**20210118-14-DCDP**

Longford County Council
Review of County Development Plan
Forward Planning Department
Áras An Chontae
Great Water Street
Longford

Submitted via email: cdp@longfordcoco.ie

18th January 2021

**RE: Review of the Draft Longford County Development Plan 2021-2027**

To Whom It May Concern,

An Taisce welcomes the opportunity to comment on the Draft Longford County Development Plan 2021-2027. We wish to make the following submission, which we request the Council take into consideration in the finalisation and adoption of the Plan.

We would also request that the Council make An Taisce known of any further consultation periods regarding the making of the new Development Plan.

Yours sincerely,

Phoebe Duvall
*Planning and Environmental Policy Officer*
*An Taisce – The National Trust for Ireland*

# Submission on the Draft Longford County Development Plan 2021-2027



An Taisce
*The National Trust for Ireland*

Tailors Hall, Back Lane, Dublin 8
www.antaisce.org

## 1. Overarching Comments

The new Longford County Development Plan (hereafter referred to as the CDP, Draft CDP or Draft Plan) should represent a catalyst for positive change and facilitate the development of the county in a plan-led, sustainable manner. The CDP should strive to establish a coherent framework for the coordinated sustainable economic, social, cultural and environmental development of the county in line with the UN Sustainable Development Goals.

An Taisce's key objectives in making this submission on the Draft County Development Plan include:

- Ensuring that the climate and biodiversity loss emergencies are addressed at all levels of planning and development;
- Ensuring that national, regional and local policy and guidelines are implemented;
- Reducing Ireland's greenhouse gas emissions in accordance with EU law;
- Protecting town centres, and counselling against unserviced development and sprawl;
- Promoting compact development served by public transport in accordance with national Smarter Travel policy;
- Promoting rapid and extensive shifts toward walking and cycling and away from private car use;
- Reducing unsustainable fossil fuel use such as in heating buildings and in transport (e.g., private car dependency);
- Ensuring the implementation of EU environmental law and protecting habitats and biodiversity, particularly Natura 2000 sites;
- Protecting our water bodies and water quality, including through the prevention of inappropriate development;
- Conserving the quality of the Irish landscape, archaeological monuments and built heritage, particularly protected structures;
- Promoting efficient investment in public infrastructure and services; and,
- Promoting local self-reliance, public health and quality of life.

We are pleased that many of these goals already form key parts of the Draft CDP.

### 1.1 Addressing Climate and Biodiversity Emergencies

Given that the global climate and biodiversity loss emergencies are the defining challenges of our time, An Taisce welcomes the significantly increased focus on climate mitigation and adaptation throughout the Draft Plan. The climate context section provided for each chapter is a very welcome addition and emphasises the need for climate mitigation and adaptation across

all elements of planning and development. We strongly support this approach and hope that it will serve as a model for other Local Authorities.

We also strongly support the numerous commitments to a Just Transition away from fossil fuel use, particularly the numerous policy objectives providing for a Just Transition for the many people impacted by the cessation of commercial peat harvesting and the closure of the Lanesborough Power Plant.

We would note that the National Mitigation Plan was struck down by the Supreme Court on 31 July 2020 for non-compliance with the Climate Action and Low Carbon Development Act 2015. However, we note that the National Mitigation Plan is still included in the Draft Plan (for instance, in section on the climate context for Chapter 5). We submit that the Draft CDP should be amended to reflect the Supreme Court Judgment.

While the Draft CDP has a strong focus on climate, An Taisce considers that it does not sufficiently address the concurrent biodiversity loss emergency. The 2018 "Living Planet Report" from the World Wildlife Fund[1] presented a very bleak picture of the state of global biodiversity. There has been an overall 60% decline in species population size in just over 40 years (1970-2014). This decline stands at 83% for freshwater species. We would also draw the Council's attention to a recent paper[2] published by an international cohort of researchers highlighting the scale of the challenge posed by biodiversity loss, the implications for human society and the lack of adequate responses from policy makers.

We submit that the new CDP should directly and thoroughly address the gravity of the biodiversity crisis in a manner commensurate to the way it in which addresses the climate crisis. While there are many robust policy objectives in the Draft Plan aimed at ecological protection, we do not consider that they sufficiently consider the context or address the scale of the current biodiversity emergency.

## 2. Sustainable Settlement

The defining pattern of spatial development in Longford and around Ireland in recent decades has been of a sprawling, uncoordinated nature where land has been developed in a 'leapfrog', low-density pattern. This type of land use has diminished the liveability of areas, created places that lack adequate public facilities, and generated car dependency for long commutes. Section

[1] Living Planet Report, World Wildlife Fund (2018): https://www.worldwildlife.org/pages/living-planet-report-2018
[2] Bradshaw et al (2021) Underestimating the Challenges of Avoiding a Ghastly Future, Frontiers in Conservation Science: https://www.frontiersin.org/articles/10.3389/fcosc.2020.615419/full ; Covered in the *Irish Times* here: https://www.irishtimes.com/news/environment/a-ghastly-future-leading-scientists-offer-bleak-prediction-for-civilisation-1.4456653

2.6.3 of the Draft Plan notes that 65% of the housing units granted in Longford from 2006-2019 were single rural dwellings.

To achieve compact and sustainable settlement, combat rising transport emissions, and improve the quality of life for citizens, it is imperative that the new CDP addresses future population growth and continues to encourage a shift away from dispersed, car-orientated development patterns to walkable, cycleable, transit-orientated and consolidated urban forms. A crucial aspect of this will be the maintenance of and improvement in investment in public transport, walking and cycling to offer communities viable alternatives to private cars.

The prioritisation of future development in Longford's towns towards efficient, compact, and serviced locations in accordance with the sequential approach and existing infrastructural capacity is critical. The CDP should be guided by the existing essential social infrastructure (schools, community facilities, etc.) and physical infrastructure (transport, water services, communications, etc.), including realistic prospects for addressing capacity constraints. Where services are not available, there should be a reasonable expectation of their provision within the plan period. Land should not be zoned if there is no reliable prospect of providing key physical infrastructure within the plan period or a within reasonable time period thereafter, such as improved roads, footpaths, drainage and lighting to serve likely future development. The Council should engage with the providers of essential physical and social infrastructure and ensure that the town-specific policies are based on realistic assessments regarding the funding and timing of such infrastructure, recognising that some levels of strategic infrastructure may take a number of cycles to provide.

An Taisce therefore welcomes the many commitments throughout the Draft Plan to, for example:

- Promote compact development;
- Locate new development in close proximity to public transport, walking and cycling routes, and existing services and amenities;
- Direct new rural development to existing villages and Rural Settlement Clusters;
- Creating vibrant communities in both urban and rural areas
- Ensure the provision of physical and social infrastructure prior to or in tandem with new residential development;
- Direct development to infill sites, brownfield sites, vacant/derelict sites, etc.
- The overall focus on regeneration and the social, economic and environmental benefits thereof.

Additionally, in Section 4.17 on the climate context for the housing and settlement strategies, An Taisce welcomes the recognition of both building design and location in contributing to

climate mitigation. In particular, we are pleased to see the requirement in A4.1 for all one-off housing applications to include a Sustainability Statement.

As an additional measure to address compact settlement creation and the issues discussed above, An Taisce recommends that the Council make the seven location test standards for new housing outlined in the now replaced National Spatial Strategy 2002 (see chart below) a mandatory CDP requirement for new housing development. Unlike sustainability and quality of life indicators, these should be strictly enforced threshold standards without which no development should be permitted. This requires that zoning and decisions for new housing be conditional on integration with existing communities, affordability and mix of housing types, walking and cycling access to local services and schools, public transport access to employment locations, and availability of recreation facilities.

| | Evaluation Considerations |
|---|---|
| **The Asset Test** | Are there existing community resources such as schools, etc. with spare capacity? |
| **The Carrying Capacity Test** | Is the environmental setting capable of absorbing development in terms of drainage, etc.? |
| **The Transport Test** | Is there potential for reinforcing usage of public transport, walking and cycling? |
| **The Economic Development Test** | Is there potential to ensure integration between the location of housing and employment? |
| **The Character Test** | Will the proposal reinforce a sense of place and character? |
| **The Community Test** | Will the proposal reinforce the integrity and vitality of the local community and services that can be provided? |
| **The Integration Test** | Will the proposal aid an integrated approach to catering for the housing needs of all sections of society? |

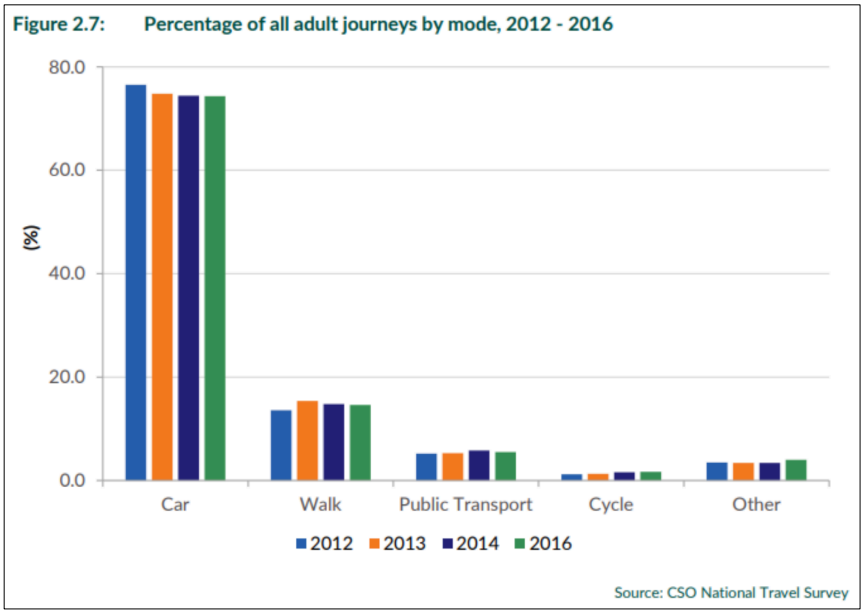
*Tests for housing locations from the National Spatial Strategy 2002*

## 3. Sustainable Transport

To achieve compact and sustainable settlement, combat rising transport emissions, and improve the quality of life for people in Longford, it is imperative that the CDP addresses future population growth and encourages a shift away from dispersed settlement towards more consolidated urban forms. A crucial aspect of this is that investment in public transport, walking and cycling is maintained and improved in order to offer communities a viable alternative to private cars.

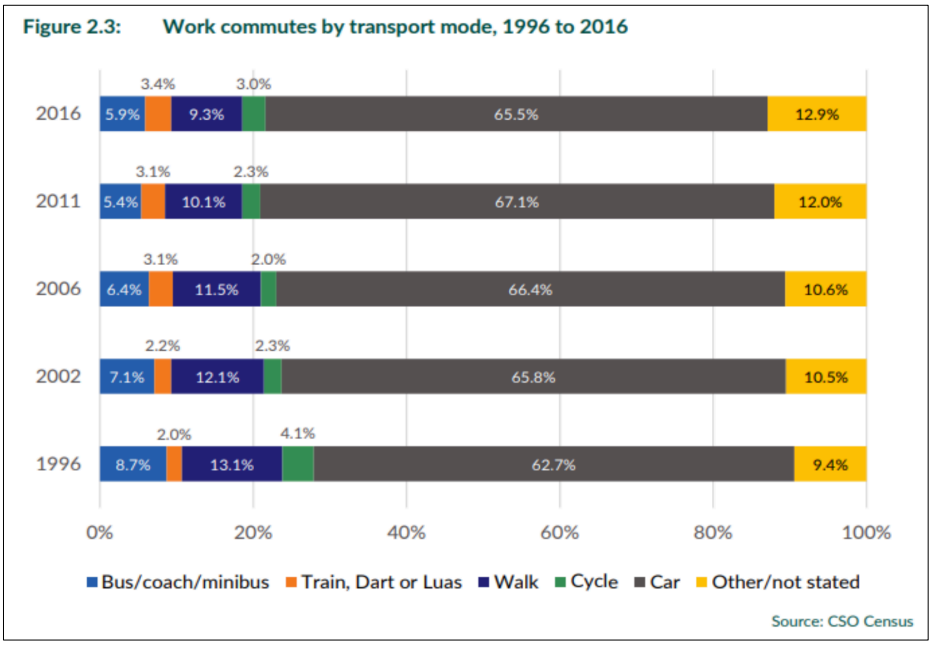
The data presented in a recent Government review of sustainable mobility policy[3] make it unequivocally clear that Ireland has failed to achieve the modal shift in transport that was envisioned in the Smarter Travel policy (2009) and a suite of other transport-related policies. Yet, as noted in the review, transport[4] accounted for over 27% of Ireland's emissions in 2017, with 52% of that generated by private cars.

CSO data show that private car dependence is extremely high across Ireland - 74.3% of all journeys are made by car. 15% are made on foot while only 5.5% are by public transport and 2% by bicycle (see chart below). We note that the National Cycling Strategy, which ran in parallel to Smarter Travel, provided that 10% of all journeys would be made by bike by 2020. Notably, public transport use and accessibility in smaller towns and rural areas is also particularly poor.




Similarly, a cornerstone target of the Smarter Travel policy was that commuting journeys made by car should drop from 65% to 45% by 2020 while commuter journeys by walking, cycling and public transport should increase to account for 55%. As the 2016 census data below shows, we have completely failed to achieve that. In fact, the share of car journeys to work has *risen* since 1996 and actually surpassed the Smarter Travel baseline of 65%. The percentage of commutes made by cycling, walking or taking the bus has decreased and is nowhere near the 55% share stipulated by Smarter Travel.

[3] https://www.gov.ie/en/consultation/f1b503-public-consultation-on-a-review-of-sustainable-mobility-policy/
[4] This does not include aviation or maritime travel emissions.




Section 8.8 of the Draft CDP states that 68.25% of Longford commuters travel to work by car, slightly above the national average of 65.6%, and just 1.7% of work commuters availing of public transport compared to 9.3% nationally.

We therefore welcome the various policies in Chapter 5 of the Draft Plan that support the integration of land use and transport planning as well as facilitate sustainable transport initiatives. However, we submit that robust targeted and timelined plans are needed to ensure the efficient implementation of these policies. We recommend that the current modal split in Longford be further analysed and that specific targets for 2027 be set in line with the Smarter Travel policy.

One specific measure that An Taisce recommends for inclusion is an explicit objective ensuring that sufficient public transport capacity as well as safe cycling and pedestrian infrastructure be provided prior to or in tandem with any new residential development. Increased sustainable transport infrastructure and capacity provision needs to come before expanded residential development, particularly in larger towns and their catchment areas.

We also submit that CPOs 5.12-5.30 on Roads and Streets should be amended to contain explicit provisions for the enhancement and expansion of safe cycling and pedestrian infrastructure. While CPOs 5.55-5.5.69 do address that infrastructure provision, we submit that these issues should also be integrated with the road policies to best facilitate the modal shift required.

### 3.1 Programme for Government

The 2020 Programme for Government sets out as overarching mission: "*A Better Quality of Life for All"* with *"A national clean air strategy," "Better work life balance"* and *"a fundamental change in the nature of transport in Ireland"* as key objectives. It sets out as immediate priority actions:

> *"Necessary improvements in climate impact, quality of life, air quality and physical and mental health demand that every effort is made by the Government to make active travel and public transport better and more accessible."*
>
> *"Each local authority will be immediately mandated to carry out an assessment of the road network, to see what space can be allocated for pedestrians and cyclists. This should be done immediately*."

In light of the Programme for Government mandate and the aforementioned transport data, we cannot overstate the urgency with which the Council needs to address the current unsustainability of transport in the county and the ongoing failure to achieve meaningful progress toward a modal shift away from private car use. We therefore recommend that provision for the immediate review called for in the Programme for Government be included in the CDP.

### 3.2 Road Investment

Any further investment in motorway or dual carriageway schemes, other than small-scale bypasses to relieve urban congestion points, would be a misdirection and misspending of limited public money. Policy and investment in Longford should be reprioritised away from road infrastructure (with the exception of necessary maintenance and town bypasses) and redirected to support public and active transport projects and cycling infrastructure. Significant amounts of existing road space needs to be reallocated for high quality segregated cycle lanes and footpaths.

### 3.3 Aviation

With regard to aviation and CPOs 5.70 and 5.71, we submit that further expansion of aviation is not compatible with national or European climate commitments.

## 4. Infrastructure

### 4.1 Water Supply and Wastewater Services

We welcome the consideration of compliance with the provisions of the Water Framework Directive and River Basin Management Plans in the granting of planning permissions (CPOs 5.81 and 5.84).

We would highlight that the ongoing proliferation of private wastewater treatment systems will present significant challenges for the achievement of Ireland's legally binding water quality targets under the Water Framework Directive. Therefore, the CDP should ensure the adequate provision of serviced sites within close proximity to established water/wastewater infrastructure, where a connection to services can be readily facilitated, and where there is sufficient cumulative capacity within the wastewater treatment plant.

We also recommend the insertion of a policy objective to promote changeover from septic tanks to public collection networks in all cases where this is feasible.

## 4.2 Energy

We welcome the Draft Plan's robust consideration of renewable energy development of various types and scales across Longford and well as the many CPOs supporting and facilitating this. We also welcome the recognition that the development of renewables must be done with regard to ecological constraints, Habitats Directive requirements, heritage considerations, landscape, local amenity, etc.

### 4.2.1 Gas Network

With regard to CPOs 5.120, 5.121, and 6.29, An Taisce submits that there is no capacity for further expansion of the fossil gas network under national, EU and international climate policy. We therefore recommend that the objective to develop further gas supplies and expand the gas network be removed. Further expansion of gas networks risks that infrastructure becoming "stranded assets" as Ireland makes the required transition away from fossil fuels.

The potential for lock-in to fossil gas and the climate implications of its continued use is not currently assessed in the climate context section Chapter 5, and we consider that such an evaluation should be included.

### 4.2.2 Anaerobic Digestion and Biomass Combustion

In principle, we welcome the objective to provide for the development of biogas through anaerobic digestion but *only* where the sustainability of this resource is justified. In order for bioenergy to be deemed renewable and to contribute to overall emissions reduction, the feedstock sources and the supply chain of these feedstocks must be assessed to be sustainable.

For example, while the burning of biogas generated from biomass, slurry, etc. might be deemed 'carbon neutral', the emissions that contribute to the growth, harvesting and transport of the feedstock must also be considered, and can negatively impact bioenergy's overall contribution to climate mitigation. The fertiliser used to accelerate the growth of energy crops and feed cattle, which eventually produce slurry, not only produce emissions but also contribute to water pollution. In the worst cases, the emissions mitigation potential of biogas may be negligible.

We would highlight that anaerobic digesters suffer from significant fugitive emissions problems via methane leaks. The effect of the leakage of this potent greenhouse gas may greatly reduce or cancel out the claimed climate benefits of using biogas in place of fossil fuels [5][6][7][8][9]. Digesters also do not remove ammonia from the digestate[10].

The CDP must therefore ensure that any provision of bioenergy is accomplished in a sustainable manner.

Anaerobic digestion predicated on increased grass/energy crop production should not be permitted in light of the increased levels of fertiliser input needed to grow the grass and the associated water quality and climate impacts. The use of existing waste streams for energy provision are often a more sustainable option as they do not promote an increase in production

[5] Paolini, V., Petracchini, F., Segreto, M., Tomassetti, L., Naja, N., Cecinato, A., 2018. Environmental impact of biogas: A short review of current knowledge. Journal of Environmental Science and Health, Part A 53, 899–906. https://doi.org/10.1080/10934529.2018.1459076

[6] Grubert, E., 2020. At scale, renewable natural gas systems could be climate intensive: The influence of methane feedstock and leakage rates. Environ. Res. Lett. https://doi.org/10.1088/1748-9326/ab9335

[7] Liebetrau, J., Reinelt, T., Agostini, A., Linke, B., 2017. Methane emissions from biogas plants. IEA Bioenergy.

[8] Ebner, J.H., Labatut, R.A., Rankin, M.J., Pronto, J.L., Gooch, C.A., Williamson, A.A., Trabold, T.A., 2015. Lifecycle Greenhouse Gas Analysis of an Anaerobic Codigestion Facility Processing Dairy Manure and Industrial Food Waste. Environ. Sci. Technol. 49, 11199–11208. https://doi.org/10.1021/acs.est.5b01331

[9] Baldé, H., VanderZaag, A.C., Burtt, S.D., Wagner-Riddle, C., Crolla, A., Desjardins, R.L., MacDonald, D.J., 2016. Methane emissions from digestate at an agricultural biogas plant. Bioresource Technology 216, 914–922. https://doi.org/10.1016/j.biortech.2016.06.031

[10] Ireland has now breached its 116kt per annum ammonia air pollution limit under the National Emissions Ceiling Directive (2016/2284/EU) for three years in a row (2016-2018) (see the EPA report, Ireland's Air Pollutant Emissions 1990-2030 published June 2020). The EPA reports that this is a direct result "*of continued increases in the national herd and fertiliser nitrogen use.*" Ireland is legally obliged under the Directive to decrease its ammonia emissions to 107.5kt by 2030, however, emissions are projected to continue to be non-compliant up to and beyond 2030.

of energy crops, which can increase $NO_2$ soil emissions and water quality impacts through higher requirements of fertiliser.

However, with regard to the use of slurry, intensive cattle farming is also a major emitter of greenhouse gases and is contributing significantly to Ireland's ongoing failures to reach its legally binding Paris Agreement targets; GHGs from agriculture account for one third of Ireland's total emissions. Any use of slurry for bioenergy production should not be reliant upon or drive further bovine agriculture intensification.

If food waste and industrial agri-food residues will be used as feedstock, it should be noted that food waste prevention is a key part of the transition to a circular economy. The maximally sustainable use of such waste material has yet to be determined, and anaerobic digestion may not be the most sustainable use. For example, there is a strong need to develop alternative composts to the current peat-based forms, and agri-food waste is a potential key ingredient.

To ensure the sustainability of biogas production, the sustainability of the biogas's end use must also be fully assessed. Permission for biogas facilities should only be granted where the biomethane will not be mixed with fossil gas, as this would exacerbate lock-in to fossil fuel use and contribute negatively to Ireland's potential to reach its 2030 emissions reduction targets. Biogas cannot be considered to be sustainable if it relies on fossil gas for its end use.

Supplying biogas to off-grid industrial users would be a potentially sustainable option, provided it is used for electricity generation and is not mixed with fossil gas. Biogas can also be sustainably used to power buses and delivery vehicles in urban areas, which will have the parallel benefit of reducing air pollution.

We submit that the above points require the CPOs for bioenergy in the CDP to be clarified. For instance, we submit that CPO 5.151 to: "*Facilitate the development of projects that convert biomass to energy, subject to proper planning considerations*" should be amended to specify that this will only be supported where it can be demonstrated that the feedstock source is sustainable and where the end product will not be mixed with fossil gas.

Similarly, CPO 5.152 to: "*Promote and prioritise utilisation of existing waste streams from agricultural and forestry sectors for renewable energy projects including anaerobic digestion, subject to proper planning and environmental considerations*" should be qualified to state that that the sourcing, sustainability and impacts of the proposed feedstocks require full assessment.

Furthermore, the import of biomass for energy should be prohibited. We would highlight the case of the West Offaly Power Station, which was refused permission for continued operation

by An Bord Pleanála on grounds that included the sustainability of the biomass as well as the inadequate domestic supply thereof and consequent reliance on imports.

## 5. Regeneration

An Taisce welcomes the Regeneration approach taken in the Draft CDP. This is also supported by the 2020 Programme for Government, which includes a mandate for implementing a Town Centres First policy to *"implement a strategic approach to town centre regeneration by utilising existing buildings and unused lands for new development, and promote residential occupancy in our rural towns and villages. We will use the National Planning Framework as our template."*

## 6. Economic Development & the Rural Economy

### 6.1 Agriculture

The EPA's latest report on Water Quality in 2019 (published in December 2020)[11] reveals that water quality trends in Ireland continue to be problematic. The report indicates that over one third of rivers and a quarter of lakes are failing to meet their environmental quality standards for nutrients. Of particular concern are the increasing pollution trends since 2015, with nitrate found to be increasing in nearly half of river sites, and phosphate increasing in a quarter of sites. This is in stark contrast to the situation in 2015 when nitrate was increasing in only 1.4% of our rivers, and phosphate in 4%. Runoff from agriculture is a key driver of these declines, particularly as herd numbers and fertiliser use increase.

Ammonia emissions causing air pollution are another result of bovine agricultural processes including manure storage, slurry spreading and the use of inorganic nitrogen fertilisers on fields. Ireland has breached its 116kt per annum limit under the National Emissions Ceiling Directive (2016/2284/EU) since 2016[12], 98% of which is caused by agriculture. Moreover, Ireland is legally obliged under the Directive to decrease its ammonia emissions to 107.5kt by 2030. Intensifying bovine agriculture in Ireland will make achieving these targets extremely difficult.

[11] EPA (2020) Water Quality in 2019: http://www.epa.ie/pubs/reports/water/waterqua/Water%20Quality%20in%202019%20-%20an%20indicators%20report%20(web).pdf

[12] EPA, June 2020, Ireland's Air Pollutant Emissions: https://www.epa.ie/pubs/reports/air/airemissions/irelandsairpollutantemissions2018/EPA-Air-Pollutant-Emissions-website.pdf

Agriculture is also a major emitter of greenhouse gases and is contributing significantly to Ireland's ongoing failures to reach its legally binding Paris Agreement targets; GHGs from agricultural account for one third of Ireland's total emissions.

While we welcome the numerous commitments to environmentally sustainable agriculture in CPOs 9.12-9.20, we do not consider that they adequately reflect the changes needed in the agricultural sector to address the aforementioned issues. These issues are also not sufficiently analysed in the climate context section of Chapter 9.

We submit that agricultural development should only be supported in the CDP policy objectives where it is demonstrably shown to not exacerbate deterioration in water quality, to comply with the Habitats Directive and to not further increase GHG emissions with respect to EU and national climate change targets.

The latest EPA water quality report discussed above is a clear indication that the water protection measures currently in place under the Nitrates Directive are failing to adequately protect our water quality, despite increased investment in this area, with the establishment of Agricultural Sustainability Support and Advisory Programme (ASSAP), and other measures intended to address this. Ireland has obligations under the EU Water Framework Directive to bring all water bodies into good status by 2027, and roughly 50% of waters are currently failing this.

We welcome CPO 9.16 to "*Facilitate the development of environmentally sustainable agricultural activities, whereby natural waters and watercourses, wildlife habitats, conservation areas and areas of ecological importance and other environmental assets are protected from the threat of pollution, and where development does not impinge on the visual amenity of the countryside*." However, we recommend that policies providing for protection from pollution should be made as strong and enforceable as possible to begin to reverse the highly problematic trends evidenced in the EPA report. The new CDP should also require compliance with River Basin Management Plans as well as the use of catchment sensitive farming practices. Specific action is also needed to protect Lough Ree and Lough Gowna.

An Taisce fully recognises that agriculture will continue to form a key part of the rural economy in Longford. In the interest of making it maximally sustainable, we therefore welcome the objectives promoting agricultural diversification. We recommend these objectives be enhanced to also specifically promote the production of vegetables, grains, nuts, pulses, fruits, etc.

### 6.1.1 New European Strategies

In May 2020, in furtherance of the European Green Deal, the EU Commission published in parallel "A Farm to Fork Strategy" and the "EU Biodiversity Strategy for 2030 - Bringing nature back into our lives". We welcome the mention of these in Section 3.3.1.

The Biodiversity Strategy includes the following key targets, the majority of which are relevant to agriculture:

1. Legally-binding EU nature restoration targets will be proposed in 2021, subject to an environmental impact assessment. By 2030, significant areas of degraded and carbon-rich ecosystems are restored; habitats and species show no deterioration in conservation trends and status; and at least 30% reach favourable conservation status or at least show a positive trend.
2. The decline in pollinators is reversed.
3. The risk and use of chemical pesticides is reduced by 50% and the use of more hazardous pesticides is reduced by 50%.
4. At least 10% of agricultural area is under high-diversity landscape features.
5. At least 25% of agricultural land is under organic farming management, and the uptake of agro-ecological practices is significantly increased.
6. Three billion new trees are planted in the EU, in full respect of ecological principles.
7. Significant progress has been made in the remediation of contaminated soil sites.
8. At least 25,000 km of free-flowing rivers are restored.
9. There is a 50% reduction in the number of Red List species threatened by invasive alien species.
10. The losses of nutrients from fertilisers are reduced by 50%, resulting in the reduction of the use of fertilisers by at least 20%.
11. Cities with at least 20,000 inhabitants have an ambitious Urban Greening Plan.
12. No chemical pesticides are used in sensitive areas such as EU urban green areas.
13. The negative impacts on sensitive species and habitats, including on the seabed through fishing and extraction activities, are substantially reduced to achieve good environmental status.
14. The by-catch of species is eliminated or reduced to a level that allows species recovery and conservation.

We submit that the policies, objectives and targets of these two strategies should be incorporated into the new CDP. We therefore recommend the inclusion of the following policy objective:

"*Longford County Council will implement the objectives and targets at county level of*

*the EU 'A Farm to Fork strategy', published in May 2020. The Council will also implement the targets of the 14 point EU Nature Restoration Plan in the 'EU Biodiversity Strategy for 2030 - Bringing nature back into our lives'. Agricultural development proposals must demonstrate compliance with the targets and policies of both strategies."*

### 6.2 Forestry

An Taisce considers that the policy objectives around forestry should differentiate between the planting of native woodland and the planting of other species such as sitka spruce, which create what are essentially ecological dead zones. We also suggest that greater emphasis be placed on facilitating the planting of native broadleaf woodlands.

### 6.3 Horticulture

We submit that an additional policy objective should be added to state: "*The extraction and use of peat for horticulture is not to be permitted"*.

### 6.4 Extractive Industry

We submit that an additional objective be included to require strict enforcement against unauthorised development and of conditions applied to permitted quarry development. We also consider that Section 35 of the Planning and Development Act 2000 (as amended) regarding past failures to comply should be rigorously applied to proposals for continued or expanding quarrying operations.

## 7. Sustainable Tourism

It is a particular objective of An Taisce that future tourism and recreational visitor promotion nationally should be as car-free as possible. A new tourist model is required based on longer area-based stays rather than drive-through tourism, and based on enhanced promotion and development of safe greenway cycling routes, and attractive walking and hiking routes for all ages and abilities.

We note that the Programme for Government sets out a range of policies on tourism including to: "*Develop Ireland as a long stay tourism destination to spread tourism more evenly across the country. This will help reduce emissions and maximise economic return.*"

We welcome the commitment to integrating climate action with tourism development in CPO 10.2 to: "*Ensure all tourism developments shall integrate climate change adaptation, the enhancement of nature and biodiversity measures into their activities, plans and proposals."* We also welcome the objectives to provide for additional tourist accommodation in appropriate locations, particularly in areas with existing services and infrastructure (e.g. CPO 10.25).

However, we submit that the Draft CDP could better support sustainable tourism development by explicitly integrating sustainable transport concerns into the tourism objectives with the goal of increasing car-free, long-stay trips, particularly through CPO 8.79. We note that this has been mentioned in CPO 10.46 to "*Support the provision of walking and cycling links between lakes, rivers, bogs and nearby towns, villages and visitor attractions, provided such developments do not negatively impact on sensitive environments*."

We also welcome the significant focus on the continued development of greenways in the county and the commitments to do so while avoiding conflicts with sensitive ecological sites.

## 8. Built Heritage and Culture

Ireland's unique built and cultural heritage in increasingly threatened with destruction. Ireland is a signatory to UNESCO's Convention Concerning the Protection of the World Cultural and Natural Heritage ratified by Ireland in 1991 and the Granda Convention ratified in Ireland in 1995. These conventions provide the basis for our national commitment to the protection of architectural heritage, the importance of "*handing down to future generations a system of cultural references*". To be effective, it relies on its signatory countries implementing their own national protective regimes.

The CDP should ensure the effective promotion of the Architectural Heritage provisions of Planning and Development Act 2000 and therefore the protection of Longford's built heritage, including Architectural Conservation Areas (ACAs) and Protected Structures.

Crucially, we submit that Chapter 11 should be amended to include policies for monitoring buildings at risk and using the provision of Section 59 of the Planning Act to serve notices of endangerment to negligent property owners. This concern is highlighted by the current situation with regard to Carrigglass Manor and its associated buildings, the early 19$^{th}$ Century former barracks in Longford Town, and the former domestic science college and convent in the village centre of Ardagh.

## 9. Natural Heritage

Ireland has a poor record when it comes to protecting the natural environment. The sprawling nature of development and settlement pattern is a driving force for habitat fragmentation, biodiversity loss and agriculture-related land loss and is contributing to climate change.

The 2019 report on "The Status of EU Protected Habitats and Species in Ireland" (prepared every six years as required by Article 17 of the EU Habitats Directive)[13] illustrates the poor condition of Ireland's biodiversity. Out of Ireland's 59 European protected habitats, 85% were assessed as being in an unfavourable conservation status and 46% suffering from ongoing declines. The report highlighted agriculture and development (housing, commercial, industrial, and recreational) as two of the primary threats facing these habitats.

In light of the above, the urgency with which we need to address the biodiversity loss emergency must be reflected in the CDP. As such, we are pleased to see the suite of policies aimed at biodiversity protection and enhancement, including for Longford's eight Special Areas of Conservation (SACs) and four Special Protection Areas (SPAs). However, the implementation and enforcement of these policies must be upheld in the planning process at all levels.

We also recommend that the implementation of the 14 points in the EU Biodiversity Strategy 2030 (as discussed above in Section 6.1.1 of this submission) should be included as a specific biodiversity objective.

## 10. Implementation and Monitoring

In the absence of rigorous application of policy, the divergence between policy and practice results in unsustainable, economically inefficient, structurally weak and spatially dispersed settlement patterns. Therefore, it is of paramount importance that the new CDP moves beyond objectives within the text and towards robust targets, actions and measures to achieve the tangible implementation of the plan's objectives and policies. The success or otherwise of the forthcoming CDP can only be judged against quantifiable and implementable criteria which are subject to ongoing monitoring. This will be fundamental in creating a sustainable and healthy society.

[13] Habitats Directive Article 17 Report Summary 2019:
https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol1_Summary_Article17.pdf

We hope and trust that the above suggestions and observations on the Draft County Development Plan 2021 – 2027 will be taken into account at the final stage of plan preparation, and will lead to an improvement in the quality of life in Longford and to better protection of our environment and climate.