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From: Roger Garland <[REDACTED]>
Sent: 23 January 2019 15:51
To: RSES
Subject: Submission to Draft RSES
Attachments: Eastern and Midland.docx

Follow Up Flag: Follow up
Flag Status: Completed

We attache our submission to the above.

Pl acknowledge receipt.

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SUBMISSION TO THE DRAFT REGIONAL SPATIAL & ECONOMIC STRATEGY FOR EASTERN AND MIDLAND REGIONAL ASSEMBLY

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

Virtually all the suggestions in our submission are based on provisions in county development plans.

Our submission is limited to the countryside and directly related issues.

We submit that you should ensure that all relevant provisions in the existing regional planning guidelines for the GDA & Eastern Region, Midland Region and Border Region(where applicable) are examined for possible inclusion. These will be referred to in the course of our submission.

Mention of a topic without comment indicates our support.

There is only one provision in the Draft to which we object which will be referred to in the course of our submission. However we will be suggesting improvement to some provisions and also suggesting additional ones.

We are surprised that the wording of very few Pol Objs are pre-fixed by a requirement to include them in development plans. Surely the best way of ensuring compliance with these Objs is to require them to be included in these plans. We commend the wording of RPO 3.1 and submit that many of the other Objs should follow on the same lines.

You will notice references to the other **Draft RSES** in our submission as we submit that there should be as much commonalty as possible in respect of non-site specific provisions. Ireland is a small country with little climatic differences between the Regions. After all all Regions contain cities, towns and villages. They all have upland and coastal areas and so on. Furthermore counties on the periphery of regions may well have more in common with adjoining counties than with other counties/cities within their own region. This problem could be exacerbated by cross boundary issues such as public rights of way, telecommunications and wind energy thus leaving county planners with sometimes invidious decisions when drawing up their development plans in trying to deal with practical cross county issues while at the same time having to conform to their RSESs.

Index We submit that the final version of the RSES should contain one particularly because many topics appear in several places in the RSES. If you don't agree we submit that a system of cross referencing should be put in place.

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

CHAPTER 1 Introduction

1.2 Eastern and Midland Regional Assembly

All text

Fig 1.1 EMRA Strategic Planning Area

1.3 What is a Regional Spatial and Economic Strategy?

All text on page 6

1.4 Review of the National Spatial Strategy and the Regional Planning Guidelines

2nd para 4th line Quite obviously **prove** on 4th line should be altered to the past tense.

CHAPTER 2 Strategic Vision

2.3 Regional Strategic Outcomes

Orange Text

10 Enhanced Green infrastructure

We submit that this should be **re-positioned** in **7.6 Green & Blue Infrastructure as an additional RPO**.

11 Biodiversity and Natural Heritage

As for 10

CHAPTER 3 Growth Strategy

3.1 Developing a growth strategy for the Region

ASSET/POTENTIAL BASED APPROACH TO GROWTH STRATEGY

PLACEMAKING

NATURAL CAPITAL

REGIONAL POLICY OBJECTIVE

3.2 Growth Enablers for the Region

ASSESSMENT OF POSSIBLE IMPACTS

Environmental Assessment

All Text

REGIONAL POLICY OBJECTIVES

Both

Ecosystems Services

REGIONAL POLICY OBJECTIVE

CHAPTER 4 People & Place

4.5 Regional Growth Centres

REGIONAL POLICY OBJECTIVES

4.7, 4.12, 4.21, 4.26, 4.34, 4.43 & 4.46

4.8 Rural Areas

1st & 2nd Paras

REGIONAL POLICY OBJECTIVES

4.52

We submit that you should replace the last phrase by: Preserve, maintain, enhance and **protect** the amenity value, visual integrity of **upland areas**. Discourage inappropriate development in open countryside and prohibit developments which are likely to have material adverse visual impacts, either individually or cumulatively, on the character of the uplands. Ensure that development will not materially interfere or detract from scenic uplands and that particular regard is had to potential impacts of new developments and require that proposed developments demonstrate that every effort has been made to reduce visual impacts(including excessive bulk and inappropriate siting) and that visually prominent sites have been avoided to minimise visibility from scenic routes, walking trails, public amenities, settlements and roads. 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 and Preserve the status of traditionally open/unfenced landscapes including commonages and other hill land. Based on **Laois** 7.19 LS01 1st phrase, Vol 1 **Wicklow** Vol 1 14.10 LO 4 & 10.3.7 NH42 1st phrase & other county/city plans.

4.55

We submit that you should **include additional sub secs:**

A Agriculture

REGIONAL POLICY OBJECTIVES:

1 Recognising the increasing demand for recreational space, commonage and other **rough grazing land** shall be regarded primarily as a **recreational resource**. Based on Galway City 4.6.2 1st para 1st sentence & Kilkenny 6.2 Commonage Land.

2 Farmers will be encouraged to see themselves as **custodians and trustees of the countryside** and the rural landscape which are valuable resources for present and future generations and provides an amenity for enjoyment of the general population. Based on **GDA RPG** 5.4.2 1st para 3rd sentence & county/city plans.

3 **Protect** and conserve **rural amenities** archaeological and natural heritage, visual amenities, eco-systems, landscapes, scenic views and the environment generally, from adverse impacts of agricultural practices and development particularly in high amenity areas and ensure that it is appropriate in nature and scale, and ensure that it does not have an undue negative impact on the visual/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, **Offaly** 10.6 RDO4 & other county/city plans.

B Forestry

We are surprised that there is no reference to **Forestry** apart from RPO 6.16 in spite of references to it in the **Issues Paper**. See 5 Environment and heritage – Land Use 3rd para 2nd sentence & Key questions 2nd pt. Therefore we submit that you should revisit this topic to include this topic.

Assuming you agree we submit that you should **include the following as RPO** under an additional sub heading: **Forestry** and that it should be **sub divided into sub secs**:

A Commercial forestry

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 a 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, **Laois** 5.10 RUR4, **Meath** 9.7.8 OBJ7 & other county/city plans.

2 Retain **existing rights of way** and **identify them** and established walking routes before planting commences and maintain them as rights of way/walking routes. Based on **Westmeath** 3.41 P 5 & other county/city plans.

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. Based on **Westmeath** 3.41 5, **Kildare** 10.5.5 FT5 2nd phrase and other county/city plans.

B Amenity woodlands

4 Manage and promote the **preservation** of the existing network of **woodlands** as they contribute to landscape character and landscape conservation and protect them from development that would impact adversely impact on them. Based on **Wicklow** 10.3.3 NH14 1st phrase,

Fingal 9.2 Obj NH27, Laois 7.13 NH22 1st phrase, Kildare 13.10.1 GI8 1st phrase & other county/city plans.

C Commercial forestry & Amenity Woodlands

5 Protect, promote, encourage and provide access to forestry and woodlands, in co-operation with Coillte, private landowners and other stakeholders for walking routes (including long distance and looped walks), mountain trails, nature trails, bridle paths, orienteering and hiking for the benefit of local people and visitors. Based on Midland RPG 3.3.4.7 last para 1st pt, Westmeath 3.41 P 4 & other county/city plans.

CHAPTER 5 Dublin Metropolitan Area Strategic Plan

5.2 Vision

Orange text

3rd para

5.3 Guiding Principles for the growth of the Dublin Metropolitan Area

Metropolitan scale amenities

5.6 Integrated Land use and Transportation

Orange text

KEY TRANSPORT INFRASTRUCTURE INVESTMENTS IN THE METROPOLITAN AS SET OUT IN NATIONAL POLICY INCLUDE

Walking and cycling

1st para

Metropolitan Greenway Network

1st para 1st sentence

2nd para 1st pt We submit that you should substitute “Sandycove” for “Sandymount”. See DLR 12.1.12 Cycling 3rd para AND that you should add: and extend it to Bray.

Remaining pts

Last para

We submit that you **include an additional para:** Where additional routes are developed Councils should provide temporary registers on their web sites pending inclusion in their next Development Plan.

Note There is a commitment in the NCPF to complete this. See 2.10 1st para.

Fig 5.3 Dublin Metropolitan Area Cycle Network

REGIONAL POLICY OBJECTIVES: MASP Sustainable Transport

Both

5.9 Green Infrastructure and Amenities

All Text

REGIONAL POLICY OBJECTIVES

Both

Metropolitan Greenbelt

All text

Fig 5.5 Green Infrastructure in the MASP area

CHAPTER 6 Economy & Employment

REGIONAL POLICY OBJECTIVES

6.4 The Region's Economic Engines and their sectoral opportunities

Rural Areas

Orange text

REGIONAL POLICY OBJECTIVES: Rural Economy

6.8

We submit that you should **include additional POL OBJS:**

1 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 **Draft RSES: Northern & Western 4.5.1 Rural Tourism** last para, **Louth 3.5 RD 16, Meath 4.6.8 P 31, Wicklow Vol 1 7.3 Strategic Objs** 7th pt & other county plans.

2 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 **Louth** 3.5 RD 16, **Kildare** 5.22 ECD 40 7th last phrase & other county plans.

3 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 unduly 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, 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 **Laois** 5.11 TM10 1st sentence 2nd phrase & 2 8 1st phrase, **Kildare** 5.16 ECD 37 last phrase, **Longford** 4.5 TOU7, **Offaly** 2.11.10 2nd para, **Westmeath** 3.14 P 3, **Meath** 4.6.8 ED POL 27, **Wicklow** Vol 1 7.4 T2 & 34 2nd sentence, Vol 3 App 1 4 **Tourism & Recreation** 1st para 1st pt, 1st sentence & 2nd pt 1st sentence & other county/city plans

5 Development of new or enhanced tourism infrastructure facilities should include an assessment of the environment sensitivities of the area including an EIA in order to avoid adverse impacts on the

resceiving environment. Ensure that effective monitoring protocols are put in place to monitor and assess the ongoing effect of tourism on sensitive features with particular focus on natural and archaeological assets. Taken from **Draft RSES: Southern Region 4.6 RPO 52**.

5 Further develop diversification into Marine, Forestry, Peatlands, Renewable Energy, Tourism and Heritage. Taken from Draft RSES: Southern Region 4.5 **RPO 48**.

6.5 Specific sectors: Retail, Tourism, Marine, Agriculture

We submit that you as **should delete Agriculture** as there is no mention of it in the sub sec.

We submit that you should **include an additional sub sec: Extractive** and that it should **include the following**:

REGIONAL POLICY OBJECTIVES

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 **Kildare 10.7.8 EI 5 last pt**, **Westmeath 3.43 P 11 last pt**, **Wicklow Extractive Industry 5.6 EX1 & other county plans**.

3 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, natural environment, listed views and prospects, features of natural beauty or interest, designated and prescribed sites, geological sites and areas of geological/geomorphological interest and areas of high scenic amenity from inappropriate development. Applicants must recognise that the

aggregates(stone and sand/gravel deposits and 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 adverse effect on the environment and visual amenities 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. Based on **Sth Dublin** 4.7.0 Obj 2, **Laois** 8.5 DM69b) & f), **Meath** 10.12 RD POL 27 & 11.14 1st para 2nd & last sentences, **Longford** 4.6 MA 2m), **Kildare** 10.7.8 3 & EI 4 & 5, **Offaly** 2.8.6 3rd para, 2.9 RDP 14 1st & 2nd sentences, 5.6 **Wicklow** Vol 1 5.6 Extractive industry Strategic Obj & 5.6 EX1.

Tourism

We submit that as **Tourism and Rural Recreation** have much in common they should be dealt with together, preferably as a separate Chpt. See **DPG** 3.5 Box 3 B Economic Development 3rd pt, **Wicklow** Vol 1 Chpt 7 & other county/city plans

Our submission relates only to rural recreation and rural tourism.

Rural Recreation

REGIONAL POLICY OBJECTIVES

Rural Recreation

1 Support development in co-operation with various stakeholders to promote, preserve, improve, encourage public access to lakes, beaches, coastal, riverside, uplands and other areas that have been traditionally used for outdoor recreation and extend recreational amenities. Based on **2000 Planning and Development Act** Sec 10(2)(j), **Meath** 4.6 POL 40, **Westmeath** 3.14 P 7 down to *recreation* on line 3 & other county plans.

2 Facilitate the improvement of existing recreational facilities including riverside and canal walks, lakes and walking and cycling routes. Taken from **Westmeath** 7.13 P 1 line 3 to *routes* on 2nd last line.

3 The importance of managing and enhancing recreational facilities, including public lands associated with important assets(such as the

Dublin Mountains) is recognised and should be supported by relevant bodies. Taken from **GDA RPG 8.6. SER 11 1st phrase**.

4 Improve access to the countryside for cycling, walking and horse riding. Taken from **Border Region 6.7 4th para last pt.**

5 Support and promote an inter-regional and collaborative approach to development of access to the countryside. Taken from **Border RPG 6.7 Recreation and Amenities Strategic Objectives EVNO 27.**

Tourism

Text

1 Rural tourism can play a strategic role in stimulating the rural economy. Taken from **GDA RPG 5.4.2 1st sentence.**

2 The project launched in 2003 by INTERREG mentions forming of the first integrated eco-tourism destination. Taken from **Border RPG 4.4.5.2 Green Box Tourism Project 1st para 2nd sentence.**

3 Tourism growth is depend on enhancing the quality and supporting the quality of rural tourism including the development of walks. Taken from **Midland RPG 3.3.4.4 2nd para 2nd sentence 1st phrase.**

4 The corridor of the River Shannon is a significant tourism asset as it offers a variety of water related holidays including boating, canoeing, walking and wildlife watching. Taken from **Midlands RPG 7.2.2.1 Lough Ree and Mid Shannon Area 2nd pt 1st sentence.**

5 Peatland tourists can interact with this unique landscape particularly in Lough Boora Parklands. Taken from **Midlands RPG 7.2.2.1 Peatlands 2nd sentence.**

6 The Region has potential for outdoor activities including equestrian activities, trekking canoeing and cycling. Taken from **Midlands RPG 7.2.2.4 1st sentence 1st phrase.**

7 The Slieve Bloom Mountains are important tourist attractions with the potential to be competitive on the national and international market for walking, cycling and outdoor based holidays. Taken from **Midlands RPG 7.2.2.4 Slieve Blooms.**

8 Lough Boora Parklands – Regional Hub for Eco Based Tourism
We submit that you should include 1st to 4th pts & 6th pts. Taken from **Midlands RPG 7.2.2.4.**

9 The **tourism potential of the Dublin Mountains** as a recreational hiking/cycling resource is significant. Taken from **DLR 3.1.2.14 6th para 1st sentence**.

REGIONAL POLICY OBJECTIVES

6 Deliver a **County Tourism Strategy** which will include objectives of promoting rural recreational activities and access to natural, geological and archaeological heritage, the coastline, forestry, inland waterways, islands and the countryside generally. Taken from Leitrim 2.2 Pol 1.

7 Develop and **promote Activity Tourism** through the development of greenways/blueways and other recreational opportunities in conjunction with county councils. Taken from **Action Plan for Rural Development 2017 Table 1 Pillar 3 3rd pt & Southern Region 4.6 RPO 51b**.

8 Encourage, enable, support, facilitate, realise the potential of and **promote** rural tourism by the provision of integrated 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. Based on **Midlands RPG 7.3 TP 13 1st phrase, Draft RSES: Northern & Western 4.5.1 RPO 36 1st phrase, Wicklow Vol 1 7.3 Strategic Objs 7th pt, Westmeath 3.35 P 6, Longford 4.5 TOU 14 & 17 2⁴th pt, Fingal 5.3 Rural Tourism 1st para 2nd sentence, Louth 3.5 RD 16, Laois 5.11 TM10 1st sentence & 5.13 VIII & other county plans**.

9 All activities will be **co-ordinated with adjoining counties**. Taken from Nth Tipp 6.11.2 **Rural Tourism** last para below Pol ECON 15 last sentence.

10 Support and facilitate the development of new **Greenways**, walking and cycling routes as key components of an overall green tourism infrastructure and actively work with all stakeholders to that end. Based on Donegal 9.1 **Other Tourism Products and Attractions 2nd para 2nd sentence last phrase & 9.2 O 9 1st phrase**.

11 Protect and conserve natural heritage features and key landscapes and seek to **restrict development** which would be detrimental to scenic and natural assets. Taken from **Westmeath 3.14 Tourism P 4**.

12 Protect key landscape resources from inappropriate development and protect the natural environment, including protected sites, coastal environment, historic and archaeological sites, maritime heritage and the routes and visual settings of potential Green Ways, walkways and cycle routes. Taken from Donegal 9.1 **Tourism - Key Planning Challenges** 1st, 7th, 8th & last pts.

13 Continue to protect the routes of potential greenways. Taken from Donegal 9.1 **Other Tourism Products and Attractions** last para, 2nd sentence 1st phrase.

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

15 Build on the amenity potential of inland waterways. Taken from **Midland RPG 7.3 TP4.**

16 Protect access to and support proposals for upgrading **inland waterways** for recreational use in co-operation with WI. Taken from **Midlands RPG 7.9 TP5.**

17 Develop and manage tourism and improved access while retaining national character and environmental sensitivity. Taken from **Midlands RPG 7.3 TP6.**

Slieve Blooms

18 Co-operate with other bodies in encouraging development of the amenity and recreational potential while preserving the quality of the environment. Taken from **Offaly 7.8.2 2nd para 1st sentence.**

19 Support the development of a Mountain Bike Trail. Taken from **Offaly 2.13 TO 9.**

20 Recognising the value of the Slieve Blooms as an area of natural beauty with considerable recreational value, protect and preserve them and support in principle the development or expansion of tourism propositions. Based on **Laois 5.13 TM4 1st sentence 1st phrase & Offaly 2.12 TP 12 & 7.9 AHAP 01.**

Recreation and Tourism

21 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.

22 Support, promote and facilitate the development of countryside and recreational outdoor activities and preserve, improve and **extend rural recreational amenities** and explore the potential for rural recreational tourism in conjunction with Tourism bodies, WI, FI, National Trails Office and NPW to diversify the range of tourist experience and extend the tourist season and Implement improvements to visitor attractions in mountain areas. Based on **Westmeath** 6.21 P & other county plans.

23 **Protect** and preserve the tourism and recreational attractions such as scenic beauty, woodlands and waterways, coastal areas and beaches, natural heritage, the character and distinctiveness of scenic landscape and the environmental quality. Taken from **Wicklow** Vol 1 7.3 Strategic Objs 1st para 6th, 8th & last pts.

Walking and Cycling

Walking

Text

1 **Connectivity** can be improve by development of walking routes to include cross border, looped walks etc and the provision of signage. Taken from **Border RPG** 4.4.5.1 last para 2nd sentence.

Table

1 We submit that you should include a **Table with maps of Way-marked Ways** of medium/long-long distance walking routes, Greenways, Sli na Slainte, heritage/historic walking trails, pilgrim paths, paths to mass rocks and holy wells, looped walks, hill walks, forest walks and other defined walking trails with accompanying maps and a data base should be set-up and up-dated as new trails emerge. See **DLR** App 8 & **Louth** Map 7.2.

REGIONAL POLICY OBJECTIVES

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

2 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. Based on **Kildare** 6.5 WCO 5 last pt, **DLR** 4.1.2.16 Pol LHB17 last phrase & 2nd sentence, **Westmeath** 8.13 O 13 last phrase & **Louth** 6.7.1 1st para.

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

4 **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.

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

Note Many counties employ one.

6 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 and facilitate the development, maintenance and enhancement of routes medium and long distance **hiking/walking** routes and community walks - particularly in rural areas and the uplands to facilitate general accessibility to link amenities and facilities. Steps to encourage routes may include secure parking and publication of maps. Based on **Laois** 5.13 TM 21 1st sentence, **DLR** 4.1.2.16 2nd to 4th sentences, **Westmeath** 3.14 P 7 5th line, **Louth** 7.4 TC 24, **Meath** 4.6.8 ED OBJ9 & other county/city plans.

7 Establish a **Recreational Trails Committee** to plan, develop and implement a recreational trail network 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.

8 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.

9 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.

10 Preserve, **protect** and enhance the integrity of existing and potential public walking and access routes(including long distance walking routes) which provide important access networks, are an important recreational resource and 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 and by protecting their integrity by taking into account the impact of any proposed development when considering planning applications. Based on **Border RPG 6.7 2nd** para 2nd to last sentences, **Louth 6.5.11 EDE 22, DLR 4.1.2.14 LHB15, Kildare 14.12.2 RW 2** & other county/city plans.

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

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

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

14 **Support the National Trails Office** in the provision of a strategy to stimulate/facilitate the promotion of recreational amenities and the development of new walking routes and it is recommended that competent authorities and community groups should plan and develop walking routes. Taken from **Draft RSES: Southern 7.2.6 1st para & 2nd para 1st phrase**.

Cycling

14 It is the aim of the NRA, in conjunction with FI, WI and Coillte, to develop a world class **traffic free route from Dublin to Galway**,

including links to Carlow and Limerick, to allow Ireland to tap into the growing tourism cycle market in conjunction with FI, WI and Coillte. Taken from **Westmeath** 8.10 2nd para.

Note This is a proposed Eurovelo route(no 2)

15 Support the delivery of Greenway projects specified on the **Greater Dublin Cycle Network** in co-operation with the NTA. Based on **Meath** 6.9 POL 14 1st phrase & **Kildare** 6.5 WCO 5 2nd pt.

16 Support the introduction of the **East Coast Cycle Route**(Killiney to Bray) in co-operation with other agencies. Taken from **DLR** 12.1.12 Cycling 4th para.

17 Promote the development, on co-operation with the relevant agencies, of the **Sutton to Sandycove** Cycletrack Scheme during the lifetime of the Plan, as it is recognised as a significant development of Dublin Bay with potential recreational and tourism benefits as well as providing a traffic free cycleway. Taken from **DLR** 12.1.12 Cycling 3rd para.

18 Support the **development of regional cycling routes** in addition to the routes identified in the NCPF and FI Strategy for the Development of Irish Cycle Tourism. Taken from **Midlands RPG** 5.10 TIP5.

Note There is a commitment in the NCPF to complete this. See 2.10 1st para.

19 Support the **development of leisure cycling routes** the extension and improvements to the **Tain Trail** route including loop routes around **Lough Ennel** and **Lough Owel**. Taken from **Midlands RPG** 5.11 TIO6 2nd pt.

20 Promote, facilitate and encourage the development, enhancement and expansion of **safe** cycle routes by facilitating the construction of cycleways. Support the development of the National Cycle Network and 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, **Draft RSES: Southern** 6.3.6.10 **RPO** 1663rd pt, **Longford** 5.1.3 PED 5, **Offaly** 4.6 STAP 08 1st line & 7.14 **LAO** 03, **Westmeath** 8.13 O 8 1st sentence 1st phrase, 2nd sentence last phrase, last sentence 1st & last phrases, **Kildare** 6.5.2 ST 17 1st phrase, **Louth** 6.7.2 RA 18 & other county/city plans.

21 Promote and incorporate the objectives contained within the **Government's National Cycle Policy Framework 2009-2012**. Taken from **DoTT's NCPF(2009)** Pol 6.2 page 26.

2 Table

We submit that you should include a Table of **Cycle routes with maps**. See **Laois** 6.1.3 Fig 17 & other county/city plans.

Walking & Cycling

Text

2 Recognise the importance of designated walking routes, greenways, pathways and cycleways with improved surfaces. Development of maintained walking routes and cycleways bring the **economic benefits of tourism** to rural areas as cyclists, walkers and backpackers stay longer in an area, and since they cannot carry much provisions they need to shop locally. International trends suggests that walking and cycling tourism have the potential to grow considerably. Based on **Sligo** 8.3 2nd para last sentence & **Cork County** 8.7.1 1st line & 8.7.3 2nd sentence.

3 Promotion of walking/cycling will be focused on leisure tourism particularly to **links to waterways and canals**. Taken from **Midland RPG** 5.2.3 3rd para.

4 We submit that you **should include Text** from **Draft RSES: Northern & Western** 5.8 **GREENWAYS**.

5 Routes can link with existing waymarked trails, **Sli na Slainte** and parts of Green Infrastructure and existing public rights of way. Taken from **GDA RPG** 8.5 last para 2nd sentence.

REGIONAL POLICY OBJECTIVES

22 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 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 countrywide 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, looped walks and 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, Smarter Travel 2009 - 2020 Cycling and Walking 1st para in line 6, Border RPG 4.4.5.1 last para 2nd sentence, 5.2.4 & 5.10 TIP4, Longford 4.5 Tourism Product 2nd para, 5.1.3 PED 3 & 5 5 & 6.9 POL15, Laois 4.3 NRA21 1st phrase, 5.11 TM20 & 7.19 LS5, Kildare 14.12.1 CR 4, Meath 4.6.8 2nd para 1st & 2nd sentences & 4.6 POL 40 1st sentence, Westmeath 3.14 P 7 5th line, Sth Dublin 4.5.0 Pol 6.1, 6.3.0 Pol 3.1 & 9.4.0. Pol 16.5, Louth 7.4 TC 24, Wicklow Vol 1 7.4 T29 1st phrase, 9.1.3 TR11 1st phrase & 13, Offaly 7.14 LAO 03 and other county/city plans.**

23 Strengthen connectivity between green space and strategic links between urban settlements and the countryside. Taken from **GDA RPG 7.7 Box 11 7th pt.**

24 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 FI, and other stakeholders to link an integrated and 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 **Westmeath 3.16 O 3, Louth 6.5.11 EDE 23 1st sentence, Longford**

5.1.3 PED 3 2nd sentence 1st & last phrase, **Wicklow** Vol 1 7.4 T29 & other county/city plans.

25 Promote, facilitate, enable and develop a comprehensive **network of greenways**, linking parks and public open spaces to regional and national Greenway Networks and collaborate with the NTA, local tourism bodies, FI, WI, adjoining councils and all stakeholders and, in accordance with an agreed code of practice, to develop a co-ordinated approach to the selection, delivering and servicing of future greenway, to achieve improve external linkages to achieve maximum impact and connectivity and having regard to the Strategy for Future Development of national and Regional Greenways(July 2018 and to provide alternative routes for pedestrians and cyclists. Based on **NPF App 1 Obj 22, Draft RSES Northern & Western 5.8 1st para RPO 97, Draft RSES Southern 6.3.6.10 RPO 166 2nd pt, Sligo 4.4.6 Obj 1.5 3rd box 2nd pt, Kildare 5.19 EO 49, DLR 4.2.2.7 Pol OSR8, Laois 4.2 OBJ6 & other county/city plans.**

26 Prioritise Greenways of scale and appropriate standards that have significant potential to deliver an increase in activity tourism and are regularly used by overseas and domestic visitors and locals. Taken from **Draft RSES: Northern & Western 5.8 RPO 95 1st phrase.**

27 Walking and Cycling will be promoted, facilitated and encouraged in accordance with initiatives contained in “Smarter Travel 2009” by improving existing cycleways and by identifying and developing a network of **safe** and guarded 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 **Smarter Travel 2009 - 2020 Cycling and Walking 1st para 2nd sentence last phrase, Laois 6.1.1 TRANS40 & 41, Kildare 6.5 WC 2, Louth 7.4 TC 22 & 23, Meath 6.9 POL 22, Wicklow Vol 1 9.1.3 TR9 to 11, Longford 5.1.1.1 ROADS 2, DLR 12.1.12 Walking 2nd para other county/city plans.**

28 Signpost and waymark walking and cycle routes with appropriately designed quality signage and information boards so as to facilitate visitors. Based on **GDA RPG 8.5** last para last sentence, **Border 4.4.5.1** last para 2nd sentence, **Wicklow Vol 1 7.4 T29**, **Kildare 14.12 CR 10** & other county/city plans.

29 Create, provide, promote, improve, plan, develop, support, enhance, encourage, extend and facilitate walking, rambling and cycling in conjunction the Irish Sports Council and other agencies by identifying/defining more dedicated walking and cycling routes(named) to enable the creation of a high quality, coherent, pleasant, integrated and comprehensive dedicated off road countrywide network of local and regional 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 strategic links from residential areas to provide access to the countryside, 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**, **Smarter Travel 2009 - 2020 Cycling and Walking 1st para in line 6**, **GDA RPG 7.7 Box 11 7th pt**, **Laois 4.3 NRA21 1st phrase, 5.11TM25 2nd phrase & 7.19 LS5**, **Kildare 14.12.1 CR 4 & 5 & 6.9 POL15**, **Sth Dublin 4.5.0 Pol 6.1, 6.3.0 Pol 3.1 & 9.4.0. Pol 16.5**, **Louth 7.4 TC 24**, **Wicklow Vol 1 7.4 T29 1st phrase & 9.1.3 TR11 1st phrase**, **Offaly 7.14 LAO 03** & other county/city plans.

30 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 **Offaly 7.16 ROWP 0 1 2nd phrase**, **Kildare 5.19 EO 50 1st phrase** & other county/city plans.

31 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, **Longford** 4.5 Mid-Shannon Wilderness Park(sic) last para & other county/city plans.

32 Explore the feasibility of developing the route of the **Sli Mor & Sli Dala** as long distance walking routes in co-operation with the Irish Sports Council, FI and other Councils. Protect and signpost them. Based on **Offaly** 7.20 AAHO-3 & **Kildare** 14.12.1 CR 8.

33 Develop and promote a Walking and Cycling Policy/Strategy within two years of the adoption of the Plan, working in partnership with statutory bodies, private and voluntary sectors, landowners and other stakeholders. The Strategy should list trails, evaluate these routes and make recommendations for their promotion. The Strategy would address, inter alia, the possibility of cycle-ways in recreational areas and along river banks, car parking for walkers and cyclists and improved signage and maps. Taken from **National Activity Plan for Ireland** App1 32, **DLR** 2.2.7.1 1st para, **Kildare** 14.12.1 CR 3 & other county/city plans.

Note Fingal has adopted a Cycle Strategy.

34 Provide adequate **car parking** and/or lay-bys for walkers and cyclists, (from your local knowledge name important locations) and other appropriate points to facilitate access to amenity/scenic areas from 9am until dark. Based on **Laois** 5.11 TM20, **Kildare** 14.12.1 CR 14 1st phrase, **Longford** 6.4 AM 3 other county/city plans.

Notes

1 The absence of car parks can cause unnecessary friction between landowners and recreational users.

2 The primary responsibility for the provision of car parking lies with councils.

35 Establish new Walkways and cycle routes on a **legal and permanent basis**. Based on **Sth Dublin** 2.2.14 2nd 15th para 1st line & other county/city plans.

36 Facilitate the **protection of walking and cycling routes** and prohibit development which would hinder the creation of future Greenways and walking and cycle routes. Based on **Cavan** 9.4.1 Objs 2nd pt & **Donegal** 11.3 P 13 2nd pt 1st phrase.

37 Protect the extent, quality, visual setting and functionality of **Greenways** and walking and cycle routes. Taken from Donegal 11.3 P13 last pt.

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

39 Consider the use of **bridle paths**. Taken from **Border** 4.4.5.1 3rd para.

40 Consider the provision of **Maps**. Taken from **Border** 4.4.5.1 3rd para.

41 Establish a **Cross Jurisdictional Working Group** to collaborate on projects such as Blueways, Greenways, Walking/Hiking Trails/Peatways to foster improved local and Regional links. Taken from **Draft RSES: Northern & Western** 8.3 RPO 209.

Disused Railways

42 Explore/Investigate the possibility of developing and utilising **former disused/abandoned** rail infrastructure for walking and cycling. Based on **Meath** 6.9 Obj 8(i) & **Laois** 6.1.1 TRANS43.

A Where the track is intact:

Safeguard the rail line from development encroachment (mentions name of line). Taken from **Westmeath** 2.3.1 Buses, Coach & Rail O IF2. To which you should add: Pending a possible re-opening of this line, consider developing a walkway/cycleway on land adjacent to the railway in cooperation with CIE, FI and the National Waymarked Ways Committee.

Note We understand that CIE generally owns a fairly wide strip of land on either or both sides of the track. Sustrans, the European organisation promoting sustainable travel, has succeeded in having this concept accepted in several European countries. Government funding could well be available and as long the track remains closed no fencing would be required for safety purposes.

B Where the track has been taken up:

43 Protect and preserve routes of former railway lines(named) for recreational development free from development by protecting, enhancing, conserving, safeguarding and preserving potential greenway

routes as long distance walking and cycling routes along or near these rail lines which could compromise their development as walking/cycle routes in the future. Along these corridors other uses shall not be considered. Where these corridors have been compromised by development, adjacent land which could provide opportunities to bypass such an impediment and reconnect these routes for walking/cycling shall be protected for this purpose. Based on **Kildare**14.12 CR5, **Offaly** 7.17 ROWO 02 & other county/city plans.

44 Actively encourage, **support, promote** and facilitate the development of disused railways (named) for **greenways**, walkways and cycleways and other recreational activity to develop a network including medium and long-distance walking and cycling routes and bridle paths to improve access to rural tourist attractions, with related signage and waymarking. Based on **FI Strategy for Development of Cycle Tourism Executive, Smarter Travel 2009-2020** Act 17 2nd sentence page 45, **Louth** 6.5.11 EDE 20, **Westmeath** 8.13 O 4 1st sentence other county/city plans. **Also Border** 4.4.5.1 last para.

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

E Golf Courses

STRATEGIC POLICY 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.

F Public Rights of Way

We submit that it should include the following **Text**:

1 Public Rights of Way have existed over the centuries and constitute an **important recreational amenity** for local people and visitors and are an economic and social asset. They enable the enjoyment of high quality landscape, natural and archaeological heritage and provide links to valuable amenities such as lakes, bogs and forests and places of natural beauty and enhance facilities for cycling and horse riding and in particular the Bord Na Mona Railway Corridor is a very valuable resource with significant tourism potential. Council recognises the importance of protecting and maintaining them. Based on **Midland RPG** 6.5.1.2 1st & 2nd sentences, **Louth** 7.5 text last sentence, **Kildare** 14.11.3 (iv) 1st phrase, **Westmeath** 7.14 1st para 1st sentence & other county/city plans.

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 **Wicklow** Vol 1 10.3.8 2nd para 2nd & 4th sentences & other county/city plans.

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 **Meath** 9.7.9 1st para & **Wicklow** Vol 1 10.3.8 1st para.

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 Part B App 3 T 15, **Meath** App14, Kerry Vol 2 App 6, Kilkenny App D, Roscommon 8.7 Map 19, Sligo 6.7.4 Public rights of way Table 6.A, Sth Tipp 6.3.7 3rd para, **Westmeath** App 8, **Wicklow** Vol 1 Table 10.3

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.

REGIONAL POLICY OBJECTIVES

For counties who have **included an Interim List**:

1 The following should be appended to the list or provided in the written statement: **This is not an exhaustive list** and the omission of a right of way from this list shall not be taken as an indication that such a right of way does not exist. Taken from **Meath** 9.7.9 2nd para 2nd sentence.

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

For other counties:

3 In accordance with the provisions of either Sections 206 or 207 of the Planning and Development Act 2000 encourage and facilitate the **creation of additional rights of way** and extend existing ones for pedestrian or amenity reasons, by investigating named areas to facilitate the development of waymarked ways and looped walks, by undertaking a review/survey of green links and cycling routes and by bringing forward proposals within two years of the adoption of the Plan, either by agreement or by the use of compulsory powers, for the creation of public rights of way particularly in areas of high amenity and recreational importance and to the Royal Canal, River Barrow, the coast, uplands, seashores, 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, **Westmeath** 7.15 O 3 1st sentence and excluding 2nd phrase, **Longford** 6.4 AM 6 1st sentence 1st line, **DLR** 4.1.2.3 LHB14 2nd & 3rd pts, **Fingal** 5.2 Obj RF118 1st line, **Kildare** 14.12.2 RW1 7th line, **Laois** 13.12 P93 & other county/city plans.

4 Provide, and where necessary, improve **signposting** and waymarking on all public rights of way. Based on **Westmeath** 7.15 O 4 & other county/city plans.

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

1 Walkers need to know of their existence to encourage usage.

2 Signage would alert local residents to planning applications affecting the integrity of rights of way.

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

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

6 **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.

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

8 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.

9 Recognizing the importance of **maintaining** public rights of way 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,

maintain, preserve, protect, conserve, enhance, support, promote and improve them for the common good and ensure that development does not impinge thereon. Ensure that they are effectively maintained by controlling undergrowth, trees and bushes. Based on **Meath** 4.6.8 2nd para, **Laois** 7.21 PRW 1 & 2, **DLR** 4.1.2.3 LHB14 1st pt, **Louth** 2.7 CON33, **Kildare** 14.12.2 RW 1 1st phrase & other county/city plans.

10 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, **Laois** 10.7 P56 & other county/city plans.

11 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 & **Kildare** 14.12.2 RW 4.

12 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.

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

(i) the footpath/bridleway being diverted by the minimal practical distance and the route continues to be segregated from vehicular traffic;

(ii) Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it.

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

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

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

Natural and Cultural tourism assets

Orange text

1st para We submit that this should be **re-positioned in a proposed additional Chpt: Built, Archaeological and Architectural Heritage**. If you agree we suggest that it should be **placed after Chpt 7 Environment**.

2nd para We submit that this should be **re-positioned in an additional sub sec entitled Inland Waterways**. If you agree it should be **placed in Chpt 7 Environment**.

3rd para We submit that this should be re-positioned in **7.7 Landscape**.

4th para We submit that this should be **re-positioned in the proposed new Chpt: Recreation And Tourism**.

Marine

Text

We submit that this should be **re-positioned in an additional sub sec: Coastal** and placed after **7.2 Integrated Land and Marine Planning**.

REGIONAL POLICY OBJECTIVE

6.19 We submit that this should be similarly re-positioned and that **National** should be inserted before **Marine**.

CHAPTER 7 Environment

7.1 Introduction

Orange text

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

The environment must be protected **for present and future generations**. Taken from **Border RPG 6.1 1st para 1st sentence**.

7.2 Integrated Land and Marine Planning

Orange text 1st sentence

Text

REGIONAL POLICY OBJECTIVES

7.1

Coastal dynamics

1st para last sentence

3rd & 5th paras

REGIONAL POLICY OBJECTIVES

7.3

We submit that you should **include an additional sub sec:**

Text

Ireland is obliged to develop a Maritime Spatial Plan which will be the maritime counterpart of terrestrial spatial plans such as the NPF and will set out sectoral policies in areas such as offshore energy and the marine environment. Taken from **Draft RSES: Southern** 4.9.1 2nd para 1st sentence.

REGIONAL POLICY OBJECTIVES:

1 Promote and support, in conjunction with the Councils in adjoining counties and other partner agencies the development and use of a strategic waymarked **coastal path/greenway** along the entire coastline, as a tourist and recreational amenity. Based on **GDARPG** 7.7 Box 11 8th pt & other county/city plans.

Notes

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

2 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 **GDA RPG 7.7 Box 11 9th pt**, **Border RPG 6.7 4th para 3rd pt**, **Wicklow 10.3.6 NH37**, **Meath 9.7.11 OBJ9**, **Fingal 9.5, DLR 4.1.2.9 3rd para last sentence & other county/city plans**.

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 and the historic and archaeological features. Protect, conserve, safeguard and preserve the character, visual, environmental and amenity values, quality and distinctiveness of coasts, landscapes 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 **NPF National Policy Obj 41a**, **Border RPG 6.8 Coastal Strategic Objectives ENVO31**, **Fingal 9.5 Obj NH 60 & 67**, **Wicklow Vol 1 11.2 CZM5 a) & c)**, **Meath 9.7.11 1st phrase & other county/city plans**.

3 Restrict development of undeveloped sections of the coastal zone to essential marine and coastal activities and only where such development would not compromise environmental protection objectives. Taken from **Border RPG 6.8 2nd para 4th pt**.

4 Protect and preserve our coastal archaeological heritage. Taken from **Draft RSES Northern & Western 4.5.4 RPO 60 1st phrase**.

5 Support the integration of different uses of the marine environment and ensure consistency and alignment between high-level plans such as the National Maritime Spatial Plan, regional-based approaches in maritime and localised coastal management plans and local integrated coastal zones management plans. It is important to be cognisant of the

need to promote cross-border management of coastal areas within the Region. Taken from Draft RSES Southern 4.9.1 RPO 75 1st & 2nd sentences.

7.5 Biodiversity and Natural Heritage

National Parks

1st para

2nd para 1st sentence

2nd sentence We have a major problem with this. While it may be possible for an interpretive centre to be well designed, the concept of an interpretive centre is, we submit, totally inappropriate whether situated within or adjacent to Wicklow Mountains National Park. You may recollect that an attempt was made about 20 years ago to provide a centre at Luggala. The project was strongly opposed by walkers and an Bord Pleanála refused to sanction the project. We are quite satisfied that, from talking to our members, that recreational users do not need a centre. While Car parking is a problem in many areas throughout the Region, the provision of car parking must not be used as pretext for a centre. We will be referring to this problem later in our submission.

You may take it that the level of opposition to any centre, however well designed, will be major. You may be aware that a proposed centre at the Hell Fire Club in Co Dublin, which is situated adjacent to the Park, is now with an Bord Pleanála. Finally, the precedent of the centre at Glendalough is being used to justify other centres. It is generally acknowledged that this centre has been a great success. However, it must be pointed out that the centre is in a lowland area and bears no relation to the Park which is entirely in upland areas.

3rd para

We submit that you should **include a POL OBJ**: Promote and explore the feasibility of creating **National Parks** at Lough Ree, Mid Shannon, Slieve Blooms and Clonmacnoise. Taken from **Midlands RPG 6.9 EO2**.

Dublin Bay Biosphere

Text

REGIONAL POLICY OBJECTIVES

7.18 We note the reference to *visitor experience*. As point out above this should not include an interpretive centre. We submit that what would be useful would be a panel showing recommended walking routes and a box containing maps.

19 & 20

We submit that you should **include an additional POL OBJ: County Heritage Plan**: Continue to support the renewal of these Plans and work with all key stakeholders to support the Plans through other plans and programmes. Taken from **GDA RPG 7.3.1 GIR 12 & Border RPG 6.3.3 National Heritage Strategic Objectives ENV02**.

7.6 Green and Blue Infrastructure

We submit that these topics are really quite different and that this sub sec should be re-drafted so that **Blue** should have a separate sub sec.

Orange Text We submit that you should insert as the 1st sentence Green Infrastructure surrounds and threads through our cities, towns, villages and rural areas. Taken from **Draft RSES: Southern 5 Sec 2 Green infrastructure**.

Other Text

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

1 Our environment and heritage resources can be described/defined as Green Infrastructure and can be public or private, with an inter-connected and strategical planned and delivered network of natural and semi-natural areas including coastal and marine areas linked to high quality green space and other environmental features which possess a broad range of ecological elements which should be designed and managed as the multi- functionality of nature and can be expanded to maximise its benefits and be capable of delivering a wide range of positive environmental/quality of life benefits for visitors, local communities and individuals and are vital resources for our future. Green Infrastructure is the framework needed for environmental, social and economic sustainability – in short it is the nation's natural life sustaining system and provides enhanced environmental and economic benefits, conserves natural ecosystems and the environment. Green Infrastructure can provide access to more areas for people to enable them to enjoy nature and it encourages physical activity with consequent improvement in the health and

wellbeing of individuals and communities. Green Infrastructure can conserve natural eco systems, values and functions. The Green Infrastructure network supports and maintains natural ecological processes and provides vital amenity and recreational spaces for communities. Based on **Draft RSES: Southern 5 Sec 2 Green Infrastructure** 1st para 2nd sentence, **Wicklow** Vol 1 10.3.6 2nd para 1st pt & Vol 3 App 8 WHAT IS GREEN INFRASTRUCRURE? 3rd 8th & 11th pts, **Dublin City** 10.5.1 1st para last 2 sentences, **Kildare** 13.10 5th para 1st sentence, **Sth Dublin** 8.0 1st para, 2nd para last sentence & 8.0 3rd para last pt, **Laois** 7.12 1st sentence 1st phrase & 2nd sentence, **Louth** 5.15.5 1st sentence, **Offaly** 7.5.1 2nd para 2nd sentence & 2nd pt & other county plans.

Also

There is excellent text in **Fingal** 8.1 & **Sth Dublin** 8.0 which could be considered for inclusion.

2 Recognising the growing importance green infrastructure and ecosystem services and functions in 2013 the EU Commission adopted a Strategy in promoting investment in Green Infrastructure to promote the development of a European Network. Based on **Draft: RSES Southern 5 Sec 2 Green Infrastructure** 2nd para 1st & 2nd sentences, **Galway County** 9.8 Green Infrastructure last sentence & **Sligo** 7 Heritage footnote attached to O H 3.

Fig 7.3 Zoned as GI and designated lands

EMRA Strategic Green Infrastructure and Cultural Heritage

We submit that this has nothing to do with GI and that it should be re-positioned as a separate sub sec: **Archaeological and Natural Heritage Assets**.

In the preparation of Green Infrastructure Strategies, Local Authorities shall follow these Guiding Principles:

Identify and protect existing GI assets

Connectivity is key

Integrate an ecosystem services approach

Design GI strategies that function at different scales and across boundaries

Integrate built and natural heritage

REGIONAL POLICY OBJECTIVES

Both

We submit that you should additional **POL 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 spatial network that can be delivered by local area plans and can connect 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 **GDA RPG 7.7.1** GIR30 1st phrase, **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, **Fingal 8.3** Obj GI10 1st phrase & 12 1st phrase & other county/city plans.

2 In developing green infrastructure, opportunities should be taken to **provide**, develop, enhance, improve and promote an attractive and integrated safe **network of paths and cycle tracks** to strategic level amenities, to promote permeability and 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 to 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 **Laois** 712 1st para 3rd sentence, **Sth Dublin** 8.1.0 Obj10, **Kildare** 13.10 GI 7, **Wicklow** Vol 1 10.3.5 NH35 1st phrase & NH36 3rd line & other county/city plans.

3 Protect, conserve, maintain, manage, facilitate, improve and enhance the green infrastructure network/linkages in consultation with relevant stakeholders. Recognise its health benefits and environmental value through the integration of GI planning and development in the planning process. Open spaces should be designed so that people can have access to nature near where they live. Based on **Laois** 7.12 NH9 1st phrase, **Kildare** 13.10 GI 1, **DLR** 4.2.1.1 Pol OSR1 & other county/city plans.

4 Restrict/resist development which would damage, fragment or prejudice the green infrastructure network. Taken from **Sth Dublin** 8.1.0 Obj 3, **Fingal** 8.2 Obj GI06 & other county/city plans.

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

6 Councils shall liaise with each other to ensure consistency with each other in delivering regionally GI development. Based on **Draft RSES: Southern** 5 Sec 2 **Green Infrastructure** 3rd para 2nd sentence & **Wicklow** Vol 3 App 8 GIR30 2nd sentence.

7 Councils should collaborate with appropriate stakeholders such as the NTA to seek out opportunities to appropriately design, deliver and manage Green Infrastructure. Taken from **Draft RSES: Southern** 5 Sec 2 **Green Infrastructure** 3rd para last sentence 1st phrase.

We submit that you **should include the following Table** (No 12) from **GDA RPG Regional Green Infrastructure**:

1st pt **World Heritage site**: Bru Na Boinne

2nd pt **Archaeological sites**: Hill of Tara

3rd pt **River & canal corridors**: Named

5th pt **Transport corridors**: Disused rail corridors

6th pt **Regional cycle/walkways**: Named

Development of Greenways, Blueways and Peatways

Orange text

1st para

2nd para 2nd sentence 1st phrase

There are significant opportunities to develop a number of flagship greenways in the Region

Greenways

Blueways

Peatways

We submit that this **should be-repositioned in proposed new sub sec: I Peatlands** at end of Chpt.

REGIONAL POLICY OBJECTIVES

23 We submit that this should be replaced by: Support the investment in the development and promotion of a Strategic Greenway Network of national and regional routes and corridors. Proposals for investment in these corridors should be based on rigorous site/route selection to ensure that they include a number of high capacity flagship routes that can be extended and/or linked with local Greenways and other cycling and walking infrastructure and extending into and between regional settlements. Based on **Draft RSES: Southern 7.2.2 RPO 193 1st phrase**.

24

We submit that you should **include an additional POL/OBJ**: Support the development of a green infrastructure along abandoned railways and canals to become part of the growing network of Greenways and Blueways as well as improving access to rivers for recreational purposes. Taken from **RSES: Southern 7.2.7 1st para**.

7.7 Landscape

1st & 2nd paras

3rd para We submit that you should add to the 1st sentence and ensure compliance with the ELC which came into force in 2004. Taken from **Draft RSES: Southern 5 Sec 2 Landscape 2nd para 1st sentence.**

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

1 Landscape is a significant resource that each generation is charged with **conserving** and safeguarding for **future generations**. Taken from **Border RPG 6.4 1st para 1st sentence.**

2 Existing pressure on landscape are primarily related to impacts on sensitive views resulting from cumulative impacts arising from inappropriate siting and design of development works. Taken from **Border RPG 6.4 2nd para 1st sentence.**

3 The European Landscape Convention(2000) recognises the importance of all landscapes as having a bearing on quality of life and establishing that the general framework for protecting the landscape is the State's responsibility. It encourages public bodies to adopt policies and measures at national, regional and local level to protect, manage and plan landscapes. Landscape means an area, perceived by people, whose character is the result of the action and interaction of natural and/or human factors. Based on **Draft RSES Northern & Western 5.3 2nd para & Border RPG 6.4 6th para 1st phrase.**

4 The National Landscape Strategy Vision is carried through into the NPF Taken from **Draft RSES: Southern 5 Sec 2 Landscape 2nd para 2nd sentence.**

5 There is Text in **Draft RSES: Southern 7.3.1 1st para** which could be considered for inclusion.

5 The Slieve Bloom Mountains rise above their relatively flat surrounding area to a height of 526M. Taken from **Midlands RPG 6.3.9 1st sentence.**

6 Rivers Nore and Barrow rise in the Slieve Bloom Mountains. The surrounding area is one of rolling landscape with significant heritage including alluvial wet woodlands. Taken from **Midlands RPG 6.3.10.**

Landscape Character Assessment

We submit that you should **include an additional para:** The Landscape Strategy for Ireland 2015- 2025 sets out the aim of developing a **National Landscape Character Assessment** which will include

guidelines for developing LCAs at county or intra county level. It is important that there is a more consistent approach to landscape characterisation and amenity protection measures applied to similar classifications across the region. Taken from **Draft RSES: Northern & Western 5.3 3rd para last para.**

Farming

We submit that this should be **re-positioned** in proposed additional sub sec A **Agriculture** in Chpt 5.

Peatlands We submit that this should **be repositioned in proposed additional sub sec: I Peatlands**

All text

In the consideration of development on peatland areas, the following guiding principles should apply:

3rd & 4th pts

REGIONAL POLICY OBJECTIVES

7.25

We submit that you should **include an additional POL/OBJ: Develop a Regional Landscape Strategy** to facilitate landscape protection, management and change through undertaking a Regional Landscape Character Landscape Map and the development of guidance on local landscape assessments including historic landscape characterisation to ensure a consistent approach particularly across planning and administrative boundaries. Taken from **Draft RSES: Southern 5 Sec 2 Landscape RPO 123.**

26

We submit that you should **include additional POL OBJS:**

- 1** Provide and increase managed **public access** to interesting and attractive landscapes or to semi-natural and landscape amenity areas for recreational purposes. Based on **Fingal 9.2 High Amenity Zoning** last pt & other county/city plans.
- 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 of **upland areas**. Discourage inappropriate development in

open countryside and prohibit developments which are likely to have material adverse visual impacts, either individually or cumulatively, on the character of the uplands. Ensure that development will not materially interfere or detract from scenic uplands and that particular regard is had to potential impacts of new developments and require that proposed developments demonstrate that every effort has been made to reduce visual impacts (including excessive bulk and inappropriate siting) and that visually prominent sites have been avoided to minimise visibility from scenic routes, walking trails, public amenities, settlements and roads. 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 & 30 & other county/city plans.**

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

5 Protect, conserve, preserve, maintain, manage and enhance the visual integrity, uniformity, character, distinctiveness, scenic quality, general amenity and recreational values and the visual quality of areas of intrinsically 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 **Draft RSES: Northern & Western 5.3 RPO 77, Border RPG 6.4 Landscape Policy ENVP7, Louth 3.10.7 1, Sth Dublin 9.20 Pol 7, Westmeath 6.23 P HAA1 & 5, Fingal 8.8.1 NHEO26 & Chpt 9 Obj 51, Meath 9.8.6 OBJ 1 2nd phrase & other county/city plans**

6 Councils shall collaborate, co-ordinate and co-ordinate with adjoining councils in determining landscape character along their borders so that development plan policies are consistent in the protection of and management of landscape. A targeted review should be undertaken to ensure consistency in classification and policy in adjoining areas of similar character. Based on **Draft RSES: Northern &**

Western RPO 78 1st & 2nd sentences & Border RPG 6.4 Landscape Policy ENVP8.

7 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, reinforces the distinctiveness and sense of place of the landscape character types by taking into account elements such as geology scenic quality, historic heritage and tranquillity. 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 **Sth Dublin 9.2.0 Pol 7.1 & 2, Meath 9.8.6 SP 1, Fingal Chpt 9 Obj NH33 & LCo2, Kildare 14.10 LO 1, Offaly 16.3 P16 02, Wicklow Vol 1 10.3.9 NH49 1st phrase & other county/city plans**

8 Investigate the feasibility of preparing a **Historic Landscape Characterisation** and utilize the results to complement and contribute to a comprehensive LCA and support outcomes through policies and objectives in Development Plans. Based on **GDA RPG 7.2.1 GIR10 1st phrase & other county/city plans.**

9 Encourage the implementation of **LCAs** using a co-ordinated approach. Taken from **Midlands RPG 6.9 E01**. Also **Border RPG 6.4** last para last sentence last phrase.

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

wire will not be used for the top line of wire. Based on **Fingal Chpt 5 Obj RF115, DLR 8.2.7.5** list of pts & other county plans.

Note As fencing may have a cross-county dimension it is important that this development plan should be in conformity with those in adjoining counties.

We submit that you should **include additional sub secs in Chpt 7 Environment** and that they should **include the following REGIONAL POLICY OBJECTIVES:**

A Eskers

Text

Eskers are derived from glacial deposits formed during the ice age and usually consist of sorted gravel deposits which have historically made them particularly attractive for quarrying operations. Historically used as transport carriageways they provide a network of raised, dry routes through flat boggy and at stages, tree covered landscape. Eskers, along with other geological features of the central region, are of significance for their geological, economic and national heritage interest. One of the most significant esker systems are known as the Esker Riada or Sli Mhor, a raised platform running from east to west. Taken from **Midlands RPG 6.3.5 1st to 4th sentences.**

REGIONAL POLICY OBJECTIVES

1 Increase cycling and **pedestrian access** and maintain esker heritage. Taken from **Westmeath 5.10 2.**

2 Support, in consultation with the NPWS, Offaly County Council, GSI and others, the designation of south Westmeath esker landscape as a **Unesco geo-park**, to promote the unique geological heritage of the area. A designation would contribute to the development of tourism. Taken from **Westmeath 5.10 O 2 & 6.20.**

3 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.**

B Geology

REGIONAL POLICY OBJECTIVES

1 Provide, promote, encourage, facilitate and support **access and public rights of way** to geological and geo-morphological features. Based on **Fingal** 9.3 Obj NH 31, **Louth** 5.6 HER 9, **DLR** 4.1.3.10 last para, **Westmeath** 5.8 P 4, **Wicklow** Vol1 10.3.5 NH28 1st phrase & other county/city plans.

2 Promote encourage and facilitate the development of geo-tourism and recreational potential by conserving and managing geological resources, and by the development of a Rock Trail(named), **Geoparks** or other similar geo-tourism initiatives. Based on **Laois** 7.22 GEOL4, **Wicklow** Vol 110.3.5 NH29 last phrase & other county/city plans.

3 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 its heritage or would damage or threaten its 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 sites 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, **Midlands** RPG 6.8 EP12 1st sentence, **DLR** 4.1.3.9 Pol LHB27, **Kildare** 13.9 NHO9 & 16, **Offaly** 7.2 13 & 7.3 NHP16, **Wicklow** Vol 1 10.3 P99 **Natural Heritage Strategy** 3rd pt, **Sth Dublin** 9.7.0 Obj 1st phrase, **Laois** 7.12 NH12 & 7.22 GEOL1, **Fingal** 9.3 Obj NH30, **Westmeath** 5.8 P 2 & GEO3, **Longford** 6.2.2.6 GEO 1 & other county/city plans.

C Islands

REGIONAL POLICY OBJECTIVES

Sea Islands

1 Preserve **public access to islands**(including uninhabited ones) 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 County 4.10 RCI 10 4, Sligo 4.4 P TOU 9 & Galway County 4.14 Obj EDT 21.

2 Protect and enhance the landscape character, exceptional landscape value and archaeological heritage of islands and safeguard their integrity. Based on **Fingal** 9.2 Obj NH50 & other county plans.

All Islands

3 Support and promote, with the co-operation of private landowners, **public access** to islands. Taken from Sligo 4.4 P TOU 8.

4 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 P1 & **Longford** 6.2.2.7 ILW 14.

D Mass Rocks/Holy Wells

REGIONAL POLICY OBJECTIVE

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

E Special Area Amenity Orders

REGIONAL POLICY OBJECTIVES

1 Protect and enhance the amenity of the (named) Special Amenity Areas in accordance with the Order and implement the Management Plan in consultation with all relevant stakeholders. Based on **Sth Dublin** 9.3.3 Pol 4 1st phrase & **Fingal** 9.4 Obj NH43 & 46.

2 Improve (named)SAAO and promote its tourism potential and investigate the feasibility of **extending** the (named) SAAO within two years of the adoption of the Plan. Taken from **Kildare** 14.8.5 WC 6, **Fingal** 5.4 **Special Amenity Areas** SA o2 & **Sth Dublin** 9.3.3 Pol 1st Action.

3 Explore the establishment of **Barrow Valley and Canals** as a SAAO as per section 202 of the Planning and Development Act 2000(as amended). Taken from **Kildare** 14.8.5 WC 7.

4 Actively propose the designation of the **Slieve Blooms** as a Special Amenity Area and seek an Order to that effect. Taken from **Laois** 7.19 LS39.

5 Seek the designation of the **Liffey Valley** from Islandbridge to the city boundary as a SAA and prepare a SAAO for it. Taken from **Dublin City** 10.5.3 GIO14.

6 Councils should undertake an **examination of suitable locations** for designation of SAAOs. Taken from **GDA RPG** 7.6.1 GIR26.

F Views and prospects

Table

We submit that you should include a Table of: **Views and Prospects** with accompanying maps. See **DLR** 4.1.2.5 Table 4.1.1, **Fingal Green Infrastructure**, **Kildare** T 14.5 to 10 & M, **Longford** T 6.1 & App 6, **Louth** 5.15.4 T5.16 & M 11.1(Vol 2b) & App 11, **Meath** App 12 & M 9.5.1, **Sth Dublin** T 9.2 & **Wicklow** Schs 17.8 & 9.

REGIONAL POLICY OBJECTIVE

Protect, preserve, safeguard, improve, enhance, conserve the character of listed **views and prospects** and listed **scenic routes** adjoining public roads which contribute to the appreciation of the character of the landscape and natural heritage, quality of vistas, visual linkages between established landmarks and landscape features or places of natural beauty or interest, river valleys, sea, lakes, rivers, canals, unspoilt mountains, uplands, coastal landscape, views of historic interest or significance or of special or high amenity value or interest visible from the public places. Based on **GDA RPG** 7.3.1 GIR15, **Border** 6.4 ENV07 1st phrase, **Dublin City** 10.5.2 G18, **Westmeath** 6.25 P 1 1st phrase, **Sth Dublin** 9.2.1 Obj1, **DLR** 4.1.2.5 2nd para 2nd pt & Pol LHB4, **Louth** 5.15.4 HER 63, **Longford** 6.1.1 LCA 3, **Kildare** 14.9.1 SR 2 & 14.10 LO5 & 06, **Laois** 7.20 AV1 & other county/city plans.

G Wetlands

REGIONAL POLICY OBJECTIVES

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 **Meath** 9.7.10 POL21 & other county plans.

2 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 protect and conserve their quality, character and features by controlling adjacent development by use of buffer zones. Based on **Sth Dublin** 7.2.0.9, **Offaly** 7.3 NHP 11, **Fingal** 5.3 Obj RF 98 1st sentence & 7.2 Obj SW01, **DLR** 4.1.3.7 1st para 6th pt, **Longford** 5.3.2 SFRA 3 & other county plans.

H Natural Heritage, Environment & Amenities

Text

We submit that you should **include Text** from **Midlands RPG 6.4 Natural Heritage(Geological Integrity)**.

REGIONAL POLICY OBJECTIVES

1 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 **Border RPG** 6.7 4th para 3rd pt, **Laois** 4.3 NRA6 1st phrase & 9 & 5.11 TM29 1st phrase, **Sth Dublin** 9.40 Pol 16, **Longford** 6.2.2 NHB 3, **Fingal** 5.1 NH01, **DLR** 4.1.1.1 Pol LHB1 & other county/city plans.

2 Strive to create a **network of natural heritage areas** and recreational open spaces/amenity areas by promoting linkages and accessibility by using walkways/cycleways. Taken from Cork City 10.3 2nd sentence 1st phrase.

3 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 night 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 ©, **Project Ireland 2040** national Pol Obj 60, **Midlands RPG** 6.8 EP12 1st sentence, **Border RPG** 2.2 SG5, **Offaly** 2.11 4th para, **Meath** 4.6.8 POL 29, **Kildare** 13.4 NH 1 & 14.10 LO 4, **Louth** 5.7 HER 10, **DLR** 4.1.3.1 Pol LHB19 1st sentence, **Longford** 6.2.2 NHB 1 1st sentence & 2, **Westmeath** 7.13 P REC1, **Sth Dublin** 4.3.3 Strategy 2nd pt, **Wicklow** Vol 1 10.3 **Natural Heritage Strategy** 4th pt & other county/city plans.

4 Support initiatives to enhance and protect the Region's **national heritage**. Taken from **Draft RSES: Southern** 7.3 **RPO 194** 1st phrase.

I Peatlands

Text

1 The **preservation of bogland** is important from a landscape perspective. Taken from **Border RPG** 6.4 4th para 3rd sentence 1st phrase,

2 The **National Peatlands Strategy(2015)** gives direction to the approach to peatland management including bog conservation and restoration. Taken from **Draft RSES Northern & Western** 5.8 **OUR BOGS & PEATWAYS** 2nd para 1st sentence. **3** A key consideration is how to harness the value of our peatlands to deliver maximum **social and environmental benefits**. Taken from **Draft RSES Northern & Western** 5.8 **OUR BOGS& PEATWAYS** 1st para at top of page 218.

REGIONAL POLICY OBJECTIVES

1 Plan and prepare for the **future use of large industrial bog sites** when peat harvesting finishes as there is potential for the development of tourism amenities in conjunction with NPWS, Coillte and ESB/Bord na Mona. Based on **Laois** 5.10 OBJ12 **Westmeath** 5.12 P 4 1st sentence 1st phrase & **Longford** 4.5 TOU 23 last pt.

2 Explore the potential for the development of new tourism and recreational activities and work in partnership with relevant stakeholders towards achieving a **National Peatlands Park**. Based on **Action Plan for Rural Development** 2017 Pillar 3 Act 187 1st phrase & **Offaly** 7.4 NHO 12.

3 **Protect**, conserve and manage the character, appearance, heritage and amenity values of peatland landscapes, in **conjunction** with the BnM, NPWS, Coillte, FI, IPCC and NGOs. Promote high environmental standards and focus on tourism. Based on **Laois** 7.19 LS44, **Meath** 9.7.6 1st para 2nd sentence & POL 11, **Offaly** 2.12 TP 06 & 7.3 NHP 12, **Westmeath** 5.12 P 1 TO 03 & other county plans.

4 Ensure that peatland areas which are **designated or proposed for protection** under international and national legislation, including landscapes and historic walkways are protected, conserved and managed to conserve their archaeological significance. Based on **Draft RSES: Northern & Western** 5.9 RPO 101, **Offaly** 7.3 NHP 12, **Westmeath** 5.12 P1 & 2 & **Meath** 9.7.6 POL 11.

5 **Establish a Regional Forum** that shall prepare an audit of worked-out bogs and peatlands to identify strategic sites, including such areas as renewable energy, tourism, recreation and amenity. Taken from **Draft RSES Northern & Western** 5.9 RPO 102.

6 Facilitate the development of the **Peatways Strategy**. Taken from **Draft RSES: Southern** 4.6 RPO 51e.

J Inland Waterways

Text

Lakelands and waterways offer significant potential to develop tourism as amenities for such as natural heritage and archaeology. Taken from **Midland RPG** 7.2.2.1 1st sentence 1st phrase.

A Table of Existing or potential riverside and lakeside walks/cycle routes. See **Kildare 5.9.5 ECD 29**.

REGIONAL POLICY OBJECTIVES

1 In partnership with the NPWS, WI, Councils, community groups and other relevant stakeholders, identify, provide, preserve, protect, promote, encourage, enhance, develop, facilitate, increase, upgrade, support and improve **public access** to and around lakes, rivers(named), river valleys, canals and riparian/waterway corridors (including rivers and streams) in order to provide improved recreational amenities for local people and tourists. Based on **National Heritage Plan 4.17, Border RPG 6.7 4th para 3rd pt 1st phrase, Laois 7.19 LS28 1st sentence, Longford 6.2.2.7 ILW 3, DLR 4.1.3.7 Pol LHB25 2nd sentence, Fingal 9.2 Obj NH25 1st phrase, Westmeath 5.16 P 4 5th line & O 1 1st phrase & other county/city plans.**

2 Provide, identify, create, protect, maintain, promote and facilitate the development of Blueways and trails, preferably off-road, **for walking, cycling** and land-based activities (including wildlife/bird watching and other non-noise generating recreational activities) to form linkages between them to form a “necklace effect”, as an amenity for visitors and local people focusing on linear features such as canal and river banks and walking paths of canals(including disused canals) and other waterways including rivers 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 **Draft RSES :Northern & Western 5.8 BLUEWAYS RPO 99, GDA RPG 7.7 Box 11 6th pt 1st phrase, Longford 6.2.2.7 ILW 9, Kildare 5.24 ECD 46 & 14.12.1 CR 7, Westmeath 5.16 P 14 2nd sentence & other county/city plans.**

3 In areas along or adjacent to inland waterways, including lakes canals and rivers, where planning permission is sought, conditions may be attached requiring the retention or creation of full **public access** and 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 & other county/city plans.**

4 Preserve and enhance an undisturbed buffer zone or riparian corridor by requiring the **reservation of land** adjoining or adjacent to canal and river banks, streams, lakes and other waterbodies to protect them and **promote and facilitate the creation of waterside linear parks** to link

with existing parks and open spaces and to facilitate the provision of walking/cycling routes along canals and watercourses and to facilitate and encourage public access for non-noise generating recreational activities. Based on **Westmeath** 3.16 P 8 & 6.2.7 O 5, **Kildare** 5.24 ECD 50, **Longford** 6.2.2.7 ILW 7, **Offaly** 7.3 NHP-13 1st phrase, **Laois** 7.19 LS 28 2nd sentence last phrase & other county/city plans.

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, improve and enhance rivers(named), 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 **Laois** 7.16 35 & 7.19 LS28 2nd sentence 1st phrase, **Kildare** 14.8.5 WC 3 & 14.9.2 WV 3, **Sth Dublin** 8.2.0 Obj 4, **Fingal** 9.2 Obj NH24 & 25 3rd line, **DLR** 4.1.3.7 LHB25 & 1st para 1st sentence last phrase, **Offaly** 4.20 EnvP 23 & 7.3 NHP 13, **Westmeath** 5.16 P RLC3, **Longford** 5.3.2 **SFRA** 3 & 6.2.2.7 ILW 3, 8 & 9 & other county/city plans.

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, **Kildare** 14.12.2 RW 2 & other county/city plans

7 Protect, enhance and improve **existing public rights of way** and where possible, provide additional access to inland waterways including lake shores, river and canal banks, through the acquisition of land for public rights of way, through agreement with existing landowners. Taken from **Longford** 6.2.2.7 ILW 5 1st sentence & 6.

8 **Protect riparian corridors.** Taken from **Border RPG** 6.9 **Natural Heritage** 3rd para.

9 Minimum distance around rivers and streams **for reservations** to be kept free from built development should be established: 31 to 50 m on urban fringes, greenfield rural areas or increased distances on Green Infrastructure corridors or particular site features. Taken from **GDA RPG 7.7 Box 11 3rd pt.**

10 Develop, promote and enhance the natural and historic **amenity potential** of (named rivers), canals and all watercourses, address the long term management and protection of these corridors and strengthen links at regional level to facilitate the development of amenity, recreational and tourism benefits and the quality of life for local people. Based on **Sth Dublin 8.2.0 Pol 3** & other county/city plans.

CANALS

REGIONAL POLICY OBJECTIVES

1 In co-operation with WI, NPWS and community groups, encourage, **promote and use the potential of canal towpaths** for designated walking and cycle routes, both as recreational and tourism amenities and to promote of links with any designated walking cycling routes, existing or proposed. Based on **Smarter Travel 2009-2020 Act 17 2nd sentence** page 45, **Border RPG 4.4.5.1 last para 1st sentence**, **Longford 6.2.2.7 ILW 10 1st sentence** & **Kildare 5.9.5 ECD 29.**

2 Ensure the conservation of canal corridors and require that **developments abutting the canal** relate to the context of the adjacent environment and contribute to its overall amenity. Taken from Galway City Pol 4.3 8th para 1st phrase.

SPECIFIC CANALS

1 GRAND CANAL

3 **Promote** and develop the towpaths along the Grand, Barrow Line and Corbally Line Canals to expand recreation and tourism in co-operation with WI, FI and adjoining councils. Based on **Action Plan for Rural Development 2017 Pillar 3 Act 168 1st phrase** & **Kildare 5.19 EO52.**

4 Investigate the possibility of **developing long distance walking routes**, within the lifetime of the Plan, along disused canals (Corbally Line, Blackwood Feeder and Mountmellick Line). Taken from **Kildare 14.11.5 CR5.**

5 Facilitate the development of the Grand Canal for **cycling, walking** and nature study. Taken from **Midlands RPG 5.11 TIO6 last pt, Sth Dublin 9.2.4.2 & Laois 7.15 WW3.**

6 Ensure that **development** along or adjacent to the Grand Canal **contributes to the creation** of an open and integrated network of **walking and cycling routes** that integrates into the Grand Canal Way Green Route. Taken from **Sth Dublin 9.2.4.3.**

7 Protect, preserve, maintain, improve and enhance the national heritage, recreational and amenity value (including walking and cycling) of the Grand Canal corridor and its towpaths by ensuring that development along and adjacent to the canal protects and incorporates high value natural heritage features including watercourses, wetlands, woodlands and includes a buffer area to facilitate a fully functioning Green Infrastructure network. Based on **Sth Dublin 9.2.4.5 & Offaly 7.3 NHP 14, 7.9 AHAP 01 & 7.18.6 3rd sentence.**

2 ROYAL CANAL

8 Promote public use and facilitate and develop the towpaths along the Royal Canal as a **Greenway** in order to expand recreation and tourism, and ensure their integration with other strategic trails including those in adjoining counties in co-operation/consultation with WI, FI, NPWS, other relevant agencies and adjoining councils. Based on **Action Plan for Rural Development 2017 Pillar 3 Act 168 1st phrase, Midlands RPG 5.11 TIO6 last pt, Kildare 5.9.5 ECD 33 & 5.19 EO52, Westmeath 3.19 O TI6 & 5.16 P 11 & Fingal 6.9 Obj ED69.**

9 Work with WI to **protect**, enhance, preserve and restore its natural heritage and landscape character by ensuring that development is appropriately managed by incorporating a visual assessment zone of 500m on each bank in which all development proposals are assessed for their impact on landscape character and which do not cause adverse impacts on natural heritage, settings, views and prospects or its and recreational potential, including promotion, facilitation, maintenance and development of public use of the towpath for walking and cycling in consultation with WI, NPWS, adjoining Councils and other agencies. Based on **Kildare 5.9.5 ECD 32, Westmeath 5.16 P 7 & 10 & 6.11 O RCC1, Meath 4.6.8 2nd para & Longford 6.2.2.7 ILW 12.**

RIVERS

10 Recognise the importance of rivers and river corridors for **walking and cycling**, natural amenity and scenic values and promote their development for recreational purposes and tourism. Support and facilitate the development of Greenways and Trails along (name) rivers. Based on **Offaly** 7.16 ROWP 03, **Sth Dublin** 4.5.0 Pol 6 Obj 1 & **Laois** 7.19 LS17 1st phrase.

11 Develop **trans-county tourism river linkages**. Taken from **Laois** 7.19 LS23.

12 Require that development along river banks set aside land for recreational routes to form an **interconnecting network of green infrastructure** and routes along rivers as part of a greater route for walking which could be extended to provide links between towns and other settlements. Based on **Fingal** 5.2 BD25, **Laois** 7.16 NH32 & other county/city plans.

13 **Riparian corridors** shall be kept free from **development** along the side of each bank of the river for recreational requirements. Taken from **Louth** 5.15.5 HER 69 1st sentence.

SPECIFIC RIVERS

LIFFEY

14 Promote, support and facilitate the development of the **Liffey Valley Greenway** and ensure its integration with other strategic trails including those in adjoining counties, Based on **Fingal** 6.9 Obj ED70 & **Sth Dublin** 4.50 Pol 6 Obj 1.

15 Within **areas of High Amenity** non-residential development will only be permitted where it relates to the area's amenity potential or its use for agriculture or recreational pursuits including recreational buildings, or comprises the re-development of or extensions to existing established area of commercial or civic activity and preserves the its amenity value including landscape valley, views or vistas. Taken from **Sth Dublin** 9.2.3.7.

16 **Preserve the undeveloped sections** of the Liffey Valley as a resource for tourism and to develop paths and walkways, where appropriate. Taken from **Kildare** 5.9.5 ECD 35.

LIFFEY VALLEY REGIONAL PARK

17 Co-operate with the Government, Dublin City Council, Fingal County Council, Kildare County Council, the OPW, landowners and community groups in with Facilitate and support the development of the Liffey Valley Regional Park as an interconnected greenway and park in accordance with **Towards a Liffey Valley Park(2007)** or any superseding plan. Based on **Sth Dublin 9.2.3.4 & Fingal 9.4** Obj NH47.

BARROW

18 Promote and develop a cycleway along the towpath and support the development of its **amenity and recreational potential** of the River Barrow Blueway, in co-operation with the NPWS, IW, adjoining Councils, Harbour Masters and other relevant authorities. Based on **Laois WW4, Kildare 5.9.5 ECD 33, Laois 5.11 TM 23** & other county/city plans.

SHANNON

Text

The River Shannon corridor is a **significant tourism asset** with potential for boating, canoeing, cycling, walking and wildlife watching. Taken from **Midlands RPG 7.2.2.1** Lough Ree and Mid Shannon Area 2nd pt 3rd sentence.

19 **Promote and develop the towpaths** along the Shannon Navigation to expand recreation and tourism, in co-operation with WI/FI. Taken from **Action Plan for Rural Development 2017** Pillar 3 Act 168 1st phrase.

20 **Protect and preserve** the landscape of the River Shannon and floodplains including the callows and views of special interest from inappropriate development. Taken from **Offaly 7.9 AHAP 01 & 7.13 LAP 05**.

BOYNE/BLACKWATER

21 Develop the **Trim-Navan-Slane-Drogheda cycle/greenway** along the River Boyne. Taken from **Meath 6.9 TRANS OBJ 8(iii) & (iv)**.

NORE

22 Develop, promote and protect its **recreational and tourism potential**. Taken from **Kilkenny 7.3.3.1** last para.

BARROW AND SLANEY

23 Protect and improve the natural amenity potential and accessibility and work with relevant authorities such as DoEHLG and NPWS to

support the **development of recreational activities**. Based on Carlow 8.8 Pol 2 6th pt & 8.11.8 Pol 4 2nd pt.

BARROW AND NORE

24 Promote. Taken from Laois 5.13 IX.

DODDER

25 Co-operate with the adjoining Councils: DLR and South Dublin in **developing a strategy**. Taken from Dublin City 10.5.4 GIO21.

LAKES

26 Promote the provision of **access** to lakes and facilitate increased access points to lakes and walkways along lakes. Improve access to lakes and lakeshores and increase public accessibility. Extend public walking and cycling routes around lakes. Based on **Westmeath** 3.16 P 6 1st phrase, 6.27 O 2, 7.13 O 8 & O 9 & other county/city plans

27 Resist development which fails to protect lakes. Taken from Monaghan 4.4 LPP3.

SPECIFIC LAKES

REE

28 Develop a walk around Lough Ree on co-operation with Longford & Roscommon County Councils and other relevant bodies within 3 years of the implementation of the Plan. Taken from **Westmeath** 3.20.1 O WB7.

29 Develop and manage tourism and improved access while retaining national character and environmental sensitivity. Taken from **Midlands RPG** 7.3 TP6.

PROPOSED NEW CHAPTER 8 Built, Archaeological and Architectural Heritage

Built

We don't propose to include this topic in our Submission.

Archaeological

Text

1 The Region has a rich and varied **archaeological heritage**, including two sited from the Mesolithic period, one on the north shore of Lough Derravaragh, County Westmeath and the other at Lough Boora County

Offaly(carbon dated to 7000-6500BC). Also tocher(trackway) which were constructed through bogs dating from 4500BC to 1000AD including the Corlea Trackway in County Longford, an Iron Age bog road that was built in 148BC. Taken from **Midlands RPG 6.3.7 1st para 1st to 3rd sentences.**

2 There is a need to view archaeological sites in their landscape setting and to engage with issues of defining and managing **archaeological landscapes** and their archaeological/historic character. Taken from **Midlands RPG 6.3.7 last para.**

3 Archaeology is the **study of past societies** through the material remains left by those societies and the evidence of their environment. All remains and any other traces of human kind from past times are considered elements of archaeological heritage. The European Convention on the Protection of Archaeological Heritage requires that appropriate consideration is given to archaeological issues during the planning process. Councils need to incorporate measures to manage and protect archaeological heritage. Taken from **Border RPG 6.6.1 1st para 1st to 3rd & last sentences.**

4 The core objectives of the **National Heritage Plan (2002)** is to protect our heritage. Taken from **Border RPG 6.6 2nd para 1st sentence.**

5 ***The Framework and Principles for the protection of the archaeological heritage (1999)*** sets out the policies and principles to be applied when undertaking or authorising development. Taken from **Border RPG 6.6 2nd para 2nd sentence.**

6 The **Planning & Development Acts** provide a mechanism affording statutory protection to structures of archaeological or historic interest. Taken from **Draft RSES: Northern and Western 5.7 2nd para 1st sentence.**

7 Where **National Monuments** are in state ownership, the OPW has responsibility to ensure that they **maintained and managed** appropriately. Taken from **Draft RSES: Northern and Western 5.7 2 3rd para 1st sentence.**

REGIONAL POLICY OBJECTIVES

1 Recognising the importance of archaeology and National Monuments as part of our heritage and as 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 Based on **Midland RPG 6.8 EP7, Laois 7.4 1 OBJ1 & 2 1st sentence & 7.9 ARC 12, Sth Dublin 9.4.0.4, Meath 9.6.9 POL 6, Offaly 7.19 AAHP-07, DLR 6.1.2.1 1st & last paras, Wicklow Vol 1 10.2.2 BH4, Longford 6.2.1 ARC 4 & 8, Kildare 12.9.1 AH 8 & other county/city plans.**

2 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.**

3 Monuments that are National Monuments in **State ownership** or guardianship and monuments subject to a Preservation Orders should be identified and zones of visual amenity defined for them. Taken from **Border RPG 6.6.1 3rd para.**

4 Undertake research to **identify key historic landscapes** which merit protection. Taken from **Border RPG 6.6.2 ENVO22.**

5 Promote the **protection** of archaeology through the planning process, by supporting, conserving, sympathetically enhancing, preserving, properly managing, safeguarding, by harnessing its potential for present and future generations and by implementing the County Heritage Plan, in consultation/co-operation with the DoAHG and other relevant bodies, archaeological heritage and/or sensitively integrate , where appropriate, all areas of 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 **2000 Planning & Development Act Sec 10(2)(c), European Convention for the Protection of Archaeological Heritage, Valetta 1992(ratified by Ireland) & First Sch Part IV 6, DPG 4.26 1st para 3rd line & 4.27 1st pt, Draft RSES: Northern & Western 5.7 RPO 89 & 90, Border RPG 6.6.1 last para last sentence & 6.6.2 ENVO13 & 14, Laois 7.9 2nd para 1st sentence 1st phrase, Wicklow Vol 1 10.2.2 last sentence & BH1 & 3, Offaly 7.18.8 1st para, 7.19 AAHP 04 3rd pt, 17 1st phrase & 7.20 AAHO 05 & 06, Laois 7.4 OBJ3, 7.9 ARC5, 9 & 10.2 Obj CH03, Kildare 10.2.2 BH1 & 12.9.1 AH1 1st sentence 1st phrase, Meath 9.6.1 2nd para 1st sentence & 9.6.9 OBJ 7, Sth Dublin 9.1.1 Pol 2, Obj 2, 3 1st phrase & 2 2nd sentence, DLR 6.1.2(i) 1st para last sentence, Louth 5.9.1 HER 20 & 21 1st sentence 1st phrase, 6.2.1 ARC 3, Westmeath 5.33 P AH3, O1, 8 1st phrase & 9, Longford 6.2 HER 1, 6.2.1 ARC 1 1st & 3rd sentences, 2, 3, 11 & 12 & other county/city plans.**

5 Where proposed development may have implications for RPMs and sites, zones of Archaeological Potential or undiscovered or archaeology councils should ensure that decisions relating to developments including infrastructure relating to broadband, telecommunications and renewable energy, installations of services and major roads are informed by an

appropriate level of **archaeological investigation** undertaken by qualified persons. Taken from **Draft RSES: Southern 7.3.3 RPO 199**.

Architectural

We don't propose to include this topic in our Submission.

Graveyards and Historic Burial Grounds

We submit that you should **include REGIONAL POLICY OBJECTIVES:**

6 Provide **public access** to graveyards. Taken from **Westmeath 5.33 P 4** last phrase.

7 **Protect**, preserve, enhance, conserve and maintain archaeological/historic graveyards and their settings and historic burial grounds(including those identified in the RPM) and those in the guardianship of the Council, 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 **Kildare 12.9.1 AH6**, **Meath 9.6.9 OBJ 11**, **Laois 4.2.4 BG3** & other county/city plans.

CHAPTER 8 Connectivity

8.4 Transport Investment Priorities

Walking and Cycling

We submit that you should include the following **Text**: Cycling and walking(including safe walking routes) promotes a healthier lifestyles in keeping with the Dept of Health's "Healthy Ireland" (2013) and other national health policies which recognises that there is an urgent need to enable individuals to incorporate more day-to-day physical activity into their lives. These activities keep people fit and significantly improves and **enhances the physical health** and wellbeing of both individuals and society, promotes and enhances physical health, improve quality of life and tackle sedentary lifestyles. Based on **Border RPG 5.2.4** last para, **Midland RPG 5.2.3 1st para** last sentence 1st phrase & county/city plans.

The following walking and cycling objectives will guide investment in the EMRA

1st & 2 pts

We submit that you should **include REGIONAL POLICY OBJECTIVES:**

1 Continue to promote the modal shift from private car towards increased cycling and walking and promote and encourage the development of walking and cycling networks 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 **Border RPG 5.8 Cycling and Walking, Dublin City 8.5 MT 1st pt & 2nd line, Fingal 7.1 Obj MT03, Meath 6.7 TRAN SP 2, DLR 2.2.2 8th pt, Offaly 4.6 STAP 08 1st part of last sentence & other county/city plans.**

2 Recognising their **health benefits**, promote, support 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 and community **health and wellbeing**, to promote a more active lifestyle and to create a healthier population by providing quality green space. Based on **Draft RSES: Northern & Western 5.8 RPO 95 last phrase. Midland RPG 5.10 TIP4, Dublin City 8.5 MT8 6th line, Laois 6.1.1 TRANS39, Fingal 7.1 Obj MT13, Westmeath 8.13 O 9 1st phrase, Meath 9.7.3 & other county/city plans.**

3 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.**

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

5 Actively **support**, promote, implement and adhere the key **goals**, targets, recommendations, proposals, actions, principles and policies of the **NCPF 2009 - 2020**. Based on **Midland RPG 5.2.3 1st para 1st sentence, Kildare 6.5 WCO 7, Offaly 4.6 STAP 08 last sentence last phrase, Westmeath 8.13 O WC8 2nd sentence 1st phrase & other county/city plans.**

CHAPTER 9 Quality of Life

9.8 Healthy Communities

Recreation and Open Space

We submit that this should **be re-positioned in Specific sectors: Retail, Tourism, Marine, Agriculture** in 6.5.

Text

1st sentence

In planning for recreation and open space Local Authorities should follow these guiding principles

We submit that references to sports facilities should be re-positioned in a separate sub-sec: **Sports facilities.**

9.9 Access to Arts, Culture, Language and Heritage

Archaeological Heritage

All text

We submit that this should be re-positioned in the proposed new Chpt 8 **Built, Archaeological and Architectural Heritage.**

REGIONAL POLICIY OBJECTIVES

9.28 We submit that this should be re-positioned in the proposed new Chpt 8 **Built, Archaeological and Architectural Heritage** as a sub sec: **World Heritage Sites** and replaced by: Recognise and respect potential Sites (name local Sites)* and support, **pursue progress and promote their designation as UNESCO WHS** in collaboration/partnership with the appropriate Government Department, landowners, local communities and other stakeholders, to over assist in the development of tourism and the preservation of the natural heritage. Based on **Action Plan for Rural Development 2017 Pillar 3 Act 190, GDA RPG 7.2.1 GIR 10, Midlands RPG 6.3.7 1st para last sentence, Louth 5.9.9 HER 32 & Meath 9.6.8 POL 5.**

*These sites are:

Louth: Monasterboice

Offaly: Clonmacnoise

Laois: Durrow

Wicklow: Glendalough

Meath: Inis Cealtra Kells & Tara Complex

Kildare: Dun Ailinne

Westmeath: Hill of Uisneach

We submit that you should **include an additional POL OBJ:**

Bru na Boinne

Protect, preserve and enhance the Outstanding Universal Value of the Site in accordance with relevant guidelines and national legislation, so that its integrity, authenticity and significance are not adversely affected by cumulative inappropriate change and development and enhance within and adjacent to the Site. Based on **Meath 9.6.7 OBJ 1 & Louth Pol 3.10.7.6.**

CHAPTER 10 Infrastructure

10.3 Energy

Future Electricity and Gas Supply and Demand

Local Authority Development Plans shall facilitate the provision of energy networks in principle based on the following guiding principles and considerations

2nd to 4th pts We submit that these should **be merged and replaced by:** Ensure that transmission lines **protect**, maintain and safeguard environmental designated sites, the open character and amenities of high amenity and mountain areas by following natural features and by avoiding areas of high landscape sensitivity, protected views, including views of special amenity value, the natural and archaeological heritage, possible effects on tourism and the natural environment through relevant environmental assessment. Where impacts are inevitable mitigation measures to minimise their visual obtrusiveness must be provided for. Based on **Border RPG 5.4.2.7 INFP 6th pt, Westmeath 10.14 P ELE1, Laois 6.6 OBJ6, Sth Dublin 10.2.10 E12 Obj1 & 2, Kildare 8.12.2 TN 4, Louth 9.2 EnCo 7 last phrase, Meath 11.15.4 4th pt, Longford 5.5.1 3rd pt 1st phrase & other county/city plans.**

Addendum

In considering **electricity transmission that traverse a number of counties**, or that traverse one county in order to serve another, Councils should consider proposals in the light of the criteria outlined above. They should also treat the proposal as if it were required to service a development within their own county. Taken from **Border RPG 5.4.2.7 para under Pols.**

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

1 Where there is inadequate protection of the environment as set out in additional pt above the **undergrounding or re-routing of transmission lines** shall be considered first as part of a detailed consideration and evaluation of all available options. Where technically feasible and environmentally appropriate, HV and other powerlines (including existing powerlines) and associated equipment should be placed underground to reduce the visual impact on the physical and on the natural environment specially in sensitive areas and areas of high amenity value in order to preserve significant landscape views from the visual intrusion of energy infrastructure. Where there is multiplicity/convergence of overhead lines including any associated tie-ins at substations the undergrounding of existing and/proposed lines shall be investigate. Where avoidance is not possible full consideration shall be given to undergrounding. Based on **Border RPG 5.4.2.7 INFP 5th pt, Kildare 8.12.2 TN2 & 11 2nd sentence, Meath 8.1.10 EC POL 19, Louth 9.2 EnCo 5 & other county/city plans.**

We submit that you should **include an additional sub sec** entitled **Renewable Energy.**

REGIONAL POLICY OBJECTIVES

Renewable Energy: General

1 Produce a **Renewable Energy Strategy** within the lifetime of the Development Plan. Taken from **Border RPG 5.5.10 INFP25 1st sentence, Louth 9.4 Pol EnCo 13 1st sentence & Laois 6.6 OBJ1.**

Note As far as we are aware no county within the Region has produced one.

2 In assessing development proposals the Council will take into account public access to the countryside and the impact on **public rights of way** and walking routes. Based on **Fingal 12.10 DMS138 (iv) 2nd phrase, Meath 11.15.1 1st para 4th pt & DLR 8.2.10.1 2nd para last sentence 4th pt last phrase.**

3 **Provide a landscape sensitivity analysis.** Taken from **Border RPG 5.5.10 INFO 7 1st phrase.**

4 As the measures required to build the renewable energy sector will require significant physical development often in scenic and/or designated conservation areas, such **development will need to be sensitively undertaken** in consultation with relevant stakeholders.

Taken from **Midlands RPG 4.4.3** para opposite **Sustainable Energy Authority 2nd & 3rd** sentences.

Wind Energy

5 Undertake an analysis of suitable areas for wind energy and **prepare a Map showing the Landscape Suitability for Wind Energy Development** in accordance with national guidelines including section 3.5 of the Wind Energy Guidelines(2006) and any subsequent revisions and as recommended in the LCA. Based on Sligo 11.1 SO EN 2 & Roscommon 4.6 Obj 4.55 1st phrase.

Note

Louth & Wicklow have prepared Maps

6 Prepare a **Wind Energy Strategy** within the one year of the adoption of the Plan.

Note

Only **Longford** App 5 have prepared one

7 **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 **Laois 6.6.1.4 EN10** 1st sentence & other county plans

8 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 & other county plans.

9 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 **Kildare 8.5 WE 3** 3rd pt & other county plans.

10 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, layout and layout** of wind farms should be suited to the landscape setting and site context and should minimise visual impacts, 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 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. Based on **Wicklow** Vol 1 9.5.3 CCE 6 1st, 2nd 4th, 6th & 7th pt 1st phrase & Vol 3 App 6 3 1st para 1st phrase & 2nd pt, **Kildare** 8.5 WE 3 1st pt, **Longford** 5.5.2.1 WD4a) 1st & 3rd sentences & h) 1st sentence, **Westmeath** 10 5 1st para 3rd & last sentence 1st phrase & 14.11.5 8th pt and other county plans.

11 The development of wind energy will be assessed on the full range of criteria identified in the **DOEHLG 2006 Guidelines**. Based on **Midlands RPG** 3.4.6.1 4th para 1st sentence last phrase & **Border RPG** 5.5.1 2nd para last sentence.

12 Councils will provide landscape **sensitivity analysis**. Taken from **Border RPG** 5.5.1 1st para 1st phrase.

Hydro Power

13 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.

Note Many counties have a policy and we submit that you should do likewise especially in view of the proposal made in 2009 by the Spirit of Ireland Group about pump storage/hydro schemes. In many schemes the minuscule amount of power produced doesn't compensate for the environmental damage and loss of access rights for recreational users.

14 Development must comply with the appropriate **planning and environmental criteria** and international directives. Taken from **Border RPG 5.5.3**.

Solar Power

15 Request the appropriate government department to make **Planning Guidelines** for ground mounted solar PV “Solar Farms”.

16 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**.

E Off-Shore Wind

17 Must be in line with **national policy** and compatible with **environmental and landscape considerations**. Taken from **Draft RSES: Northern & Western 4.5.2 RPO 43 last phrase**.

We submit that you should **include an additional sub sec: Telecommunications** and that it **should include**

REGIONAL POLICY OBJECTIVES:

1 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 **Laois 6.6.5.2 TELE10**, **DLR 8.2.9.9 last pt & other county/city plans**.

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

2 Councils should provide a **landscape sensitivity analysis** to consider and assess the impact of proposed mobile telephone infrastructure. Taken from **Border RPG 5.8 Telecommunications 2nd para**.

KEEP IRELAND OPEN

January 2019