.biodiversityireland.ie/#/Home <i>EcoPlan Project (Green-Infrastructure/Ecosystems Approaches) Guide and Report</i>
Flood Prevention and Management	www.floodmaps.ie www.cfram.ie
Air	http://www.epa.ie/pubs/reports/air/quality/
Climate	http://www.environ.ie/en/Environment/Atmosphere/ClimateChange/ http://www.epa.ie/pubs/reports/research/climate/
Waste Management	http://www.epa.ie/pubs/reports/waste/
Radon	http://www.epa.ie/radiation/radonmap
Energy Conservation	www.sei.ie
Landscape Character Assessment	http://www.heritagecouncil.ie/
Geology / Geomorphology	http://www.gsi.ie/Mapping.htm
Transportation	https://www.nationaltransport.ie/planning-policy/ http://www.nra.ie/environment/
SEA	www.edenireland.ie (SEAGIS Reporting Tool) http://www.epa.ie/pubs/advice/ea/
EIA	http://www.environ.ie/en/DevelopmentHousing/PlanningDevelopment/EnvironmentalAssessment/EIASEAGuidance
Spatial Planning GIS	www.myplan.ie http://www.epa.ie/soilandbiodiversity/soils/land/corine/ http://gis.epa.ie/SeeMaps
DECLG Guidelines / Legislation	http://www.environ.ie/en/DevelopmentHousing/PlanningDevelopment/Planning/
Flood Risk	www.cfram.ie www.floodmaps.ie



Appendix II: Suggested High Level Plans/Programmes/Strategies (PPS) to Consider*

Environmental Criteria	Suggested High Level Plans/Programmes/Strategies (PPS)
National	<ul style="list-style-type: none"> - National Planning Framework (DHPCLG) - National Spatial Strategy (DECLG) – being replaced by National Planning Framework - Rural Development Programme (DHPLG) - National CFRAMS Programme (DHPLG) - River Basin Management Plan for Ireland - National Renewable Electricity Policy Framework (in preparation DCCAIE) - Grid 25 Implementation Strategy (Eirgrid) - National Hazardous Waste Management Plan (EPA) - Food Harvest 2020 / FoodWise 2025 (DAFM) - National Forestry Programme / Forestry Policy Review (DAFM) - Seafood Operation Programme / Strategic Aquaculture Programme (DAFM) - Harnessing Our Ocean Wealth (DAFM) - National Broadband Plan (DCCAIE) - National Landscape Strategy (DCHG) - National Peatland Strategy, SAC Raised Bog Management Plan (DCHG) - National Biodiversity Plan (DCHG) - Water Services Strategic Plan / Capital Investment Programme (Irish Water) - Sectoral Climate Change Adaptation Strategies and Low Carbon Roadmaps - Smarter Transport / Strategic Framework for Integrated Land Transport (DTTAS) - Framework for Alternative Fuel Infrastructure in Transport (in preparation DTTAS) - Offshore Renewable Energy Development Plan (DCCAIE) - State of the Environment Report 2016 (EPA) - National Bioenergy Plan (DCCAIE) - National Mitigation Plan (DHPLG) - National Policy Position on Climate Action and Low Carbon Development (DCCAIE) - 10 Year Tourism Strategy (in preparation Fáilte Ireland) - National Greenway Strategy (in preparation, DTTAS) - National Water Resources Plan (in preparation, Irish Water)
Regional	<ul style="list-style-type: none"> - Regional Spatial and Economic Strategies (replacing the Regional Planning Guidelines) - Draft National River Basin Management Plans for Ireland & Programme of Measures - Relevant CFRAMS - Pollution Reduction Programmes for Shellfish Waters - Freshwater Pearl Mussel Sub-basin Management Plans - Forestry and Freshwater Pearl Mussel Plan (DAFM, in preparation) - Regional Waste Management Plans - Transport Strategy for Greater Dublin Area - Wild Atlantic Way - Shannon Integrated Framework Plan (SIFP) - County Renewable Energy / Wind Energy Strategies - County Tourism Strategies

Note: *Plan-makers should identify key relevant PPS in the SEA. These Lists are indicative only and some may not always be relevant to a particular plan.



Appendix III – Baseline-related questions to consider for climate mitigation

Direct emissions:

- What emissions or removals arise during construction? Use of fossil fuels during development? What are the embedded emission associated with the materials used in construction? Are there alternative materials with lower emissions intensity? Disturbance of biomass and soil carbon pools lead to very significant emissions of greenhouse gases to the atmosphere. The impact of drainage on carbon pools merits attention.
- Direct emissions: What are the emissions and removals associated with typical operation and maintenance of the Plan.

Indirect:

- To what extent would the existence of, or engagement with the Plan change behaviours or activities leading to reductions or increase in greenhouse gas emissions.
- Increased demand for emission intensity goods and services for example for transport, heat and energy, waste.

Gather any current emissions baseline for all relevant gases associated with sources and activities likely to be influenced by the Plan.

Consider projected emissions of gases on timescale relevant to the lifespan of the Plan, and likely including legacy.

Information on national estimates of emissions of greenhouse gases are available on the EPA website, including Inventories of historic emissions and projections of emissions based on existing policies and measures. <http://www.epa.ie/climate/emissionsinventoriesandprojections/>

Estimates of regional emissions are available through a spatial mapping project, which is developing a 1x1km gridded dataset for emissions of GHGs under an EPA research project. Data will be available in 2017. Note the data will also include main air pollutants and may be useful for air quality assessment. <http://projects.au.dk/mapeire/>

PD- 6



Energy for
generations

ESB Group Property

Issues Stage - Mayo County Development Plan 2020-2026

Submission on behalf of Electricity Supply Board to the Issues Paper.
14/06/2018





Contents

1. Introduction	3
1.1 Generation	3
1.2 Transmission and Distribution	3
1.3 ESB Telecoms & Telecommunications Infrastructure	3
1.4 ESB roll-out of EV infrastructure.....	4
2. Planning Policy & Proposed Draft CDP	4
2.1 Generation, Transmission & Distribution	4
2.2 Telecommunications	5
2.3 Transport & Electric Vehicles	6
2.3.1 Proposed parking standards for Draft CDP	7
3. Conclusion	8



1. INTRODUCTION

Electricity Supply Board (ESB), 42 Merrion Square, Dublin 2, welcomes this opportunity to make a submission to Mayo County Development Plan 2020 – 2026; Consultation Paper & Issues. ESB is a landowner and employer in Mayo with property and infrastructural assets throughout the county. As a strong, diversified, vertically integrated utility, ESB operates right across the electricity market; from generation, through transmission and distribution to supply of customers. In addition, we extract further value from our assets through supplying gas, using our networks to carry fibre for telecommunications and to provide charging infrastructure for electric vehicles. ESB is Ireland's leading electricity utility with approximately 3.2 million customers throughout the island of Ireland.

Outlined below are a number of observations with regard to strategic issues that should be taken into consideration in the preparation of the draft Mayo County Development Plan 2020 - 2026.

1.1 Generation

ESB is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. Sustainability, both within the company and in the services we provide are integral to our corporate strategy. We are committed to reducing carbon emissions and addressing long-term concerns over future fuel supplies. We have already reached our 2012 target of reducing carbon emissions by 30%, and in the coming years we are aiming to half the levels of CO² emissions.

ESB power generation is making rapid progress in building our renewables portfolio based on wind. In 2016, 22.8% of the electricity generated in Ireland came from wind (SEAI). ESB has over 400MW of installed capacity in the Republic of Ireland with additional wind farms in development, including Oweninny Wind Farm in Co. Mayo. Building on a long history of indigenous electricity generation at Bellacorrick and demonstrating our commitment to a low-carbon future, powered by clean electricity, we are partnering with Bord na Mona to deliver the 172 MW Oweninny Wind Farm at Bellacorrick. Phase 1 (89MW) is currently under construction comprising 29 wind turbines, a 110kV substation, 20km of access tracks, a visitor centre and an operations-maintenance building. Phase 1 is expected to be complete in 2019 and its commissioning will significantly contribute to ESB plans for delivery of a total operating capacity based on wind energy on the Grid of 1,600 MW by 2025. By 2020, ESB will be delivering one-third of its electricity from renewable generation and will achieve carbon net-zero by 2035.

1.2 Transmission and Distribution

ESB Networks builds, manages and maintains a transmission and distribution network of over 180,000 km in the Republic of Ireland. It is responsible for constructing all the sub-transmission, medium and low voltage electricity network infrastructure in the country and for managing this infrastructure which is owned by ESB. The focus on recent investment in the network was on continuing the reinforcement of the system to facilitate the connection of new renewable electricity generation. ESB Networks is unique in that all electricity users are in contact with ESB Networks and in 2016 over 20,000 new residential and business connections were completed.

1.3 ESB Telecoms & Telecommunications Infrastructure

ESB Telecoms has grown from its original function of providing a communications system for ESB to become Ireland's leading independent telecommunications infrastructure provider. ESB Telecoms now provides network solutions for the wide variety of mobile network operators, wireless broadband providers and public sector business activities. All sites developed by ESB Telecoms are made available to third party mobile phone and wireless broadband operators as points for co-location. Our open policy of sharing infrastructure limits the overall number of telecoms structures appearing in urban and rural landscapes.



In addition, a joint venture between ESB and Vodafone called SIRO - is bringing 100% fibre-to-the-building to 50 towns across Ireland. Powered by Light, SIRO is the only network in Ireland that uses the existing electricity network to provide 100% fibre broadband directly to the home or business, enabling speeds of 1 Gigabit per second. SIRO will continue to accelerate this roll-out in 2017.

1.4 ESB roll-out of EV infrastructure

ESB, as the owner/operator of the electricity Distribution System, is responsible for providing the EV charging infrastructure in Ireland.

To date, ESB has rolled out over 1,000 publicly accessible charge points, including 70 fast chargers along all major inter urban routes. Currently, the charge point infrastructure is building to become a comprehensive network of public and domestic charge points with open systems and platforms accessible to all supply companies and all types of electric cars. ESB targets are to install 2,000 home charge points, 1,500 public charge points and 60 fast charge points nationwide. 95% of all major towns and cities already have electric vehicle recharging infrastructure in place.

According to the 3rd National Energy Efficiency Action Plan (NEEAP), it is now estimated that approximately 50,000 electric vehicles will form part of the national transport fleet by 2020.

2. PLANNING POLICY & PROPOSED DRAFT GDP

ESB welcomes the view set out in in the Infrastructure section of the Issues Paper in relation to electricity infrastructure;

"Infrastructure development and investment in transport and movement (roads, rail, cycling, walking), water services, energy (including renewable energy), waste and telecommunications are critical to promote Mayo as an attractive location for enterprise, investment and a place to live, work and visit."

Notwithstanding the above, ESB has a number of observations with regard to strategic issues, as set out below which should be taken into consideration in the preparation of the draft plan.

2.1 Generation, Transmission & Distribution

ESB broadly supports existing policy that accommodates the ongoing generation, transmission and distribution of electricity, promoted through the policies and objectives in the Infrastructure Strategy in Section 3 of the current Development Plan, where it is recognised that;

"investment in infrastructure is a key element in economic growth, employment, wellbeing of our citizens and environmental sustainability."

Policies and objectives, such as those highlighted below, will support the development of future projects and the maintenance of a safe, secure, reliable and efficient electricity system while having due regard for the environment.

In this regard, ESB support the continuation of Objectives I-03, EY-01 & EY-05 which state;

I-01

"It is an objective of the Council that the final route of any major public and private utilities infrastructure is in line with best international Practice. Among other things, this process will require that a highly detailed study be carried out incorporating technical and environmental and health and safety considerations to assist in selecting the most appropriate route. The feasibility of using all existing linear infrastructure corridors or the undergrounding of overhead lines should be given due consideration on a case-by-



case basis, to ensure the best route is selected from a technical, economic and environmental point of view. The council will safeguard and protect infrastructure corridors from development of non-infrastructure related purposes that would prejudice their future use."

EY-01

"It is an objective of the Council to support and facilitate the provision of a reliable energy supply in the County, with emphasis on increasing energy supplies derived from renewable resources whilst seeking to protect and maintain bio-diversity, wildlife habitats, the landscape, nature conservation and residential amenity."

EY-05

"It is an objective of the Council to support and facilitate the provision of a high quality electricity infrastructure in the County, whilst seeking to protect and maintain bio-diversity, wildlife habitats, scenic amenities, including protected views and nature conservation."

ESB support the continuation of the above policies in the context of the National Planning Framework, Regional Planning Guidelines, Local Development Plans and the Strategic Infrastructure Act provides a robust framework for ensuring that all necessary standards are met and that extensive statutory and non statutory consultation continues to be an intrinsic part of the planning process for the development of electricity infrastructure. This ensures that there is ongoing consultation with local communities and local authorities regarding the construction of new networks.

In addition, Government policy recognises that public acceptability is required for the delivery of key networks projects and that to achieve public confidence, project proposals must adhere to the highest international standards of technology choice, health and safety, environmental and visual impacts. The Government affirms that ESB Networks are obligated to adhere to all relevant guidelines and standards and they act in the national interest, and on behalf of all electricity consumers.

ESB retains lands at the former Power Station site at Bellacorrick which are not used for electricity generation purposes at present, but have the potential to provide for a number of future uses, such as electricity peaking plant or other compatible uses, due to its proximity to the electricity transmission and distribution network. In this regard we support the continuation of Objective E-03 of the current Development Plan, which states;

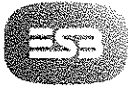
"It is an objective of the Council to encourage enterprise and employment development to locate in brownfield sites or unoccupied buildings in town centres or where appropriate in existing industrial/retail parks or other brownfield industrial sites in preference to undeveloped zoned or unzoned lands."

Brownfield sites, particularly those relating to industrial or employment generating development offer significant opportunities to efficiently and sustainably contribute to the county's stock of available economic assets. Brownfield lands will have supported employment use in the past, often in the recent past, and already have in place the range of services, hard standing and structures that could support new industry, infrastructure and other job-creating activities into the future.

2.2 Telecommunications

The provision of high-quality telecommunications infrastructure is recognised by Mayo County Council a prerequisite for a successful economy and important in removing the peripheral barrier that the County experiences. ESB's collection of telecoms infrastructure in the county continues to assist in delivering enhanced communications networks through the provision of backhaul fibre and shared telecommunications towers.

ESB generally supports the Telecommunications policy set out in Section 3 of the current Plan, particularly TC-03 that promotes a policy of co-location. All ESB Telecoms Mast sites are open for co-location and duplication of infrastructure is reduced as a result.



We support the view that location of telecommunication infrastructure is dictated by service provision and each application should be determined on its own merits as set out under 55.1 of the current Development Plan and must accord with the Telecommunications Antennae and Support Structures Guidelines for Planning Authorities 1996 (DoECLG) and the updated in 2012 *Circular Letter PL 07/12*. ESB encourages policies consistent with the Department Circular to allow for the improved development of telecommunications infrastructure, particularly broadband capability in the area.

2.3 Transport & Electric Vehicles

Ireland is fully committed to the EU2020 strategy and in 2015 the Climate Action and Low Carbon Development Act was passed, which aims to provide certainty surrounding government policy and provide a clear pathway for emissions reductions, in line with negotiated EU 2020 targets. The purpose of the Act is to provide for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a low carbon, climate resilient and environmentally sustainable economy by the year 2050.

In the Programme for Government 2016, the Government stated that the Climate Action and Low Carbon Development Act requires the preparation of a National Low Carbon Transition and Mitigation Plan. It commits to publishing the final Plan by June 2017 and states the following in relation to transport. Specifically in relation to electric vehicles the Programme for Government states;

"We want Ireland to become a leader in the take-up of electric vehicles. We will establish a dedicated taskforce involving relevant government departments, agencies, and industry and representative groups, to work on this goal and to set ambitious and achievable targets. The taskforce will also investigate the potential role and use of other future fuels such as hydrogen."

Energy use in transport has grown significantly; increasing 6.3% per annum average between 1990 and 2007, reflecting the country's rapid economic growth. Notwithstanding the economic slow down, continued growth of 2.7% per annum in transport energy to 2020 is anticipated. The National Energy Efficiency Plan sets out actions to reduce the transport energy demand.

The Government Electric Transport Programme sets the following targets for 2020;

- 50,000 electric vehicles will form part of the transport fleet.
- ESB will roll out charging points to meet EV target.
- Open access to all electricity suppliers and car manufacturers.
- Roll out of EV's will provide major employment opportunities.

The above targets demonstrate that EV's (incl. plug-in hybrid electric vehicles PHEV's) are central to Government targets for zero carbon emissions transportation systems. The establishment of EV infrastructure by ESB and the associated EV usage both nationally and internationally aligns with the key principles and benefits of sustainability and the National Climate Change Strategy on reduction of emissions.

Section 2 of the Consultation and Issues Paper sets out the objective under Goal 4; *To adopt 'green principles' that promote a high quality of life*. ESB welcomes this goal and wish to highlight that Mayo County Council can adopt green principles and encourage greater efficiencies in the use of energy in transport with the inclusion of specific policies and objectives in the new County Development Plan in relation to EV charging infrastructure. ESB recently revised and updated the standards required in order to achieve the desired 10% target for the Electric vehicles as follows.

S.I. No. 325 of 2014 ROAD TRAFFIC (TRAFFIC AND PARKING) (CAR CLUBS AND ELECTRICALLY POWERED VEHICLES) REGULATIONS 2014 makes provision for EV parking in public areas.



Therefore, in order to meet the targets of the Governments Electric Transport Programme, we respectfully submit that Mayo County Council should strengthen their support for the roll-out of EV infrastructure with the inclusion of following updated parking standards:

2.3.1 Proposed parking standards for Draft CDP

1. ***For Developments with Private Car Spaces (residential and non-residential) including visitor car parking spaces e.g. office –spaces***

- a. *At least one parking space should be equipped with one fully functional EV charging point in accordance with IEC 61851 Standard for Electric Vehicle Conductive Charging Systems. This should be capable of supplying 32A 230V single phase AC electricity and be equipped with Mode 3 protection. It should be fitted with a Type 2 socket as defined by IEC 62196.*
- b. *It should be possible to expand the charging system at a future date (e.g. by installing appropriate ducting now) so that up to 10% of all spaces can be fitted with a similar charging point.*

2. ***For Developments with Publicly Accessible Spaces (e.g. supermarket car park, cinema etc.)***

- a. *At least one parking space should be equipped with one fully functional EV charging point in accordance with IEC 61851 Standard for Electric Vehicle Conductive Charging Systems. This should be capable of supplying 32A 230V single phase AC electricity and be equipped with Mode 3 protection. It should be fitted with a Type 2 socket as defined by IEC 62196.*
- b. *It should be possible to expand the charging system at a future date (e.g. by installing appropriate ducting now) so that up to 10% of all spaces can be fitted with a similar charging point.*
- c. *The Charge Point Parking space(s) should be clearly marked as being designated for EV charging.*
- d. *Appropriate signage indicating the presence of a charge point or points should also be erected.*
- e. *All charge points fitted in publicly accessible areas should be capable of communicating usage data with the national charge point management system and use the latest version of the Open Charge Point Protocol (OCPP). They should also support a user identification system such as RFID.*

As the use of electric vehicles continues to increase the Council may increase the number of parking spaces to be equipped with fully functional charge points in either of the above cases.

The above standards or similar have been implemented in the latest review of development plans by planning authorities in Ireland. Promoting policies and objectives are facilitating growth in charge point infrastructure, to become a comprehensive network of public and domestic charge points with open systems and platforms accessible to all supply companies and all types of electric cars.



3. CONCLUSION

Investment in infrastructure is crucial to the economic and social well-being of our country. Such investment creates jobs, stimulates economic activity and provides modern, efficient facilities to provide the services that people need including healthcare, education and community services amongst others. There is a significant multiplier effect from investment in infrastructure which means that it stimulates growth in the local economy. This investment in infrastructure is also necessary to support EU and national policy on Climate Change adaptation and mitigation.

ESB requests that Mayo County Council give due consideration to the matters raised in this submission including:

- The draft plan should maintain the planning policies which protect the county's future capacity for the development of energy infrastructure whilst encouraging the sustainable development of renewable energy resources. This will enable ESB to develop and maintain a safe, secure, reliable, economical and efficient electricity Generation, Transmission and Distribution System with a view to ensuring that all reasonable demands for electricity are met having due regard for the environment.
- The continuation of a clear policy of encouraging the redevelopment of brownfield sites in rural areas would assist in permitting employment generating development.
- ESB welcome planning policies and objectives which will facilitate an improvement in telecommunications infrastructure and help position the county to attract intellectual and physical capital.
- The Government's National Policy Position on Climate Action and Low Carbon Development "establishes the fundamental national objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050". Reflecting the strategic goals of the State to reduce anthropogenic greenhouse gas emissions, support energy generation from renewable sources and to embrace the principles of sustainable development, ESB submit **that the Mayo County Development Plan should include specific objectives regarding the provision EV charge points at residential and commercial developments and that 'on-street' locations should be included to ensure the proposed levels of parking provision for EV's are achieved. Indicative standards are set out in s.2.3.1. of this submission.**

If we can be of any further assistance, or if you wish to clarify any of the points raised, please do not hesitate in contacting the undersigned.

Yours sincerely,

Gerard Crowley | Planning and Asset Manager | ESB Business Service Centre |
[Redacted]



An Roinn
Cultúir, Oidhreachta agus Gaeltachta
Department of
Culture, Heritage and the Gaeltacht

30 May 2018

Mary Killoran Coyne
Mayo County Council,
Aras an Chontae,
The Mall, Castlebar,
Co. Mayo

Re: SEA Scoping of environmental report-Mayo County Development Plan 2014-2020

A Chara,

The Department refers to your notifications regarding the review of Mayo County Development Plan 2014-2020 (as varied), and the commencement of the preparation of a new County Development Plan for 2020-2026. Reference is also made to the SEA scoping consultation, including the document for environmental authorities, and the 'Consultation Paper and Issues Document'. Outlined below are the nature conservation recommendations of the National Parks & Wildlife Service (NPWS) of the Department of Culture, Heritage and The Gaeltacht.

Context of submission

This submission is made in the context of the Department's role in relation to nature conservation, including as an environmental authority under SEA legislation. The observations are offered to assist the Council in meeting the obligations that arise in relation to European sites and the Natura 2000 network, other nature conservation sites, natural habitats and protected species, and biodiversity and environmental protection in general in the context of the plan and the environmental assessments required. The observations are not exhaustive and are made without prejudice to any submissions or recommendations that may be made by the Minister and this Department at future stages in the plan-making process.

It is noted that the processes of public consultation at pre-draft stage (our ref. FP2018/053) and SEA scoping (our ref. FP2018/052) are in train at present, and overlap. This submission includes observations in relation to the plan and the scope of the SEA. The opportunity has also been taken to make observations in relation to the appropriate assessment (AA) process, noting that all three elements are inter-linked, as is the Strategic Flood Risk Assessment.

This submission should be read as a whole by the Council, including by any teams or individuals involved in the preparation of the new plan and associated environmental assessment reports.

The Department is available to meet the Council in relation to the plan and its environmental assessments, if that would assist.

Duties of authorities in relation to nature conservation

The Council has duties in relation to European sites and nature conservation as the competent authority under Part XAB of the Planning and Development Act, 2000 as amended, and as a public authority¹ within the meaning of the European Communities (Birds and Natural Habitats) Regulations, 2011. Not only do these duties include the specific requirements of the AA process, they also include obligations placed on all public authorities to exercise their statutory powers and functions in compliance with and, as appropriate, so as to secure compliance with the requirements of the Birds and Habitats Directives, and these Regulations. Appropriate steps must be taken to prevent the deterioration of natural habitats and the

¹ As defined in Part 1 of the European Communities (Birds and Natural Habitats) Regulations, 2011, and including DHPCLG

habitats of protected species as well as significant disturbances of species in European sites insofar as this disturbance could be significant in relation to the objectives of the Habitats Directive. All public authorities are advised to incorporate such obligations into their plans and programmes, and associated assessments, as required and relevant. This could usefully include the development of systems that will monitor and ensure the compliance of “downstream” projects with these obligations, as well as any internal mechanisms that may be needed to ensure compliance.

Matters relating to the plan

County Development Plans are primarily strategic in nature and sit within a hierarchy of statutory land use plans. It is understood that the new plan is to be based on the current development plan, with updates to reflect and incorporate the provisions of the National Planning Framework and (forthcoming) Northern and Western Regional Economic and Spatial Strategy, as well as any other new or amended national policy. It will also incorporate land use zoning and other key objectives for towns within the county, with the exceptions of Castlebar, Ballina and Westport, which have their own Development Plans. The current plan has a vision and eight goals, a core strategy setting out the strategy for the location of future development, and a series of objectives and policies under various headings. Various other strategies, such as the county’s Renewable Energy Strategy, form part of the plan. It is unclear if the review will allow for these to be revisited.

In the ‘Consultation Paper and Issues Document’, the Council acknowledges the wealth of its natural heritage and biodiversity resources, including as an asset for the people of the county, for visitors and for the economy and future development. The Department welcomes the Council’s commitments to the short- and long-term protection of the natural environment in general, and the European sites and Natura 2000 network in particular.

It is recommended that, as at present, the new plan should have a section or chapter with information and maps on key elements of the natural heritage and biodiversity of the plan area, and objectives for their conservation – see below. Biodiversity considerations should also be reflected in other sections of the plan, as appropriate and as required to reflect AA mitigation and SEA measures to safeguard European sites, biodiversity and the environment.

In land use planning, where multiple uses or ‘green infrastructure’ models are envisaged, it is advised that a clear distinction is made between nature conservation obligations, and other land uses, e.g. tourism, recreation and amenity. In certain scenarios, changes in land uses or increased pressures can lead to or perpetuate habitat loss, deterioration and fragmentation, or species disturbances which may be inconsistent with nature conservation objectives and obligations. Good land use planning should seek to anticipate and manage such competing requirements, including by early consideration of constraints, the selection of optimal locations and options, and by having a set of steps or measures in the plan to guide the planning and design of future projects to maximise their likely success. These steps or measures could dovetail with the SEA measures and any mitigation from the NIR. Alternatively, reference could be made to guiding principles and steps or approaches in associated or related plans or strategies, e.g. the ‘Greenways Strategy’ (in preparation) which should include measures to guide the planning, routing and assessment of future greenways and blueways.

Where (subject to) ‘sustainable development’ is used to indicate the safeguarding of the environment and of natural resources, it would be beneficial and would provide clarity if the term was defined in the plan to mean, among other things, the absence of adverse effects on the conservation objectives and integrity of a European site, or of adverse effects on any other statutory nature conservation site.

Available guidance

Existing EU and Irish guidance on SEA and AA should be followed in general terms when carrying out the environmental assessments, but the Council should also be cognisant of changes in the interpretation and application of Directives and national legislation arising from European and Irish jurisprudence, particularly in respect of Article 6 of the Habitats Directive. There should be due regard to the terminology, stages and tests of the assessment processes as set out in relevant legislation, notably in the case of the appropriate

assessment process. Where legislation updates or amends elements of existing guidance, the former should be used or applied in preference in all cases.

SEA – Biodiversity, flora and fauna

It has been determined that the likely significant effects of the plan on biodiversity, flora and fauna must be assessed. Biodiversity is generally defined as the variety of life on earth. An outline of key elements of biodiversity of relevance to the plan is given in Appendix 1, and includes sites, habitats, species of flora and fauna, certain river catchments, and ecological networks. There are interrelationships between biodiversity, flora and fauna and most other environmental issues or topics, including population, human health, water, soil, air, climatic factors, landscape, and possibly architectural and archaeological heritage. The potentially significant effects of the plan on these interdependencies should be explored and assessed in the SEA.

There will be overlaps and linkages between biodiversity, flora and fauna in SEA, and sites, habitats and species of relevance to the AA and Article 6 of the Habitats Directive. SEA should address all such issues in general, as well as any other relevant provisions of the Habitats and Birds Directives, including in respects of Article 6(1), 6(2) and 10 of the Habitats Directive, and associated national legislation. See also the general duties of a public authority above.

The plan should be developed to integrate biodiversity considerations in a positive, proactive and precautionary way, and this should be reflected in the text and content of the plan, including its aims, objectives and policies, as well as in maps and land use zoning objectives. The findings and recommendations of SEA should be assimilated into the plan, and should modify the content of the plan where necessary.

The biodiversity, flora and fauna section of the Environmental Report should be prepared by or in conjunction with a suitably qualified ecologist(s), and other specialists as necessary, and in conjunction with the NIS to ensure full integration of biodiversity issues and concerns. The EPA's *Integrated Biodiversity Impact Assessment* best practice guidance is of relevance in this regard.

The Environmental Report is required to contain information on environmental protection objectives which are established at international to national level, and are relevant to the plan. For biodiversity, flora and fauna, these should integrate with the objectives and obligations of other directives such as the Habitats Directive, the Birds Directive, the Water Framework Directive and the Floods Directive, and with the Wildlife Acts, 1976-2000, and the National Biodiversity Plan. Land use planning should also take into account and safeguard any ecological restoration or mitigation measures delivered in connection with developments that have carried out, or cases where habitat restoration or environmental enhancement was required.

The monitoring programme should be set out clearly and developed in such a manner to ensure it will identify effects on the environment that will or may arise, and to monitor the effectiveness of any mitigation on which the assessment relies. While it may be considered efficient to use monitoring programmes that are already in place and run by other authorities, it is important to establish that these are in fact designed in such a way that they will identify the effects anticipated from the particular plan in question. As such, it is important to understand the objectives, methodologies, parameters, assumptions, etc. of any existing monitoring programme that is proposed to be used in such a way.

It is advisable to set out clearly where responsibilities for monitoring programmes lie, and their frequency and reporting/publication arrangements, as well as the procedures that will be put in place to ensure that there is a response mechanism to any unforeseen or undesirable negative effects/results, and that remedial action will be taken, if necessary.

Available ecological information

The National Parks and Wildlife Service website (www.npws.ie) is a key source of data, information and publications on nature conservation sites and biodiversity issues of potential relevance to the plan area and the environmental assessment(s) required. This includes site boundaries, site synopses, lists of qualifying interests (SACs) and special conservation interests (SPAs), conservation objectives (European sites),

features of interest (NHAs), and dates of site designation. GIS datasets are available for download for nature conservation sites², and for certain habitats and species arising from various sources, including national surveys. Other NPWS-held data on habitats and species may be requested by submitting a 'Data Request Form'³.

Site-specific conservation objectives (SSCOs), and associated backing documents, are available for Lough Corrib SAC (site code 000297) and some other European sites on the NPWS website⁴. GIS datasets associated with site-specific conservation objectives are also available for download: <http://www.npws.ie/mapsanddata/habitatspeciesdata/>. For all other European sites, generic conservation objectives are available and the most up-to-date versions should be used and referenced in any relevant documents. The full scope of conservation objectives should be used, as appropriate, to guide and inform the scope of the scientific assessment and analysis in an NIS. The most recent version of the conservation objectives should be used and referenced, and each of the individual conservation objectives of relevance should be addressed separately.

The Habitats Directive Article 17 reports for 2007 and 2013, which should be consulted, are available from <http://www.npws.ie/article-17-reports-0>. The recent national report on Article 12 of the Birds Directive, at <http://www.npws.ie/news/birds-directive-article-12-reporting>, should also be consulted. The national habitat surveys that have been undertaken, and their resulting reports, should be consulted, including for information regarding the definitions and evaluations that have been developed for Annex I habitat types in Ireland.

Data on biodiversity and ecological features will be available from various other sources including, for example:

- Other organisations, e.g. National Biodiversity Data Centre, BirdWatch Ireland (e.g. IWeBS data), Bat Conservation Ireland, etc.
- SEA Environmental Reports, NIRs/NISs and other reports for other plans and strategies
- EISs, NISs and other reports (including constraints study, route selection and monitoring reports) for projects in the plan area

Appropriate assessment

It appears that it has been determined that AA is required in this case, meaning that an NIR is required. It is advised that the Council's references to a 'Habitats Directive assessment' should be reviewed and revised in line with the applicable legislation and associated terminology. General notes on the preparation of an NIS are included in Appendix 2, and should be taken into account, as relevant, as they also apply to an NIR. As outlined above, there should be due regard to the terminology, stages and tests of the AA process as set out in relevant legislation.

Where the NIR identifies that plan-level mitigation is necessary, including to avoid or reverse adverse effects on European sites and to manage future scenarios, this must amend and be reflected in the content and objectives of the final plan wherever necessary. Specific and repeated cross-referencing to mitigation measures in other sections or reports may be used but should be done clearly, consistently and unambiguously.

The AA is carried out by the competent authority for the final iteration of the plan, prior to its adoption. The AA must take account of the NIR (including any addenda or revisions), and should address the content of submissions made where issues or concerns are raised regarding the effects on European sites. The AA and decision-making authority has obligations to address scientific uncertainties or discrepancies, including matters raised by other parties, particularly in relation to the implications for European sites and their conservation objectives in the AA; the final determination should demonstrate how the differing scientific opinions were resolved, noting that case law of the Court of Justice of the European Union (e.g. case C-258/11) has established that an appropriate assessment cannot have lacunae, and must contain complete,

² Special Areas of Conservation (SACs, currently known as candidate sites but fully legally protected); Special Protection Areas (SPAs); Natural Heritage Areas (NHAs); and proposed Natural Heritage Areas (pNHAs)

³ Available from <http://www.npws.ie/maps-and-data/request-data>

⁴ <http://www.npws.ie/protectedsites/conservationmanagementplanning/conservationobjectives/>

precise and definitive findings and conclusions with regard to the implications of a project for the conservation objectives and integrity of a European site or sites.

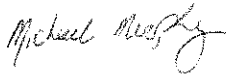
Kindly forward any further information received; or in the event of a decision being made a copy of same should be forwarded to the following address as soon as it issues:


The Manager,
Development Applications Unit,
Department of Culture, Heritage, and the Gaeltacht,
Newtown Road,
Wexford Y35 AP90

Preferably, documentation associated with the above can be referred electronically to the DAU at the following address: manager.dau@chg.gov.ie

In addition, please acknowledge receipt of these observations by return.

Is mise le meas,



Michael Murphy,
Development Applications Unit




Forward Planning Section,
Mayo County Council,
Áras an Chontae,
The Mall, Castlebar,
Co Mayo

countydevplan@mayococo.ie

www.eirgrid.com
The Oval, 160 Shelbourne Road
Ballsbridge, Dublin D04 FW28, Ireland
Telephone +353 1 677 1700
Email info@eirgrid.com

8th June 2018
[By Email]

Re: Submission to the pre-draft public consultation for the Mayo County Development Plan 2020-2026

Dear Sir/Madam,

Thank you for your correspondence in relation to the *Mayo County Development Plan 2020-2026*. EirGrid welcomes the opportunity to make a submission on the plan and requests this submission is taken into consideration in the drafting of the plan.

EirGrid is responsible for the safe, secure and reliable transmission of electricity – now and in the future. EirGrid develops, manages and operates the electricity transmission grid. This brings power from where it is generated to where it is needed throughout Ireland. The grid also supplies power to industry and businesses that use large amounts of electricity and powers the distribution network. The distribution network in turn supplies electricity to homes, businesses, schools, hospitals, and farms.

EirGrid's Function

EirGrid's function as the national electricity Transmission System Operator (TSO) is set out in the *European Communities (Internal Market in Energy) Regulations, 2000 - SI 445/2000*. Article 8(1)(a) gives EirGrid as TSO, the exclusive statutory function:

"To operate and ensure the maintenance of and, if necessary, develop a safe, secure, reliable, economical, and efficient electricity transmission system, and to explore and develop opportunities for interconnection of its system with other systems, in all cases with a view to ensuring that all reasonable demands for electricity are met having due regard for the environment."

The transmission system on the island of Ireland refers to the higher capacity electricity network and primarily comprises substations and circuits at 400 kV (i.e. 400,000 Volts), 220 kV, and 110 kV (in Northern Ireland, transmission infrastructure also occurs at 275 kV). EirGrid's (2016) Transmission System Map (ENCL1) is enclosed.

Policy-Led Plan

The electricity transmission grid's importance in supporting our society and economy should not be understated. The plan should contain policies and objectives which support a safe, secure and reliable supply of electricity. These need to be explicit in the plan in order to assist EirGrid in the successful implementation of its *Grid Development Strategy - Your Grid, Your Tomorrow* (2017a) (ENCL2). This is imperative to meeting

DIRECTORS

John O'Connor
Chairman

Dr Joan Smyth
Deputy Chair

Fintan Slye
Chief Executive

Shane Brennan
Lynne Crowther

Dr Theresa Donaldson

Michael Hand

Eileen Maher

Liam O'Halloran

John Trethowan

Tom Finn

Company Secretary

*EirGrid Plc
The Oval
160 Shelbourne Road
Ballsbridge
Dublin D04 FW28
Ireland*

*Company Registration
No. 334532*

national targets for electricity generation, climate change targets, and security of energy supplies.

This consultation is being carried out following publication of *Project Ireland 2040: National Planning Framework* (NPF) and in parallel to the preparation of the draft *Regional and Economic Strategy* (RSES) for the Northern & Western Regional Assembly. In this context the policies and objectives proposed in the NPF should be reviewed and transposed into the County Development Plan. Similarly the planning authority should consider any future proposed policy objectives for the transmission network contained in the RSES during the course of drafting and adopting the plan. National Policy Objective 47 is the primary text relating the transmission network in the NPF:

National Policy Objective 47: In co-operation with relevant Departments in Northern Ireland, strengthen all-island energy infrastructure and interconnection capacity, including distribution and transmission networks to enhance security of electricity supply.

EirGrid requests it be further consulted in the development of the policies and objectives relating to the transmission network. EirGrid would be willing to meet with the planning authority to contribute to the development of appropriate and robust policies and objectives in this regard. Such policies and objectives in the plan will also be critical in setting the context for proposals for the transmission network in future. In requesting such policies, EirGrid also suggests they could be input into a section in the plan that addresses strategic infrastructure and/or utilities.

EirGrid also suggests the plan be explicit as to how the various Government (and State Agency) policy documents have been considered in the preparation of the plan, and how these have informed the policy and objectives. We suggest a section is included in the plan setting out how these policy documents have been considered in a holistic and integrated way to inform subsequent plan policy. This gives a clear policy-led foundation to the plan, which will prove invaluable as it subsequently informs proposals for the transmission network in future.

Relevant Energy Policy

In terms of electricity transmission there are a number of important Government Policy documents namely:

- Department of Communications, Energy and Natural Resources (2012) *Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure.*
- Department of Communications, Energy and Natural Resources (2015) *White Paper On Energy: Ireland's Transition to a Low Carbon Energy Future 2015-2030;*
- EirGrid's (2017a) *Grid Development Strategy - Your Grid, Your Tomorrow;*
- EirGrid (2017c) *Tomorrow's Energy Scenarios 2017: Planning our Energy Future.*

In this regard, the Department of Communications, Energy and Natural Resources (2015) *White Paper on Energy* titled *Ireland's Transition to a Low Carbon Energy Future 2015-2030* reaffirms the Government's position on energy matters and should be relied upon as a source for policy formulation for energy in the plan. The White Paper acknowledges that developing, maintaining, and upgrading the grid is essential to meeting its short, medium and longer-term objectives. It also has considerable regard to wider emerging EU Policy which promotes smart low-carbon economies centred on energy efficiency. This policy in turn acknowledges the role of sustainable development of individual country's transmission grids to assist in their delivery.

EirGrid's (2017a) *Grid Development Strategy - Your Grid, Your Tomorrow* is consistent with the Government White Paper on Energy and should also be incorporated/referenced in the plan to support the safe, secure and reliable transmission of electricity. The *Grid Development Strategy* is also set in the context of Government Policy, in particular the Department of Business, Enterprise and Innovations (2017) *Action Plan for Jobs 2017* and the Irish Development Authority's (IDA) (2015) strategy, *Winning: Foreign Direct Investment 2015-2019*. The *Grid Development Strategy* acknowledges the need to achieve a balance between social, environmental and economic factors.

It is important that the draft plan incorporates robust policies to develop the electricity grid in a safe and secure way. This is necessary to meet projected demand levels; to meet Government Policy; and to ensure a long-term, sustainable and competitive energy future for Ireland. The plan should include policies that facilitate the development of grid reinforcements including grid connections including network that traverses into and through the county and between all adjacent counties and regions.

An increased strategic spatial focus identifying demand and generating locations in the plan will be of benefit in facilitating EirGrid to successfully plan for the future transmission network and is of particular importance in EirGrid's (2017c), recently published, *Tomorrow's Energy Scenarios 2017: Planning our Energy Future* (ENCL4) which brings together a wide range of factors which can influence the evolution of the electricity sector. One of EirGrid's roles is to plan the development of the electricity transmission grid to meet the future needs of society. The key to this process is considering the range of possible ways that energy usage may change in the future through scenario planning.

Other National and Regional Strategies

Other national and regional strategies are important in ensuring consistency across all regional strategies and local plans. This is important to EirGrid given it is often working in an inter-county and transboundary context. For example, landscape designations are often inconsistent across local authority boundaries. An important role for the development plan is coordinating such policies to ensure consistency across local authority plans. Adopting and implementing the objectives and actions of the *National Landscape Strategy for Ireland 2015 – 2025* should be a key consideration for the plan.

It should also be noted in designating landscape polices EirGrid supports and understands the principle underlying measures to protect landscape sensitivities and will always seek to comply. However, in developing the transmission network it may not always be possible to avoid landscape sensitive areas because of the nature of generator and demand locations. As such stringent policies could pose difficulties for the development of the network and the safe, secure and reliable supply of electricity. The planning authority should be aware of EirGrid process for grid development which carefully plans its routes and sites for new transmission grid infrastructure based on a careful consideration of a wide range of issues including avoiding areas of high amenity; ecologically sensitive areas (SACs, SPAs, etc.) while integrating lines within the existing landscape. The final route for any line is a carefully considered balance of technical, environmental and landowner considerations. Where it is not possible to avoid an sensitive sites/areas, EirGrid will always document reasons for same.

We would again stress that there is an opportunity for EirGrid to collaborate more closely with the planning authority, both on the development of the plan, and going forward - as part of a wider working group on infrastructure and utilities. This may be something that the planning authority may welcome and facilitate when developing objectives for the draft plan.

Regional Context

In the *Grid Development Strategy* EirGrid sets out its view of the major investment projects necessary to meet Ireland's needs in each of these sub-regions. This document relates only to Ireland, but considers the all-island energy market. In particular, it responds to the urgent need to secure electricity supply in Northern Ireland. The figure below show the forthcoming projects planned for the region¹ including the type of project, its location and the length of line (where applicable). We request EirGrid's projects are referenced specifically in the plan and supported generically in policy objectives and the importance of their timely and efficient delivery is emphasised. The information and figures below are extracted from EirGrid (2017b) *Grid Development Strategy - Your Grid, Your Tomorrow* [Technical Report] [ENCL3], which is enclosed with this submission.

The West region is particularly rich in renewable energy resources. These generation sources are dispersed across the region, but particularly concentrated along the western coastline. There is also a large conventional thermal generator located at Tynagh substation. The main demand centres are composed of a mix of residential, commercial and industrial demand, which is expected to grow up to 2025 and beyond.

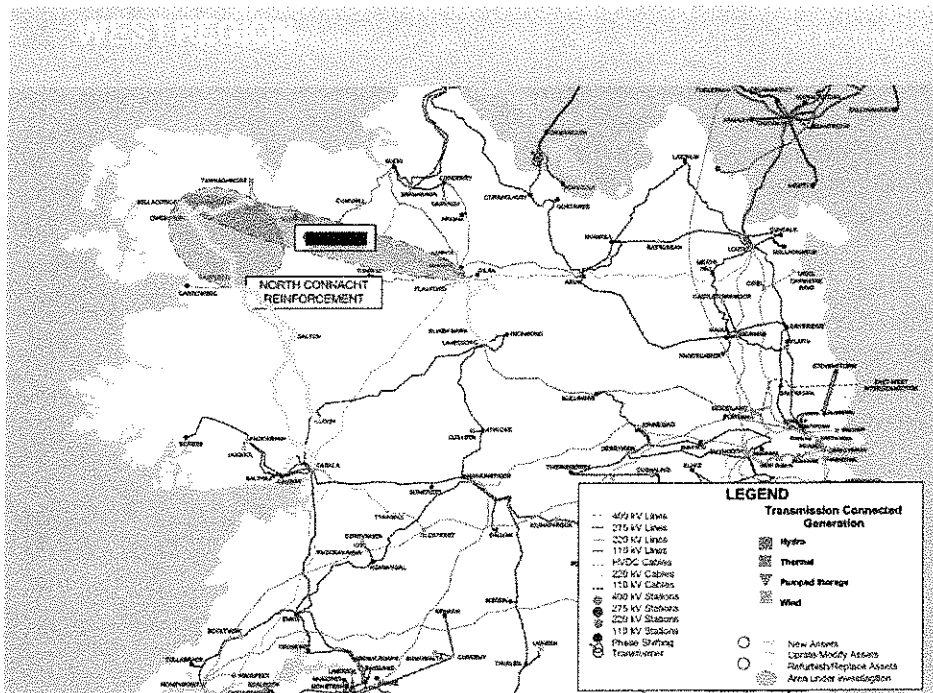
The existing transmission network is predominantly lower capacity 110 kV with very little higher capacity 220 kV and 400 kV transmission infrastructure. Developing the grid will enable the transmission system to safely accommodate more diverse power flows from surplus regional generation and also to facilitate future growth in electricity demand. These developments will strengthen the network for all electricity users, and in doing so will improve the security and quality of supply. This is particularly important if the region is to attract high technology industries that depend on a reliable, high quality, electricity supply.

The planning authority should note that in September 2017 EirGrid announced plans to replace the Grid West electricity transmission project with a smaller-scale development called the North Connacht Project. Ireland has a target for renewable generation to account for 40% of electricity consumption by 2020. This includes wind, wave and tidal power. Although there has been a reduction in anticipated wind generation in North Connacht, there is still a need to connect generators in there . This can now be met through the development of 110 kV electricity infrastructure; not the 220 kV nor 400 kV infrastructure that was proposed under Grid West.

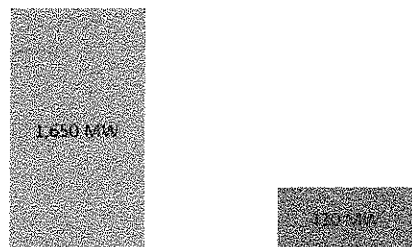
As the national electricity transmission system operator for Ireland, we have a statutory function to connect electricity generators. Subject to direction from the regulator, this statute requires us to offer a connection to the grid for those who request it. When an electricity generator accepts our connection offer, we have to meet their needs. This means we are legally required to develop the grid in response to plans for new electricity generation, such as wind farms.

By connecting renewable energy from the North West to the grid, this new project will reinforce the electricity network, supporting Mayo County Council's aim to enhance the attractiveness of the county as a place in which to live, work and invest.

¹ EirGrid's *Grid Development Strategy* was been prepared in the context of NUTS 2 Regional Assemblies.



Forecast Regional Generation/Demand Balance



■ Generation ■ Demand

Main Regional Demand Centres²⁸

Location	Forecast Demand (MW)	Additional Demand Capacity (MW) ²⁹
Castlebar	26	10
Galway	71	60

Type of Projects	No. of Projects	Project kilometres	Total Regional Cost
New build circuits	2	125	€0.4-€0.6 billion
Uprate circuits	8	236	
New substations	2	N/A	

- Series Compensation on the existing 400 kV overhead line at Oldstreet 400 kV substation (part of the Regional Solution, see the South-East region summary for more information)

Other Notable Proposed Projects

- Reinforcement of the transmission network in the vicinity of Mayo and Sligo comprising the North Connacht 110 kV project. The reinforcement potentially includes the uprating of some 110 kV circuits in the area, for example Castlebar – Dalton – Cashla and Castlebar – Cloon 110 kV circuits³¹
- Uprating of Cashla – Salthill 110 kV circuit
- Uprating of Flagford – Lanesboro 110 kV circuit
- Uprating of Bellacorick – Castlebar and Bellacorick Moy 110 kV circuits
- Reactive power support required to strengthen system voltage

Figure 1: Midlands Region as identified in EirGrid's (2017b) Grid Development Strategy (Technical Report)

Conclusion

The development of the transmission grid as summarised above and outlined in detail in EirGrid's *Grid Development Strategy - Your Grid, Your Tomorrow* (2017a) and associated Technical Report (2017b), is of critical importance to support the economy and society, as well as to realise the transformation of Ireland's energy system to meet climate change and energy obligations. Electricity infrastructure is critical for regional economic and spatial development.

To ensure Ireland's sustainable development and growth, EirGrid requires appropriate and robust policies and objectives for planning the national grid infrastructure and prioritising it appropriately in order to deliver national, regional and local benefit. In this regard, EirGrid requests that the importance of the grid is acknowledged as a strategic issue.

EirGrid is available to collaborate with the authority and to provide expert and focused input into the preparation of the plan, particularly from a strategic energy policy perspective. Should you have any comments in regard of this submission please contact the undersigned. EirGrid once more welcomes the opportunity to participate in the making of the plan and looks forward to further engagement.

Yours sincerely,

Tomás Bradley, MRTPI
tomas.bradley@eirgrid.com

Enclosures (links to website)

- ENCL 1: [Transmission System Map](#);
- ENCL 2: [Grid Development Strategy - Your Grid, Your Tomorrow](#)
- ENCL 3: [Grid Development Strategy - Your Grid, Your Tomorrow – Technical Report](#)
- ENCL 4: [Tomorrow's Energy Scenarios 2017: Planning our Energy Future](#)

References

Department of Communications, Energy and Natural Resources (2015). *Ireland's Transition to a Low Carbon Energy Future 2015-2030*. Dublin: DCENR. [Available Online](#).

Department of Housing, Planning and Local Government (2017). *Ireland 2040 – Our Plan: Draft National Planning Framework*. Dublin: DHPLG. [Available Online](#).

Department of Business, Enterprise and Innovations (2017). *Action Plan for Jobs 2017*. Dublin: DBEI.

EirGrid (2017a). *Grid Development Strategy - Your Grid, Your Tomorrow*. Dublin: EirGrid. [Available Online](#).

EirGrid (2017b). *Grid Development Strategy - Your Grid, Your Tomorrow [Technical Report]*. Dublin: EirGrid. [Available Online](#).

EirGrid (2017c). *Tomorrow's Energy Scenarios 2017: Planning our Energy Future*. Dublin: EirGrid. [Available Online](#).

EirGrid (2016). *Transmission System Map*. Dublin: EirGrid. [Available Online](#).

Government of Ireland (2000). *European Communities (Internal Market in Electricity) Regulations, 2000 (SI No. 445/2000)*. Dublin: The Stationary Office.

Irish Development Authority (2015) *Winning: Foreign Direct Investment 2015-2019*. Dublin: IDA. [Available Online](#).



Forward Planning Section
Mayo County Council
Áras an Chontae
The Mall
Castlebar
Co. Mayo

Dáta | Date
11 June, 2018

Ár dTag | Our Ref.
TII18-101841

Bhur dTag | Your Ref.

Re. **Review of the Mayo County Development Plan, 2014 - 2020**
Preparation of the Mayo County Development Plan, 2020 - 2026

Dear Sir/Madam,

The Authority welcomes consultation on the review of the Council's Development Plan and the preparation of a new County Development Plan. The Authority submits the following observations for the Councils consideration which may inform the preparation of the Draft County Development Plan:

1. MANAGING EXCHEQUER INVESTMENT AND STATUTORY GUIDANCE

The Trans-European Transport Networks (TEN-T) are a planned set of transport networks across Europe. The TEN-T regulations target a gradual development of the transport network with the core network a priority (by 2030) followed by the remainder of the comprehensive network (by 2050). The TEN-T regulations define the objective of increasing the benefits for road users by ensuring safe, secure and high-quality standards for road users and freight transport in a co-ordinated fashion to achieve integrated and intermodal long-distance travel routes across Europe.

The Council will be aware that the N5 and N17, national primary routes, through Mayo are identified as part of the TEN-T Comprehensive Network which has repercussions and action requirements for policies and objectives which should be considered in the preparation of the new County Development Plan. In addition, the N26, N58, N59, N60, N83, N84 all provide important regional and inter-regional connectivity within and through the Region.

Project Ireland 2040 | National Development Plan, 2018 – 2027, outlines the investment priority to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users. Government also includes the objective to maintain the strategic capacity and safety of the national roads network, including planning for future capacity enhancements, in National Strategic Outcome 2 of the National Planning Framework.

The routes identified are important strategic national roads and give access to regional and international markets, including through strategic airport and port locations as well as linking with other strategic national roads.

It is of particular importance that policies and objectives are drafted which allow the network of national roads to continue to play the intended strategic role in catering for inter-urban and inter-regional transport requirements that

will serve Ireland's economic competitiveness and regional accessibility by providing faster, more efficient and safer access to and from our major ports, airports, cities and large towns.

There is a critical need to manage these assets in accordance with national policy as outlined in Smarter Travel (DTTAS, 2009), (SFILT) Investing in our Transport Future (DTTAS, 2015), the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and Project Ireland 2040| National Development Plan and National Planning Framework objectives.

The County Development Plan should reflect the foregoing provisions of official policy and national objectives.

2. DEVELOPMENT AND CORE STRATEGY

As demonstrated in this submission, the Authority seeks to ensure that the carrying capacity, operational efficiency, safety and national investment made in national roads in Mayo continue to be safeguarded and that the relevant policies/objectives included in the County Development Plan are developed to reflect this.

In particular, the Authority requests that the Council consider the implications of land use policies on the strategic national road network in the area as a criterion in determining the future land use zoning strategy to be outlined in the Draft Development Plan and the respective Core Strategy.

The Authority respectively points out that although a requirement may be identified for the development of a particular town or location, this demand should be developed complementary to safeguarding the strategic function of the national road network; such an approach will support economic growth. Proposals should not be developed that are to the detriment of the investment in national infrastructure, by eroding or undermining that investment, which is required to service the Country's major inter-urban and inter-regional transport requirements and underpins Ireland's competitiveness.

Policies and objectives in identified urban growth areas can be developed and adopted so as to avoid undermining the strategic transport function of national roads. In that regard measures to cater for the needs of local traffic and local development related traffic are appropriately addressed within a framework of providing an adequate local transportation infrastructure. The Development Plan is the policy document to set this framework at county level.

In accordance with Government policy, the Authority supports practices aimed at concentrating development in established urban areas and designated development centres subject to development being framed within a coherent integrated land use and transportation strategy. In addition to the review of the extent and location of residential lands in accordance with core strategy requirements, the Council may consider it appropriate to review the extent and location of industry, employment and other commercial type land uses to prepare a co-ordinated and integrated land use pattern; the Guidance Note on Core Strategies published by the DoECLG (2010) contains advice on this requirement, page 8 refers.

The Authority recommends that residential, retail, and employment objectives especially zoning objectives should guide developers to design for sustainable transportation requirements at the earliest stages of development design. An integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by public transport, foot and private car so that the variety of enterprise and employment zones/areas can be easily accessible by all modes of transport and all sections of society.

As indicated in the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) where planning authorities propose large scale development in urban areas and or areas adjoining national roads, including

major junctions and interchanges, development plans should ensure that the capacity on national roads is utilised appropriately and that such roads can continue to perform their intended function into the future by:

- protecting undeveloped lands adjoining national roads and junctions from development to cater for potential capacity enhancements;
- ensuring that capacity enhancements and or traffic management measures will be put in place to facilitate new development; and
- improving operational efficiency of the regional and local road and transportation infrastructure – e.g., where appropriate, promoting new regional and local road networks and alternative modes.

The Council is also advised that any costs such as land acquisition, additional road infrastructure and environmental mitigation measures arising to the national roads network to accommodate local development proposals will be borne by the local authority and will not be funded by TII and thus should be integrated within future local development contributions schemes.

In addition, the DoECLG Spatial Planning and National Roads Guidelines also advise, Section 2.5 refers, that development plans should make it clear that the policy of the planning authority will be to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kph apply. There is also, therefore, a requirement to co-ordinate proposed zoning designations and/or access strategies in the Development Plan and settlement plans with speed limits on national roads when included in the Draft Plan.

3. ESTABLISHING 'EXCEPTIONAL CIRCUMSTANCES'

Where the planning authority proposes to exercise a less restrictive approach to the control of development accessing national roads, this should be plan led, done in consultation with and subject to the agreement of TII in accordance with the provisions of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines. The Authority advises that it is available to discuss proposals in relation to Section 2.6 of the Guidelines with the Executive of Mayo County Council where relevant.

4. DEVELOPMENT AT NATIONAL ROAD JUNCTIONS

In addition to the Core Strategy and general development strategy safeguarding the strategic inter-urban and inter-regional function of national roads, as outlined above, it will be important for the Council to exercise particular care in their assessment and management of development proposals in the Development Plan relating to the zoning of locations at or close to junctions on the national road network where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

Proposals for development and land use zoning designations at national road interchanges and junctions should be considered and be prepared in the context of the provisions of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines.

As outlined, Development Plan policies should reflect and safeguard the strategic role of the national road network and associated junctions in catering for the safe and efficient movement of inter-urban and inter-regional traffic. Planning authorities, in considering proposals for zoning objectives adjacent or close to existing or planned national roads/motorways and junctions, should give special attention to the preferences expressed in the Retail Planning Guidelines for locating developments that attract many trips within established towns and district centres.

It should be noted that whilst the Authority recommends that traffic and transport assessments be carried out for individual planning applications as part of the development management process, this is not a substitute for a prior overall transport assessment of areas where the planning authority is determining fundamental issues of land use and transportation. Leaving the overall transport assessment of areas to individual applicants' transport assessments is considered highly inappropriate and would lead to a piecemeal and unsustainable approach to development in the vicinity of the strategic national road network. Such an approach is particularly relevant for planned growth areas in the County and within the higher tiered settlements.

Thus, it is the Authority's opinion that the Council should give consideration to undertaking appropriate Area Based Transport Assessment (ABTA) or Strategic Transport Assessment (STA) to support the preparation of the Draft County Development Plan, particularly, in relation to areas of planned development which have an interface with the national road network. Section 1.4 of the TII Traffic and Transport Assessment Guidelines (2014) refers and ABTA guidance is available at TII Publications reference PE-PDV-02046.

5. TRANSPORT PLANNING AND NATIONAL ROAD SCHEMES

As you are aware the Authority is developing/progressing road schemes and improvements within County Mayo, details of which should be considered for incorporation into the review of the County Development Plan. The following schemes are included as Schemes at Planning/Design/Construction Stage and under 'Accessibility to the North-West' in Project Ireland 2040|National Development Plan, 2018 – 2027;

- N5 Westport to Turlough,
- N59 Westport to Mulranny.

In addition, the following scheme is included as a scheme to be progressed through pre-appraisal and early planning in the National Development Plan;

- N17 Knock to Collooney.

A number of other schemes, currently suspended include;

- N5/N26/N58 Turlough to Bohola,
- N26/N59 Ballina Bypass,
- N59 Ballina – Crossmolina Bypass,
- N60 Castlebar to Claremorris,
- N84 Ballinrobe Bypass,
- N83 Ballyhaunis Bypass,
- N5/N59 Westport Southern Relief Road.

The Authority's other priorities in relation to national roads are the maintenance of the existing national road network, including junctions, and safeguarding the Exchequer investment in national roads to date.

Planning authority policies and objectives, including rezoning of lands, should not compromise the road planning and route option evaluation process in circumstances where road scheme planning is underway and potential routes have been identified and brought to the attention of the planning authority, including schemes that may currently be suspended. Similarly, development strategies or rezoning proposals should not have the effect of altering the function of these routes or importantly, increase the cost of land to be acquired or under active consideration as a route option

for a national road scheme. Such proposals, while potentially bringing major financial gains to the property owners involved, would be at variance with the broader public interest and would, by significantly increasing the cost of the land to be acquired for road schemes, reduce the funding available to the Authority for road construction and improvement work generally.

The Council may also consider it appropriate to identify any local improvements to national roads planned by the Council over the term of the Development Plan that may be incorporated into the adopted plan. The Authority advises that while any additional improvements relating to national roads identified at a local level should be done so in consultation with and subject to the agreement of TII, the Council will be aware that TII may not be responsible for the funding of any such schemes or improvements.

Related to the foregoing, the Authority requests the inclusion of policies and objectives in the Development Plan that provide for the following:

- objectives providing for development of the relevant national road schemes,
- a policy to protect routes of national road schemes free from adverse development that may compromise the development of route options or the construction of preferred routes, or add to the overall costs associated with proposed schemes.

The Council will be aware that the implementation of all national road schemes is subject to budgetary constraints and is subject to prioritisation and adequacy of the funding resource available to the Authority. In these circumstances and taking account of the Exchequer financial position and levels of funding available to the Authority, the relative priority or timeframe for national road schemes may be subject to alteration.

6. OTHER SPECIFIC POLICIES AND OBJECTIVES

a. Road Safety

The Road Safety Authority's Road Safety Strategy, 2013 – 2020, builds on existing road safety interventions, but reframes the way in which road safety is viewed and managed in the community. It addresses all elements of the road transport system in an integrated way with the aim of ensuring collision energy levels are below what would cause fatal or serious injury. It requires acceptance of shared overall responsibilities and accountability between system designers and road users and it stimulates the development of innovative interventions and new partnerships necessary to achieve ambitious long term road safety targets.

Therefore, the design of development proposals must address the functionality and safety of the road needs. Two processes specifically address these design concerns: Road Safety Impact Assessment (RSIA) and Road Safety Audit (RSA).

- **Road Safety Impact Assessment (RSIA)** is described in the EU Directive on Road Infrastructure Safety Management (EU RISM) 2008/96/EC as a strategic comparative analysis of the impact of a new road, or for substantial modifications to an existing road, on the safety performance of the road network (refer to TII Publications Planning and Evaluation PE-PMG-02001 Road Safety Impact Assessment).
- **Road Safety Audit (RSA)** involves the evaluation of road schemes during design, construction and early operation to identify potential hazards to all road users. RSA is to be carried out on all new national road infrastructure projects and on any schemes/proposal which results in a permanent change to the layout of a national road (refer to TII Publications GE-STY-01024 Road Safety Audit).

RSIA is a separate process to RSA. While RSA examines the safety aspects within a scheme, RSIA considers the safety impact of a scheme on the surrounding road network. RSIA and RSA both work to improve the safety performance of new roads and existing roads that require modifications due to projects or proposals. Both have consequences for the design and layout of any project.

b. Traffic and Transport Assessment (TTA)

As referenced in the observations above, the Authority recommends that planning applications for significant development proposals should be accompanied with TTA and RSA to be carried out by suitably competent consultants, which are assessed in association with their cumulative impact with other relevant developments on the road network. Guidance in relation to TTA is given in the "Traffic Management Guidelines". To assist with TTA, the Authority has updated the Traffic and Transport Assessment Guidelines (2014), which are available at www.tii.ie and could be referenced in the Draft Plan as appropriate guidance. The Guidelines also include recommendations on the requirement for sub-threshold traffic and transport assessments.

The Council are requested to reference the TII Traffic & Transport Assessment Guidelines (2014) in the Draft Development Plan relating to development proposals with implications for the national road network. Thresholds advised in the TII Traffic & Transport Assessment Guidelines (2014), including sub-threshold TTA requirements, relate specifically to development proposals affecting national roads.

c. Service Areas

The planning authority will be aware that Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines indicates the requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions and also addresses road side service facilities on non-motorway national roads and their junctions. Comments, above, in relation to development at national road junctions may also be pertinent in the case of such development proposals.

The Council will be aware that the Authority has issued the TII Policy on Service Areas (August, 2014). Section 1.4 of the Policy outlines the roles of the Authority and planning authorities in relation to the provision of service areas.

The Authority would welcome the provisions of the TII Service Area Policy (2014) and the DoECLG Guidelines reflected in the Draft County Development Plan.

d. Signage

TII has also issued the Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011). The purpose of this document is to outline TII's policy on the provision of tourist and leisure information signs on national primary and national secondary roads in Ireland.

With respect to the new Development Plan, the Planning Authority is also referred to Section 3.8 of the DoECLG's Spatial Planning and National Roads Guidelines which indicates a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads. The Authority would welcome the provisions of the TII Policy and the DoECLG Guidelines incorporated into the new Development Plan.

e. Noise

The Council is also requested to refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations in the Draft Plan. The Authority advises that it requires that development proposals identify and implement noise mitigation measures, where warranted. The costs of implementing mitigation measures shall be borne by the developer, as the Authority will not be responsible for the provision of additional noise mitigation.

CONCLUSION

Having regard to the foregoing, the Authority recommends that the development objectives that may be included in the Draft Development Plan would reflect the provisions of the DoECLG's Spatial Planning and National Roads Guidelines which indicates the importance of developing an evidence based approach at development plan stage for proposals with implications for the on-going safe and efficient operation of national roads.

In summary, the Planning Authority is advised to ensure in the review of the County Development Plan:

- The protection of the safety, carrying capacity and efficiency of the existing and future national roads network is maintained, and;
- An integrated approach to land use and transportation solutions throughout the County should be undertaken such that local traffic generated by developments is catered for primarily within the framework of the local (i.e. non-national) road network.

The Authority is available to meet the Executive of the Council to further discuss the issues raised in this correspondence at your earliest convenience as an aid to devising an appropriate and sustainable development strategy for County Mayo.

Yours sincerely,



Michael McCormack
Senior Land Use Planner



Northern & Western Regional Assembly

www.nwra.ie

12th June, 2018

**Ms. Mary Killoran Coyne,
Administrative Officer,
Planning & Development,
Mayo County Council,
Áras an Chontae,
Castlebar,
Co. Mayo.**

RE: Review of Mayo County Development Plan 2014 – 2020 and Preparation of a new County Development Plan

Dear Mary,

The Assembly received notification on 23rd April, 2018 from Mayo County Council that they intend to review its County Development Plan for the period 2020 – 2026. The closing date for receipt of submissions is 14th June, 2018. The Assembly is obliged to make a submission in response to the invitation.

This proposed Development Plan is being prepared during a period where the process of preparing a Regional Spatial and Economic Strategy (RSES) has commenced and is ongoing. The RSES shall replace the Regional Planning Guidelines 2010 – 2022 and it may ultimately be an important informant for the future development of the Development Plan, as it will be necessary for all Planning Authorities to review their Development Plans to ensure consistency with the RSES when it is finalised.

The National Planning Framework which has a timeframe up to 2040 has currency and the Assembly would advise that the National Strategic Outcomes set out in this document should be used by Mayo to inform its Draft County Development Plan and subsequently the RSES as referred to above.

The emerging strategic themes in the region concerning a Connected Place, a Vibrant Place, an Inclusive Place and a Low Carbon Place and the information surrounding them published on our website could be used by the Council to help inform the new Draft Development Plan.

Finally, the above submission is made in a spirit of collaboration and the Assembly looks forward to ongoing engagement with Mayo County Council. Should any query arise in respect of this submission then do not hesitate to revert.

Mise le Meas,

Denis Kelly
Assistant Director & Senior Planner

Northern & Western Regional Assembly
The Square, Ballaghaderreen, Co. Roscommon
Bainn Reilgnach an tAontas Eorpach an tOirthear
An tAontas Eorpach, Bealnach an tOirthear, Co. Ros Comáin

+353 (0)94 9862970

+353 (0)94 9862973

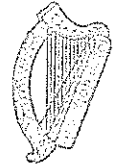
info@nwra.ie



An tAontas Eorpach
Ciste Forbartha
Réigiúnach na hEorpa

An Roinn Oideachais
agus Scileanna
Department of
Education and Skills

PD-11



Forward Planning Section
Mayo County Council
Áras an Chontae
The Mall
Castlebar
Co. Mayo

08th June 2018

Re: Review of Mayo County Development Plan

Dear Sir/Madam

I refer to the preparation of a new County Development Plan for Co. Mayo.

With reference to the request for details of any sites identified for acquisition for school development in Co Mayo, I can confirm that there are currently no sites identified for acquisition in Co Mayo for the period of 2018-2026.

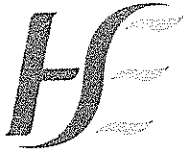
If you have any queries or require any additional information please do not hesitate to contact me.

Yours sincerely,

David Bradley
Acting Higher Education Officer
Site Acquisition and Property Management Section
Department of Education and Skills



PD-12...# 29.



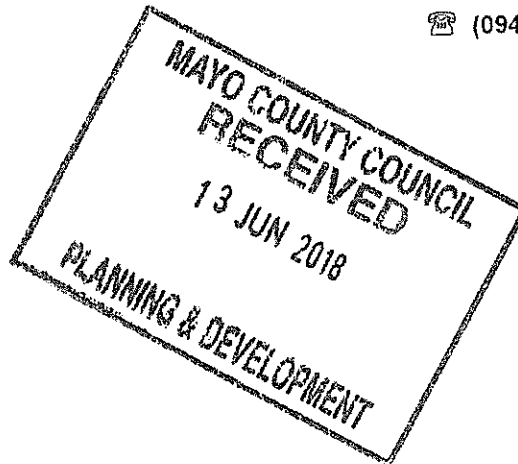
An tSeirbhís Sláinte Chomhshaoil
Feidhmeannacht na Seirbhíse Sláinte (Iarthar)
Ceanncheathrú Naomh Muire
Caisleán an Bharraigh
Contae Mhaigh Eo

Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Service
HSE West
St. Mary's Headquarters
Castlebar
Co. Mayo

☎ (094) 90 42260 / 90 42105
📠 (094) 90 27312

Mr Ian Douglas
Senior Executive Planner
Mayo County Council
Planning Department
The Mall
Castlebar
Co. Mayo



12th June 2018

EHIS Number: EH/LDP 44
Re: Mayo County Development Plan

Dear Ian,

Please find enclosed the Environmental Health Service consultation report on behalf of the HSE in relation to the Mayo County Development Plan.

If you have any queries regarding this report please contact me, Maria Horkan, Principal Environmental Health Officer, St Mary HQ, Castlebar, Co. Mayo.

In addition I have included as an appendix, a submission we received from Department of Public Health Galway on the Mayo CDP.

Yours sincerely,

Maria Horkan

Maria Horkan
Principal Environmental Health Officer

Submission on the Review of the Mayo County Development Plan 2014-2020 from The Environmental Health Service on behalf of the HSE

The Environmental Health Service is making this submission under the remit of Healthy Ireland and relevant supporting health strategies. The aim of the submission is to identify to Mayo County Council where the implementation of the objectives of Healthy Ireland can be incorporated into strategic planning of the spatial and built environment for the County

Healthy Ireland is a framework for improved health and wellbeing.

Its vision statement is '*A Healthy Ireland, where everyone can enjoy physical and mental health and wellbeing to their full potential, where wellbeing is valued and supported at every level of society and is everyone's responsibility*'.

There are four goals outlined in Healthy Ireland:

1. Increase the proportion of people who are healthy at all stages of life
2. Reduce health inequalities
3. Protect the public from threats to health and wellbeing
4. Create an environment where every individual and sector of society can play their part in achieving a health Ireland.

The Environmental Health Service has considered key health strategies and makes in these submission recommendations to incorporate relevant health actions into the strategic planning of the spatial and built environment in County Mayo, with the overall aim of improving health and wellbeing in the County.

A healthy population is a major asset for society, and improving the health and wellbeing of the nation is a priority for the Government and the whole of society. This means that all sectors of society and the whole of Government need to be proactively involved in improving the health and wellbeing of the population.

“Neither the health service alone, nor the department of health can fully realise the objectives of improving population health, addressing the rise in chronic disease and the widening of health inequalities across our population. It requires out collective efforts, working with our partners across Government, Local Authorities, the Community and Voluntary sector, philanthropy, academia and the private sector to make a difference and build an informed, empowered and healthy society.” – **Dr. Stephanie O’Keeffe** (Chair, Healthy Ireland Cross Divisional Steering Group, National Director, Health and Wellbeing, Member, Healthy Ireland Council)

Healthy Ireland in the Health Services – National Implementation Plan

<http://www.hse.ie/eng/health/hl/hi/hihhs/>

The HSE has an implementation plan for Healthy Ireland in the Health Service.

One key action outlined in this plan is:

'Ensure that each programme is supported by a network of partner organisations, including the community and voluntary sector, academia and professional bodies.'

Mayo Strategic Development Plan should aim to support community involvement in the development of health services and Healthy Ireland Initiatives.

The strategic aim should be to actively facilitate community development and voluntary sector involvement in the priority programme areas within the HSE.

For example, this could take the form of providing suitable premise for community groups to meet, providing seed funding, and other actions to facilitate and strengthen community groups in Mayo and their interaction with the HSE.

County Mayo Health Status

The creation of County Health Profiles is one of the key actions from the Healthy Ireland strategy which is our national framework for action to improve the health and wellbeing of the people of Ireland. Understanding health needs at a local level enables local action and creates an environment where every individual and sector of society can play their part in achieving a healthy Ireland.

County profiles help identify health priorities in areas and highlight health inequalities which may exist.

County Mayo's most recent Health Profiles can be accessed at:

<http://www.lenus.ie/hse>

Key Facts for County Mayo (2015):

- Has the third highest dependency ratio nationally of 55.9% (i.e. the number of those aged 0-14 and 65 and over as a percentage of the number of persons aged 15-64) national ratio 49.3% and 14.9% of the population is aged over 65.
- The birth rate of 13.7 is lower than the national rate of 15.8
- Has high levels of people who only completed primary education at 20.5% (national rate 15.2%)
- Deprivation levels are high – 70% of Mayo's population is below average affluence or disadvantaged. The birth rate of 13.7 is lower than the national rate of 15.8
- For males the incidence of prostate cancer and malignant melanoma are higher than the national average.
- Rates of mortality from heart disease and stroke, respiratory disease, and injuries and poisonings are higher than the average for Ireland.

It can be seen from the key stats that County Mayo has an ageing population and the Strategic Development Plan should recognize that in the planning and development of services and facilities for older members of the County.

Get Ireland Active – National Physical Activity Plan for Ireland

<http://health.gov.ie/wp-content/uploads/2016/01/Get-Ireland-Active-the-National-Physical-Activity-Plan.pdf>

A key aim of the National Physical Activity Plan for Ireland is compiling a directory of publicly accessible sports/recreational and amenities facilities.

The Strategic Development Plan should include a strategy for meeting this aim for County Mayo. All new facilities should be added to this directory and an audit should be carried out to ensure that all existing sites/facilities are entered.

A strategic aim for County Mayo should be to increase the active school flag programme to at least another 20 schools in the county. There are 20 active

school flags in place at present, which is 10% of the total number of primary schools in the County.

Physical activity should be considered and included in the development plans of Children and Young Peoples Services Committees to meet the guidelines in the National Physical Activity Plan for Ireland.

A strategic aim for Mayo County Council should be to develop and establish processes that enable consultation with children and young people in the development and implementation of programmes in which they are involved, i.e. playgrounds, activity centres and public spaces. This is particularly important given the age profile of the County.

A strategic aim for development in Mayo should be that all plans and development for Nursing Homes or Residential Care Facilities should include proposals for gardens and recreational activities. Physical activity should be integrated into long term care planning and practice.

Strategic development of Mayo County should include:

- a. Developing guidelines and support materials in the development of the built environment to promote the importance of including opportunities for physical activity.
- b. Developing and promoting walking and cycling strategies by ensuring that the planning, development and design of the built environment promotes cycling and walking with the aim of delivering a network of cycle routes and footpaths. The strategy should aim to promote connectivity of housing to town centres, park and recreational amenities
- c. Planning and development and design of towns promote the development of local and regional parks and recreational spaces that encourage physical activity.
- d. Prioritising the planning and development of walking and cycling and general recreational/physical activity infrastructure.
- e. Exploring opportunities to maximise physical activity and recreation amenities in the natural environment.
- f. Developing a framework for workplace health and wellbeing, including physical activity.
- g. Promoting the smarter travel workplaces initiative.

- h. Ensuring planning makes provision for recreational facilities for staff in industrial estates and ensures connectivity of work to park and recreational activities.
- i. Supporting and developing new walking groups in the County through funding of signage, upgrade of paths and lighting and resolving safety issues.
- j. Developing a standardised framework for publicly funded programmes designed to increase physical activity levels. Using public money to leverage private funding to promote and develop physical activity and sport programmes.

Tobacco Free Ireland

<http://static.rasset.ie/documents/news/tobacco-free-ireland.pdf>

A strategic aim of the Mayo County Development Plan should be to:

- a) Implement the tobacco free playgrounds initiative.
- b) Promote tobacco free environments, parks, beaches, and public campuses and grounds

Healthy Ireland - A Healthy Weight For Ireland

<http://health.gov.ie/wp-content/uploads/2016/09/A-Healthy-Weight-for-Ireland-Obesity-Policy-and-Action-Plan-2016-2025.pdf>

The strategic Plan for Mayo should include development of guidelines and support materials to reduce the obesogenic environment. Support development that creates environments that make the healthy choice the easy choice:

- a. Support community based initiatives that develop programmes that support healthy lifestyles and prevention of obesity in children and adults.
- b. Promote through planning and the built environment the benefits of healthy eating, physical activity and non-sedentary behaviour.
- c. Improve availability of and access to healthier food choices,
- d. Support opportunities for increasing physical activity levels generally/ in the community through Local Sports Partnerships and supporting initiatives e.g. Park run.
- e. Facilitate community gardens through identifying and releasing suitable publicly owned land.

Steering group report on a national substance misuse strategy

http://health.gov.ie/wp-content/uploads/2014/03/Steering_Group_Report_NSMS.pdf

The Strategic Development Plan for Mayo should include:

- a. A strategy to reduce and eliminate the reliance on alcohol sponsorship. Any public event or events on publicly owned lands or buildings should use alternatives to alcohol sponsorship
- b. Develop the provision of alcohol-free venues for young people, (e.g. Youth cafés, alcohol-free music and dance venues and sports venues) with:
- c. the young people being centrally involved in the development and management of the programmes and venues;
- d. late night and weekend opening; and increased access to school facilities in out of- school hours.

The National Positive Ageing Strategy

http://health.gov.ie/wpcontent/uploads/2014/03/National_Positive_Ageing_Strategy_English.pdf

A strategic aim for the development of County Mayo should be to enable people as they age 'to get out and about' through the provision of accessible, affordable, and flexible transport systems in both rural and urban areas. This should include:

- a. Provision of age-friendly public transport,
- b. Promotion of the integration of the Rural Transport Programme with other local transport services,
- c. Provision of public transport linkages to major health facilities and personal social services.
- d. Supporting the design and development of age friendly public spaces, transport and buildings.
- e. Designing age friendly urban environments (street lighting, footpaths, roads, public seating)

Suitable housing is a key aim in the National Positive Ageing Strategy and a key strategic aim for County Mayo should be to:

- a. Carry out an assessment of housing need and provision and consider all housing options in development (i.e. social housing, sheltered housing; retirement villages).
- b. Implement Older People Remaining at Home (OPRAH) strategy.
- c. Promote lifetime adaptable housing and design and the use of assistive technologies.
- d. Implement a strategy that facilitates older people to live in well-maintained, affordable, safe and secure homes, which are suitable to their physical and social needs. Development should incorporate the principals outlined in the 'Design Out Crime' Document.
http://www.designcouncil.org.uk/sites/default/files/asset/document/designersGuide_digital_0_0.pdf
- e. Promote access (in terms of affordability, transport availability, accessibility of venue) to a wide range of opportunities for continued learning and education for older people.
- f. Promote the concept of active citizenship and the value of volunteering, and encourage people of all ages to become more involved in and to contribute to their own communities.
- g. Promote the development of opportunities for engagement and participation of people of all ages in a range of arts, cultural, spiritual, leisure, learning and physical activities in their local communities.

Time to move on from congregated settings – A strategy for community inclusion

<http://www.hse.ie/eng/services/list/4/disability/congregatedsettings/congregatedsettingsreportfinal.pdf>

The Strategic Development Plan for County Mayo should:

- a. Improve community inclusion of people with disabilities in their local community and community based services.
- b. Improve greater connectivity between generic community based services and disability specific organisations. Facilitate their engagement as stakeholders.

- c. Focus on meeting the housing and accommodation needs of people with disabilities through a combination of purchased housing, new-build housing, leased housing or rented housing. A local re-housing plan should be prepared and jointly co-ordinated with the HSE, in collaboration with service providers. The plan should be based on best practice in including people with disabilities in local communities and should facilitate dispersed housing with personal supports.
- d. All residents in congregated settings should be assessed by the local authority to establish their eligibility and need for social housing support.
- e. Consideration to reserving a certain proportion of dwellings for people with disabilities.
- f. Focus on supporting and sustaining people with disabilities to live in their own homes in the community through the provision of housing grants.
- g. Support people with disabilities to access employment and education opportunities.
- h. Support people with disabilities to access mainstream community services.

Sustainable Development

Our sustainable future – A Framework for Sustainable Development

<http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/Environment/Miscellaneous/FileDownload%2C30452%2Cen.pdf>

Our environment is one of the country's most valuable assets and has the capacity to contribute significantly to our economic revival. We must be very conscious of the need to manage effectively all activities which impact on this vital asset.

Energy

Ireland's Second National Energy Efficiency Action Plan to 2020

http://www.seai.ie/Publications/Energy_Policy_Publications/Energy_Service_Companies/Ireland%E2%80%99s_second_National_Energy_Efficiency_Action_Plan_to_2020.pdf

The Strategic Development Plan for County Mayo should include spatial planning policies to reduce the need for commuting to and from work.

The Strategy should:

- a. Promote and facilitate the incorporation of energy efficient design into projects.
- b. Develop and implement an energy management programme for all public buildings.
- c. Develop new key skill sets in areas such as green procurement, carbon accounting, carbon management and energy management.
- d. Support and promote the Better Energy Communities Scheme to enable communities around the country develop new and innovative, locally-based solutions to energy poverty.

Transport

Smarter Travel Policy

http://www.smartertravel.ie/sites/default/files/uploads/2012_12_27_Smarter_Travel_english_PN_WEB%5B1%5D_0.pdf

The Strategic Development Plan should:

- a. Set targets requiring a minimum percentage of new residential and mixed-use development to take place on brownfield/existing sites to consolidate urban growth and enable organic development of urban areas from the centre out.
- b. Specify a maximum permitted level of car parking for commercial sites, which have suitable public transport facilities and are within walking/cycling distance to amenities.
- c. A general restriction of the future development of out-of-town retail centres except in exceptional circumstances and consideration of a similar requirement that parking charges be introduced for most existing centres.
- d. Developments above a certain scale have viable travel plans in place and establish e-working centres on a regional basis to provide opportunities for people in rural areas and satellite towns to work from a location closer to home.
- e. Set a target that every school and college in Mayo has a school travel plan to encourage students to take alternatives to the car. This should be supported with a strategic aim to develop safe walking and cycling routes to and from schools and other educational institutions as well as providing disability access.
- f. Provision of facilities such as secure bike parking and changing/showering facilities at places of employment in public authorities to encourage staff to cycle.

To support smarter travel there should be a strategic aim to:

- g. Reprioritise traffic signals to favour pedestrians instead of vehicles, reducing waiting times and crossing distances at junctions.
- h. Create level grade crossings for pedestrians across junctions. Create larger traffic-free areas in urban centre. Ensure that 30 km/h zones are designated in central urban areas which accommodate motorised traffic.
- i. Widen footpaths where there are high pedestrian flows, particularly close to public transport nodes. Improve the surface quality of footpaths. Provide appropriately designed safe, well-lit, direct, continuous facilities for pedestrians.
- j. Ensure State-owned lands such as canal towpaths, former rail lines, Coillte estates, etc. are made available for the development of walking and cycling trails.
- k. Support private and public sector initiatives to establish car club schemes in Ireland. Provide on-road parking spaces to be designated for car clubs through appropriate signage.
- l. Establish park and ride facilities along major public transport nodes, at the periphery of major urban areas and at key public transport locations and nodes.

National Cycle Policy Framework

http://www.smartertravel.ie/sites/default/files/uploads/2013_01_03_0902%2002%20EnglishNS1274%20Dept.%20of%20Transport_National_Cycle_Policy_v4%5B1%5D%5B1%5D.pdf

The Strategic Development Plan should include the needs of cyclists, and in particular:

- a) Measures to reduce the volumes of through-traffic, especially HGVs, in town centres and especially in the vicinity of schools and colleges.
- b) Introduce traffic calming measures / enforce low traffic speeds in urban areas, make junctions safe for cyclists.

c) Support the provision of dedicated signed rural cycling networks building on Fáilte

Ireland's Strategy to Develop Irish Cycling Tourism.

d) Ensure that all surfaces used by cyclists are maintained to a high standard and are well lit and signposted.

e) Provide secure cycling parking at all destinations of importance to the cyclist and aim to integrate cycling and public transport and the provision of cycling parking at all appropriate public transport interchanges.

Ensure that the urban road infrastructure (with the exception of motorways) is designed / retrofitted so as to be cyclist-friendly. Link up all existing cycle lanes.

Waste

A Resource Opportunity – Waste Management Policy in Ireland

https://www.epa.ie/pubs/reports/waste/plans/Resource_Opportunity2012.pdf

The Strategic Development Plan should implement the Waste Hierarchy set out in the Waste Framework Directive and place prevention and minimisation at the forefront of any waste policy.

Disposal of municipal waste to landfill should be a last resort.

The development strategy should continue to expand and implement waste prevention measures with local business and community groups.

Waste prevention strategy should include Community Waste Prevention Demonstration Programmes, which provides skills to develop waste prevention within local communities.

A Reuse Policy should be developed in consultation with the national Procurement service and other relevant bodies, and implemented within public bodies in Mayo to ensure that full consideration is given to feasible reuse options before embarking on the purchase of new goods.

Water

The strategic aim of development in Mayo should be to ensure the provision of safe secure drinking water and the reduction in waste and over use of water.

Water usage audits of public buildings should be carried and water conservation measures implemented.

To protect the ground water quality in the County there should be a strategic aim of ensuring all waste water treatment plants can operate effectively with their current demand and future demand, and that private effluent treatment and domestic septic tanks are fit for their purpose

Food

It should be a strategic aim from the development plan to facilitate the production of more locally produced, high quality food.

Biodiversity & Green Areas

Mayo County Development should be in the context of the strategic objectives in Actions for Biodiversity

<https://www.npws.ie/sites/default/files/general/national-biodiversity-plan-english.pdf>

and particularly Objective 1: *To mainstream biodiversity in the decision making process*, Objective 3: *To increase awareness and appreciation of biodiversity and ecosystems services*, and Objective 4: *To conserve and restore biodiversity and ecosystem services in the wider countryside*

Local Biodiversity Actions Plans should be developed

Guidance on managing Biodiversity in strategic planning and urban areas is found in:

http://www.uep.ie/pdfs/guidelines_complete.pdf

Radon

Radon Gas in Ireland

<http://www.hse.ie/eng/services/Publications/Environmentalhealth/Radon%20Gas%20in%20Ireland.pdf>

County Mayo has been identified as having areas with high levels of radon. 15% of homes in Mayo have been reported as having high levels of radon (RPII). It should be a strategic aim of the Development Plan to undertake a programme of radon measurement and remediation in housing and workplaces in Mayo.

Environmental Noise

The World Health Organisation (WHO) has identified Environmental Noise as an increasing cause of ill health and detrimental effect on health and wellbeing.

http://www.euro.who.int/_data/assets/pdf_file/0008/136466/e94888.pdf

The Strategic Development Plan should consider Environmental Noise in the context of:

- a. New roads, railways, airports, industry or recreational activities adjacent to residential properties or noise sensitive premises such as schools or hospitals, or recreational spaces,
- b. New residential properties or noise sensitive premises such as schools or hospitals, adjacent to existing roads, railways, airports, industry or recreational activities;
- c. The development of mixed residential/commercial use buildings, and multipart residential buildings;
- d. Public house, night clubs, restaurants or other recreational activities; and
- e. Industrial operations, workshops and factories.

It should be a Strategic aim of the Development Plan to map noise and implement Noise Action Plans as per EPA Guidance:

<http://www.epa.ie/pubs/advice/noisemapping/epaguidancenotefornoiseactionplanning.html>

Air Quality

The Strategic Development Plan should have an aim to reduce polluting emissions into air and increase the quality of air in County Mayo:

- a. Participating in, and facilitating national programmes of air quality monitoring,
- b. Working to develop and promote the Air Quality Index for Health,
- c. Local Air Quality Management Plans that identify pollution 'hot spots' and aim to reduce pollution through local action on emissions.

 ¹²/₆/₁₈

Evelyn Keane

Environmental Health Officer

Submission to Mayo CDP process from Department of Public Health Galway

Consultants in Public Health Medicine based in the Department of Public Health in Galway are making a submission as the Medical Officers of Health for Mayo. Under Medical Officer of Health legislation, we are obliged to inform ourselves “as respects all influences affecting or threatening to affect injuriously the public health in the county and as respects the causes, origin and distribution of diseases in the county”¹ and to advise the local authority in relation to the health of the people, “sanitary services and housing accommodation”.

As you are aware the population and human health are environmental receptors and require consideration under the Strategic Environment Assessment process. The SEA process unfortunately does not address the wider definition of health². We have read the consultation paper for the Mayo County Development Plan 2020 – 2026 and welcome this opportunity to make a submission.

The following actions should be considered in the drafting of the plan:

- Protection of human health
- Reduction of health inequalities
- Co-ordination of action between health and other sectors
- Health proofing of all policies to ensure no maladaptive planning

Health topics which should also be considered:

- Community safety
- Housing provision as required by the population
- People with low incomes and how they are facilitated to live healthy lives through environmental planning
- Access to healthy open spaces and recreational activities
- Affordable quality food outlets which are easily accessible to all
- Local education / employment
- Walking / cycling opportunities - active transport which both promotes health but is also a climate change mitigation measure
- Developing sustainable communities

The 5th EPA Strategic Plan³ states that “Sustainable development means linking the environment, health, wellbeing and the economy. A thriving, clean environment provides the very basis for good lifestyles. This means an Ireland that has a vibrant economy, people and communities that help and respect each other, and as an essential foundation, a protected environment that is valued for itself and the benefits it provides for us to live safe, healthy lives.” One of the EPAs’ stated objectives is to “Promote a greater awareness of the impact of environment quality on human health.”

¹ Health (Duties of Officers) Order 1949 <http://www.irishstatutebook.ie/eli/1949/si/128/made/en/print>

² “A state of complete physical, mental and social well-being and not merely the absence of disease or infirmity” – WHO Constitution 1948

³ http://www.epa.ie/pubs/reports/other/corporate/EPA_Strategic_Plan_English.pdf

Also of note is the following statement from the EPA⁴:

“The benefit of a clean environment for health and wellbeing is now widely recognised. People should not have to live in an area where local amenities are degraded and cannot be used. Controlling the release of chemicals and pollutants to the environment is probably one of the main concerns which people think about when they hear about health and the environment. But it is increasingly being recognised that having a clean environment in itself is highly beneficial to wellbeing by providing better places to live and local amenities for communities. Ireland still has many unspoilt areas that are beneficial to people as well as to the economy. The outstanding natural beauty and wilderness of the Wild Atlantic Way is now recognised as a key economic asset that attracts significant numbers of visitors each year.”

However, even along the Wild Atlantic Way there are environmental pressures that need to be closely monitored. The protection of water quality is essential, and effective environmental protection measures are needed to ensure that coastlines, beaches, rivers and lakes along the Wild Atlantic Way, and elsewhere, are maintained and protected. This means that planning needs to take into account the need for robust and climate resilient waste water and drinking water systems.

Possible input into the Mayo County Development Plan by Public Health

The Department of Public Health in Galway will be able to provide you with a baseline county profile for Mayo which details the health of Mayo’s population. While we have limited resources we could assist with the co-ordination across sectors affecting health and health proofing of your plan.

⁴ Recognition of the Benefits of a Good Quality Environment to Health and Wellbeing (EPA, 2016). Seven Key Environmental Actions for Ireland on the State of the Environment in 2016

To: Mayo County Council

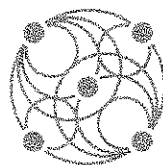
Re: Mayo County Development Plan 2020-2026

To help promote Tourism and visitors to Ballyhaunis and to improve the overall attractiveness of the Town we would like to make the following submission:

- To continue to improve on the attractiveness of the Towns Centre
Create an enhanced urban centre with an emphasis on shared surfaces and control of traffic speeds by design to provide an additional layer of pedestrian connection. By extending the surface of the square to BOI to form shared surfaces this will provide an expanded level events area to accommodate a significant number of people.
- Re-Development of Derelict Sites
Vacant premises (The Old National School) to be restored and converted to a Community Amenity Centre with New Library plus housing for various organisations
- Pedestrian Network
Carry out strategic demolition of derelict property owned by Mayo County Council in order to create a new pedestrian link between The Square and the new Public Park about the Augustinian Abbey (circa. 1405) thus encouraging the beginnings of a sustainable transport network about the town and creating synergies between places of special significance.
- Development of walking trails / Promotion of Smarter Travel
To enhance/lengthen the Friary Walk (Augustinian Grounds) to connect this walk to the town and bring in the Towns By-Pass R323 via Clare St. The by-pass would need to be lined and lit for the safety of pedestrians and drivers.
To extend the existing footpath on the Knock Road out to the Ballyhaunis GAA grounds and from the Ballyhaunis GAA Grounds a walking trail out to the Connacht Centre of excellence and onto Knock village this can be done by pushing the verge back and putting a walking/cycling lane thus promoting a safe & religious walkway going from The Friary Church to Knock Village
- Promote Ballyhaunis strategic location to Ireland West Airport and Knock
- Identify Economic Role for Ballyhaunis and encourage Enterprise & Employment for the town and to support Organisations in developments in this area
- A Community Centre is a priority for the town to help with integration of the diverse multi-cultural population

ON BEHALF OF:

13TH JUNE 2018



**Ballyhaunis
Chamber**

Advancing business together



Draft Mayo County Development Plan
 Aras an Chontae
 The Mall
 Castlebar

13/06/2018

RE: Mayo County Development Plan 2020-2026 Issues Paper

Uisce Éireann
 Buaic QP 6000
 Baile Átha Cliath 1
 Éire

Irish Water
 PO Box 6000
 Dublin 1
 Ireland

T: +353 1 89 25000
 F: +353 1 29 25001
 www.water.ie

Dear Sir / Madam

Irish Water acknowledges receipt of your letter and welcomes the opportunity to make a submission on Mayo County Development Plan 2020-2026 Issues Paper.

Capacity to accommodate Growth

We have attached a high level assessment of the water services supply and treatment infrastructure in the top three tiers of the current settlement hierarchy (Linked Hub, Key Towns, Other Towns and Villages). The Draft NPF population projections have been used as an *initial* estimate of the 2026 population in these settlements i.e. 40% (1.67% p.a.) population increase by 2040 in towns with a population above 10,000, and 15% (0.63% p.a.) population increase by 2040 for all settlements with a population of less than 10,000.

Irish Water are currently developing water and wastewater treatment capacity registers for settlements with populations greater than 500. It is anticipated that these will be available in Q4 2018

With regard to non-domestic growth, this will be facilitated through Irish Water's New Connections process. We note that Irish Water has prepared a national Connection Charging Policy which address both domestic and non-domestic connections. The consultation process on this policy by the Commission for Regulation of Utilities (CRU) is underway.

Projects and Activities

The following is a summary of projects on Irish Water's 2017-2021 Capital Investment Plan in County Mayo:

Project Title	Comment
Belmullet Sewerage Scheme Network & WWTPs	Complete
Charlestown Sewerage Scheme	Contract awarded Q1 2018, anticipated

Foxford Sewerage Scheme	completion date 2020.
Killala Sewerage Scheme Network & WWTP	
Lough Mask RWSS Extension to Westport	Complete
Lough Mask RWSS- Ballinrobe to Kilmaine Extension	Complete
Lough Mask RWSS - Extension to Ballinough and Williamstown	Substantially complete
Countywide Leakage Reduction Plan	Leakage reduction and replacement of the most problematic mains is ongoing. Dedicated Find & Fix resources are being established to undertake intensive leakage reduction activities in a systematic and planned manner prioritising the worst schemes based on underlying leakage levels. Similarly water main replacement works are being prioritised based on key criteria such as burst history, leakage levels, water quality issues and customer complaints.
Ballina RWSS Extension to Bonniconlon	Complete
Inishturk WSS- Upgrade of WTP	Ongoing
Ballinrobe WWTP	All four WWTPs are progressing under one design team appointment. The Project is currently at Feasibility Study stage to determine the scope of works to progress to detailed design stage. Anticipated completion date is 2024.
Ballyhaunis WWTP	
Claremorris WWTP	
Newport WWTP	

In addition to ongoing and planned water services projects it is likely that further projects will be identified under the following initiatives:

- Irish Water 2020-2024 Investment Plan, preparation of which is currently underway. A consultation paper on Irish Water's proposed methodology for the Investment Plan was issued to Mayo County Council. The methodology includes our proposed methodology for Supporting Growth and Economic developments which includes a number of initiatives to support growth e.g. Small Towns and Villages Programme, leakage reduction, local network reinforcement and strategic network plans.
- The National Certificates of Authorisation Programme is currently underway which will review wastewater treatment plants with Certificates of Authorisation and identify and prioritise those in need of upgrade. Works will be progressed on a priority basis as funding becomes available.

Suggested Policies and Objectives

Irish Water has a suite of policies/ objectives which we would like to suggest to the Council for inclusion in the County Development Plan in relation to protecting Irish Water assets and the environment for the benefit of current and future population served by public water services networks. We have attached these policies/ objectives to this submission.

Irish Water is available for discussion in relation to the future sustainable development of the area and any other issues with respect to the provision of water services within our remit.

Yours Sincerely,



Suzanne Dempsey
Spatial Planning Strategy Specialist

Attached:

Summary Table

Menu of Policy Objectives



Menu of appropriate Objectives/Policies for Water Services in development plans

General Policies in relation to Water Services

- a) To work closely with Irish Water to identify and facilitate the timely delivery of the water services required to realize the development objectives of this plan;
- b) When identifying areas for development, to ensure that full consideration is given to the level of investment that will be required in the provision of water services – particularly in environmentally sensitive areas - to ensure that the provision of water services does not negatively impact on habitat quality, species diversity or other environmental considerations
- c) To facilitate the provision of integrated and sustainable water services through effective consultation with Irish Water on the layout and design of water services in relation to the selection and planning of development areas and the preparation of master plans and SDZs;
- d) To maximise the use of existing capacity in water services in the planning of new development;
- e) To ensure that adequate water services will be available to service development prior to the granting of planning permission for those developments and to require developers to consult Irish Water regarding available capacity, prior to applying for planning permission;
- f) To protect existing way leaves and buffer zones around public water services infrastructure through appropriate zoning and to facilitate the provision of appropriate sites for required water services infrastructure as necessary;
- g) To ensure that development proposals comply with the standards and requirements of Irish Water in relation to water and wastewater infrastructure to facilitate the proposed developments

Water Supply

- h) To protect both ground and surface water resources and to work with Irish Water to develop and implement Water Safety Plans to protect sources of public water supply and their contributing catchment;
- i) To minimise wastage of water supply by requiring new developments to incorporate water conservation measures;
- j) To promote water conservation and demand management measures among all water users;

Uisce Éireann
Bosca OP 8000
Baile Átha Cliath 1
Éire

Irish Water
PO Box 8000
Dublin 1
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Wastewater Services

- k) To ensure that the Local Authority provides adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure;
- l) To require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems;
- m) To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems;
- n) To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works;
- o) To refuse residential development that requires the provision of private waste water treatment facilities, other than single house systems;
- p) To ensure the changeover from septic tanks to collection networks in all cases where this is feasible (subject to connection agreements with Irish Water) and that all new developments utilise and connect to the public wastewater infrastructure. The provision of individual septic tanks and treatment plants in the plan area will be strongly discouraged to minimise the risk of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing regulations and standards, including the EPA's Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses (PE. ≤10) (EPA 2009), as may be amended, will be required;
- q) To ensure that private wastewater treatment plants, where permitted, are operated in compliance with their wastewater discharge license, in order to protect water quality;
- r) To require existing developments that are in close proximity to a public sewer to connect to that sewer, subject to a connection agreement with Irish Water;

PO-15

Planning Department
Mayo County Council
Aras an Chontae
Castlebar
County Mayo

14 June 2018

**Re: Pre-Draft Submission to the Mayo County Development Plan 2020-2026
Submission on behalf of Inishoo Management Ltd., and Hotel Westport Ltd.**

Dear Sir / Madam,

This Submission is made on behalf of Inishoo Management Ltd., and Hotel Westport Ltd., Westport Demesne, Westport, County Mayo, in response to the Notification from Mayo County Council inviting pre-draft submissions on the Mayo County Development Plan, 2020-2026.

Inishoo acquired Westport House and Demesne in 2017. Inishoo is committed to preserving and protecting those elements of the Demesne that contribute to its historic and cultural importance, and to making the Demesne a self-sustaining international visitor and tourist attraction. These objectives are consistent with the principles of the Architectural Heritage Protection Guidelines published by the Department of Arts, Heritage and the Gaeltacht, which state at Section 1.1:

'Sympathetic maintenance, adaptation and re-use can allow the architectural heritage to yield aesthetic, environmental and economic benefits even where the original use may no longer be viable. The creative challenge is to find appropriate ways to satisfy the requirements of a structure to be safe, durable and useful on the one hand, and to retain its character and special interest on the other.'

'The conservation-minded approach entails changing assumptions about existing buildings and thinking carefully about how they can be used or redeveloped so as to conserve and highlight their qualities. At as early a stage as possible in the process of designing for change, emphasis should be put on identifying and holding on to the inherent character of the structure and its physical and aesthetic strengths.'

This submission proposes that appropriate policies are included in the County Development Plan to provide a policy framework that is consistent with the principles of the Guidelines, supports Inishoo's objectives, and that will in due course inform the preparation of the Westport LAP.

1. Proposed Policies to be Included in the Draft County Development Plan

The following policies are proposed for inclusion in the Draft County Development Plan:

Westport House and Demesne is a cultural and landscape resource of international significance. It is a recreational, visitor and economic asset of county, regional and national importance. The sensitive development and conservation of the Demesne is essential to the economy and quality of life of our citizens, and is supported by the Council.

To this end, a Conservation Masterplan will be prepared to guide the protection and development of the Demesne to realise its potential to become the major cultural and tourist destination on the Wild Atlantic Way. The agreed Conservation Masterplan will be consistent with the principles of the Architectural Heritage Protection Guidelines which support the active use of structures and landscapes in a manner that satisfies the requirements of a structure *"to be safe, durable and useful on the one hand, and to retain its character and special interest on the other"*.

The Masterplan will identify and appropriately protect those physical elements that contribute to the cultural significance of Westport House and Demesne, and will incorporate conservation and design strategies to unlock potential to deliver a sustainable economic future for this important cultural landscape. The Masterplan will guide decision making about:

- **Landscape conservation.**
- **Building conservation, adaptation and extension to find new and viable uses for existing historic buildings;**
- **The appropriate location, nature, scale and use of new buildings and features within the Demesne.**
- **An access strategy which maximises accessibility by both active and private modes, facilities existing and new uses, and that protects the conservation assets and character of the Demesne.**

The policies of the County Development Plan and the agreed Conservation Masterplan pursuant to the above policy provisions, will take precedence over the provisions of the Westport & Environs Development Plan 2010-2016, as extended, pending the making of the new Westport Local Area Plan.

An overview of the planning, development and conservation basis for the inclusion of the above policies is provided below.

2. Cultural, Recreational and Economic Importance of Westport Demesne

Westport Demesne is a cultural, landscape and recreational asset of national and international significance. Established in the 1700's, it is one of the earliest and finest natural style demesnes in Ireland. It takes full advantage of its surroundings, incorporating layers of subtle, natural-style landscape design within a landscape of outstanding natural beauty. It contains one of the largest walled gardens in Ireland and a range of ornamental structures. Westport House has a monumental presence in the landscape. It is a multi-layered

building of national significance, albeit the product of at least five different architects over a period of almost two hundred years. This multiplicity of designers has resulted in a house that contains some very fine rooms containing a large collection of paintings by various high standing artists, along with furniture, fittings, books and miscellaneous art objects. Although some buildings, structures and artefacts have been lost over time, the demesne contains many buildings and structures providing a record of how a country house and estate once operated.

Since 1960 the house and grounds have been open to the paying public. The site currently attracts two broad types of visitor, family fun seekers who visit the pirate park and associated attractions, and culturally curious visitors more interested in the history and landscape of the demesne. In 2002, day visitor numbers had reached 70,000 with 18,000 people staying overnight. Recent visitor numbers reached approximately 160,000. Kylemore Abbey by contrast attracts up to 500,000 visitors annually. This provides an indication of the potential of the demesne to become a major economic driver in Westport and the wider region.

3. Architectural Heritage Guidelines

The proposed policies are consistent with the Architectural Heritage Guidelines which support the sympathetic maintenance, adaptation and re-use of architectural heritage, and empower planning authorities to protect architectural heritage. There are 18 protected structures within the demesne and the sympathetic conservation and reuse of these structures and the attendant grounds are key to the future success of the demesne as a cultural and visitor attraction. In this regard, Section 7.3 of the Guidelines state:

'It is generally recognised that the best method of conserving a historic building is to keep it in active use. Where a structure is of great rarity or quality, every effort should be made to find a solution which will allow it to be adapted to a new use without unacceptable damage to its character and special interest.'

The proposed policies and agreed Conservation Masterplan approach is consistent with Section 7.4 and Section 13.7 of the Guidelines:

'Before formulating proposals for works to a protected structure, the developer should research its historical development and understand thoroughly the present condition of the structure. The research should encompass not only the main structure and its interior but also its curtilage and attendant grounds, where relevant, and any structures or features within them which contribute to the special interest of the protected structure. The contribution of the setting of the structure to its special interest should also be assessed, as should any other relationships which add to the appreciation of it.' (Section 7.4)

'It is essential to understand the character of a site before development proposals can be considered. Where attendant grounds of particular significance are proposed for development, a conservation plan could be prepared in advance of any planning application which would identify the significance of the site and locate areas within the designed landscape, if any, which could accept change and development and those areas which could not without damaging the architectural heritage of the place.'

'Development proposals should have regard to the planted features of designed landscapes and efforts should be made to reinforce or to re-establish important structural planting such as avenues or clumps of trees, plantations, woodlands, hedging or shelter belts.' (Section 13.7).

I trust that the Council will afford due regard to the issues raised in this submission and I look forward to the above policies and objectives being incorporated in the Draft Mayo County Development Plan, when published.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Declan Brassil', with a stylized flourish at the end.

Declan Brassil
Declan Brassil & Co.

Newport Development Area plan 2020 -2026

Submission on behalf of Newport and District Development Company

Infrastructure

1. A new Public Sewerage Scheme need to be built on the Mayo County Council owned lands at Calicaun Newport as soon as possible. Newport is now identified as an untreated agglomeration discharge. There is increased concerns for people's health, shellfish production and tourism activities in the greater Clew Bay catchment due to the possible existence of NDMA superbugs in these waters.
2. New sewer/ Water pipe lines need to be extended out on many entrance roads to Newport. Particularly on the Glenhest road to service the Newport Sports and Educational Hub in line with the 2007 Newport sewerage Scheme (Job: PB8838).
3. The Bleach yard drain to be improved and widened and strengthened where necessary.
4. The inlet pipe to the Newport water scheme needs strengthening. The decision needs to be taken to connect to the Lough Mask water scheme (or not) and then acted upon.
5. Mayo Co Co to aggressively target the back streets/back lands of the Main Street for the provision of off street parking as seen in Ballina, Westport or Castlebar.
6. Wheelchair access needs to be provided to the Railway Viaduct.

Town Boundary

1. The town boundary needs to be extended to reflect the new reality on the ground and the speed limits need to move accordingly.
2. Westport Road Town Boundary needs to move south to accommodate the housing Estate in Kilbride and should also include Mayo County Councils owned grounds at Carrowbaun. These grounds to be leased to the community if not suitable for development. Speed limit to move accordingly.
3. The Glenhest Road Town boundary and speed limit needs to move east to reflect the new development of the Newport Community Playing pitch and Community Center.
4. New road crossing and traffic calming measures need to be provided at Newport National School before a serious accident occurs.
5. Mulranny road boundary needs to move North West to accommodate the new housing estate of Acres Grove and together with the Knocknageeha area should be within the new Town Boundary. Speed limit to move accordingly.
6. Road widening needs to occur on Chapel Lane/Barrack Hill along the Newport Church to allow access to Western Care, Cuan Modh and the residential housing particularly during mass/funeral occasions.



Forward Planning Section,

Mayo County Council,

Áras an Chontae,

The Mall,

Castlebar,

Co Mayo

By Email: countydevplan@mayococo.ie

14th June 2018

Re. Review of Mayo County Development Plan

A Chara,

This submission has been prepared by Fáilte Ireland, the National Tourism Development Authority, in response to the public notice seeking submissions in relation to the review of the current County Development Plan 2014-2020 and the preparation of a new County Development Plan 2020-2026.

The Authority welcomes the opportunity to engage with Mayo County Council on the emerging Plan for the County. Fáilte Ireland is seeking to enhance the partnership approach between the County Council and the National Authority and ensure that the expertise of both organisations is shared.

The current County Development Plan 2014-2020 sets out a number of main goals for the development of Mayo, some of which give reference to visitor experiences including:

- *"To attract investment and people into the County";*
- *"To maintain and provide additional services for our citizens, investors and **visitors**";*

- *“To offer **visitors**, from Ireland and overseas, a range of high quality experiences”.*

The current plan incorporates tourism into its Economic Development Strategy and also provides specific policy for the support and sustainable development of tourism within the county, and in collaboration with adjacent counties and tourism organisations. Fáilte Ireland welcomes the Council's acknowledgement of tourism in the main goals set out for the development of the county and the Economic Development Strategy, and recommends that it remains included within the main aims for the county and as one of the primary elements of the Economic Development Strategy within the new Mayo County Development Plan 2020 – 2026.

In terms of tourism specific policy however, the current development plan provides little policy directly related to tourism within the plan. As tourism is a strong contributor to economy within the county with significant potential for further growth it is further recommended that there be a chapter in the new 2020 – 2026 development plan dedicated to tourism which would include further policy provision for the sustainable development of tourism within the county.

The coverage of tourism in other sectors, such as Marine Resources, of the current plan is welcomed. The tourism sector does not control all elements which underpin or assist in enabling the tourism sector or development thereof in order to ensure a successful tourism environment. For example, transport enables visitors to access the county, but the tourism sector does not have control over the provision and maintenance of transport links. Additional such cross-sectoral alignment and acknowledgement between tourism and other sectors would therefore be further welcomed in the new 2020 – 2026 development plan.

As the tourism sector within Mayo has the potential to play a larger and stronger role within the County's economy it is recommended that the County Development Plan provides a spatial dimension to tourism development, i.e. incorporating and building tourism considerations into the settlement hierarchy. This would involve the identification, prioritisation and strengthening of the Fáilte Ireland 3 tier concept of 'Always On' (Hub), 'Seasonal' (Service Centre) and 'Attraction', with maximum development and minimal seasonality at the Hub. As well as the existing/ potential tourism 'offer', this should also be based on an integration of other complimentary land uses, demographic projections and environmental assimilative capacity.

Following the Settlement Hierarchy set out within the current county development plan, it is suggested that Westport and Ballina would be 'Hubs' as both have the greatest potential offering to tourism. Westport offers a variety of attractions such as Westport House, the Great Western Greenway and the Clew Bay Archaeological Trail. Ballina can also be classified as a 'Hub' due to its accommodation capacity and tourist attractions adjacent to the settlement in the north Mayo area (e.g. the Ceide Fields and Downpatrick Head). In terms of 'Service Centres', it is recommended that these would include settlements such as Newport and Belmullet.

Fáilte Ireland is also creating a framework to develop and deliver visitor experience development plans (VEDPs). This approach identifies the 'hero' products for an area, and provides a framework to present the experiences and stories of that area in a way that tourists can readily and easily understand. It clearly identifies tangible actions and a process for businesses to shape their respective tourist experience(s) in line with the overall experience brand proposition and the key motivating themes for their area.

Through collaboration and partnership, stakeholders and industry must join together to develop a joint plan. The success of this process depends on a partnership approach and requires input from a variety of providers. Each partner needs to incorporate the actions from the plans into their own operational and strategic plans, thereby maximising budget and resource effectiveness. There will be two VEDP's delivered in Mayo over the next number of years, Clew Bay and North Mayo/Erris. These will enable clusters and geographies to amplify their local tourism offering in a compelling and motivating way for international tourists and encourage increased visits, dwell time and spend in the locality.

The VEDPs can be done either geographically or thematically. Fáilte Ireland would like to see inclusion of a policy/ objective to support the delivery of these VEDPs.

Mayo is home to a range of tourism attractions as well as a number of important emerging tourism assets which will further strengthen the offering of the county. Such emerging assets include the development of the Ballycroy National Park and the Western Way over the next number of years. The park itself is now the 2nd largest national park (it is also a wilderness area and a dark sky park) in the country following an acquisition of Coillte land and now stands at close to 15,000 hectares of Atlantic blanket bog, mountain and forests through which the

Western Way leads. Plans are afoot to develop the Western Way as a long distance off road mountain bike route. Such developments will provide further depth and appeal to attractions available to visitors.

The issues paper, published in association with the preparation of the new County Development Plan, acknowledges that *'Mayo has a hugely unique offering in terms of economic development opportunities across many sectors, including manufacturing, tourism, renewable energy, marine development and other rural based sectors'*. It also identifies that tourism is one of the sectors *"that offer best potential for sustainable employment growth, clustering and value added"*.

In support of the above, Fáilte Ireland's figures indicate that in 2016, 309,000 overseas visitors came to Mayo, spending an estimated €68 million in the county. Domestic tourism figures indicate an estimated 508,000 domestic visitors to the county in 2016, spending in the region of €105 million (Fáilte Ireland Regional tourism performance in 2016). Fáilte Ireland acknowledges that Mayo is an established tourism area in relation to natural and cultural heritage, recreation and amenities and the diverse range of attractions and activities offered. The county has an extensive Atlantic seaboard coastline (1,162km of coastline), which includes 12 Blue Flag beaches and is the longest coastline in Ireland.

Since the publication of the current County Development Plan, Fáilte Ireland has further developed the **Wild Atlantic Way** – the longest defined coastal touring route in the world stretching 2,500km from the Inishowen Peninsula in Donegal, to Kinsale in West Cork. The geography of the Wild Atlantic Way encompasses the coastline and hinterland of the nine coastal counties of the West of Ireland, which includes Mayo. The immediate catchment of the Wild Atlantic Way is the area surrounding the spine of the route itself, the landmass to the west of the route as far as the coast (and the islands) and immediate landmass to the east of the route. The route itself is a magnet or calling card to gain the attention of the international visitor and acts as a device to entice people to the West of Ireland. Once there, visitors are encouraged to further explore and engage with tourism experiences and communities in the wider geographical area. County Mayo is home to a significant and important wealth of natural and cultural heritage and attractions which form an integral part of the Wild Atlantic Way. Mayo is therefore in a significantly advantageous position to attract further visitor numbers to the county, and should be fully incorporated into the County Development Plan [Appendix A].

Although the strategic issues paper acknowledges the importance of the tourism sector within the county, it does not refer to the Wild Atlantic Way, which will play an important role in promoting and further developing tourism in the County. Fáilte Ireland would welcome the incorporation of the Wild Atlantic Way brand into the tourism policies of the new county development plan.

There are 188 Discovery Points along the Wild Atlantic Way and 33 in Mayo alone. Fáilte Ireland would like to see the management and maintenance of these (in particular the Keem Bay and Downpatrick Head Signature Discovery Points) highlighted as a priority within County Development Plan.

It is also understood that county Mayo is developing its own brand to attract visitors and increase investment into the county (MAYO.IE). Further opportunities to maximise market exposure exist through co-operation and themed 'branding bundles' including linking the Wild Atlantic Way Brand and the Mayo County brand – MAYO.IE. This will encourage the capturing of greater international interest by promoting strategic attractions of scale and signature visitor attractions.

The Wild Atlantic Way has recaptured the attraction of Ireland's Atlantic coast for visitor's and reinforced the need to protect this valuable environmental and tourism resource. Fáilte Ireland itself is committed to protecting the Ireland's Atlantic coast and carries out its own annual environmental monitoring programme along the route of the Wild Atlantic Way at discovery points. Fáilte Ireland would like to see continued commitment from Mayo County Council to participate in this programme and to work in partnership to implement the environmental recommendations from this monitoring programme for the management of the Wild Atlantic Way.

Fáilte Ireland welcomes the Council's recognition of tourism as an important element for driving economic development in the County. The current Mayo County Development Plan identifies the need to attract investment into the county with a focus on certain sectors, one of which includes tourism. As previously mentioned, a dedicated tourism chapter within CDP is again recommended in order to effectively (a) encompass all of the policies and objectives relating to tourism and its role as an economic driver in attracting increased investment and

revenue generation and (b) recognise the significant function of tourism in the overall operation and development of the County. In addition, Fáilte Ireland promotes the incorporation of the principles of sustainability in the tourism policy section of the County Development Plan [for ease of research, these are included in *Appendix B*].

The Authority would also like to see tourism policies and objectives clearly set out where possible through the inclusion of maps in the Development Plan. The inclusion of the County's strategic tourism locations; transport routes; scenic routes and views; tourism attractions and facilities; and transportation hubs in the Development Plan maps, serves as an effective tool to highlight the importance of tourism in the spatial and strategic planning of the County. The County Development Plan should include provisions to incorporate mapped and discrete urban/ rural routes and Hubs to constitute Visitor Experiences in specific areas that provide a mixture of urban and rural, natural and developed Visitor Attractions.

In relation to accessibility, County Mayo is directly accessible both nationally (including Dublin) and internationally through road, rail and air links (Knock Airport – Ireland West Airport), which provides potential to attract increased visitor numbers. Policies in relation to public transportation and improved linkages, provide potential for those visitors who visit Ireland and the Capital City without a car to explore the County of Mayo more easily. In addition, linkages within the county and the development of cycleways and walkways, provide opportunities to attract visitors for extended periods of time. Fáilte Ireland acknowledges and welcomes the development of greenways in county Mayo. With regard to the Great Western Greenway, an interpretation plan was previously undertaken for the greenway; however, this was never implemented. Therefore, Fáilte Ireland would welcome the implementation of an interpretation plan for this greenway and all future greenways in Mayo in collaboration with Mayo County Council in order to enhance the visitor experience.

County Mayo has an extensive coastline and is well known for its attractive, unspoiled beaches. The county encompasses a large number of uninhabited and inhabited islands, some of which include Achill Island, Clare Island and Inishturk, and are important tourist assets for the county. It is imperative that these rich natural resources are protected and promoted, and it is recommended that the new County Development Plan includes policies to encourage the preparation of a Coastal Zone Management Plan. In this regard, and in consideration of the synergies between the Wild Atlantic Way Operational Programme and the Government's Integrated Marine Plan (*Harnessing our Ocean Wealth*), it is also recommended that reference and/ or objectives be incorporated with regard to the following development priorities in marine and coastal areas:

Boat Touring: One of the main objectives of the Wild Atlantic Way is to provide visitors with the lots of different memorable experiences and to slow down and explore areas, from both the land and the sea. Boat touring along our coastline and to the islands is a key part of this, and the Wild Atlantic Way provides the opportunity now to increase the availability and quality of passenger boats tours.

Activities: For the majority of visitors, access to the coastline is actually from the land and, therefore, a range of both sea-to-land, but perhaps more importantly, land-to sea solutions and opportunities must be provided for our visitors. This can range across water-based activities such as sea angling, surfing, sailing, kayaking and wildlife watching to coast-based walks, attractions and services.

The development of coastal walks/ paths is also a key aspect of the visitor experience. These types of walks bring people in to coastal communities, and provide opportunities for local guides, activity providers, coffee shops, bars, restaurants and accommodation providers etc.

Coastal Towns and Villages: the Mayo coastline has many towns and villages along its extent, which are also a key aspect of the Wild Atlantic Way. However, the physical appearance and condition of some of these can be poor, requiring investment in public realm and the appearance and condition of streetscapes and individual key buildings.


Beach management: There are nearly 90 Blue Flag and Green Coast beaches along the full extent of the Wild Atlantic Way. The infrastructure at these beaches has been developed in piecemeal fashion over many years, as and when resources become available and/ or in response to storm and weather damage. At some locations this has led to poor and visually intrusive design and layout of infrastructure such as car parks, access paths, toilet blocks, litter bins, and signage in particular.

In addition to the CDP policies regarding Renewable Energy and Energy Efficiency, the Authority would also encourage an update of the current Renewable Energy Strategy which accompanies the county development plan in order to emphasis the development of renewable energy in a sensitive manner that would not negatively impact on tourism assets within the

county. Fáilte Ireland commends the map-based approach of the current renewable energy strategy and welcomes this approach in identifying areas suitable and unsuitable for the siting of renewable energy developments. Robust policies will assist the Council in ensuring a continued emphasis on the positive interactions between both the energy and tourism potential of the County.


Fáilte Ireland would like to thank the Council in advance for their consideration of this submission, and encourage the inclusion of Fáilte Ireland's recommendations in the preparation of the new County Development Plan. We greatly appreciate this opportunity to take part in shaping the Plan for the County and hope that this submission can represent a first step in a collaborative process that culminates in the preparation and adoption of the new Mayo County Development Plan 2020-2026.

Is mise le meas,



Yvonne Jackson

Innovation and Investment, Fáilte Ireland



Appendix A – Wild Atlantic Way

Fáilte Ireland acknowledges the value of the key partnership with Mayo County Council in the development of the Wild Atlantic Way. As the Wild Atlantic way has been introduced since the publication of the current Development Plan, it is proposed that some descriptive text is included in the new Plan in order to provide a more comprehensive overview of the framework.

The Wild Atlantic Way is the longest defined coastal touring route in the world stretching 2,500km from the Inishowen Peninsula in Donegal, to Kinsale in West Cork. The geography of the Wild Atlantic Way encompasses the coastline and hinterland of the nine coastal counties of the West of Ireland. The immediate catchment of the Wild Atlantic Way is the area surrounding the spine of the route itself, the landmass to the west of the route as far as the coast (and the islands) and immediate landmass to the east of the route. The route itself is a magnet or calling card to gain the attention of the international visitor and acts as a device to entice people to the West of Ireland. Once there, visitors are encouraged to further explore and engage with tourism experiences and communities in the wider geographical area.

The overall objective of the Wild Atlantic Way project is to grow the economic contribution of tourism to the nine coastal counties of the West of Ireland by increasing international bednights and revenue and by sustaining and creating employment in the geography. A key element of the project is the identification of Discovery Points and Embarkation Points which have been identified as ‘must see’ destinations. A total of 188 such locations have been identified along the route and these locations are being enhanced to improve the visitor experience.

Fáilte Ireland welcomes the opportunity to work with the Council on any further development of the Wild Atlantic Way branding strategy. As part of that process the Authority hopes to liaise with the Council on the further development of the overarching strategy, as well as any smaller scale plans or programmes that are prepared to give effect to that strategy. The Council is encouraged to consult with the Authority as required, on the assessment of any such plans, programmes or policies to ensure that they are adequately screened or assessed in full compliance with Directives including the SEA Directive and the Habitats Directive. The Council

is also encouraged to support environmental monitoring of key sites along the Wild Atlantic Way.

Note:

Fáilte Ireland would encourage the Council to incorporate the detail of strategies such as the Wild Atlantic Way, into the zoning maps for the County and implement the policies set out therein as policies of the County Development Plan. It is recommended that the locations of key nodes such as 'Signature Points' and 'Discovery Points' are also included.

Appendix B – Fáilte Ireland’s Guidance on Sustainable Tourism

Fáilte Ireland promotes the incorporation of the principles of sustainability in the tourism policy section of the County Development Plan. Fáilte Ireland has developed five key principles that ensure developments achieve a balance between appropriate tourism development and economic, environmental and social sustainability. Developments will be assessed having regard to compliance with these and the associated policies.

Principle 1: Tourism, when it is well managed and properly located, should be recognised as a positive activity which has potential to benefit the host community, the place itself and the visitor alike. Sustainable tourism planning requires a balance to be struck between the needs of the visitor, the place and the host community.

Principle 2: Our landscapes, our cultural heritage, our environment and our linguistic heritage all have an intrinsic value which outweighs their value simply as a tourism asset. However, sustainable tourism planning makes sure that they can continue to be enjoyed and cherished by future generations and not prejudiced simply by short term considerations.

Principle 3: Built development and other activities associated with tourism should in all respects be appropriate to the character of the place in which they are situated. This applies to the scale, design and nature of the place as well as to the particular land use, economic and social requirements of the place and the surroundings.

Principle 4: Strategic tourism assets – including special landscapes, important views, the setting of historic buildings and monuments, areas of cultural significance and access points to the open countryside, should be safeguarded from encroachment by inappropriate development.

Principle 5: Visitor accommodation, interpretation centres and commercial / retail facilities serving the tourism sector should generally be located within established settlements thereby fostering strong links to a whole range of other economic and commercial sectors and

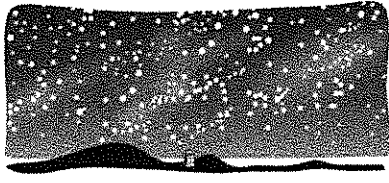
sustaining the host communities. Sustainable tourism facilities, when properly located and managed can, especially if accessible by a range of transport modes, encourage longer visitor stays, help to extend the tourism season and add to the vitality of settlements throughout the year.

Underlying these principles for Sustainable Tourism, the definitions of economic, environmental and social sustainability against which any tourism project assessed are defined as follows:

Economic sustainability must be considered to ensure that the tourism sector is managed. The key strengths of the County include landscape, heritage, natural environment, lifestyle and amenity pursuits. The sector is highly affected by seasonality and there are extremes in visitor numbers as key attractions contrasted with smaller attractions which struggle to maintain visitor numbers. These 'peaks and troughs' should be carefully managed to ensure the protection of natural resources. Tourism innovation should also be encouraged – particularly where it brings about environmental benefits. Finally, for projects to be economically sustainable they should meet the needs of the permanent and also visitor population alike, so the preparation of robust business plans for all such developments will ensure proposals are viable and sustainable.

Environmental sustainability will be central to the development and protection of a viable tourism sector and this is a key consideration in the County where tourism attractions are located in environmentally sensitive areas and close to historic areas where the quality of the built heritage and environment must be protected from inappropriate development – whether tourism related or not. The 'mainstreaming' of policy guidance tools such as the Strategic Environmental Assessment (SEA) will undoubtedly address any deficits in relation to many of these key policy areas.

Social sustainability is arguably more difficult to assess. Many of the potentially negative impacts of tourism development can however be addressed through careful consideration of the social and cultural nature of the receiving environment. The impacts that large-scale developments can have on existing local communities' policies can be assessed having regard to the impact of visitor numbers on local quality of life, culture and heritage – with a particular emphasis placed on unique areas such as culturally sensitive areas where small impacts over time may have a significant cumulative effect.



Mayo Dark Skies

Submission on behalf of “Friends of Mayo Dark Skies” to ‘Mayo County Development Plan 2020-2026’

Pre-draft stage of Mayo CDP

Written and submitted by Georgia MacMillan June 2018

Background

There is no doubt that artificial lighting has its place in our world and is invaluable to our businesses, homes, roads and recreation. However, when used inappropriately or excessively, artificial lighting can cause light pollution. Many of us are not aware that light pollution has adverse effects on the environment, our health, biodiversity, and our climate (through energy waste).

In the UK over 80% of the population can no longer view The Milky Way from their home due to light pollution. In Ireland, over 45% of us have also lost sight of this natural night sky phenomenon and this figure is rising rapidly due to the increase in domestic, commercial and public lighting over recent years.

The impact of such wasted energy not only affects our view of starlight from above, but can interfere with our health and wellbeing by impacting our sleep patterns, circadian clock and melatonin production.

Our Biodiversity, wildlife, trees and insects are also affected by the interruption of our natural night and daylight cycles with excessive artificial light at night and in particular with blue -rich LED lighting.

County Mayo is home to the only International Dark Sky Park in Ireland. Mayo International Dark Sky Park received a gold tier award the quality of its night skies, free from light pollution it is an important asset of natural night sky heritage. Without preserving such dark sky places, there is a real risk of losing our natural night skies to light pollution across the country.

Encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

Irish Facts and Figures*

- Unmetered electricity (public lighting) accounts for over 30% of a local authority budget.

- 28,000 tonnes of CO2 p.a. / Annual cost of €7.4m
- 16% of residential electricity is used for lighting
- Per household Costs €230/year, ≈5 kg CO2
- 18% of Ireland's population no longer uses dark adaptation vision and instead use daylight colour vision at night due to lighting changes.
- 45% of us can no longer view the Milky Way from our homes due to light pollution.

*Source TCD School of Physics

The image below was taken at 1am in Newport, Mayo. This type of lighting requires full colour vision as well as wasting energy with excessive public lighting. During a period of 60minutes only 5 cars passed (with full headlights) and not a single pedestrian.

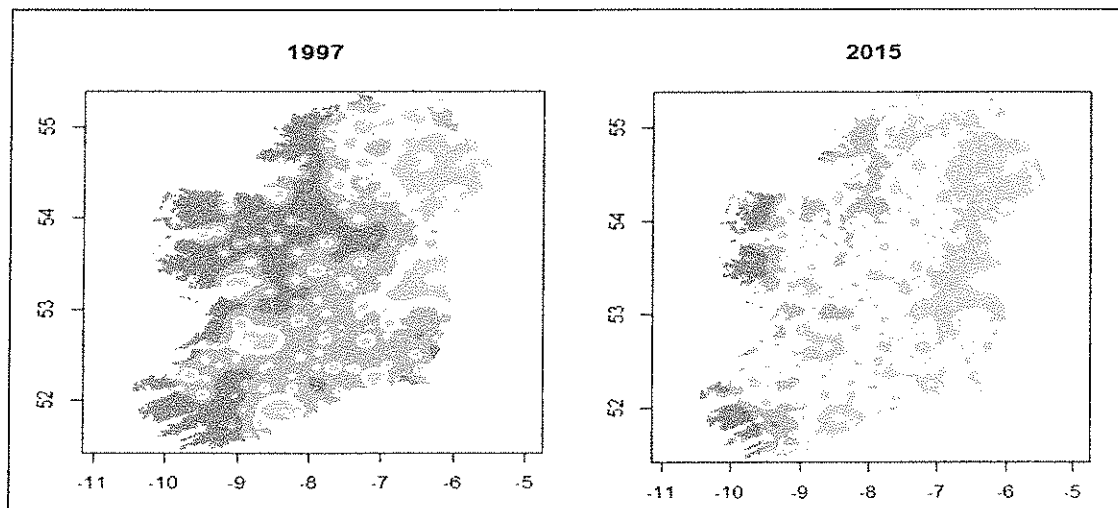


In Ireland, between 1992 and 2010 there was a +20% increase in light level across most of the country as determined from satellite measurements due to increased development during the boom years. Growth of public lighting in the republic of Ireland is 10x faster than that of Northern Ireland.

In Mayo our light pollution is spreading rapidly and we have bench-marked this with a mapping snapshot which is available here:

<https://luc.maps.arcgis.com/apps/MapJournal/index.html?appid=a6239f11a6fa410e8fc543d231c97469#map>

Dark green areas show natural lighting	Brigher areas (white) are up to 10x natural levels of brightness
--	--



Light Pollution as an Environmental issue

UNESCO's Earth Charter states that the prevention of harm before it happens is the best method of environmental protection. When knowledge is limited, apply a precautionary approach:

- a. Take action to avoid the possibility of serious or irreversible environmental harm even when scientific knowledge is incomplete or inconclusive.
- b. Place the burden of proof on those who argue that a proposed activity will not cause significant harm, and make the responsible parties liable for environmental harm.

The worldwide introduction of blue-rich LED lighting has involved almost:

- No environmental impact assessments
- No definitive studies on human health
- No democratic sanctions, investigation or review of likely effects
- No widely accepted policies or standards on beneficial luminaire design or installation
- No concern for its effect upon night sky heritage

General Comments on Goals of the Consultation Document for Mayo County Development Plan

Goal 4 | To adopt 'green principles' that promote a high quality of life
Goal 5 | To create attractive settlements that promote a high quality of life

Light pollution is a threat to creating a cleaner environment for a Healthy Society and therefore needs to be presented to the same extent as Waste, Noise Pollution, Air Quality and Water Quality.

The UK's Chief Medical Officer's report for 2017 dedicates a full page to light pollution and health and references LEDs and blue rich lighting "Local authorities [in the UK] have been replacing mercury and sodium street lights

with LEDs. If this is done purely on the basis of energy efficiency and cost, it is possible to end up with installations that may not be fit for purpose. “

We suggest that public lighting should be planned in a similar vein to the Danish lifestyle of “Hygge”. This would entail lighting designs to become more passive, warm and inviting for those living and working in lit areas. Current lighting trends have moved toward sterile, white, and excessively bright LEDs (generally not tested for Environmental or Health considerations). By adopting responsible lighting principles, residents and visitors can avail of enhanced security, not degraded.

Goal 7| To protect and enhance our natural environment

Within the above heading, natural nightscapes should be included as part of our natural environment and duly recognised for preservation. Our landscapes and waterways are typically noted yet our nightscapes are not and are at risk from the rapid growth in artificial lighting.

Goal 8| To offer visitors, from Ireland and overseas, a range of high quality experiences

As stated above, Mayo is home to the only International Dark Sky Park in the country and has attracted international interest for the quality of the pristine night skies in that region. Since qualifying for this accreditation in 2016, there has been a considerable increase in blue-rich (high temperature) LED lighting, which has already begun to infringe upon the quality of our night skies. Visitors typically journey to Dark sky parks during the off-peak season, bringing much needed custom to rural areas and helping to extend the tourism season. They will expect responsible lighting practices to be evident in towns and villages near to the Dark Sky park and further beyond.

Dark Sky lighting recommendations:

Policies for responsible lighting in planning, maintenance and for environmental protection should be included in Mayo County Development Plan.

Environmental Zones - specify the following environmental zones for exterior lighting control within Mayo County Development Plan.

Zone	Surrounding	Lighting Environment	Examples
E0	Protected	Dark	UNESCO Starlight Reserves, IDA Dark Sky Parks
E1	Natural	Intrinsically dark	National Parks, Areas of Outstanding Natural Beauty etc
E2	Rural	Low district brightness	Village or relatively dark outer suburban locations
E3	Suburban	Medium district brightness	Small town centres or suburban locations
E4	Urban	High district brightness	Town/city centres with high levels of night-time activity

- Colour Temperature /Kelvin - Streetlights should have a colour temperature of 2700 or less as a default specification. Exceptions should be justified. New technology such as Narrow band amber lighting to be brought into Ireland. All lights to have Full cut-off sheilds or fixtures (FCO) to prevent light trespass into residents window and potential sky glow.

Our 7 Recommendations for Mayo Development Plan

1. To have a Light Pollution Policy within Local Development Plans in line with National Planning Framework taking aforementioned points into account.
2. Street lighting policy to include Environmental Zones with strict requirements in identified dark areas
3. All public buildings and car parks should lead by example lighting only where necessary and with responsible lighting. Lighting on new buildings should take account of light trespass and colour correction temperatures used.
4. Consider Part-night lighting or dimming schemes. (examine cost & carbon savings in consultation with community),
5. LED Lighting - careful consideration to lighting fixtures in use. Consider impact of high temperatures on ecology & human health.
6. Include lighting impacts in **Mayo's Strategic Environmental Assessments**. Testing new street lighting 'in situ' before new schemes rolled out in wider areas. Involve residents' response.
7. Preserve dark sky areas - Strong presumption against new lighting, in naturally dark areas.

Further information

Thank you for the opportunity to submit our comments for the pre-draft of Mayo Development Plan. Friends of Mayo Dark Skies would be happy to elaborate on, or discuss, any of the ideas contained in this submission.

Please contact:

Georgia MacMillan
Compliance & Development Officer
Friends of Mayo Dark Skies,

[REDACTED]

[REDACTED]



Submission on behalf of Mountaineering Ireland to the Consultation for 'Mayo County Development Plan 2020-2026'

Mountaineering Ireland welcomes the opportunity to comment on the pre-draft stage of Mayo County Development Plan 2020-2026.

As the national representative body for walkers and climbers on the island of Ireland, Mountaineering Ireland is deeply aware of the contribution that enjoyment of Ireland's natural environment makes to people's physical and mental health and wellbeing. Mountaineering Ireland has over 12,500 members, the majority of whom are affiliated through our 185 registered clubs.

This submission sets out key points which Mountaineering Ireland believes should be taken into account in the drafting of Mayo County Development Plan. These points are presented in order of the consultation paper provided by Mayo County Council.

2.0 Establishing a Vision

In response to the goals set out in the consultation document, Mountaineering Ireland would like to stress the need to recognise the value of Mayo's Upland and Mountainous environments. Mayo is home to some of the most iconic mountains and wilderness regions in the country including inter alia; Croagh Patrick, Mweelrea, and Wild Nephin. These regions are signature landmarks and landscapes for Mayo and their protection is an essential part of achieving several of the goals included in the county's draft vision.

It is Mountaineering Ireland's position that Mayo's mountains and upland areas are vital natural assets which should be wisely managed for societal benefit through appropriate planning and landowner involvement, in a way which ensures ecological integrity and the maintenance of these cherished natural landscapes.

Mountaineering Ireland has recently developed its own vision for Ireland's mountains and upland areas in 2040:

Mountaineering Ireland's vision is that Ireland's mountain landscapes will be valued and protected as environmental, cultural and recreational assets.

Core Strategy & Settlement Strategy /Our towns and Villages/Rural Development

Mountaineering Ireland has noted that the new Core Strategy and Settlement Hierarchy will be derived from the policy framework established by the National Planning Framework and RSES and has the following observations in this regard:

Ireland's mountains and upland areas are Mayo's largest areas of relatively undeveloped wild land. They provide defining geographic features in the landscape and encourage a sense of place as well as providing most of our drinking water and valuable carbon storage.

The importance of undeveloped or semi-natural land

Ireland's extremely limited stock of undeveloped land is irreplaceable and it is being depleted every day by renewable energy developments, afforestation, extractive industry, the erection of new fences and communications masts, the construction of new roads and tracks, and other built development including inappropriately sited housing.

The small area of undeveloped upland landscape or wild land, which remains in Ireland is a very valuable national asset and Mayo is home to much of this wild land.

Mountaineering Ireland urges the mapping of undeveloped or semi-natural landscapes as a spatial planning tool and the development of guidance for assessing impacts on these areas as part of the hierarchy planning process.

Sustaining rural communities

Reliable and reasonably fast broadband is a key support measure needed to maintain population in rural areas, enabling people to do work or study from home and to operate businesses from their local area. This improves people's quality of life and leaves them with more time for involvement in their local community.

The Mayo Development Plan should provide for built development in rural areas which does not diminish the character of the rural landscape; residential development in or immediately adjoining existing settlements or villages should be favoured as the cost of services is less and it is more conducive to engagement between neighbours.

Heritage has the potential to be a unifying force in rural communities, strengthening local pride and engaging both local locals and those who have settled in the area. This also links into tourism. Improved support for local heritage projects, events, publications and place-based education in schools would all contribute to the sense of vitality within rural communities, thus making these more attractive places to live.

2.5 Economic Development

The semi-natural areas with little sign of human influence are a key component of Mayo's identity and also have real economic value. These areas are highly attractive to domestic and recreational users as well as overseas visitors, they have a role in securing foreign direct investment, and images of these places are used extensively in marketing Ireland's agricultural exports.

Research from the UK shows that outdoor recreation generates a significant economic impact, as well as making a contribution to tackling the economic cost of physical inactivity. To put it simply, recreation in natural environments make people's lives better.

The recent growth in outdoor recreation activities such as walking, mountain-biking and running etc, combined with an increase in the commercial provision of such activities, is exerting ever greater pressure on Ireland's natural environment and on the goodwill of individual landowners. Yet, with an integrated approach and strategic investment, this is a sector with potential to deliver local economic benefit and improvements to health and wellbeing, while also protecting the natural resource base that all of this activity is dependent upon.

2.6 Infrastructure

Mountaineering Ireland wishes to highlight that wind farm development in upland landscapes has a disproportionate impact, due to the relatively wild and undeveloped character of these areas and the dominance of turbines over the surrounding landscape. Wind farm development introduces a large-scale industrial use, which is inappropriate in most upland areas.

Mountaineering Ireland believes there should be greater focus on developing offshore renewable energy generating capacity, otherwise valuable landscapes and habitats will be irreversibly damaged.

Due to the unreliability of wind there is need for diversity in our renewable energy sources, the growth in solar generation is welcome, however progress with harnessing wave and tidal energy appears to be slow. Investment in research and development to utilise these renewable energies should be stepped up and accommodation made for these in the County Development Plan.

It should also be taken into consideration that improvements in grid capacity, better electricity storage and other technological developments will all enable greater efficiency to be achieved from Ireland's existing windfarm infrastructure, thereby reducing the pressure for new development.

In addition, Mountaineering Ireland would like to see greater investment in public transport for rural areas such as Mayo, where dependency upon private vehicles is largely reflective of poor public transport.

2.7 Environment, Heritage and Amenity & 3. Environmental Assessments

Outdoor recreation

Mountaineering Ireland welcomes the acknowledgment in the consultation paper of how Mayo's heritage and natural assets, deliver significant amenity value, contributing to both the economy and quality of life. Mountaineering Ireland agrees that the sensitive development, management and conservation of these resources is essential.

The recent growth in outdoor recreation activities such as walking, cycling and running etc, combined with an increase in activity tourism, especially along the Wild Atlantic Way, is exerting ever greater pressure on Ireland's natural environment and on the goodwill of individual landowners. While the vast majority of landowners, especially in upland and coastal areas, continue to allow recreational access to their land, the situation is largely unmanaged and therefore vulnerable to change. Recreational access plays a vital enabling role in rural development, economic activity, and quality of life which should be recognised in land use planning.

To secure access into the future there is a need to invest in recreation planning and management, and in sensitive interventions to mitigate the impact of increased visitor numbers on the natural environment and the local community. Mountaineering Ireland recommends the development of a Mayo Outdoor Recreation Strategy and the formation of a multi-stakeholder group to co-ordinate delivery of the strategy, both of which should align with strategy and structures at a national level.

Protecting natural and cultural heritage

Mountaineering Ireland has direct experience of situations where local authorities and An Bord Pleanála have failed to address significant damage to the upland environment in a timely manner. It is vital that the Mayo County Development Plan includes stronger mechanisms to ensure effective development control and enforcement by local authorities to deal with unauthorised developments.

The mapping and consideration of undeveloped or semi-natural landscapes recommended above could be instrumental in safeguarding these special places.

The rural uplands of Mayo contain some of the best-preserved examples of Ireland's archaeological heritage and are significant within our cultural heritage. Sufficient protection for such examples of heritage should be included within the County Development Plan.

Flood mitigation is one of the ecosystem services that can be provided through better management of upland habitats. Improved habitat condition could be achieved by incentivising landowners to maintain appropriate grazing levels, through peatland restoration projects and by the planting of small woodlands of native tree species such as birch, alder and willow in appropriate locations in upland areas.

Most of Ireland's drinking water comes from surface water, i.e. rivers and lakes, which in turn have their origin in upland areas. The condition of the natural environment in the catchment around these upland streams and rivers has a direct bearing on the quality of this water and therefore also the cost to treat it.

Overall there is a very strong rationale for adopting an ecosystems services approach and sustainable land-use planning in drafting the Mayo Development Plan.

Conclusions

Mountaineering Ireland's primary concern is that appropriate measures for the protection of Mayo's mountains, upland area and upland communities should be part of the County Development Plan, and that the plan should recognise the importance of investing in the planning and management of outdoor recreation so as to ensure these activities continue to deliver benefit to County Mayo in the years and decades ahead.

Further information

Mountaineering Ireland would be happy to elaborate on, or discuss, any of the ideas contained in this submission.

Please contact:

Helen Lawless, Hillwalking, Access & Conservation Officer

Mountaineering Ireland, Irish Sport HQ, National Sports Campus, Blanchardstown, Dublin 15.


Website: www.mountaineering.ie

14th June 2018

By E-Mail

Forward Planning Section
Mayo County Council
Áras an Chontae
The Mall
Castlebar
Co. Mayo

Our Ref: 501.00180.141/17

Dear Sir/Madam

**RE: MAYO COUNTY DEVELOPMENT PLAN 2020 - 2026
CONSULTATION PAPER AND ISSUES: SUBMISSION**

SLR Consulting Ireland acts as planning and environmental advisors to Roadstone Limited, Fortunestown, Tallaght, Dublin 24.

Roadstone has a number of landholdings in County Mayo, namely:

- Castlebar Quarry in the townland of Moneenbradagh, Castlebar;
- Landholding at Islandeady in the townlands of Ballynamarroge and Clonkeen;

Only Castlebar Quarry is operational at present.

This submission relates to the pre-draft consultation paper of the Mayo County Development Plan 2020 – 2026.

BASIS OF THIS SUBMISSION

Importance of the Extractive Industries

The importance of the extractive industries to the wider economy and the need to protect the operations of working quarries and proven aggregate resources is firmly established in regional planning policy.

Section 3.6.5 of the Regional Planning Guidelines for the West Region 2010 – 2022 relates to the natural resource sectors, including the extractive industry. The text states:

“Extractive industry represents a valuable resource in the provision of raw material for the construction industry and is also an important source of employment. The products provide building materials for the provision of housing and infrastructure.”



The relevant policy and objective of the regional planning guidelines seek to support sustainable development of extractive industry and to include aggregate potential mapping in county development plans. Reference is also made to the need to minimise environmental effects and to rehabilitate sites to uses that ensure positive impacts for biodiversity.

The extractive industry provides the necessary raw materials for the majority of building and infrastructure development in Ireland. Roads, motorways, homes, schools, hospitals, colleges, factories, water and sewerage systems are all constructed with construction aggregates and concrete products. The construction of power stations, railways, wastewater and water treatment plants and sporting stadia is heavily dependent on the supply of crushed stone, road making materials, concrete and other building materials made from aggregates.

Aggregate extraction can only take place where suitable aggregate resources exist; they are a 'tied' resource. It is considered, therefore, that planning policies should be carefully constructed to avoid adverse effects on aggregate resources and the related extractive industries and added-value production that are essential for our built environment, infrastructure and future economic development.

Current Development Plan Policies

The current development plan provides a relatively balanced approach to facilitating extractive industries and protecting the environment from significant adverse effects, as per the following text:

"There has traditionally been a strong extractive industry sector in County Mayo which, like the rest of the country, has suffered in recent years due to the economic downturn. Quarrying in the County is largely divided between sand and gravel supplies, as well as crushed rock, and is an important sector both in terms of employment and as a local source of raw materials. The Council supports the continued development of the extractive industries sector and will aim to ensure that development is carried out in a manner which has full regard to the principles of sustainability."

Like many forms of development, extractive industries have the potential to cause harm to the environment, heritage and the landscape if not appropriately designed and managed. However, aggregates are a necessary resource and are of great importance to the economy and society. In addition, well managed and designed quarry sites minimise environmental effects. There is also the potential for habitat creation through the restoration of quarry sites following the cessation of operations.

Given that it is not generally viable to transport aggregates over long distances, each county and region, including Mayo, should have its own sources of aggregates in order to achieve many of the housing, development and infrastructure projects that will be envisaged in the draft development plan.

Proposed Policies

In order to ensure that existing and any future proposed extractive industry schemes are feasible under the development plan for the period 2020 - 2026, we recommend that the forthcoming draft development plan refers to:



We trust this is in order; should you require any further information, please do not hesitate to contact the undersigned.

Yours sincerely
SLR Consulting Ireland

A handwritten signature in black ink that reads 'Tim Paul' with a stylized flourish at the end.

Tim Paul
Director



- i. The important role of the extractive industry in providing the construction materials for the delivery of infrastructure, housing and other social and economic benefits.
- ii. The importance of avoiding the sterilisation of important aggregate/mineral reserves by inappropriate development in or adjacent to the relevant sites.
- iii. The potential for quarries and pits to deliver environmental benefits in the form of habitat creation and increased biodiversity.
- iv. Securing of long-term future supply of aggregates and value-added products including concrete products, blacktop etc.

In addition, it is recommended that the following policies, or similar, should be included:

To support the necessary and important role of the extractive industries in the delivery of building materials for infrastructural and other development and to recognise the need to develop extractive industries for the benefit of society and the environment.

and

To secure the long-term supply of value-added products (such as concrete products and asphalt) within the county, which are often, but not always, produced in conjunction with aggregate extraction.

CONCLUSION

The extractive industry provides essential building materials for residential development, infrastructure, health care facilities, education facilities and all other forms of built development. Extraction can only take place where resources occur and it is, therefore, tied to certain locations.

Aggregate extraction, without the implementation of mitigation measures, has the potential to cause adverse effects on the environment, visual amenity and residential amenity. These effects can be mitigated during the operational and restoration phases of extraction. It is considered that the economic and social benefits of aggregate extraction, a long-term secure supply of aggregates and valued added products should be balanced carefully against the potential for environmental and other effects.

The forthcoming draft county development plan should ensure that the extraction of aggregates can take place in suitable locations where resources exist without undue environmental effects. It is important to ensure that the future interpretation of county development plan policies does not result in the sterilisation of aggregate resources and does not prevent the secure, long-term supply of construction aggregates and value-added products such as concrete, blocks and road making materials.

Through this submission, Roadstone requests that the considerations set out in this submission are incorporated into the forthcoming draft development plan.

SUBMISSION TO MAYO ISSUES PAPER

Information about Keep Ireland Open

KIO is a voluntary organisation whose aim is to lobby for the legal right to reasonable access to the countryside which is the norm in virtually all European countries but is denied to us. Our membership covers a broad spectrum of recreational users of our countryside, rural organisations including An Oige, Scouting Ireland, Catholic Guide of Ireland, An Taisce, Friends of the Irish Environment, Federation of Local History Societies, Irish Hang Gliding & Paragliding & Irish Rural Link. See our web-site: www.keepirelandopen.org.

We are members of Comhairle na Tuaithe

We make this Submission as a national body but also on behalf of our members living in the county.

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

Other county plans

While you are obliged to take into account plans in adjoining counties, you may care to take into account plans in other counties particularly those within the Northern & Western Region

Review of Plans within the Region

We presume that you will be monitoring the reviews of Plan in Monaghan which has commenced and that you will liaise with their planners to ensure that the plans are compatible, where appropriate.

As our submission is very focused on issues of walking/cycling, public rights of way and better access to the countryside rather than answering the questions therein, we are basing our submission on a critique of the 2014 Plan.

CRITIQUE OF EXISTING PLAN

We presume that you will use the 2014 Plan as the basis for the new one as it contains much excellent material. It does, of course, require expansion and updating.

We would respectively point out that the Plan fails to comply with, have regard to/take into account:

Planning & Development Acts

Plans in adjoining counties(including Draft Monaghan Plan)

Development Plan Guidelines

Heritage Act 1995

The mention of a provision in the Plan, without comment, indicates our support for the wording with appropriate up-dating.

Counties in **bold** are adjoining and/or counties within the Region.

FORMAT

Contents We submit that as well as the main secs you should include sub-secs.

Index We submit that you should provide an Index as recommended in the Development Plan Guidelines (5.15). See Clare, DLR, Sth Tipp & Waterford.

Design and Development Standards We submit that these should dealt with at the end of each sec rather than in Vol 2 as this would make the plan more user friendly. At the very least the Pol Secs and Vol 2 should be cross referenced.

Layout We submit that this can be improved by including the Sec title & its number on each page.

Volume 1

Introduction

We submit that you should include:

- 1 The names of **adjoining counties**
- 2 The names of **counties within the Northern & Western Region**
- 3 *The Planning Act and Development Act 2000 Sec 9(6) requires that a **development plan shall**, as far as practicable, **be consistent with national plans**, policies, guidelines and strategies.*
- 4 *The Plan shall be in **conformity with the Ireland 2040 Our Plan** for the Northern & Western Region.*

5 *The Planning and Development Act 2000 Sec 15(2) requires a **two year Review** and that development plans should include a commitment to that effect.*

6 *The Planning and Development Act 2000 Sec 10.2(as amended) must include a statement which demonstrates that the development objectives in the Development Plan are consistent, as far practicable, with the **protection and conservation of the environment**.*

7 *The Planning and Development Act 2000 Sec 9(4) requires that the Plan **must have regard to plans in adjoining counties**.*

8 *This Plan shall **co-ordinate the objectives** in this plan with those in the adjoining counties, except where it is considered to be in appropriate or unfeasible and shall take into account any significant likely effects the implementation of the plan may have on the area of any adjoining county. Based on Wicklow 1.4 4th para 1st sentence & Carlow 1.1 1st para 2nd sentence.*

9 *The Plan shall be in conformity with the **RSES** for the Northern and Western Region when adopted.*

10 *Actively strive to secure the **financial resources** to implement the policies and objects of the Plan. Taken from Kerry 1.3 2nd para(7).*

2 Economic Development Strategy

Agriculture

AG-01 We submit that you **should add**: *Protect and conserve rural amenities, archaeological and natural heritage, visual amenities, eco-systems, landscape, scenic views from adverse impacts of agricultural practices and development particularly in high amenity areas and ensure that it is appropriate in nature and scale, and ensure that it does not have an undue negative impact on the scenic amenity of the countryside and identify mitigating measures where required. Integrate into the landscape, including the minimal use of signage. 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. Based on Laois 5.10 RUR13, Waterford 6.7.1 2nd para (a), (d) & (e) & Offaly 10.6 RDO4. **Also Roscommon 3.4.1 Obj 3.6 & 7, Monaghan 5.5.4 AGO 4, Leitrim 2.3 Pol 2b) & Cavan 3.4 EDO6 2nd sentence.***

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

1 *The Council recognises that increasing demand for recreational space, commonage and other **rough grazing land** requires that this land shall be regarded primarily as **a recreational resource**. Based on Kilkenny 6.2 Commonage Land & Nth Tipp Agriculture 4.4.1h).*

2 *The Council recognises that farmers should be encouraged to see themselves as **custodians of the countryside** and the rural landscape which are a valuable resource for present and future generations and provides an amenity for enjoyment of the general population. Based on **Cavan** 3.5 EDO6 1st sentence & **Leitrim** 3.7.2 2nd para under Pol 61 & 3.8.7 2nd para 2nd sentence.*

3 *Encourage, enable, **support**, facilitate and promote the provision, development and expansion **agri-tourism including** farmhouse accommodation, open/pet farms and horse trekking centres. Based on **Monaghan** 5.5.4 AGO 6, **Roscommon** 3.4.1 P 3.31 & 6.11.2 11th line, **Sligo** 4.3 6th para, **Galway** 11.5 Obj AFF 2e) & **Leitrim** 2.3m).*

4 *Ensure that all built elements of agri-tourism protect and conserve the landscape and the natural environment and are appropriately located, screened, designed and satisfactorily assimilated into the landscape and do not have an unduly negative impact on the **visual/scenic amenity** of the countryside or natural heritage and that they will not take away from the rural character and appearance of the area. Buildings in visually sensitive areas must address the surroundings. Based on **Sligo** 4.4 P TOU 3, **Leitrim** 2.3 Pol 2b) & 3.7.2 Pol 61 5th line & **Monaghan** 15.20 TO04.*

Forestry

We support both **Objs**

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

1 *Develop, promote, provide, protect, improve and encourage greater **public access** to new and existing forestry, both state and private, for recreational activities such as walking, cycling, orienteering, horse riding and other non-noise generating activities and the provision of bridle paths, 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 stakeholders and other agencies. Based on **Smarter Travel 2009-2020** Act 17 2nd sentence*

page 45, Westmeath 3.41 P 4,6.21 P 10 & 6.23 P 12 1st phrase Clare 9.3.9 10c), Limerick 6.11 Obj 031a), Laois 5.10 RUR4, Kilkenny 6.5 last para, Wexford 15.5 RS 12 & 14, Nth Tipp 4.5 EV27, Meath 9.7.8 OBJ7 & Sth Dublin 4.3.9.x. **Also Roscommon** 3.4.2 Pol 3.35 & 38, **Galway** 11.9 Pol AFF9 1st sentence & **Leitrim** 3.7.3 5th para 1st sentence.

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, **Sligo** 4.3.2 P FOR 3 & **Roscommon** 3.42 Pol 44 2nd sentence.

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 or recreational or tourist amenities 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. **Also** Westmeath 3.41 5, **Monaghan** 15.12 AFP 7 & **Leitrim** 4.4.7 3rd para 1st sentence 1st phrase.

Tourism

We submit that as this topic has much in common with Recreation they should be dealt with together preferably as a separate Chpt. See **DPG** 3.5 Box 3 B Economic Development 3rd pt, **Cavan** Chpt 9, DLR Sec 3, Kilkenny Chpt 7 & Wicklow Vol 1 Chpt 7.

TM-01 from *where* on 5th line We submit that this **should be re-positioned** in Vol 2 58 Tourism Development and replaced.

TM-03 We submit that this should **be re-positioned** in Chpt 3 Pedestrians & Cyclists and replaced by proposed additional Obj 23.

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

1 *Encourage, enable, support, facilitate, realise the potential of and **promote** rural tourism by the provision, development and expansion of such activities as walking, cycling, mountain and other off road biking, bridle paths, painting, photography, field studies, hill walking, adventure sports, hiking, back packing, rowing, orienteering, swimming in waterways, boating, bird watching, heritage, nature, maritime and wildlife trails, hang and para gliding, canoeing and kayaking, caving, mountaineering, rock climbing pony trekking, archaeological guided*

walks and eco-, geo- & green-tourism. All activities will be co-ordinated with adjoining counties. Based on **Monaghan** 5.5.4 AGO 6 & 15.12 AFP 5, **Roscommon** 3.4.1 P 3.31 & 3.5 P 3.64, **Cavan** 3.4 EDO 2 & EDP 4, **Galway** 11.5 Obj AFF 2e) & 4 & 4.14 Obj EDT17 & **Sligo** 4.4.4 last para 1st sentence.

2 **Safeguard tourism assets** from encroachment by inappropriate development. Taken from Sth Tipp 5.6.1 last para (iv).

We submit that you should **include an additional sub sec: Countryside Recreation** as the activities mentioned in the above proposed additional Obj can also be enjoyed by local people.

Objs

1 *Support development in co-operation with various stakeholders to maximise, promote, preserve, improve, enable, encourage public access to lakes, beaches, coastal, riverside, uplands and other areas that have been traditionally used for outdoor recreation and extend **recreational amenities** in accordance with the National Countryside Recreation Strategy. Based on **2000 Planning and Development Act Sec 10(2)(j)** **Sligo** 4.4.6 8th pt & 6.7.4 P OR 14 1st sentence 1st phrase, **Galway** 10.11 Pol RA 1 and many other counties,*

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

Extractive Industries

EI-01 We submit that you **should add:** *Protect, conserve, preserve and safeguard recorded monuments and areas in their vicinity, World Heritage Sites, archaeological sites and features and zones of archaeological potential, natural heritage, listed views and prospects, geological sites and areas of geological/geomorphological interest and areas of high amenity from the inappropriate development. Applicants must recognise that the aggregates(including mines), concrete products industry have a particularly sensitive role in relation to the environment. Any development of aggregate extraction, processing, delivery must be carried out so that it minimises their effect whether in respect of new quarries or extensions to existing ones. 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. A strictly*

precautionary approach will be taken where designated sites will be affected. Based on Donegal 7.1 Aim 2.1 & 2, Cavan 3.8 EDP6 & 7, Galway 2.9 RDP 14 1st & 2nd sentences & 6.21 Obj EQ 1, Roscommon 3.4.4 last para & 3.57 Monaghan 15.15 EIP 4 1st sentence down to Monuments on 4th line, Sligo 4.3.4 P MEQ 2 1st phrase & many other counties.

EI-02

We submit that you should **include additional 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 are adjacent to the development site. They shall be kept free from development as Rights of Way/Walking Routes. 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 ***Prohibit development** of aggregate extraction, processing and associated concrete production which **would impinge on existing public rights of way**, walking routes and satisfactorily address the potential impact on recreational or tourist activities and protect tourism amenities. Based on Monaghan 15.18 EIP 7, Sligo 4.3.4 P MEQ 2 last phrase & many other counties.*

Renewable Energy

RE-01 & RE-03

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

Wind Energy

1 ***Identify existing public rights of way** and established walking routes and maintain them free from development, preserve them as public rights of way or walking routes. Taken from Cavan 4.7.3 PIO117.8.*

2 *Take into account, when assessing planning applications, the impact on public access to the countryside including **public rights of way**, walking routes, recreational activities and amenities and the openness and visual amenity of the countryside and the impact on surrounding tourism The Council will liaise with Failte Ireland and regional and local tourism bodies and will consider any representations received. Based on*

DLR 8.2.10.1 last para 4th pt, Meath 11.15.1 1st para 4th pt, Laois 6.6.1.4 EN10 2nd sentence & Sth Tipp App 3 WIND 4 (xi) 1st sentence.

3 *All applications shall be accompanied with a LIA including an assessment of the **impact on any existing rights of way** and established walking routes.* Taken from Kilkenny 10.5.3 Landscape Impact Assessment 1st para 1st sentence.

4 *Planning applications will be assessed against the suitability of the site, having regard to other land use policies and the potential visual impact both on the site and over extensive areas and zones of visual influence including areas beyond the county boundary, in respect of landscape designations, heritage sites, recorded monuments, sensitive amenity areas and rural character, including the need to protect areas of important natural heritage from inappropriate development and measures to minimise the impact on the environment and also the size, scale and layout of the proposed development. Council may impose conditions regarding environmental management plans. The **siting and layout** of wind farms should be suited to the landscape setting and site context and should minimise visual impacts and should take advantage of existing screening and where possible should follow and respect existing landforms and landscape patterns and should follow best practice in the design and siting of turbines and all ancillary works in order to contribute to effective mitigation. Where impacts have been identified mitigation measures will be required which may include alterations to the layout, spacing, height and the number of turbines. The finish of turbines shall ensure minimum the visual impact and integrate with the landscape setting in so far as practicable. Ideally, they should be sited a background of a hill or elevated area. Non-linear type layouts are favoured. Wind farms should not be intervisible from one another.*

Based on **Galway** App 4 5.2.7c) 1st pt, 5.3.1 1st para, a) 2nd pt & h) & 1st sentence, **Leitrim** 3.11.5 Criteria 8th pt & 4.4.8 2nd para 1st sentence last phrase, & 2nd sentence 4th & 7th lines & many other counties.

Hydro Energy

5 *In assessing hydro energy schemes proposals the Council will take into account the **impact on public rights of way** and walking routes.* Taken from Meath 11.1.5.1 4th pt, Laois 6.6.1.1 HE1 & Carlow 6.3.2 Pol 6 2nd pt.

Solar

6 *In assessing development proposals ensure that it does not have a **negative effect** on the character of the landscape, natural heritage, views and prospects, scenic routes, archaeology, local amenities, tourism areas and the potential for mitigation through screening with hedges.* Based on Laois 6.6.1.3 Ground Mounted Arrays 6th & 8th pts, Fingal 7.3 EN14, Kildare 8.7 SE 1 2nd sentence & 2 1st & 5th pt 5th line, Sth Dublin 10.2.5 Pol 7 2nd sentence & Tipperary Renewable Energy Strategy App 1 6.8 3rd para © & Pol RE10.

Advertising & Signage

3 Infrastructure Strategy

Map 2 Strategic Transportation Network

Table 3 Amenity 1st & 2nd pts

We submit that you **should include**: *Examine the possibility of linking Ballindine(Mayo) with Miltown, Tuam and its environs to the NCN and/or the Tuam/Athenry cycle route.* Taken from **Galway** 5.1 National and Local Cycle Networks Cycle Routes 8th pt.

Land Use Integration & Sustainable Transport

As we can see no connection between these two topics we submit that the 2nd topic should be deleted from the title and that LS-03 should be re-positioned in Pedestrians & Cyclists and replaced by proposed additional Obj 1 in the case of *Smarter Travel* and by Obj 5 in the case of the *NCPF*.

Pedestrians & Cyclists

PC-01

We submit that:

A the reference to the *further development of the public footpath network* in line 2 **should be replaced**. See proposed additional Obj 6.

B Replace from *to* on line 7 to *Counties* on line 8 by: *Support, promote and actively encourage the provision, development, extension and design of off road interlinked cycleways and walkways, walking and cycling routes(mention routes), including medium and long distance walkways, in conjunction with IW, FI, and other stakeholders to link a*

strategic network of trails and in adjoining counties, including cross border counties in partnership with their councils, the state, private and voluntary sectors. Based on Roscommon 8.7.1 Pol 8.39, Monaghan 7.5 CWO 4, Sligo 4.4 P TOU 7 1st phrase & many other counties.

We submit that you should include additional Objs:

Physical Activity/Health

1 *Promote the development of walking and cycling by implementing, supporting, **promoting**, adhering to and facilitating the key principles, goals, targets, initiatives, strategies and actions of DoTT's Transport's "Smarter Travel Policy". Based on Leitrim 3.6.1 Pol 44, Monaghan 6.2 TRO 3, & many other counties.*

2 *Promote and encourage walking, rambling and cycling as healthy modes of transport and as healthy recreational activities, by securing, encouraging and facilitating the development of a network direct, comfortable, pleasant, convenient and safe cycle routes and public footpaths network that are suitable for all sections of the community and people of different generations and levels of fitness, to facilitate and contribute to individual **health and wellbeing** and to promote a more active lifestyle and to create a healthier population by providing quality green space. Based on Smarter Travel 2009 - 2020 Cycling and Walking 1st para 2nd sentence last phrase page 26, Leitrim 3.6.1 para below Pol 44 2, Roscommon 8.7.1 Pol 8.37, Sligo 8.3 P CW1, Cavan 4.4 PIO61 & many other counties.*

3 *Cycling and walking will be pivotal to achieving some of the goals in national **health** policies to promote physical activity to counteract the increasing the numbers at risk of chronic diseases such as obesity, heart disease and mental health. Taken from Smarter Travel 2009 - 2020 Cycling and Walking 2nd para.*

4 *Promote and facilitate the **development of cycle routes** in accordance with the National Cycle Scoping Study 2010. Taken from Louth 6.5.11 EDE 21.*

5 *Actively **support**, promote and implement the key **goals**, targets, recommendations, proposals, actions and relevant policies of the **NCPF***

2009 – 2020. Based on **Galway** 5.4 Obj 19 1st phrase, **Roscommon** 8.7.1 Pol 8.39, **Monaghan** 6.2 TRO 5 & many other counties.

Recreation - Walking

6 *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 rerouting 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.

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.

7 *In view of the obesity and diabetes crisis, support, improve, develop, expand, 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 & Dev 2nd sentence, Westmeath 8.13 O 13 last phrase & Louth 6.7.1 1st para.

A **Table** should be included

8 *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 Slanite** and the **Green Infrastructure Network** and existing or new public rights of way.* Taken from Fingal Chpt 5 Obj RF113.

9 **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.

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

Note Many counties employ one.

11 *The **Council will co-operate with relevant agencies**, both public and private, including the National Trails Office, FI, NWMWAC, Coillte, the Heritage Council, adjoining local authorities and local landowners, to support the development, maintenance and enhancement of hiking & walking routes - particularly in the uplands. Steps to encourage routes*

may include secure parking and publication of maps. Based on DLR 4.1.2.16 2nd to 4th sentences & Laois 5.11 TM21 1st sentence.

12 *Establish a **Recreational Trails Committee** to plan, develop and implement a recreational trail network throughout the county in association with relevant stakeholders, landowners and community interest groups and develop a recreational Trails Plan within the lifetime of the Plan. This plan shall set out a coordinated strategic framework for future recreational trail development.* Taken from Fingal 6.9 Objs ED66 & 67.

13 *Implement the relevant provisions in the **DoTT's Walking Policy** when published.* Taken from **Sligo** 8.3 P CW 11.

Note there is a commitment in **Smarter Travel 2009-2020** Art 16 last para 1st sentence to publish this.

14 *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.

15 *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 **Sligo** 6.7.4 P OR 22 1st sentence, **Monaghan** 7.5 CWO 5 & many other counties.

16 ***Protect listed walks** from development that creates or has the **potential to create dis-amenities.*** Taken from **Cavan** 9.4.1 2nd para.

17 *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.

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

Recreation - Cycling

19 *Promote, facilitate and encourage the development, enhancement and expansion of **safe** cycling facilities and cycle routes by facilitating*

the construction of cycleways. Promote and incorporate the objectives contained within the Government's National Cycle Policy Framework 2009-2012. Support the development of the National Cycle Network and enhance and maintain these routes with better sign posting, lighting and road surfaces, separation 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 & Pol 6.2 page 26, **Cavan** 4.1.2 Objs 2nd pt, **Leitrim** 3.10.8 Obj 113,

Roscommon 8.7.1 Pol 8.39, **Donegal** 4.1.3 T P41 & many other counties.

Recreation - Walking & Cycling

20 *Support and promote **activity tourism** through the development of a comprehensive **network of greenways, blueways** and other recreational opportunities linking parks and public open spaces to regional and national Greenway Networks and work with the NTA, local tourism bodies, FI, adjoining councils and all stakeholders to develop a co-ordinated approach to the selection, delivering and servicing of future greenway to facilitate the spread of parkland into urban areas and to achieve improve external linkages. Protect and promote them and provide linear parks to achieve and improve external linkages and corridors. Based on **Action Plan for Rural Development 2017** Table 1 Pillar 3 3rd pt, **Sligo** 4.4.6 Obj 1.5 3rd box 2nd pt, **Donegal** 9.3 Pols CCG P 18 & many other counties.*

21 *Walking and Cycling will be promoted, facilitated and encouraged in accordance with initiatives contained in "Smarter Travel 2009" by identifying and developing a network of safe cycle routes and footpaths on existing roads, and, in particular, between towns and villages. Ensure, where possible, that cycleways and footpaths are effectively separated from major vehicular carriageways. Provide, promote, improve and extend the network of off road cycle and walking routes on all new road improvement schemes (including regional and local roads, on roads being up-graded, to ensure personal **safety**, particularly at night and a more convenient, pleasant, attractive environment. Support the installation of infrastructure measures e.g new/wider pavements, road*

*crossings, retrofitted, if necessary, which would facilitate and encourage safe walking and cycling. Based on **Monaghan** 7.5 CWO 6 1st phrase, **Leitrim** 3.6.3 Pol 46, **Galway** 6.3.2 Obj RT44, **Roscommon** 8.7.1 Pol 8.42 1st sentence, **Sligo** 8.3 P CW 9 & many other counties,*

*22 **Signpost and waymark** Walking and Cycle Routes with appropriately designed quality signage and information boards so as to facilitate visitors. Based on **Sligo** 4.4 P TOU 4 1st phrase, **Monaghan** 7.5 CWO 6 2nd phrase, **Roscommon** 8.7.1 Pol 8.37, **Leitrim** 3.6.3 2nd para 3rd sentence & many other counties.*

*23 Create, **provide**, promote, improve, plan, develop, support, enhance, encourage, extend and facilitate walking, rambling, cycling and horse riding in conjunction the Irish Sports Council and other agencies and by identifying/defining more dedicated walking and cycling routes(named) to enable the creation of a high quality, coherent, integrated and comprehensive dedicated off road countryside network of cycling/walking routes, footpaths, greenways and tourist trails in rural areas that link communities to key destinations and amenities, including looped walks, local walks, community walks medium/long distance walks, established rights of way, through open spaces, strategic green corridors(including river corridors) and other off-road routes), particularly those with historic connections or associations or other areas of interest. Expand and extend existing routes by utilising links from residential areas to provide access to coasts, mountains, lakeshores, rivers and scenic areas. Bring mountain amenities closer to residential communities by promoting the establishment of a network of formal footpaths, off road paths and cycleways that are attractive and facilitate casual walkers and cyclists. Investigate the provision of dedicated cycle and pedestrian routes along routes of high amenity. Based on **DPG** 3.5 Box 3 B Infrastructure 3rd pt, **National Physical Activity Plan** App 1 36, **Roscommon** 8.7.1 pol 8.36 1st sentence, **Monaghan** 7.5 CWO 4, **Donegal** 4.1.3 Pol TP40, **Sligo** 4.4.6 Obj 1.5 3rd box 2nd pt & 8.3 P CW 9 & many other counties.*

*24 Exploit the tourist potential of walking, rambling and cycling routes by encouraging and promoting walking and cycling-based **tourism** for both international visitors and local tourists to attract activity and adventure tourists. Based on **Sligo** 4.4 P TOU 6 & many other counties*

*25 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).*

Based on **Action Plan for Rural Development 2017 Pillar 3**
Action 200, **Leitrim 3.6.3 Obj 29** & other counties.

26 *Provide **car parking** and/or lay-by 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 Nth Tipp 7.5.7 Obj INF 28 7th line, Kildare 14.12.1 CR 14 1st phrase, **Sligo 4.4. P TOU 4** last phrase & Longford 6.4 AM 3.

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

27 *Establish new Walkways and cycle routes on a **legal and permanent basis**.* Taken from Carlow 5.3.2 Pol 8 12 pt 1st line & Sth Dublin 2.2.14 2nd 15th para 1st line.

28 *Facilitate the **protection of walking and cycling routes**.* Taken from **Cavan 9.4.1 Objs 2nd pt.**

29 *Ensure that **development proposals protect the routes** of potential linkages (such as linear parks, footpaths trails, cycleways) through the subject site where the council considers that a strategic opportunity exists to provide a linkage in or between adjoining areas.* Taken from **Donegal 4.1.3 T P36.**

Rail

RL-02

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

1 **Protect established/historic railway corridors** for recreational development. *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.* Taken from **Donegal 4.1.3 Pol T P 30.**

2 **Actively encourage, support, promote and facilitate the development of disused railline from the Galway border south of Claremorris to Charlestown for greenways, walkways and cycleways and other recreational activity to develop a network including medium and long-**

*distance walking and cycling routes and bridle paths to improve access to rural tourist attractions, with related signage and waymarking. Based on **FI Strategy for Development of Cycle Tourism Executive Summary** 9th last line on page 26, **Smarter Travel 2009-2020 Act** 17 2nd sentence page 45, **Leitrim** 3.6.3 2nd para 4th sentence, **Roscommon** 8.7.1 Pol 8.39 1st sentence, **Sligo** 8.3 P CW 8 1st sentence & many other counties.*

*3 **Protect, enhance, conserve and, where appropriate restore, the conservation value of disused railway lines notwithstanding that they may be re-opened as railway lines.***

Information and Communication Technology

All Objs

Energy

EY-02 We submit that this should **be deleted** as it duplicated. See Renewable Energy RE-01 in Chpt 2.

EY-05

4 Environment, Heritage & Amenity Strategy

Coastal Zone Management & Protection

All Objs

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

*1 **Provide, support, actively promote, maintain, protect, improve and enhance access to the coast, beaches, seashore, coastal heritage and scenic landscapes in co-operation with landowners and local groups and with statutory and relevant organisations for recreational activities including walking, cycling, pony trekking, whale/dolphin watching and bird-watching, and should allow for further expansion and provide links to other activities and facilities 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 **Sligo** 4.4 P TOU 8 & 6.7.4 P OR 16, **Leitrim** 3.3.3 Pol 19 & many other counties.*

*2 **Prohibit inappropriate development** where such development would significantly interfere with the recreational use of beaches or which could cause damage to or degradation of beaches, estuaries or sand dunes, protected/designated landscapes, amenity areas and their*

*recreational and amenity values both for visitors and local people or where it might affect the character, quality and distinctiveness of seascapes. Protect, conserve, preserve and safeguard the character, visual, environmental and amenity values, quality and distinctiveness of coasts and seascapes as valuable local amenities and as a tourism resource, 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. Protect the structure and function of sand dunes and prohibit development that would damage their visual integrity. Based on **Sligo** 10.4.4 P DCZ 1 1st para, **Leitrim** 3.3.3 para under Pol 18 2nd & 3rd pts, **Donegal** 6.1.3 6, **Galway** 9.9 NHB 8 c), 10 1st & 3rd sentences and many other counties.*

Landscape Protection

LP-01 We submit that this should **be replaced by:** *Ensure the preservation, enhancement and protection of the uniqueness of a landscape character type by having regard to the character, value and sensitivity of the of a landscape when determining planning applications. Applications for development that would impact on landscape must be in accordance with the LCA. Ensure that development reflects and, where possible, reinforce the distinctiveness and sense of place of the landscape character types by taking into account elements such as geology scenic quality, historic heritage and tranquility. Ensure that proposed developments would not conflict with the policies and objectives set out in the Landscape Character Assessment/Classification and associated map in accordance with the Government's guidance on LCA and National Landscape Strategy. Ensure the preservation of the uniqueness of a landscape character type by having regard to the character, value, sensitivity and visual impact on the landscape when determining planning applications. Based on **Cavan** 8.7 NHEP19 & NHEO22, **Monaghan** 4.4 LPP 1 & many other counties.*

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

1 Provide **public access** to interesting and attractive landscape or to semi-natural areas. Taken from Fingal 9.2 High Amenity Zoning last pt.

2 *Where possible secure access to commonage and other hill land. Taken from **Sligo** 7.4 P CAP 7.*

3 *Preserve, maintain, enhance and protect the amenity value, visual integrity and rural character of open/unfenced landscape of the hills, mountains and other **upland areas**, areas of **rough grazing** and commonage. 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. Protect the positive contribution that views across adjacent lowlands areas and landmarks make to the overall landscape character. Have particular regard to the potential impacts of development on sensitive upland areas and materially consider the difficulty of establishing and maintaining screening vegetation. Based on Laois 7.19 LS01 1st phrase, 2 & 30, Kilkenny 8.2.10 DMS 6th pt & 14.8.3 LU 1, 4 & 5 & Wexford 14.4.3 LO3.*

4 *Preserve the status of **traditionally open/unfenced landscapes** including commonages and other hill land. Based on **Galway** 9.11 Obj LCM 3 1st sentence, **Sligo** 7.4 P LCAP 6 1st sentence & other counties.*

5 ***Protect**, conserve, preserve, maintain and enhance the visual integrity, uniformity, regional distinctiveness, character, scenic quality, amenity and recreational values and the visual quality of areas of important and outstanding, highly **sensitive**, natural, unspoilt and open **landscapes**, scenic areas, high amenity areas and the environs of archaeological or historic sites from intrusive, inappropriate, injurious or unsympathetic developments and reinforce their character and distinctiveness by prohibiting development where it would be injurious to or detract from natural amenities. Maintain the visual integrity of areas of exceptional value and high sensitivity. Based on **Donegal** 6.1.2 P 5 1st sentence 1st phrase & 6.1.3.10, **Galway** 10.11 Pol RA 2 & many other counties.*

Map 3A

Views and Prospects

VP-01 We submit that this should **be replaced by**: *Protect, preserve, safeguard, improve, enhance and conserve the character and quality of views, focal points and prospects, visual linkages between established landmarks and landscape features and designated Scenic Routes, or on views to and from places of natural beauty or interest to recorded monuments or when viewed from the public realm and particularly from adjoining public roads(although not restricted thereto) and river valleys, to or from the sea, lakes, lakeshores, rivers, unspoilt mountains, uplands, coastal landscape, historic sites, views of historic significance, protected structures, natural beauty, of high or special amenity value or interest by prohibiting intrusive and insensitive levels development that would interfere with the character and visual amenity of the landscape or adversely affect tourism and structures and eyesores and by ensuring that structures or other developments do not seriously obstruct these views. Applicants must specify materials to be used demonstrate that proposed development does not negatively impact on the character of a scenic route and that the views towards visually vulnerable or sensitive areas are not obstructed or degraded. Protect scenic amenity routes from insensitive development by integrating them into landscape areas. Curtail development along river banks that could cumulatively affect the quality of a designated view. Applicants in the environs of a scenic route and/or an area with important views and prospects must demonstrate that there be no adverse obstruction or degradation of views towards and from vulnerable landscape features and that the design, site layout and landscape of the proposed development must be appropriate, along with mitigation measures, to prevent significant alterations to the appearance and character of the area. Due regard will be paid in assessing applications to the span and scope of the view/prospect and the location of the development within that view and prospect. Ensure that developments in river valleys will not adversely affect or detract from protected views (especially from bridges) or distinctive linear sections of river valleys(including floodplains when viewed from settlements. In evaluating planning applications in the foreground of protected views and/or prospects consideration will be given to the effect of such development. Careful management and special controls will be attached to permissions to maintain their inherent interests. Encourage appropriate landscape and screen planting for existing or proposed developments along scenic routes. Based on **Sligo** 7.4 P LCAP 3 1st sentence 1st phrase, **Roscommon** 7.6 Obj 7.40, **Cavan** 8.8.1 NHEO28 to 30, **Leitrim** 3.8.9 Pol 102 & 4.1.1 1st para 3rd pt, **Galway** 9.11 Pol LCM 1 4th line & 9.13 1st sentence & many other counties.*

Heritage

We submit that this should be re-positioned on Chpt 4.

Map 4 Views & Prospects

Natural Heritage

NH-01 a)

We submit that you should **include an additional Obj:**

Prohibit intrusive development that would detrimentally impact on natural heritage which could or might have a negative impact on natural amenity assets or natural heritage features or might unduly damage or take away from its character. Promote appropriate enhancement of the natural environment as an integral part of development. Engage with stakeholders, including local communities, to protect, conserve, preserve, manage, enhance, safeguard, facilitate, maintain and, where appropriate restore, visual and scenic amenities, the quality and character of the natural heritage, natural heritage features and natural environment including rivers, streams and other waterways, wetlands, woodlands and forests, 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 them, for the benefit and enjoyment of future generations while maximising the recreational amenity, tourism potential and quality of life for present generation 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. Based on DPG 3.5 Box 3 Environment, Heritage & Amenities last pt, 2000 Planning & Development Act Sec 10.2, Sligo 7.1 P NH 1, Cavan 8.2 NHEP1, Galway 4.14 Pol EDT 1, 7.1 P1, 9.1 Pol HL 1 & 9.3 pol 4, 9.9 Pol NHB1, Leitrim 1.10.2 b, 3.8.1 1st para 3rd pt & 2nd para i to iii, Monaghan 4.6.7 BDP 1 & 8.11.1 1st para last sentence, Donegal 6.1 Aim, Roscommon 3.4.4 4th para 2nd line & many other counties.

e) We submit that this should be **re-located** in a separate sub sec entitled: Geology

AND

that:

A It should be replaced by: *Recognising the importance of County Geological Sites and their significant geological value work with stakeholders, consult with the GSI and be in accordance with the National Heritage Plan and the "Geological Heritage Guidelines for the Extractive Industry" to protect sites of geological or geomorphological*

*interest from inappropriate development by prohibiting development at or in the vicinity of a site that would detract from their heritage or would damage or threaten their integrity value. Preserve, enhance, maintain, manage, conserve and where appropriate restore the character conservation value and integrity of these sites for their amenity, scientific, heritage and historic values(including County Geological Sites and sites that may become designated), proposed NHA's, areas near site and areas of geomorphological interest Ensure that any plan or project affecting karst formations or other important geological and geomorphological systems are adequately assessed for their potential geophysical or ecological impacts. Based on **Planning & Development Act 2000** First Sch Part IV 6, **Galway** 9.9 Pol NHB 5 & Obj NHB 4, **Roscommon** 7.2 Obj 7.3, **Sligo** 7.1.8 O SGI 1, **Cavan** 8.5 NHEP13 1st part, **Leitrim** 3.8.3.8 Objs 71 & 72 & many other counties.*

B It should **include an additional Obj**: *Provide, promote, encourage, facilitate and support **access and public rights of way** to geological and geo-morphological features.* Based on **Kilkenny** 8.2.4 Dms last phrase, **Monaghan** 7.4 RAO 9, **Fingal** 9.3 Obj NH 31, **Galway** 9.9 Pol NHB 5 & **Sligo** 4.4.1 P TOU 8.

f) 1st phrase

NH-02

Archaeological Heritage

AoH-01 a) We submit that this should be merged with h) & App 5 Archaeological Assessment last para and **replaced by**: *Recognising that archaeology is an important element in long term economic development by promoting, protecting, through the planning process, supporting, conserving, sympathetically enhancing, preserving, managing and safeguarding for present and future generations, in consultation with the DoAHG and other relevant bodies, archaeological heritage as defined in the Heritage Act, including the intrinsic value, character, amenity, visual integrity, context and settings of National/Recorded Monuments, Zones of Archaeological Notification or newly-discovered archaeological sites and/or sub-surface archaeological remains, of known and unknown archaeological areas(including areas or zones of archaeological potential and areas of special archaeological interest), sites and features(and their settings, either above or below ground), in the ownership or guardianship of the State or the Council, including those identified in the RMP, RHM & SMR, castles, monuments and features of*

historic interest National Monuments that are the subject to Preservation Orders by prohibiting development which might be In general, developments within or adjacent to sites or which might affect them and in particular those within a 20m radius of National Monuments included in the RMP and Zones of Archaeological Potential will not be permitted and proposed development within 75m will be discouraged. Extend this protection to cover additions or alterations that may arise during the adoption of this Plan and impose conditions on development that might impact on sites of archaeological potential to ensure that appropriate measures are taken and that archaeology is suitable integrated into new development in co-operation with the relevant Government Department. Developments which would injure or affect the settings and character of sites or which would be seriously injurious to their cultural value, will be prohibited within areas of archaeological potential and within close proximity of recorded monuments and they will take account of the archaeological heritage of the area and will take cognisance of the potential for subsurface archaeology. Because development can impact on the visual appreciation, setting and amenity of recorded monuments these impacts should be adequately assessed, and where possible, eliminated or minimised. Based on DPG 4.27 1st pt, Cavan 7.5.2 Pol BHP5, Monaghan AHO 1 & 2 & AHP 1 1st phrase, Sligo 7.2 P AH 1, 7.2.3 1st para 1st & 2nd sentences & P AH 3 1st sentence, Donegal 6.3.2 AH 01 & 6.3.3 AH P3 & 4, Galway 9.7 Pol ARC 1, 4 & 5, Roscommon 6.7 Pol 6.9, Leitrim 1.10.2h), 3.9.8 Pol 106 & 1st para 1st sentence & 2nd para 1st sentence & many other counties.

b) & c) We submit that these should be **deleted** as they are duplicated in Vol 2 App 5 Archaeological Assessment

f) We submit that this **should be re-positioned** in an additional sub sec entitled: World Heritage Sites

g) 1st phrase We submit that this **should be replaced by:**
Recognising the importance of archaeology and National Monuments as part of our heritage and an important element in long term economic development, promote, enhance, facilitate, encourage, support, improve and protect public access to National Monuments, Archaeological Sites, castles, sites of historic interest and to archaeological landscapes, in the direct ownership, guardianship or control of the Council, and/or the State or private ownership, including those listed in the RMP, in co-operation with landowners and promote walking routes thereto. Information on

access to sites will be made be available on the Council's web-site.(Insert address). Based on **Leitrim** 1.10.2h), **Sligo** 7.2 P AH 6, **Monaghan** 7.4 Obj 9 & many other counties.

h) We submit that this **should be re-positioned** in an additional sub sec entitled: *Historic Graveyards and Burial Grounds* and that:
A it should be replaced by: *Protect, preserve, enhance, conserve and maintain archaeological/historic graveyards and historic burial grounds(including those identified in the RPM) and encourage and promote local involvement and community stewardship in the care, 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 **Leitrim** 3.4.5 1st para 1st sentence & 3.4.5 Pol 28 & 29, **Roscommon** 8.8 Pol 8.46, **Galway** 9.7 Obj ARC 4 & other counties.

B We submit that you should **include an additional Obj:** *Provide **public access** to graveyards.* Taken from Westmeath 5.33 P 4 last phrase.

We submit that you should **include an additional Obj:**
*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.

Natural Recreation, Amenities & Open Space

a We submit that this **should be re-positioned** in Coastal Zone Management & Protection

b We submit that this **should be re-positioned** in Chpt 2 Forestry

Access to Heritage and Amenities

a

b 1st sentence

2nd sentence We submit that this should be **re-positioned** in Vol 2 40. Public Rights of Way & Fencing

c We submit that this should be re-positioned as above

AC-03 We submit that this should be **re-positioned** in Coastal Zone Management & Protection

We submit that you should **include an additional Obj:**

*Recognizing the role played by natural amenities and landscapes as major resources for visitors and local people and as part of our heritage, identify, provide, support, maintain, actively promote, encourage, protect, preserve, improve, safeguard and enhance **public access** to heritage sites and features, natural heritage and amenities including Natura 2000 sites, nature reserves mountains, uplands, moorlands, forests, rivers, lakes, valleys, scenic areas, areas of natural beauty and other natural amenities for 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 and by designating traditional walking routes thereto as public rights of way. This will be done in co-operation with state agencies, landowners, community groups other interested bodies and local community groups. Based on **Sligo** 4.4 P TOU 5 1st para & 2nd para 2nd sentence & 8 & 6.7.4 P OR 16, **Monaghan** 7.4 Obj RAO 9, **Leitrim** 1.10.2h) & many other counties.*

We submit that you should include additional sub secs:

A Eskers

Objs

1 *Increase cycling and **pedestrian access** and maintain esker heritage.*

Taken from Westmeath 5.10 2.

2 ***Protect**, preserve and conserve the landscape and natural heritage and geo-diversity values of esker systems from inappropriate development. Ensure that any plan or project affecting eskers is adequately assessed with regard to their potential impact on the environment. Taken from Laois 7.22 ESK1. **Also Galway** 9.9 Obj NHB 4.*

B Green Infrastructure

Objs

1 ***Prepare a comprehensive Green Infrastructure Strategy**, within the lifetime of the Plan, and support its implementation and development so that it will allow the provision, protection and management of green spaces. The Strategy must integrate policies and objectives including natural heritage, parks and open spaces and archaeology to allow a*

strategic approach to green space planning. It must protect and enhance eco-system services and contribute to a high quality environment and guide, assist and facilitate the development of a countrywide coherent integrated and evolving network that can be connected to an inter-county and regional network of green corridors to provide amenity areas by the linking of existing fragments of green space and focusing on linear features such as canals, river corridors and walking paths to form a “necklace” effect and by incorporating items of historic or heritage importance as amenity features Fully recognise the cumulative positive impact generated by creating connectivity between open spaces, rivers, wetlands, woodlands, mountains and coastal areas that will form the basis for the identification, protection, enhancement, expansion, and management of the GI network and which reflects a long term perspective. GIS will be developed and implemented in accordance with international best practice and emerging national guidance and in consultation with key stakeholders including the public, adjoining councils, BnaM, Coillte, NPWS, WI, farmers, community groups and NGOs. Based on Wexford 14.3.2 1st para last sentence 1st phrase, 2nd para 1st, 2nd, 4th & 5th pts & 14.3 Obj GI01, DLR 4.2.1.1 text 3rd sentence, Sth Dublin 8.0 Obj 2, Action & 8.1.0 Obj 7, Offaly 7.7 GIO 01 & 04, Cavan 8.11 NHE046, Sligo 7. Heritage General Obj 3 & Fingal 8.3 Obj GI10 1st phrase.

*2 **Provide**, develop and promote an attractive and integrated safe **network of paths and cycle tracks** in order to facilitate retain, improve and enhance accessibility to Green Infrastructure linking key green space sites, green corridors, parks and open spaces and heritage asset, to improve quality of life for both visitors and inhabitants and ensure the provision of recreational amenities. Require the integration of Green Infrastructure in all areas of public space. Conserve, enhance, manage, protect, facilitate, encourage and improve the green infrastructure network, in consultation with relevant stakeholders. Based on Clare 14.4.27a) 1st phrase & b), Sth Dublin 8.1.0 Obj10, Kildare 13.10 GI 7, Monaghan Green Infrastructure 4.10.1 GIO 3, Wicklow 10.3.5 NH35 1st phrase & NH36 3rd line.*

*3 **Protect**, conserve, maintain, manage, facilitate, improve and enhance the green infrastructure network in consultation with relevant stakeholders by resisting and **restricting development** that would damage, degrade, fragment or prejudice it and recognise its health benefits and environmental value through the integration of GI planning*

*and development in the planning process. Based on Laois 7.12 NH9 1st phrase, Kildare 13.10 GI 1, **Monaghan** 4.10.1 Pol 1, DLR 4.2.1.1 Pol OSR1, Sth Dublin 8.1.0 Obj 3, Fingal 8.2 Obj GI06, Kerry 10.9 NE-42 & **Galway** 9.9 Pol NHB 3.*

*4 **Ensure green infrastructure protection and provision promotes pedestrian access and cycling.** Taken from Fingal 8.2 Obj GI07 1st phrase.*

C Inland Waterways

Tables

1 The main rivers See **Monaghan** 4.6.6 1st para 1st & 2nd sentences, **Roscommon** 7.4 T 7.2 & M 14 & **Sligo** 4.4.1 5th para 1st sentence.

2 The main lakes See **Cavan** 8.8.1 & Map 11, **Monaghan** 4.9.8 1st para, **Roscommon** 7.4 M 14, **Sligo** 4.4.1 5th para & 7.1.6 2nd sentence.

Objs

1 *In partnership with the NPWS, WI, Councils, community groups and other relevant stakeholders, identify, provide, preserve, **protect**, promote, encourage, enhance, develop, facilitate, increase and improve public access to and around lakes, rivers(named) canals and waterway corridors (including rivers and streams). Require that land adjacent to river and canal banks and lakeshores be reserved/preserved for public access by preserving an undisturbed edge or buffer zone between new development and river corridors and other water bodies. Based on **National Heritage Plan** 4.17, **Cavan** 8.9 NHEP21, **Galway** 9.3.4.1 HL55, **Monaghan** 7.4 RAO 9, **Leitrim** 3.10.3 Obj 100 & 3.10.4 Pol 106 & many other counties.*

2 ***Provide**, create, protect, maintain and facilitate trails, preferably off-road, **for walking, cycling** and land-based activities (including wildlife/bird watching and other non-noise generating recreational activities) as amenity for visitors and local people focusing on linear features such as canal and river banks and walking paths of canals and other waterways including rivers(named, in co-operation with landowners, WI, NPWS, Government Departments, community groups other Councils and all stakeholders. Encourage the retention of existing walkways along lakes and rivers. Based on Longford 6.2.2.7 ILW 9, **Leitrim** 3.6.3 Obj 29, Kildare 5.24 ECD 46,*

14.12.1 CR 7, Westmeath 5.16 P 14 2nd sentence & **Cavan** 8.9 NHEP21 7th pt.

3 *In areas adjacent to inland waterways, including lakes canals and rivers, where planning permission is sought, conditions may be attached requiring the retention of or **creation of public access** to facilitate the creation of or expansion of walking/cycling routes. Based on Longford 5.1.3 2nd para 1st sentence & 6.2.2.7 ILW5 2nd sentence.*

4 *Reserve, where feasible, land along riparian corridors and land adjacent to river banks and lakes to provide **public access to facilitate the creation of linear parks** and to facilitate the provision of walking/cycling routes along canals and watercourses. Promote and facilitate the creation of waterside linear parks to link with existing parks and open spaces. Require that development along rivers set aside land for pedestrian recreational routes. Based on Westmeath 3.16 P 8, Carlow 8.8 Pol 2 5th pt 1st phrase, Kildare 5.24 ECD 50, **Leitrim** 3.10.3 2nd para & Westmeath 6.2.7 O 5.*

5 *Recognising the importance of inland waterways, both navigable and unnavigable, work with State Agencies, landowners, local communities and other relevant groups/stakeholders to **protect**, manage, maintain, preserve, conserve and enhance rivers, river valleys, streams, lakes, springs and associated undeveloped riparian strips/zones, buffer zones distinctive linear sections of water corridors, canal and river banks and river valleys from degradation and damage and the visual impact of dispersed and highly visible development that could adversely affect them by compromising their visual integrity, natural heritage, aesthetic or landscape values and the natural characteristics and features and recognise and promote them as natural environmental assets and key elements in the green infrastructure and maintaining free from inappropriate development. Keep them in an open state and in a natural condition by discouraging culverting or realignment and in certain instances by uncovering existing culverts. Based on **Roscommon** 7.4 Pol Obj 7.30, **Leitrim** 4.1.1 4th para 8, **Sligo** 7.1.6 Riparian zones 1st para 2nd sentence, 2nd para 1st sentence & P INW 2 last phrase, **Cavan** 8.9 NHEO39, NHEP21 & 13.10.2 GI 23, **Galway** 8.7 Obj FI 3 & 9.9 Pol NHB 4 & many other counties.*

6 ***Protect** the amenity and recreational value of walking and cycling routes by prohibiting the intrusion of development along public walking routes and public rights of way. Based on Westmeath 5.16 P RLC14 2nd sentence & Carlow 5.3.2 Pol 8 7th pt.*

7 *Development proposals must demonstrate that they will not compromise a river's function as a **green infrastructure corridor**.* Taken from Kilkenny 8.2.6 DMS last pt.

8 *Ensure that **new development** will not have a **negative impact on established walking routes** along inland waterways.* Taken from Kildare 14.12.2 RW 2.

D ISLANDS

Objs

1 *Support, promote and preserve **public access to islands**(including uninhabited ones) in co-operation with private landowners, for recreational users, and facilitate the development of green tourism which draws on the archaeological wealth of islands.* Based on Clare 12.3.17 16c), Cork 4.10 RCI 10 4, **Sligo** 4.4 P TOU 8 & 9, **Galway** 4.14 Obj EDT 21 & **Donegal** 8.1.3 P4.

2 ***Protect** and enhance the landscape character, exceptional landscape value and archaeological heritage of islands and safeguard their integrity.* Based on **Donegal** 7.1.3 NH P16 1st sentence 1st phrase, **Galway** 4.14 Obj EDT 21 & other counties.

3 *Recognising the historic and scenic importance of islands **protect** them from inappropriate development that will detract from their significant archaeological and natural heritage values, whether on the islands themselves or at locations that interferes with their integrity and setting and actively encourage and assist conservation works by the NPWS.* Based on Westmeath 6.23 P 7 & 6.27 P 1 & Longford 6.2.2.7 ILW 14.

E MASS ROCKS & HOLY WELLS

Obj

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

F WETLANDS

Objs

1 *In partnership with the NPWS, WI and other stakeholders facilitate **public access** to wetlands and support and protect the recreational, tourism and amenity potential of wetlands and provide for an intrinsic network.* Based on Kerry 10.6 NE 29, Meath 9.7.10 POL21, Carlow 9.1 Pol 1 7th pt & Kilkenny 8.2.6 last para last sentence.

2 *Ensure that the impacts on archaeology are taken into consideration when assessing development proposals involving drainage or loss of wetlands and **protect**, conserve, manage and enhance existing wetlands (including fens, estuarine marshland and turloughs) which are vital green infrastructure, from destruction, infilling, fragmentation, degradation and other inappropriate development and seek to protect and conserve their quality, character and features by controlling adjacent development by use of buffer zones.* Taken from **Cavan** 8.3 NHE02 & 8.5.2 NHEP16, **Galway** 8.7 Obj FL3 & 9.9 Pol NHB 4 & many other counties.

5 Social Infrastructure & Community Development Strategy

We submit that you should **include an additional sub sec** entitled *Golf Courses*

Obj

***Identify public** rights of way and walking routes prior to development.*

Based on Sth Dublin 11.5.5(ii) last para & Kildare 14.12.2 RW 3 4th line.

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

Appendix 5 Statement of Implementation of Ministerial Guidelines

Appendix 6 Legislative and Policy Framework Documents

Volume 2

40 Public Rights of Way & Fencing

As we can't see any connection between these two topics, we submit that 40.3 & 40.3.1 should be the subject of an additional sub sec in Chpt 4 Environment, Heritage and Amenity Strategy.

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

1 ***Public Rights of Way have existed over the centuries** and constitute an important recreational amenity for local people and visitors and an economic and social asset. They enable the enjoyment of high quality landscape, natural and archaeological heritage and provide links to valuable such as lakes bogs and forests and places of natural beauty.*

Council recognises the importance of protecting and maintaining them.

Based on

Sligo 6.7.4 Public rights of way 1st para 1st & 2nd sentences, **Galway** 10.12, **Leitrim** 3.6.1 3rd para 4th line, **Cavan** 8.10 1st para 1st sentence & 1st para 2nd sentence 1st phrase, **Monaghan** 7.4.1 2nd sentence & last sentence 1st phrase.

2 A PROW or highway is a physically defined route over which the public have a right of passage even if the route is not in public ownership. It is described as “a user as of right” and confers an unrestricted right of the general public to pass and repass at all times of the day or night and at all seasons without notice to, or permission from the landowner. Based on **Sligo** 6.7.4 Public rights of way 1st para last sentence, Wicklow Vol 1 10.3.8 2nd para 2nd & 4th sentences & **Cavan** 8.10 1st para 3rd sentence.

3 The 2010 Planning and Development (Amendment) Act Sec 7(b)(ii)(o) requires that: *The preservation of public rights of way which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility, which public rights 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 appended to the development plan.* Taken from **Monaghan** 7.4.1 1st sentence.

4 It is intended that listing and mapping will preserve Public Rights of Ways for recreational purposes for current and future generations. Taken from Kerry 9.10 2nd para last sentence.

5 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.

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** 10.13, 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.

3 We submit that 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.

4 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 **Sligo** 6.7.4 Public rights of sentences & **Cavan** 8.10 2nd para last sentence.

6 There is an **excellent modus operandi for listing** taken from **Cavan** 8.10 NHEO45: *Identify the existing public rights of way which give access to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity using the following methodology:*

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.

7 Carry out further research regarding the identification and mapping of other potential public rights of way. Such research will be carried out in consultation with elected representatives, members of

the public, recreational organisations, relevant statutory bodies, landowners and farming organisations for consideration for inclusion of any further identified public rights of way by way of variation in accordance with Sec 13 of the Planning and Development Act 2000(as amended). Part of such project may give rise to proposals for the creation of new public rights of way and/or extending /re-routing of existing public rights of way in accordance with respective provisions of either Secs 206 or 207 of the Act. Taken from Wicklow 1Vol 1 0.3.8 NH 47.

Also Sligo 6.7.4 Public rights of way para below Table 6.A last sentence & P OR 18 1st phrase.

40.1 1st sentence We submit that this **should be replaced by:**
Recognizing the importance of maintaining public rights of way public rights especially in tourist and coastal areas and those which provide access to archaeological sites, National Monuments, seashores, lakeshores, riverbanks, upland areas, water corridors or other places of natural beauty or recreational utility and to encourage cycling and walking and maintain, preserve, protect, conserve, enhance, support, promote and improve them for the common good. Ensure that they are effectively maintained by controlling undergrowth, trees and bushes.
Based on **Galway 10.13 Pol PRW 1 Monaghan 7.4.1 RAO 10, Roscommon 8.6 Obj 8.5 & 8.7.1 Pol 8.37 & many other counties.**

2nd sentence We submit that this **should be re-positioned** as a separate pt and replaced by: *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 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, sea shores, lake shores, river banks, forests, heritage and scientific sites, areas of historic or archaeological importance, National Monuments, to create a meaningful network. Promote their greater use and designate traditional walking routes to the coast as public rights of way. Provide linkages from built up areas to the countryside and to 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, Carlow 8.12 Obj 4 1st pt, Westmeath 7.15 O 3 1st sentence and excluding 2nd phrase, Sth Tipp 6.3.7 Pol AEH10, Longford

6.4 AM 6 1st sentence 1st line, DLR 4.1.2.3 LHB14 2nd & 3rd pts, Kilkenny 7.3.5 2nd para 3rd line, **Leitrim** 3.10.7 Obj 108, Fingal 5.2 Obj RF118 1st line, Kildare 14.12.2 RW1 7th line, Laois 13.12 P93, **Roscommon** 8.7.1 6th para, Limerick 6.10.3 Obj COM 030 & **Monaghan** 8.12 REO 6 2nd phrase.

40.2 We submit that this should be replaced by: *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 **Leitrim** 4.5.12 and many other counties.

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

1 *Provide and where necessary improve **signposting** and waymarking on all public rights of way.* Based on **Sligo** 6.7.4 P OR 19 & **Roscommon** 8.7.1 Pol 8.3.7.

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.

2 *Protect and **promote Greenways and consider designating them as public rights of way.*** Based on Laois 7.21 PRW5 1st phrase & **Sligo** 6.7.4 P OR 20.

3 ***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.

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

5 **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.

6 **Prohibit development** and keep free from obstruction public walking routes and public rights of way, particularly those at seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity and take legal action if necessary, to prevent any attempt to close them off. Based on DLR 4.1.2.13 LHB14 4th pt & Wexford 15.9 Obj RS36 **Also Leitrim** 3.10.7 Obj 110.

7 Look favourably on planning applications which include proposals to **improve the condition and appearance** of existing rights of way. Taken from DLR 4.1.2.3 LHB14 6th pt, Laois 7.21 PRW5 2nd phrase, Carlow 8.12 Pol 6 7th pt & Kildare 14.12.2 RW 4.

8 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. **Also Cavan** 8.10 NHEO44.

54 Renewable Energy

All

55 Telecommunications

55.2

55.3

1st & 2nd pts

4th pt We submit that this **should be replaced by: Existing Public Rights of Way** and established walking routes will be identified 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. Based on Roscommon 4.7 Pol 4.70 & Cavan 4.8 PIO123.

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

5th & last pts

57 Extractive Industries

57.2

58 Tourism Development

We submit that this **should be replaced by**: *Prohibit developments and other activities associated with tourism which are incompatible with the enhancement, preservation, and protection of the environment by strictly controlling all tourism and recreational development that might be detrimental to scenic and heritage assets, proposed designated sites, sensitive landscape and visually vulnerable areas, so that they can be enjoyed and cherished undiminished for future generations. Ensure that development is appropriate to the traditional character of the area and have particular regard to its scale, design, nature, balance and pertaining environment conditions and sensitivity and which would materially detract from visual/scenic amenities or to the visual setting of, or the views to be had significant tourist attractions. They must be sited and designed to the highest quality and standards and must protect environmentally sensitive areas as identified in the LCA. They must be readily absorbed into their surroundings by taking advantage of existing vegetation and/or topography, and be unobtrusive and satisfactorily integrated into the landscape so that they do not have an undue negative effect on it or damage its integrity either now or at some time in the future. Proposed development must demonstrate that it can be accommodated without damage to the environment including the integrity of Natura 2000 network, residential amenity, the countryside or general amenities, natural and archaeological heritage features and areas of special amenity or have a negative impact on the appearance and character of landscapes, rivers or forests. Based on **Sligo** 4.3.1 P RDD 1, 4.4 P TOU 1 2nd para, **Donegal** 8.1.3 P3, **Galway** 4.14 Pol EDT 1 & Obj EDT 1 4th pt, **Roscommon** 3.5 Pol 3.77, **Monaghan** 15.20 T003 & many other counties.*

Appendix 5 Environmental Assessments

Archaeological Assessment

All

KEEP IRELAND OPEN



Mary Killoran
 Planning and Development
 Forward Planning Section
 Mayo County Council
 Aras an Chontae
 The Mall, Castlebar
 Co. Mayo

14 June 2018

Re: Review of Mayo County Development Plan

Dear Ms Kiloran

Inland Fisheries Ireland (IFI) is the state body responsible for the protection, management and conservation of the inland fisheries and sea angling resource in Ireland. Protection of the aquatic environment and habitat is a vitally important element of IFI's work. County Mayo contains some of the most important game fisheries in Ireland. The River Moy is one of the most productive salmon fisheries in Western Europe and has immense value for the local economy and for angling tourism. There are a number of other lake and river systems which support valuable salmonid fisheries including Loughs Conn, Cullin, Mask, Carra, Carrowmore and Beltra. The Mayo coast line provides a variety of shore fishing and angling resources with charter boat available. County Mayo contains a major fisheries research centre based at Burrishoole and operated by the Marine Institute.

The protection of water quality and fisheries habitat should be a major consideration in respect of all future development. An IFI commissioned study "*A Socio-Economic Study of Recreational Angling in Ireland*" found that up to 406,000 individuals participated in recreational angling in Ireland in 2012 and total direct expenditure on recreational angling in 2012 was estimated to be €555 million. IFI market and promote angling in County Mayo and have developed access routes, including disabled access, stiles, bridges and fishing stands for anglers

It is important that some water based recreational and tourism activities are not developed at the expense of others. A number of complaints have been made by anglers in recent years in relation to power boats and jet skis interfering with angling and, in some instances, anglers being forced to leave designated fisheries as a result of inappropriate activities. A number of these complaints related to Loughs Muck, Conn and the River Moy. The Development Plan should address the need to regulate these activities, and identify and designate specific locations areas where such activities will not interfere with established angling activity.

It is also important that the development of public access routes adjacent to recognised angling locations is given careful consideration to ensure no conflict occurs between the existing use of the angling facility and public health and safety, particularly in the case of fly casting areas such as the River Moy in Ballina. Where possible, consideration should also be given to providing parking areas at key locations where new roads or road improvements are being planned.

Riparian and Aquatic Habitat:

A policy in relation to aquatic habitat protection should be included in the Development Plan. The Council under the terms of the EU Water Framework Directive (WFD) (2000/60/EC) is legally obliged to protect the ecological status of river catchments. To ensure that impacts from development or change in land use practices do not interfere with the aquatic environment it is essential that riparian buffer zones are managed

in a manner which will reduce impacts to these habitats. Riparian zones along salmonid rivers, spawning and nursery habitat should be given the highest protection to maintain and improve fishery stocks.

IFI support the existing Goals 4, 7 and 8 which must include the protection and enhancement of the aquatic and riparian habitats. Policies on zoning of lands along watercourses as open space, wildlife corridors or linear parks etc. would support the achievement of these goals.

IFI should be consulted in relation to any development that could potentially impact on the aquatic ecosystems and associated riparian habitat. IFI can provide guidance on site specific measures to enhance, protect, rehabilitate or establish riparian and aquatic habitats.

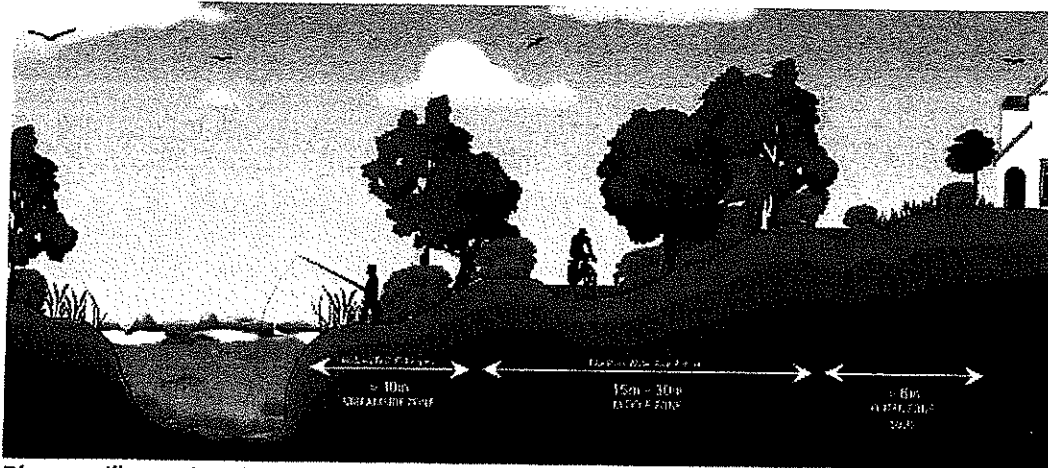


Diagram illustrating riparian buffer sub zones (from IFI guidance document - Planning for watercourses in the urban environment - <http://www.fisheriesireland.ie/Download-document/86-Planning-for-Watercourses-in-the-Urban-Environment.html>)

River Crossing Structures:

The impacts of poorly designed river/stream crossing structures can be serious in terms of habitat loss. Prevention of the free upstream migration of fish species such as Salmon, trout, eel and lamprey results in the loss of spawning habitat and a barrier to migration. This could have serious implications for the populations of fish species concerned. When structures are being designed for crossing fisheries waters, consideration must be given to the following biological criteria: species of fish; size of fish (life stage); time of year in which fish passage is required; and high and low design passage flows etc. Bridges and bottomless culverts have the least impact on fish passage. IFI recommends that the Development Plan should include a clear policy on the use of clear span structures where possible on fisheries waters and that IFI should be consulted on any such proposed developments.

Marine Strategy:

The marine strategy must prioritise the protection of existing natural resources including marine species of fish and shell fish as well as species that migrate from and to the freshwater environment including Atlantic salmon, sea trout, eel and lamprey species.

Invasive Species:

Invasive non-native plant and animal species are the second greatest threat to biodiversity worldwide, after habitat destruction. These can impact negatively on native species, can transform habitats and threaten whole ecosystems, resulting in serious problems to the environment and the economy. IFI request a policy on the spread, control and management of invasive species to be included in the Development Plan. There needs to be specific emphasis put on the spread of invasive species during development and construction works as, for example, Japanese knotweed can be spread through construction earth works as part of

developments and road works. An invasive species policy should also prohibit invasive species from inclusion in landscape design proposals. Landscaping proposals should require the use of native species from local stock.

Flood alleviation:

All flood alleviation and drainage works must be carried out in a fisheries sensitive manner and in consultation with IFI. All in-stream works must be carried out between July and September where spawning and juvenile fish are present. There must be no development in areas which are liable to flooding. It is imperative that land zoning takes account of this and does not permit such development.

Waste Water Treatment

IFI supports the sustainable development where the standard of sewage effluent treatment is such that there is no deleterious impact on water quality, salmonids and other fish species. IFI considers that in areas where sewage treatment facilities are inadequate or overloaded, planning permissions should either be refused or the developer should be constrained by an appropriate condition requiring that connections to sewer will not be permitted until sewage works upgrading is completed and operational.

IFI has significant concerns regarding the long-term management and maintenance of privately operated communal proprietary effluent treatment systems serving a number of dwelling houses. In the event of a breakdown, there is a high potential for surface and groundwater contamination. It is often difficult to locate the person or company responsible for the system. IFI request a policy preventing such effluent treatment system development to be included in the Development Plan.

Rural Housing

In relation to Goal 1 of the current Development Plan 'To promote rural sustainability by encouraging more people to live in Rural Areas ...' it is important that the development of housing in rural areas does not result in negative impacts on aspects of the rural environment that economically support communities such as fisheries and a healthy aquatic ecosystems.

The effluent from single wastewater treatment systems can have a significant impact on surface and groundwaters, with consequent deleterious impacts on aquatic life. This is especially true in areas where there is a high density of such systems, with a consequent build-up of phosphorus in local soils. Section 20.2 of the Development Plan should be retained.

It should be a condition of planning that a long-term maintenance contract is taken out on any proprietary effluent treatment system. Failure to do this may result in discharges of poor quality effluent into sensitive fishery catchments in the long term. This is especially true in certain sensitive lake catchments e.g. Loughs Conn and Cullin, and Carrowmore Lake. In such sensitive areas, IFI would be in favour of identifying areas which are unsuitable for development basis of soil profile, drainage characteristics, groundwater regime and vulnerability, topography, elevation, extent of existing development and correlation with catchments which have been identified in the River Basin Management Plan as being 'at risk' of not meeting its objectives as set out in the Water Framework Directive due to the impact of Domestic Waste Water or Urban Waste Water.

Integrated Constructed Wetlands

Integrated wetland systems should be designed and installed by qualified persons such as engineers and scientists. Wetland systems should satisfy the criteria detailed in the November 2010 publication "Department of the Environment, Heritage and Local Government, *Integrated Constructed Wetlands, Guidance Document for Farmyard Soiled Water and Domestic Wastewater Applications*".

Agriculture

IFI supports the inclusion of section 56.2 in the current Development Plan. Agriculture is the largest land use type in County Mayo and as such has the potential to have a very significant impact on the environment and water quality. Mayo County Council must remain committed to exercising its powers under the Water

Pollution Act to ensure that agricultural development will not cause pollution to watercourses. This should continue along with cross compliance inspections and the issuing of Section 12 notices where required.

Forestry:

IFI has major concerns regarding the impact of forestry on sensitive fishery catchments, especially where planting has been carried out on deep peat soils. These forests pose a risk to fisheries due to altered hydrology of the catchment and nutrient rich discharges. Peat soils do not hold fertiliser after application and trees planted on these sites often require additional fertilisation to bring them to maturity. There has been an increase in the number of Aerial Fertilisation Applications applied for in 2018. Two of these sites are in fisheries sensitive catchments, are unsuitable for commercial forestry and would not be approved for afforestation under current guidelines. Forestry production should not be encouraged in these areas. At present, there is a requirement to re-plant on sites where harvesting has taken place, even in situations where the trees have not grown well and require aerial fertilisation to reach maturity. The Indicative Forestry Statement (December 2008) indicated large areas of the north and west of County Mayo as 'suitable, where appropriate, for nature conservation and/or amenity forests' not for commercial forestry production.

Sustainable Urban Drainage Systems (SUDS)

There should be a requirement for the inclusion of SUDS as part of all development projects, including road developments. This is necessary to mitigate against any negative impacts arising from surface water run-off and to aid flood management. The new Development Plan should also take account of the IFI guidance document - Planning for watercourses in the urban environment (<http://www.fisheriesireland.ie/Download-document/86-Planning-for-Watercourses-in-the-Urban-Environment.htm!>)

Strategic Environmental Assessment:

In determining the likely significant effects of plans or programmes, regard should be given to the need for the sustainable development of the inland and marine fisheries resource. Consideration should be given to potential significant impacts on:


- Water quality
- Aquatic and associated riparian habitats
- Fish spawning and nursery areas
- Surface water hydrology
- Passage of migratory fish
- Sport and commercial fishing and angling

Public Right of Way:

IFI use many access roads to ports, harbours and piers along the coast. It is considered that all roads to these public areas are public rights of ways. Many of these roads are not in common use as the harbours etc. are no longer in use and some may have gates placed across them but it is important that their status as public access is retained. This is also the case for many roads which lead to lake shore piers, jetties etc. or river fords. A list of some specific areas considered public rights of way area attached.

IFI requests an acknowledgement from Mayo County Council of receipt of this submission, and looks forward to receiving a copy of the draft plan in due course.

Yours sincerely


Aisling Donegan

Senior Fisheries Environmental Officer

mcc-cdp-0618

Public Rights of Way

Below is a list of areas considered to be Public Rights of Way. The status of some is considered uncertain and is denoted accordingly.

Lough Mask

Cushlough Bay

Cahir Bay

Ferrybridge

Fox Hill, 53.597644, -9.4347808

Gortmore (Uncertain)

Churchfield

The Docks – Tourmakeady pier

Srah pier.

Ballygarry (uncertain)

Lough Corrib

Lisloughrey

Gortahora 53.529472, -9.2472885 (uncertain)

Salthouse/Derries

Ballynalty 53.504356, -9.2195850

Ballycurran Lighthouse (uncertain)

Lough Carra

Brownstown

Cloondawer 53.695556, -9.2077359

Moorehall

Castleburke

Lough Na Fooey

The Beach, 53.579405, -9.5817071

Robe river.

Crossboyne village

Hollymount at sewerage works (uncertain)

Ballinrobe, Bowers Walk

Fenny River

Bog road 53.577574, -9.5123877

Stepping stones 53.573863, -9.5072962

Glansaul River

Tourmakeady Waterfall 53.652716, -9.3758168

Clare Lake, Claremorris

Public Right of Way at entrance

Black River

Shrule village.

Cong Canal & River

Cahernagower Bridge

Mayo County Development Plan 2020-2026

Submitted to; Mayo County Council

Submitted by; Family Resource Centre (FRC) Programme- Mayo

Mayo Projects:

- Ballina Family Resource Centre
- Ballyhaunis Family Resource Centre
- Claremorris Family Resource Centre
- Cairdeas Kilmovee Family Resource Centre
- Le Chéile (Castlebar) Family Resource Centre
- Tacú (Ballinrobe) Family Resource Centre
- Westport Family & Community Resource Centre

Submission

The network of Family and Community Resource Centres as part of the National FRC Programme wish to be included & recognised in the Mayo County Development Plan 2020-2026 as a key programme of community development being delivered across communities in county Mayo. The Programme is divided into 9 regions and the Mayo projects are part of a proactive, energetic and driven Western Region of FRCs.

Programme Outline

The Mayo projects make up 7 of 120 Family Resource Centres nationally. The programme is funded by *Tusla the Child and Family Agency* under the *Department of Children & Youth Affairs*. Through the provision of universal and targeted services we work to tackle disadvantage, marginalisation and social exclusion and to improve the functioning of the family unit so that families & communities can achieve the 5 National Outcomes, under the Better Outcomes, Brighter Futures policy framework.

FRCs are located within a community-based model of family support and this model is at the heart of the Programme. The centrality of community development in informing the approaches, values and methods underpinning the work of FRCs is a defining feature of their contribution. The community development ethos is embedded into FRCs makeup; each FRC is a community managed, autonomous and independent organisation run by Voluntary Management Committee comprised of community members.

We work inclusively and cooperatively with individuals, families and communities, as well as both statutory and non-statutory agencies. FRCs operate under a combined model of community development and family support, supporting families and communities through a prevention and early intervention approach. Through this model we strive to effectively bring about social inclusion, empowerment and to facilitate and support participation, community leadership and self-determination. FRCs are community led and locally informed; the projects, programmes and services provided are determined by the needs of the local communities which they operate in.

Services & programmes commonly delivered by FRCs include:

- The provision of information, advice and support to target groups and families. Information concerning the range of services and development options available locally and advice on accessing rights and entitlements is also extended. FRCs act as a focal point for onward referrals to main stream service providers.
- Delivering education courses and training opportunities.
- The establishment and maintenance of new community groups to meet local needs and the delivery of services at local level (for example, childcare facilities, after-school clubs, men's groups, etc.)
- The provision of counselling and support to individuals and groups.
- Developing capacity and leadership within communities.
- Supporting personal and group development.
- Practical assistance to individuals and community groups such as access to information technology and office facilities.
- Practical assistance to existing community groups such as help with organisational structures, assistance with accessing funding or advice on how to address specific social issues.
- Supporting networking within the community.
- Contributing to Policy work.

Family Resource Centres by Region

<http://www.familyresource.ie/family-resource-centres-regions.php>

Forward Planning Section
Mayo County Council
Áras an Chontae
The Mall
Castlebar
Co. Mayo

By e-mail to: countydevplan@mayococo.ie

14th June 2018

RE: Review of Mayo County Development Plan

To whom it may concern;

1.0 Introduction to Brookfield

Brookfield Renewable ('Brookfield') welcomes the opportunity to make this submission to Mayo County Council on the Draft Mayo County Development Plan 2020 - 2026. This submission has been prepared pursuant to the public notice inviting observations and comments from interested parties. This submission is addressed to the Forward Planning Section, Mayo County Council and has been emailed to countydevplan@mayococo.ie before 5pm on Thursday 14th of June 2018.

Brookfield Renewable is part of Brookfield Renewable, one of the largest publicly-traded renewable power platforms operating across North America, South America and Europe. Employing close to 100 people in its Irish headquarters in Cork City, its Irish base in Cork forms an important part of Brookfield's global growth plans in Europe. Its portfolio primarily consists of hydroelectric and wind facilities totalling more than 10,700 MW of installed capacity and is diversified across 15 power markets in 7 countries.

Brookfield Renewable owns and operates one of the largest renewable energy portfolios on the island of Ireland. The Irish portfolio consists of 368 MW of operating wind capacity across 20 wind projects in 9 counties. Brookfield is deeply committed to complying with national policy, contributing to the reduction of greenhouse gas emissions, enhancing Ireland's energy security and contributing to a post-carbon and climate resilient economy. As it currently stands, Ireland is falling behind in meeting its stated targets in respect of renewable energy and considerable effort is needed by all citizens to meet the significant challenges ahead.

2.0 Summary of Brookfield's Consultation Response on the stage 1 Pre-draft County Development Plan (2020-2026)

In setting out an overall strategy for the proper planning and sustainable development for County Mayo under the New County Development Plan 2020-2026, Brookfield welcomes the opportunity to submit their observations and would like Mayo County Council to consider the following in relation to Infrastructure and Climate Change, specifically wind farm development.

Brookfield notes that the majority of land currently zoned for Renewable Energy within the current Mayo CDP (2014-2020), lie within areas which would not be acceptable to wind development (Please see figures 1 and 2 appended).

The "Landscape Appraisal of County Mayo" which is over a decade old, forms part of the current CDP 2014-2020, outlines four Principal Policy Areas and 16 Landscape Character Units.

Within the four Principal Policy Areas, there are 26 policies which describe each area's ability to absorb development. In parallel, of the 16 Landscape Character Units described, there are eight potential critical landscape factors to consider which describe these unit's ability to absorb development based on their characteristics.

Taking a view of the policies defined within each of the four Principal Policy Areas, and the critical landscape factors outlined within the 16 Landscape Character Units described e.g. undulating topography, shelter vegetation, steep slopes etc. Brookfield Renewable notes that:

1. Only land within Policy Area 4 for County Mayo would currently be considered for wind development (as outlined in the Landscape Sensitivity Matrix) and;
2. Of the 16 Landscape Character Units described within the County, 11 units (69%) may be considered negative, 4 units (25%) considered uncertain, and 1 unit (6%) considered positive towards wind energy development.

Expanding on point 2 above, and taking the granted Oweninny wind farm (ABP Ref: PA0029) and refused Cluddaun wind farm (PC0133) as specific examples to illustrate the contradiction between the Renewable Energy Strategy (2011-2020) and the Landscape Character Appraisal under the current CDP. Both wind farms are located within a Priority (Oweninny) or Tier 1 Preferred for large windfarms (Cluddaun) areas for wind farm development under the Renewable Energy Strategy. However, under the Landscape Appraisal, these developments would be considered unacceptable to wind energy development as they are located within Policy Area 3, and Landscape Character Unit F.

Given Mayo County Council took a positive view to the Cluddaun wind farm development during the planning process and, that Oweninny was granted permission irrespective of the Landscape Character Appraisal, this point confirms the inconsistency between the current Renewable Energy Strategy and Landscape Appraisal Policy, and illustrates that they are not aligned. It also demonstrates that the Landscape Appraisal for the County is not robust enough to consider specific sites or smaller areas, and is an inadequate tool to use when assessing potential wind development projects at inception.

In addition to above points, after taking account of the current areas zoned for wind farm development under the Renewable Energy Strategy, and considering the Landscape Character Appraisal, as well as current and predicted minimum set back distances of turbines from dwellings under the National Wind Energy Guidelines, the available land space left for potential development is insignificant.

Brookfield Renewable would urge Mayo County Council to consider above observations when producing the new County Development Plan for Mayo and urges Mayo County Council to draft and produce a new Landscape Appraisal Report which is line with its Renewable Energy Strategy for the County going forward.

Mise le meas,


Alice Power

Alice Power

Planning & Environment Specialist

Brookfield Renewable

Floor 5, City Quarter, Lapps Quay, Cork, Ireland


www.brookfieldrenewable.com

Brookfield



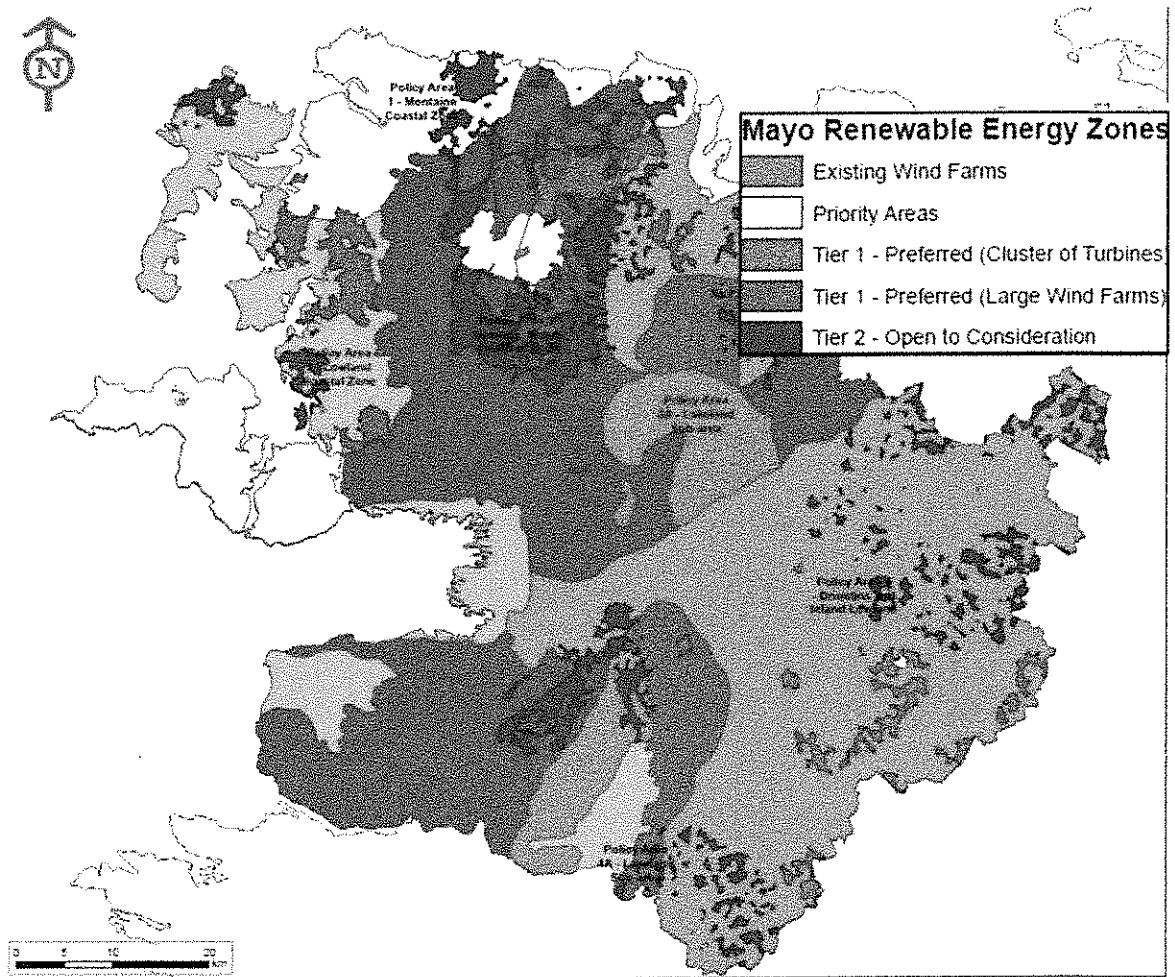


Figure 1 – Indicative Map illustrating Existing Renewable Energy Zoned Areas overlaid on current Mayo Landscape Appraisal Policy Areas

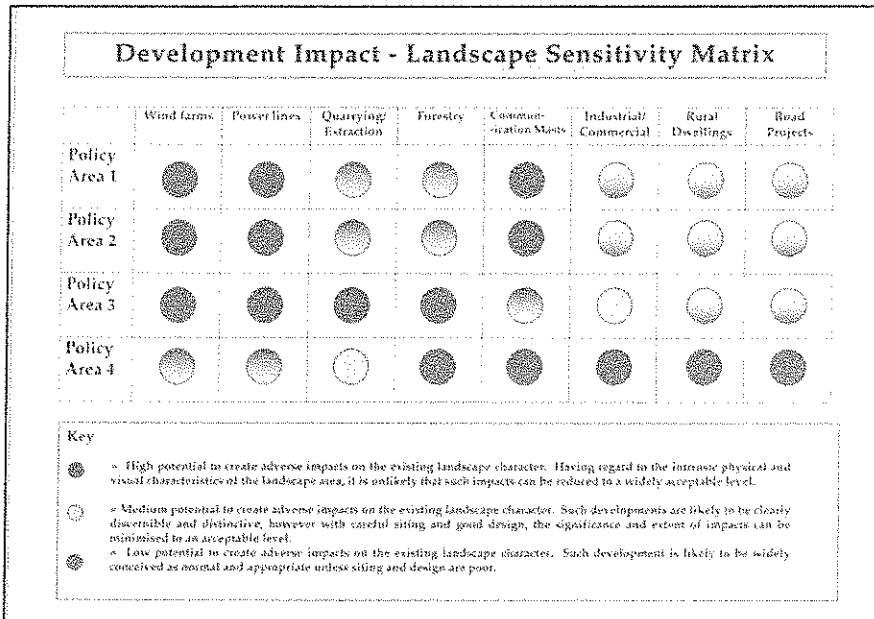


Figure 2 – Current Mayo Landscape Appraisal – Landscape Sensitivity Matrix

DD-25
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

Brendan Munnelly

From: Patrick Moran [Redacted]
Sent: 14 June 2018 16:54
To: countydevplan
Subject: From Mulranny Futures group

Town & Village Regeneration/Renewal
GOALS SHOULD BE :

- Provision of affordable social housing by :
- i) Buying property which has been on the market over a long period
 - ii) Building social housing
 - iii) Actively revisiting RLS

COMMENTS :

ESTABLISHING A VISION :

- Goal 1) Affordable housing a priority
- 2) A dedicated team to pursue objectives
- 3) Transport infrastructure
- 4) Improve access to any attractions available in coastal areas and rural locations

CLIMATE CHANGE: (2.7)

- Look at alternative energy sources
- Explore means of reducing light pollution and pursue a greenplan agenda
- Coastal management and coastline habitats
- Light pollution and CO2 emissions

SOCIAL/INFRASTRUCTURE & COMMUNITY DEVELOPMENT (2.8)

Again : more affordable housing, thereby arresting migration to other more affordable area.

Priority should be given to the provision of social housing in rural areas.

EG Mulranny : there ample opportunities for employment in the area but because of the shortage of affordable housing, some workers are unable to find accommodation and have to rent property away from the area. This is having a negative impact on the village and may result in the loss of a teacher in the national school. IE At present one family have had to move to Ballycroy to cost effective accommodation, thereby moving their children to the school in Ballycroy. This is a malady symptomatic of many rural areas in the country.

As tourism is the mainstay of many coastal villages, consideration should be given to transport infrastructure to enable access to all the attractions available in the area, ie providing safer walking and cycling route and loop walks which can accommodate all abilities.

To improve and maintain the road infrastructure to a higher standard

Pat Moran
Chairperson
Mulranny Community Futures CLGF

Rural Cluster Housing

Introduction

The Tochar Valley Rural Community Network is an established network of 18 rural communities over the past 20 years.

It provides: capacity building, training and supports, working in conjunction with existing support organisations, including the local Authority, primarily responding to the needs of farm families.

The success of this collaborative effort can be clearly seen, in many small villages which now have Community Centres, Childcare facilities, Schools, Playground facilities, Social Housing, landscaped public amenities and Sports Facilities. These local facilities are mostly managed on a voluntary basis, by individuals and groups who provide a range of critical local services. There is an ageing population in rural Mayo. Too many young people are forced to leave the rural areas, for decent job opportunities. Existing rural housing policy is not helping this trend and neither is the desired village clustering taking place.

Submission

The basis of this submission is to support the policy of the County Development Plan, in terms of growing a more clustered or centralised population around these services in the respective communities. This, we believe, is achievable now that many key services are available. Clustering would be more cost effective for the provision of improved broadband and other key services to more people. This, in turn could be a factor to retaining more of our young families, attract technology jobs, reducing travel and improved quality of life. Houses in a built up area, adjacent to services, would retain a better market value.

There are economic and social reasons why once-off scattered rural houses continue to be built; many by family members on family farms, or to offset declining household income. Most villages have suitable building land, not being farmed or offered for sale; there can be multiple reasons, economic and social. In some cases, there is just no incentive to do anything with it.

To achieve clustering in TVRCN (and other) villages, there is a need to provide incentives, in some form to different stakeholders involved in the wider process of 'development'. The 'status quo' is not working, in terms of growing sustainable rural communities. Positive incentives tend to work best, where blockages are address in a multifaceted integrated way. The TVRCN have successful examples of this down the years. We recognise that policy planners, with their expertise and resources need to become more proactively involved in tackling blockages, both economic and social at community level in determining optimum solutions to address issues identified. This is an appropriate time to explore how

the existing blockages might be undertaken, in an equitable way we do not have the definitive answers, but invite policy makers consider where incentives might work: Incentives to make land available: Incentives for farm family members build the second or third house in the village. Incentives to choose the village site to build: and / or incentives to encourage local community groups with a track record in development. Incentives such as Grant Aid be available to Community Councils/Groups with Company Status to explore different ways of working with the Local Authorities and fund providers to promote local cluster housing.

In conclusion, this submission from the Tochar Valley Rural Community Network invite the County Planning Authorities to give serious consideration to exploring how existing successful village/parish communities might get involved in supporting and implementing 'cluster focused' housing developments. Incentives, to roll out such an approach would also help address our present housing crisis.

The TVRCN hereby strongly request that provision be included to develop pilot models

Signed: *Mary B Prendergast*

Chairperson of The Tochar Valley Rural Community Network.

Signed: *Sr Maureen Lally,*

Manager of The Tochar Valley Rural Community Network

PD - 27.

daa cúlraíochas phoiblí éire pranta
Priority Aerfort Átha Cliath,
Co. Bhaile Átha Cliath, Éire

T. 083-1-019-1111
F. 083-1-019-4120
www.daa.ie

daa public limited company
Head Office, Dublin Airport
Co. Dublin, Ireland

Forward Planning Section
Mayo County Council
Áras an Chontae
The Mall
Castlebar
Co. Mayo



04th May 2018

Ref No: 03.4.1.14.005

Dear Sir/Madam,

**RE: REVIEW OF THE MAYO COUNTY DEVELOPMENT PLAN 2014-2020
AND PREPARATION OF A NEW COUNTY DEVELOPMENT PLAN**

Further to your letter dated 20th April 2018, daa (Head Office, Dublin Airport, Co. Dublin) has no observations to make in relation to proposed review of the Mayo County Development Plan 2014-2020 and preparation of a new County Development Plan.

Please do not hesitate to contact us if you have any queries.

Yours faithfully,

Linda O'Grady

Linda O'Grady
Planning Department

An Bord Stiúrthóirí | Board of Directors Niall Greene, Patricia King, John Lynch, Colm McCarthy, Des Mullally, Barry Newlin, Eric Nolan, Ann-Marie O'Sullivan, Paul Schütz (German), Denis Smyth, Gerry Walsh, Dalton Phillips –
Príomhcheifmheannach/Chief Executive

Uimhir Chláraithe: Aerfort Bhaile Átha Cliath, Co. Bhaile Átha Cliath. **Uimhir Chláraithe:** 9401 Éire
Registered Office: Dublin Airport, Co. Dublin. **Registered Number:** 9401 Ireland



An Roinn
Cultúir, Oidhreacht agus Gaeltachta
Department of
Culture, Heritage and the Gaeltacht

14 June 2018

ref: FP2018/053

Mary Killoran Coyne
Mayo County Council,
Aras an Chontae,
The Mall, Castlebar,
Co. Mayo

Review of the Mayo County Development Plan 2014-2020 and preparation of a new one

A Chara,

The Department refers to your notifications regarding the review of Mayo County Development Plan 2014-2020 (as varied), and the commencement of the preparation of a new County Development Plan for 2020-2026. Reference is also made to the SEA scoping consultation, including the document for environmental authorities, and the 'Consultation Paper and Issues Document'.

Context of submission

This submission is made in the context of the Department's role in relation to nature conservation, including as an environmental authority under SEA legislation. The observations are offered to assist the Council in meeting the obligations that arise in relation to European sites and the Natura 2000 network, other nature conservation sites, natural habitats and protected species, and biodiversity and environmental protection in general in the context of the plan and the environmental assessments required. The observations are not exhaustive and are made without prejudice to any submissions or recommendations that may be made by the Minister and this Department at future stages in the plan-making process.

It is noted that the processes of public consultation at pre-draft stage (our ref. FP2018/053) and SEA scoping (our ref. FP2018/052) are in train at present, and overlap. This submission includes observations in relation to the plan and the scope of the SEA. The opportunity has also been taken to make observations in relation to the appropriate assessment (AA) process, noting that all three elements are inter-linked, as is the Strategic Flood Risk Assessment.

This submission should be read as a whole by the Council, including by any teams or individuals involved in the preparation of the new plan and associated environmental assessment reports.

The Department is available to meet the Council in relation to the plan and its environmental assessments, if that would assist.

Duties of authorities in relation to nature conservation

The Council has duties in relation to European sites and nature conservation as the competent authority under Part XAB of the Planning and Development Act, 2000 as amended, and as a public authority¹ within the meaning of the European Communities (Birds and Natural Habitats) Regulations, 2011. Not only do these duties include the specific requirements of the AA process, they also include obligations placed on all public authorities to exercise their statutory powers and functions in compliance with and, as appropriate, so as to secure compliance with the requirements of the Birds and Habitats Directives, and these Regulations. Appropriate steps must be taken to prevent the deterioration of natural habitats and the habitats of protected species as well as significant disturbances of species in European sites insofar as this disturbance could be significant in relation to the objectives of the Habitats Directive. All public authorities are advised to incorporate such obligations into their plans and programmes, and associated assessments,

¹ As defined in Part 1 of the European Communities (Birds and Natural Habitats) Regulations, 2011, and including DHPCLG

as required and relevant. This could usefully include the development of systems that will monitor and ensure the compliance of “downstream” projects with these obligations, as well as any internal mechanisms that may be needed to ensure compliance.

Matters relating to the plan

County Development Plans are primarily strategic in nature and sit within a hierarchy of statutory land use plans. It is understood that the new plan is to be based on the current development plan, with updates to reflect and incorporate the provisions of the National Planning Framework and (forthcoming) Northern and Western Regional Economic and Spatial Strategy, as well as any other new or amended national policy. It will also incorporate land use zoning and other key objectives for towns within the county, with the exceptions of Castlebar, Ballina and Westport, which have their own Development Plans. The current plan has a vision and eight goals, a core strategy setting out the strategy for the location of future development, and a series of objectives and policies under various headings. Various other strategies, such as the county’s Renewable Energy Strategy, form part of the plan. It is unclear if the review will allow for these to be revisited.

In the ‘Consultation Paper and Issues Document’, the Council acknowledges the wealth of its natural heritage and biodiversity resources, including as an asset for the people of the county, for visitors and for the economy and future development. The Department welcomes the Council’s commitments to the short- and long-term protection of the natural environment in general, and the European sites and Natura 2000 network in particular.

It is recommended that, as at present, the new plan should have a section or chapter with information and maps on key elements of the natural heritage and biodiversity of the plan area, and objectives for their conservation – see below. Biodiversity considerations should also be reflected in other sections of the plan, as appropriate and as required to reflect AA mitigation and SEA measures to safeguard European sites, biodiversity and the environment.

In land use planning, where multiple uses or ‘green infrastructure’ models are envisaged, it is advised that a clear distinction is made between nature conservation obligations, and other land uses, e.g. tourism, recreation and amenity. In certain scenarios, changes in land uses or increased pressures can lead to or perpetuate habitat loss, deterioration and fragmentation, or species disturbances which may be inconsistent with nature conservation objectives and obligations. Good land use planning should seek to anticipate and manage such competing requirements, including by early consideration of constraints, the selection of optimal locations and options, and by having a set of steps or measures in the plan to guide the planning and design of future projects to maximise their likely success. These steps or measures could dovetail with the SEA measures and any mitigation from the NIR. Alternatively, reference could be made to guiding principles and steps or approaches in associated or related plans or strategies, e.g. the ‘Greenways Strategy’ (in preparation) which should include measures to guide the planning, routing and assessment of future greenways and blueways.

Where (subject to) ‘sustainable development’ is used to indicate the safeguarding of the environment and of natural resources, it would be beneficial and would provide clarity if the term was defined in the plan to mean, among other things, the absence of adverse effects on the conservation objectives and integrity of a European site, or of adverse effects on any other statutory nature conservation site.

Available guidance

Existing EU and Irish guidance on SEA and AA should be followed in general terms when carrying out the environmental assessments, but the Council should also be cognisant of changes in the interpretation and application of Directives and national legislation arising from European and Irish jurisprudence, particularly in respect of Article 6 of the Habitats Directive. There should be due regard to the terminology, stages and tests of the assessment processes as set out in relevant legislation, notably in the case of the appropriate assessment process. Where legislation updates or amends elements of existing guidance, the former should be used or applied in preference in all cases.

SEA – Biodiversity, flora and fauna

It has been determined that the likely significant effects of the plan on biodiversity, flora and fauna must be assessed. Biodiversity is generally defined as the variety of life on earth. An outline of key elements of biodiversity of relevance to the plan is given in Appendix 1, and includes sites, habitats, species of flora and fauna, certain river catchments, and ecological networks. There are interrelationships between biodiversity, flora and fauna and most other environmental issues or topics, including population, human health, water, soil, air, climatic factors, landscape, and possibly architectural and archaeological heritage. The potentially significant effects of the plan on these interdependencies should be explored and assessed in the SEA.

There will be overlaps and linkages between biodiversity, flora and fauna in SEA, and sites, habitats and species of relevance to the AA and Article 6 of the Habitats Directive. SEA should address all such issues in general, as well as any other relevant provisions of the Habitats and Birds Directives, including in respects of Article 6(1), 6(2) and 10 of the Habitats Directive, and associated national legislation. See also the general duties of a public authority above.

The plan should be developed to integrate biodiversity considerations in a positive, proactive and precautionary way, and this should be reflected in the text and content of the plan, including its aims, objectives and policies, as well as in maps and land use zoning objectives. The findings and recommendations of SEA should be assimilated into the plan, and should modify the content of the plan where necessary.

The biodiversity, flora and fauna section of the Environmental Report should be prepared by or in conjunction with a suitably qualified ecologist(s), and other specialists as necessary, and in conjunction with the NIS to ensure full integration of biodiversity issues and concerns. The EPA's *Integrated Biodiversity Impact Assessment* best practice guidance is of relevance in this regard.

The Environmental Report is required to contain information on environmental protection objectives which are established at international to national level, and are relevant to the plan. For biodiversity, flora and fauna, these should integrate with the objectives and obligations of other directives such as the Habitats Directive, the Birds Directive, the Water Framework Directive and the Floods Directive, and with the Wildlife Acts, 1976-2000, and the National Biodiversity Plan. Land use planning should also take into account and safeguard any ecological restoration or mitigation measures delivered in connection with developments that have carried out, or cases where habitat restoration or environmental enhancement was required.

The monitoring programme should be set out clearly and developed in such a manner to ensure it will identify effects on the environment that will or may arise, and to monitor the effectiveness of any mitigation on which the assessment relies. While it may be considered efficient to use monitoring programmes that are already in place and run by other authorities, it is important to establish that these are in fact designed in such a way that they will identify the effects anticipated from the particular plan in question. As such, it is important to understand the objectives, methodologies, parameters, assumptions, etc. of any existing monitoring programme that is proposed to be used in such a way.

It is advisable to set out clearly where responsibilities for monitoring programmes lie, and their frequency and reporting/publication arrangements, as well as the procedures that will be put in place to ensure that there is a response mechanism to any unforeseen or undesirable negative effects/results, and that remedial action will be taken, if necessary.

Available ecological information

The National Parks and Wildlife Service website (www.npws.ie) is a key source of data, information and publications on nature conservation sites and biodiversity issues of potential relevance to the plan area and the environmental assessment(s) required. This includes site boundaries, site synopses, lists of qualifying interests (SACs) and special conservation interests (SPAs), conservation objectives (European sites), features of interest (NHAs), and dates of site designation. GIS datasets are available for download for

nature conservation sites², and for certain habitats and species arising from various sources, including national surveys. Other NPWS-held data on habitats and species may be requested by submitting a 'Data Request Form'³.

Site-specific conservation objectives (SSCOs), and associated backing documents, are available for Lough Corrib SAC (site code 000297) and some other European sites on the NPWS website⁴. GIS datasets associated with site-specific conservation objectives are also available for download: <http://www.npws.ie/mapsanddata/habitatsspeciesdata/>. For all other European sites, generic conservation objectives are available and the most up-to-date versions should be used and referenced in any relevant documents. The full scope of conservation objectives should be used, as appropriate, to guide and inform the scope of the scientific assessment and analysis in an NIS. The most recent version of the conservation objectives should be used and referenced, and each of the individual conservation objectives of relevance should be addressed separately.

The Habitats Directive Article 17 reports for 2007 and 2013, which should be consulted, are available from <http://www.npws.ie/article-17-reports-0>. The recent national report on Article 12 of the Birds Directive, at <http://www.npws.ie/news/birds-directive-article-12-reporting>, should also be consulted. The national habitat surveys that have been undertaken, and their resulting reports, should be consulted, including for information regarding the definitions and evaluations that have been developed for Annex I habitat types in Ireland.

Data on biodiversity and ecological features will be available from various other sources including, for example:

- Other organisations, e.g. National Biodiversity Data Centre, BirdWatch Ireland (e.g. IWeBS data), Bat Conservation Ireland, etc.
- SEA Environmental Reports, NIRs/NISs and other reports for other plans and strategies
- EISs, NISs and other reports (including constraints study, route selection and monitoring reports) for projects in the plan area

Appropriate assessment

It appears that it has been determined that AA is required in this case, meaning that an NIR is required. It is advised that the Council's references to a 'Habitats Directive assessment' should be reviewed and revised in line with the applicable legislation and associated terminology. General notes on the preparation of an NIS are included in Appendix 2, and should be taken into account, as relevant, as they also apply to an NIR. As outlined above, there should be due regard to the terminology, stages and tests of the AA process as set out in relevant legislation.

Where the NIR identifies that plan-level mitigation is necessary, including to avoid or reverse adverse effects on European sites and to manage future scenarios, this must amend and be reflected in the content and objectives of the final plan wherever necessary. Specific and repeated cross-referencing to mitigation measures in other sections or reports may be used but should be done clearly, consistently and unambiguously.

The AA is carried out by the competent authority for the final iteration of the plan, prior to its adoption. The AA must take account of the NIR (including any addenda or revisions), and should address the content of submissions made where issues or concerns are raised regarding the effects on European sites. The AA and decision-making authority has obligations to address scientific uncertainties or discrepancies, including matters raised by other parties, particularly in relation to the implications for European sites and their conservation objectives in the AA; the final determination should demonstrate how the differing scientific opinions were resolved, noting that case law of the Court of Justice of the European Union (e.g. case C-258/11) has established that an appropriate assessment cannot have lacunae, and must contain complete,

² Special Areas of Conservation (SACs, currently known as candidate sites but fully legally protected); Special Protection Areas (SPAs); Natural Heritage Areas (NHAs); and proposed Natural Heritage Areas (pNHAs)

³ Available from <http://www.npws.ie/maps-and-data/request-data>

⁴ <http://www.npws.ie/protectedsites/conservationmanagementplanning/conservationobjectives/>

precise and definitive findings and conclusions with regard to the implications of a project for the conservation objectives and integrity of a European site or sites.

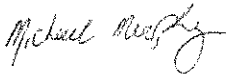
In the event of a decision being made a copy of same should be forwarded to the following address as soon as it issues:

The Manager,
Development Applications Unit,
Department of Culture, Heritage, and the Gaeltacht,
Newtown Road,
Wexford Y35 AP90


Preferably, documentation associated with the above can be referred electronically to the DAU at the following address: manager.dau@chg.gov.ie

In addition, please acknowledge receipt of these observations by return.

Is mise le meas,



Michael Murphy,
Development Applications Unit



Submission to Mayo CDP process from Department of Public Health Galway

Consultants in Public Health Medicine based in the Department of Public Health in Galway are making a submission as the Medical Officers of Health for Mayo. Under Medical Officer of Health legislation, we are obliged to inform ourselves “as respects all influences affecting or threatening to affect injuriously the public health in the county and as respects the causes, origin and distribution of diseases in the county”¹ and to advise the local authority in relation to the health of the people, “sanitary services and housing accommodation”.

As you are aware the population and human health are environmental receptors and require consideration under the Strategic Environment Assessment process. The SEA process unfortunately does not address the wider definition of health². We have read the consultation paper for the Mayo County Development Plan 2020 – 2026 and welcome this opportunity to make a submission.

The following actions should be considered in the drafting of the plan:

- Protection of human health
- Reduction of health inequalities
- Co-ordination of action between health and other sectors
- Health proofing of all policies to ensure no maladaptive planning

Health topics which should also be considered:

- Community safety
- Housing provision as required by the population
- People with low incomes and how they are facilitated to live healthy lives through environmental planning
- Access to healthy open spaces and recreational activities
- Affordable quality food outlets which are easily accessible to all
- Local education / employment
- Walking / cycling opportunities - active transport which both promotes health but is also a climate change mitigation measure
- Developing sustainable communities

The 5th EPA Strategic Plan³ states that “Sustainable development means linking the environment, health, wellbeing and the economy. A thriving, clean environment provides the very basis for good lifestyles. This means an Ireland that has a vibrant economy, people and communities that help and respect each other, and as an essential foundation, a protected environment that is valued for itself and the benefits it provides for us to live safe, healthy lives.” One of the EPAs’ stated objectives is to “Promote a greater awareness of the impact of environment quality on human health.”

¹ Health (Duties of Officers) Order 1949 <http://www.irishstatutebook.ie/eli/1949/si/128/made/en/print>

² “A state of complete physical, mental and social well-being and not merely the absence of disease or infirmity” – WHO Constitution 1948

³ http://www.epa.ie/pubs/reports/other/corporate/EPA_Strategic_Plan_English.pdf

Also of note is the following statement from the EPA⁴:

“The benefit of a clean environment for health and wellbeing is now widely recognised. People should not have to live in an area where local amenities are degraded and cannot be used. Controlling the release of chemicals and pollutants to the environment is probably one of the main concerns which people think about when they hear about health and the environment. But it is increasingly being recognised that having a clean environment in itself is highly beneficial to wellbeing by providing better places to live and local amenities for communities. Ireland still has many unspoilt areas that are beneficial to people as well as to the economy. The outstanding natural beauty and wilderness of the Wild Atlantic Way is now recognised as a key economic asset that attracts significant numbers of visitors each year.”

However, even along the Wild Atlantic Way there are environmental pressures that need to be closely monitored. The protection of water quality is essential, and effective environmental protection measures are needed to ensure that coastlines, beaches, rivers and lakes along the Wild Atlantic Way, and elsewhere, are maintained and protected. This means that planning needs to take into account the need for robust and climate resilient waste water and drinking water systems. We strongly recommend that Health Impact Assessment techniques should be used in development the Mayo County Development Plan 2020-2026.

Possible input into the Mayo County Development Plan by Public Health

The Department of Public Health in Galway will be able to provide you with a baseline county profile for Mayo which details the health of Mayo’s population. While we have limited resources we could assist with the co-ordination across sectors affecting health and health proofing of your plan.

⁴ Recognition of the Benefits of a Good Quality Environment to Health and Wellbeing (EPA, 2016). Seven Key Environmental Actions for Ireland on the State of the Environment in 2016



Enterprise Ireland

Response to Mayo County Council

22nd of June 2018

Introduction

Enterprise Ireland supports companies in urban and rural areas to start, innovate and remain competitive in international markets, now and into the future. At the center of the agency's strategy, *Build Scale, Expand Reach 2017 – 2020*, are strategic targets focused on:

- Assisting clients to create 60,000 new jobs by 2020 while sustaining the existing record level of jobs;
- Growing the annual exports of client companies by €5bn to €26bn per annum;
- Increasing the level of spend made by client companies in the Irish economy by €4bn to €27bn per annum by 2020; and
- Inspiring more Irish owned companies to have global ambition.

The 5,000 manufacturing and internationally traded services companies that Enterprise Ireland works with are a critical source of existing employment and job creation in every county in Ireland. In 2017 209,338 people were employed at Enterprise Ireland supported companies which includes the creation of 10,309 net new jobs. In 2017, 65% of employment in Enterprise Ireland supported companies was outside of Dublin. Employment growth was recorded across all counties. In 2017, 4118 people were employed in supported companies in Mayo - a 5% increase on 2016's employment figures.

Enterprise Ireland supported companies sustain over 375,000 direct and indirect jobs nationwide. The total spend of Enterprise Ireland clients in the Irish economy across payroll, and goods and services purchased reached €24.97bn in 2016. These figures clearly illustrate the contribution of Enterprise Ireland client companies to the Irish economy.

Enterprise Ireland is working with client companies in every county in Ireland via a network of market and sector advisers from ten offices located throughout the country to:

- Prospect for a pipeline of early stage start-ups and high potential start-ups. This includes:
 - Enterprise Ireland's New Frontiers Development Programme, the national entrepreneur development programme for early-stage startups, ran in partnership with 14 Institutes of Technology throughout the country.
 - Enterprise Ireland's Competitive Start Fund to support new early stage business investments of up to €50,000 each through a series of Competitive Start Fund calls. In 2017 91 new start-ups were funded under this fund. To support balanced growth across regions, on the 27th of February 2018, Enterprise Ireland will launch a Competitive Start Fund targeting new start-ups outside of Dublin.
 - Enterprise Ireland has a Service Level Agreement in place with four Business Innovation Centres throughout the country. These bodies work in partnership with Enterprise Ireland to assess, advise, validate and progress early stage-business plans of Enterprise Ireland clients to an investor ready stage-point, with an objective of driving the number of High Potential Start-Ups approved each year by Enterprise Ireland.
- Enterprise Ireland works with established clients and potential exporters in urban and rural areas to maximise job creation potential and to support internationalisation. To deliver on this, Enterprise Ireland engages with client companies through teams of sectoral focused development advisors using a company led diagnostic approach. This permits Enterprise Ireland to better understand client business needs which enables the agency to tailor a support package to the company's growth potential based on their ambition, capability and need. A support package focuses, where relevant, on six business pillars (Innovation, Finance, Operations, Sales and Marketing, People and Organisational Development).
- Innovation is essential for companies to be competitive internationally and to win market share. Harnessing the knowledge and expertise of the Higher Education Sector is a vital tool to support innovation capability building with in companies. To build research capability throughout the country Enterprise Ireland supports companies to undertake in-house R&D and the collaborate with the research expertise with the higher education sector.
- To assist in supporting regional enterprise development and to ensure regions have the required infrastructure to grow jobs into the future, Enterprise Ireland has:

- Approved investment of €31.5 million in 21 projects under the first call of the Regional Enterprise Development Fund to support the building of enterprise capability in regions.
- Invested in infrastructure to support building research and innovation capabilities within regions such as the national network of Technology located in Institutes of Technology through the country. Enterprise Ireland.
- Launched four accelerators outside of Dublin to enhance the high potential start-up ecosystem. Located in Galway, Clare and Waterford, these accelerators build on regional sectoral strengths.

Enterprise Ireland’s footprint in Mayo – a statistical overview

In 2017, 118 people were employed in supported companies in Mayo - a 5% increase on 2016’s employment figures. Employment in Enterprise Ireland supported companies for the period 2014 -2017 is presented in Table 1. Table 2 details the number of plants supported by Enterprise Ireland in the period 2014 – 2017.

Mayo	Data	2017	2016	2015	2014
	PFT ¹ Jobs	3,650	3479	3252	3286
	Other Jobs	468	377	415	498
	Total (PFT & other)	4,118	3856	3667	3784

Data Source: Annual Employment Survey 2014, 2015, 2016 and 2017

Note:

- For business confidentially reasons, Enterprise Ireland is not in a position to release employment figures at a company level.
- Enterprise Ireland collects employment figures annually via the Annual Employment Survey. As a result of this, year to date employment figures for 2018 are not available.

In 2018 Enterprise Ireland clients, CBE and Irish Pet Foods, announced the creation of 55 new jobs in Mayo.

¹ Permanent Full Time

Table 2 details the number of plants supported by Enterprise Ireland across the period 2014 – 2017.

Table 2: Number of Enterprise Ireland Supported Plants in Mayo				
No. of Plants	2014	2015	2016	2017
Mayo	113	110	114	115

Data Source: Annual Employment Survey 2014, 2015, 2016 and 2017

Enterprise Ireland is actively working with companies with global ambition in these counties to drive competitiveness, innovation and market diversification. Table 3 presents payments to Enterprise Ireland supported companies across the period 2014 – 2017.

Table 3 – Payments to Client Companies for years 2014-2017				
Payments	2017	2016	2015	2014
Mayo	€5,021,555	€1,763,754	€1,210,388	€1,803,125

Emerging trends with respect to enterprise development (from an Enterprise Ireland perspective)

Enterprise Ireland clients growing employment strongly in Mayo. A number of emerging trends with respect to enterprise development in the county have been identified over the last five years.

1. Companies are facing new market conditions, including but not limited to challenges and opportunities as a result of Brexit. Building further capability in innovation and competitiveness is essential to build resilience to a changing market place.
2. The availability of talent and skills, as well as retention of key staff, is an area of concern for companies.

3. Indigenous exporters have performed strongly in recent years and when expanding, they are likely to expand close to their existing premises. The ability to quickly undertake an expansion will be a competitive advantage for Mayo exporters.

Additionally, in Mayo County Council's 'Consultation Paper & Issues' document (<http://www.mayococo.ie/en/Planning/MayoCountyDevelopmentPlan2020-2026/Document1,29974,en.pdf>), a number of Goals are set out addressing a broad range of issues. However, one sector would merit discussion and inclusion in the Draft CDP. Enterprise Ireland would promote an enterprise specific Goal for:

- sustaining and growing indigenous enterprise across the county and
- entrepreneurship and innovation at the heart of future development policy in the county.

PD-31

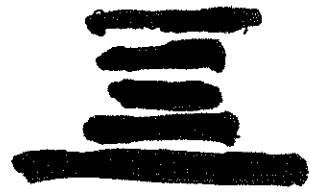


McDonnell, Padraic

From: David Malee [redacted]
Sent: 15 June 2018 10:19
To: countydevplan
Subject: Review of Mayo County Development Plan

AFA

David Malee, (cyclist)



For whom it may concern,

I'm writing to you today in relation to the review of the County Development Plan 2020-2026. As a cyclist I believe that a development of a Greenway on the old Sligo Limerick railway line is the best use for this state owned land until such a time as the line can be reopened for train services.

The development of a Greenway would also protect the line from encroachment and in what many believe would be an unlikely event for the route ever to reopen as a rail line in our lifetimes.

Mayo has over the last number years been developing as a major cycling destination but most of this cycling infrastructure has been centred around Castlebar but also Newport, Mulranny and Westport. I would argue that a Mayo Sligo Greenway will rebalance this deficit in the east of the county as well as unlocking the potential for the county to become a major cycling/walking hub as part of the proposed National Greenway Network. A Greenway along this route would also certainly guarantee the commercial success of the proposed Vilo-Rail project in Kiltimagh bringing thousands of potential customers to the Kiltimagh who wouldn't otherwise be there.

The development of these types of projects have been proven again and again to bring massive benefits to the areas that they serve. The positive effect of a Mayo Sligo Greenway would bring both in terms of tourism development and economic development to the East Mayo area can't be underestimated. Particularly I believe because of these two factors, the location of Ireland's West Airport to the Greenway and the Shrine at Knock. The Airport could become a gateway to the National Greenway network, arriving tourists simply could cycle from the airport along a signposted route on the existing rural road network to Charlestown joining the Greenway. Secondly the potential development of a Pilgrim route to the Shrine at Knock via Kiltimagh similar to the Camino de Santiago in Spain. With the popularity and successes of other repurposed railway lines projects such as the Waterford Greenway with almost 250,000 visitors within its first year. The High Line Park in New York City originally estimates of 300,000 visitors which has been far outpaced with 7.6 million visitors in 2015 alone and the continued success of the Great Western Greenway, these projects have proven to be a transformative catalyst for the communities they serve.

But in what I believe would be the greatest benefit a Greenway would bring is the positive impact on the health and wellbeing on the population who would have access to a safe segregated cycleway. With Ireland still on course to become the most obese nation in Europe its projects like this which can be real game changer for everyone, but in particular combating childhood obesity. If you take into account the population of the five towns this Greenway would serve (Charlestown, Swinford, Kiltimagh, Claremorris, Ballindine) approx 8100 and the people in between the towns, if fair to assume that this project could potentially benefit over 10, 000 people. With up to 70% of school students now walking or cycling to the schools in Westport it's now proven that segregated Greenways work in the county and this should be extended to the five towns that the Mayo Sligo Greenway would serve. Getting up 70% of the student population in the five towns walking/cycling to school would be one of the greatest successes of this project and a massive investment in the health and wellbeing for the people of Mayo. With many of the towns within an easily commutable distance by bike, (For example from Swinford to Kiltimagh or to Charlestown would take under 30 minutes) it offers everyone a real alternative and safe way to travel. Reconnecting these towns would



also help reduce rural isolation for many but also rebuild a rural network which was lost when the train line closed. Which surely comes under the Smarter Travel initiative started by the Department of Transport.

Cycling now has never been as popular and never before has there been as much funding available from government for new greenway projects. Almost 56 million has been made available in the capital plan from 2018 - 2021 Potentially there may also be ways of securing additional funding by selling naming rights to different sections of the greenway to some of the Biotech company's along the route. Baxter Healthcare in Swinford or AbbVie Ireland in Sligo for example.

Thank you for taking the time for reading my submission and I hope you can consider some of points made above as to why this project should be included in the new County Development Plan as a matter of urgency.

Best Regards

David Malee

