



CHIEF EXECUTIVES REPORT ON THE PROPOSED MATERIAL AMENDMENTS TO THE DRAFT PLAN

The Chief Executive's Report is prepared and submitted in accordance with the requirements of Section 12 (4) of the Planning and Development Act 2000 as amended.

NOVEMBER 17, 2021
LAOIS COUNTY COUNCIL
Aras an Chontae, Portlaoise, Co. Laois

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SECTION 1. INTRODUCTION

1.1 PURPOSE OF REPORT AND CONTENTS OF THE CHIEF EXECUTIVE'S REPORT

The purpose of the Chief Executive's Report is to report on the outcome of the consultation process on the Proposed Material Amendments to the Draft Laois County Development Plan 2021- 2027, to set out the Chief Executive's response to the issues raised in the submissions, and to make recommendations on the proposed amendments, as appropriate. The report forms part of the statutory procedure for the preparation of a new Development Plan.

Pursuant to Section 12(6) of the Planning and Development Act 2000 (as amended), notice of the preparation of Proposed Material Amendments to the Draft Laois County Development Plan 2021 – 2027 was given on 23rd September 2021. Submissions or observations with regard to the Proposed Material Amendments together with associated Strategic Environmental Assessment(SEA) and Appropriate Assessment (AA) Determinations and Reports only, were invited for a period of 4 weeks.

Pursuant to Section 12(8)(b) of the Planning and Development Act 2000 (as amended), this Chief Executive's Report provides details of submissions and observations received in relation to the proposed Material Amendments as follows:

- Lists the persons or bodies who made submissions or observations during the prescribed public consultation period
- Provides a summary of the recommendations, submissions and observations made by the Office of the Planning Regulator
- Summarises the submissions or observations made by any other persons during the prescribed public consultation period
- Gives the response of the Chief Executive to the issues raised, taking account of:
 - Directions of the members of the authority regarding the preparation of the Draft Development Plan
 - The proper planning and sustainable development of the area
 - The statutory obligations of the Local Authority
 - Any relevant policies or objectives of the Government or of any Minister of the Government.

This Chief Executive's Report on submissions or observations received in relation to the proposed Material Amendments to the Draft Laois County Development Plan 2021-2027 is hereby submitted to the members of the Planning Authority for consideration.

1.2 STRUCTURE OF THIS REPORT

The report is structured as follows:

- **Section 1** - sets out the requirement and legislative background for the report, the Development Plan progress to date, together with the next steps in making the Laois County Development Plan 2021-2027. A report on the consultation undertaken for the Proposed Material Amendments to the Draft Plan which resulted in 36no. submissions.
- **Section 2** - provides a summary of those recommendations where no submissions, or only support for the amendments was received during the consultation period.
- **Section 3** - provides a summary of the recommendations, submissions and observations made by the Office of the Planning Regulator together with the Chief Executive's response and recommendations in response to same.
- **Section 4** - includes an analysis of the submissions received relevant to the proposed Material Amendments (arranged by chapter, settlement, zoning map and appendices) followed by the Chief Executive's response and recommendations in response the issues raised.
- **Section 5** - sets out the SEA and AA considerations as part of the process.
- **Section 6** - outlines the Chief Executives Recommendation on this report.

1.3 TIMEFRAME

Under the Planning and Development Act 2000 as amended (hereafter referred to as the Act), development plans run for a six-year period and preparation of a new plan must commence not later than four years after the plan was adopted.

The publication of a notice on 12th January 2020 stating the intention to prepare a new Draft County Development Plan for the period 2021 - 2027 marked the formal commencement of the two-year review process. Within two years of this date a new plan must be adopted by the Members of the Council. The Act sets out a number of key stages in the process.

STAGE 1

The first stage involved an eight-week preliminary consultation period, from 6th January 2020 until 2nd March 2020, during which submissions were invited on issues to be included in the Draft County Development Plan. A number of meetings were held with interested bodies, the Public and the County Council members. Service Providers were also consulted on their plans and operational programmes. There were also meetings with key internal Council sections such as Road Design and Water Services on the subject of overall infrastructure provision in the county.

A Chief Executives report was then prepared and circulated to the Council members for their consideration on 26th June 2020. The Chief Executives Report listed the persons who made submissions, summarised the issues raised and indicated the opinion and recommendation of the Chief Executive in relation to such issues.

A 12-week period for the preparation by the Executive of the Draft County Development Plan and its submission to Council members who had an 8-week period for its consideration at the end of which it

became the formal Draft Plan. The Plan was adopted for public display at a Special Council Meeting on the 12th December 2020 subject to a number of amendments.

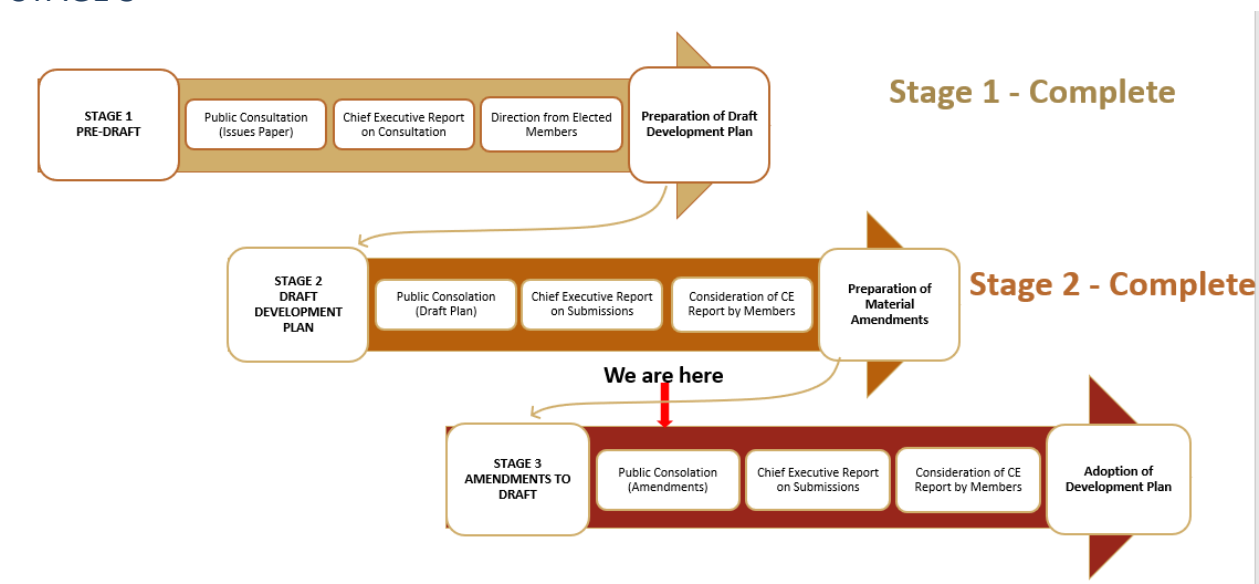
STAGE 2

The statutory 10-week consultation process for the Draft Laois County Development Plan 2021 – 2027 began on 12th January 2021 with public notices appearing in the Irish Independent and local newspaper the Laois Nationalist, and ended on 23rd March 2021. The Draft Plan was put on public display in the Planning Department, Aras an Chontae, JFL Ave, Portlaoise, Co. Laois and was also available to view on <http://consult.laois.ie>.

154 written submissions were received within the statutory timeframe, with **7** submissions were received outside the consultation deadline. A Chief Executive Report was prepared and circulated to members on the 22nd June 2021. A Full Council meeting was held on the **1st September 2021** where Elected Members considered the Chief Executive's Report.

Following that meeting the Proposed Material Amendment to the Draft Laois County Development Plan 2021 – 2027 was prepared.

STAGE 3



Consultation on the Proposed Material Amendments to the Draft Laois County Development Plan 2021-2027 together with the associated Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) Determinations and Reports was carried out for a period of 4 weeks. The following documentation was put on public display:

- Laois County Development Plan – Proposed Material Amendments
- Volume 1 Map Amendments
- Volume 2 Map Amendments
- Housing Needs Demand Assessment
- Strategic Flood Risk Assessment

- Natura Impact Report
- Environmental Report and Appendices
- Infrastructure Assessment
- SEA Determination and Screening for Appropriate Assessment.

The key elements of the consultation programme are set out below:

- Notices of the Proposed Material Amendments to the Draft Laois County Development Plan 2021-2027 were published in the following newspapers:
 - Irish Independent,
 - Leinster Express; and
 - Laois Nationalist.

The notices included information on how to make a submission on the Proposed Material Amendments and associated Environmental Reports and Determinations together with information on their display.

- Notices of the Proposed Material Amendments together with information on public consultation were issued to the prescribed bodies.
- The Proposed Material Amendments and associated Environmental Reports and Determinations were put on public display at the following locations:
 - In Laois County Council's office.
 - Online Consultation Portal <https://consult.laois.ie/en>
- Notices of the Proposed Material Amendments together with information on public consultation were put on public display in libraries
- The Laois County Council website included details of the consultation on the Proposed Material Amendments including information on how to make a submission by post or via the online Consultation Portal.

36 submissions were received during the Proposed Material Amendments consultation period. Under the Planning and Development Act 2000, (as amended), the final (third) phase of public consultation is solely limited to consideration of the Proposed Material Amendments to the Draft Plan.

A list of all the persons/bodies that made submissions or observations is provided in Appendix 1.

1.4 CONSIDERATION OF AMENDMENTS AND MAKING OF THE DEVELOPMENT PLAN

In accordance with Section 12(9) of the Planning & Development Act 2000 (as amended), the members of the Planning Authority are required to consider the material amendments to the Draft Plan and the Chief Executive's Report within **six weeks** of receiving the report.

Having considered the Chief Executive's Report, the members can make the plan with or without the proposed amendments, except where they decide to accept the amendments subject to a further modification of a **minor nature**.

A further modification to a Material Amendment

- May be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European Site,

- b. Shall not be made where it relates to an increase in the area of land zoned for any purpose an addition to or deletion from the Record of Protected Structures.

In accordance with Section 12 (11) of the Planning & Development Act 2000 (as amended), in making the development plan, the members are restricted to considering the proper planning and sustainable development of the area to which the development plan relates, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or any Minister of the Government.

1.5 APPROACH TO CONSIDERATION OF SUBMISSIONS

Following the upload of all submissions to the online consultation portal, each submission was read first to allocate the issues raised to the appropriate Proposed Material Amendment of the Draft Development Plan.

1.6 HOW THIS DOCUMENT IS ORGANISED

Proposed Material Amendments to the Draft Plan, as originally displayed in September 2021 are identified as follows:

- Text in **BLUE** is text from the Draft Plan as is.
- Proposed amended text and new text is coloured **RED**.
- Text with ~~**STRIKETHROUGH**~~ is proposed for deletion

In terms of modifications to Proposed Material Amendments, as recommended under this report, the omission of any text from a proposed Material Amendments is shown in its original colour text as displayed with strikethrough, with any modifications in the form of additional text to the proposed Material Amendments shown in **green print**.

SECTION 2 NO RESPONSES TO PROPOSED MATERIAL AMENDMENTS

This Section of the report lists those amendments detailed in the Proposed Material Amendment consultation, where no submissions were received or where support has been received on them, and where no further changes are recommended.

The Chief Executive recommends that these amendments are included in the Final Plan without any further changes, save for editorial amendments, where necessary.

Those amendment numbers that **are not listed** have been excluded because either:

- 1) There has been a submission on them seeking a change, or clarification; or
- 2) They have had to be amended for consistency, following the submission to another part of the Draft Plan.

For reference LS-C24-36(HSE) issued a brief response noting that the Environmental Health Service (EHS) revised the proposed material alterations and support and agree with the objectives outlined. This response has been noted, however due to the broad nature of the response, and not being specifically referring to a PMA, this is not referred to in the following table.

VOLUME 1 – WRITTEN STATEMENT

Chapter Reference	Amendment Number*	Section / Policy Objective / Policy	No submission or support?
1 – Introduction	1.1	Section 1.2	No submission
	1.2	Section 1.5	No submission
	1.3	Section 1.6.4	No submission
2 – Core and Settlement Strategies	2.1	Section 2.2	No submission
	2.2	Section 2.7.1.1	No submission
	2.4	Section 2.8.1	No submission
	2.5	CS 08	No submission
	2.6	CS 09	No submission
	2.7	CS 10	No submission
	2.8	CS 11	No submission
	2.9		No submission
3 – Climate Action and Energy	3.1	Section 3.2.3.1	No submission
	3.2	CA1	No submission
	3.3	Section 3.2.3.5	No submission
	3.4	3.2.3.5	No submission
	3.5	Section 3.4	No submission
	3.6	Section 3.4	No submission
	3.9	Additional Policy Objective	No submission
	3.10	Additional Policy Objective	No submission
	3.11	Area Action 2	No submission
	3.12	Additional Policy Objective	No submission
	3.13	Section 3.4 – Action Area 2, additional policy objective	No submission
	3.14	Additional Policy Objective	No submission
	3.15	Additional Policy Objective	No submission
	3.16	Action Area 2 Built Environment - Section 3.4	No submission
	3.18	CM RE 4	Support – LS-C24-27
	3.20	CMRE 8	Support – LS-C24-27
	3.21	Additional Policy Objective	Support – LS-C24-27
	3.22	Additional Policy Objective	Support – LS-C24-27
	3.23	Additional Policy Objective	Support – LS-C24-20 Support – LS-C24-27
	3.24	Additional Policy Objective CM RE 17	No submission
	3.26		
	3.27	3.5.2, 2 nd paragraph	No submission
	3.28	Section 3.5.5	Support – LS-C24-27
	3.31	Section 3.5.8	Support – LS-C24-27
	3.33	Section 3.6.1	No submission
	3.34	NRE 2	No submission

Chapter Reference	Amendment Number*	Section / Policy Objective / Policy	No submission or support?
	3.35	Additional DM standard for Hydro Energy	Support – LS-C24-27
4 - Housing	4.1	Section 4.2	No submission
	4.2	New Policy	No submission
	4.3	DM HS 2	No submission
	4.4	DM HS6	No submission
	4.5	DM HS 10	No submission
	4.8	Additional Policy Objective (HPO 19)	No submission
5 – Quality of Life and Sustainable Communities	5.1	Section 5.1.1	No submission
	5.2	5.2	No submission
	5.3	Additional Policy Objective (SCPO15)	No submission
	5.4	Additional Policy Objective (SCPO 16)	No submission
	5.5	DM ED1	No submission
	5.6	DM SC 2	No submission
	5.7	NRPO 7	No submission
	5.8	Policy Objective EDPO 2	Support - LS-C24-23
	5.9	EDPO 6	No submission
	5.10	Additional Policy Objective (EDPO9)	Support - LS-C24-23
	5.11	DM CC 1	No submission
	5.12	Additional Policy Objective (HCPO 7)	No submission
	5.13	BGPO 1	No submission
	5.14	Section 5.4.1	No submission
	5.15	NRPO 5	No submission
	5.16	NRPO 15	No submission
	5.17	NRPO 17	No submission
	5.18	5.3.6	No submission
	5.19	Additional Policy Objective (NRPO 19)	Support – LS-C24-27
	5.20	Policy DM NR 1	Support – LS-C24-27
	5.21	DM NR 1	Support – LS-C24-27
	5.22	Section 5.4	Support – LS-C24-27
6 – Economic Development	6.1	Strategic Aim of Chapter 6	No submission
	6.2	Section 6.4	No submission
	6.3	Section 6.3.5	No submission
	6.4	Additional Policy Objective	No submission
	6.5	Table 6.4	No submission
	6.6	Section 6.7	No submission

Chapter Reference	Amendment Number*	Section / Policy Objective / Policy	No submission or support?
	6.7	Additional policy objective (ED 17)	No submission
	6.8	Map 6.1	No submission
7 – Retail and Town / Village Centre Management	7.1	TC3	No submission
	7.2	Additional Policy (RTP18)	No submission
8 - Tourism	8.1	Section 8.1-Second Paragraph	No submission
	8.2	Section 8.1-Third Paragraph	No submission
	8.3	Table 8.1 - Key Tourism Initiatives 8	No submission
	8.4	Table 8.1 - Key Tourism Initiative 9	Support – LS-C24-27
	8.5	Table 8.1	Support – LS-C24-27
	8.6	Table 8.1	Support – LS-C24-27
	8.7	DM TM2	Support – LS-C24-27
	8.8	TM8	Support – LS-C24-27
	8.9	Policy Objective TM10	Support – LS-C24-27
	8.11	Additional Policy Objective TMXX	No submission
	8.12	TI1	Support – LS-C24-27
	8.13	Additional policy objective after Section 8.3	No submission
	8.14	Section 8.5.3- Updated Reference	No submission
	8.15	DT1	No submission
	8.16	ABT1	No submission
	8.17	ABT2	Support – LS-C24-27
	8.18	ABT 4	Support – LS-C24-27
	8.19	IAE 2	No submission
	8.20	IAE3	Support – LS-C24-27
	8.21	Section 8.5.5	No submission
9 – Rural Laois	9.1	Additional Policy Objective	No submission
	9.2	Section 9.2	Support – LS-C24-27
	9.3	DM RL1	Support – LS-C24-27
	9.4	DM RL2	Support – LS-C24-27
	9.5	DM RL3	Support – LS-C24-27
	9.6	Additional Policy Objective	No submission
10 - Infrastructure	10.1	Section 10.1.3.1	No submission
	10.2	Additional Objective	No submission
	10.3	TRANS1	No submission
	10.4	TRANS4	No submission
	10.5	TRANS 5	No submission
	10.6	TRANS14	No submission
	10.7	TRANS16	No submission

Chapter Reference	Amendment Number*	Section / Policy Objective / Policy	No submission or support?
	10.8	TRANS18	No submission
	10.9	TRANS 21 and TRANS 23	No submission
	10.10	TRANS 25	No submission
	10.11	TRANS27	No submission
	10.12	TRANS 28	No submission
	10.13	TRANS39	No submission
	10.14	Additional Policy Objective	No submission
	10.15	Additional Policy	No submission
	10.16	Additional Policy	No submission
	10.17	Additional Policy Objective	No submission
	10.18	Section 10.1.8.2 – Bus Existing	No submission
	10.19	Section 10.1.8.1	No submission
	10.20	Section 10.1.9	No submission
	10.21	additional Policy Objective (CNG1)	No submission
	10.22	Section 10.3.2, Water Infrastructure	No submission
11 – Biodiversity and Natural Heritage	11.1	11.2	Support – LS-C24-27
	11.3	DM RH 7	Support – LS-C24-27
	11.4	Section 11.2.4	No submission
	11.5	Section 11.4	Support – LS-C24-27
	11.6	BNH3	Support – LS-C24-27
	11.7	Additional Policy Objective	No submission
	11.8	Additional Policy Objective	Support – LS-C24-27
	11.9	BNH 17	No submission
	11.10	Table 11.3	Support – LS-C24-27
	11.11	Table 11.4	Support – LS-C24-27
	11.12	BNH 25	Support – LS-C24-27
	11.13	BNH32	Support – LS-C24-27
	11.14	GEO 3	Support – LS-C24-27
	11.15	Additional Policy Objective	Support – LS-C24-27
	11.16	11.10.1	Support – LS-C24-27
	11.17	Additional Policy Objective	Support – LS-C24-27
	11.18	Additional Policy Objective	Support – LS-C24-27
	11.19	Map 11.8	Support – LS-C24-27
12 – Cultural and Built Heritage	12.1	PS 2	Support – LS-C24-27
	12.2	Additional Policy Objective	No submission
	12.3	Additional Policy Objective	No submission
13 – General Location and Pattern of Development	13.1	Table 13.4	No submission
	13.2	Additional Policy Objective	No submission

Chapter Reference	Amendment Number*	Section / Policy Objective / Policy	No submission or support?
14 – Implementation and Monitoring	14.1	Section 14.1	Support - LS-C24-19
	14.2	Section 14.2	No submission
	14.3	Additional Policy Objective	No submission
	14.4	Additional Policy Objective	No submission
	14.5	Additional Policy Objective	No submission
	14.6	Section 14	No submission

*Please note there was no 3.26 amendment number.

VOLUME 2 – SETTLEMENT PLANS

Zone Amendment Site ID*	Settlement Name	Old Zone Type	New Zone Type	Motion Number from 1/9/21 (where applicable)	No submission or support?
1	Portlaoise	Residential 2	Residential 1. Established		No submission
2	Portlaoise	Strategic Reserve	Countryside		No submission
3	Portlaoise	Strategic Reserve	Countryside		No submission
4	Portlaoise	Residential 1. Established & Open Space/Amenity	Open Space/Amenity & Residential 1. Established		No submission
5	Portlaoise	Residential 2	Residential 1. Established		No submission
6	Portlaoise	Residential 2	Open Space/Amenity		No submission
7	Portlaoise	Residential 1. Established	Residential 2		No submission
11	Portlaoise	Open Space/Amenity, General Business, Residential 1. Established, Town Centre & Utilities	Infrastructure		No submission
12	Portlaoise	Neighbourhood Centre	Residential 2		No submission
13	Portlaoise	Residential 2	Open Space/Amenity & Residential 1. Established		No submission
14	Portlaoise	Town Centre	Transport and Utilities		No submission
15	Mountmellick	Strategic Reserve	Countryside		No submission
16	Mountmellick	Strategic Reserve	Residential 2		No submission
17	Mountmellick	Strategic Reserve	Open Space/Amenity		No submission
18	Mountmellick	Open Space/Amenity	Residential 2		No submission
19	Mountmellick	Strategic Reserve	Residential 2		No submission
20	Mountmellick	Strategic Reserve	Countryside		No submission
21	Mountmellick	Residential 2 & Strategic Reserve	Residential 1. Established		No submission
22	Mountmellick	Residential 2	Residential 1. Established		No submission
23	Abbeyleix	Open Space/Amenity	Residential 1. Established		No submission
24	Abbeyleix	Open Space/Amenity & Strategic Reserve	Countryside		No submission
25	Abbeyleix	Open Space/Amenity	Residential 1. Established		No submission
26	Abbeyleix	Strategic Reserve	Countryside		No submission
27	Abbeyleix	Strategic Reserve	Countryside		No submission
28	Abbeyleix	Strategic Reserve	Countryside		No submission
29	Abbeyleix	Strategic Reserve	Residential 1. Established		No submission
30	Abbeyleix	Open Space/Amenity	Industrial		No submission
31	Mountrath	Town Centre	Open Space/Amenity		No submission
32	Mountrath	Residential 1. Established	Open Space/Amenity		No submission

Zone Amendment Site ID*	Settlement Name	Old Zone Type	New Zone Type	Motion Number from 1/9/21 (where applicable)	No submission or support?
33	Mountrath	Enterprise and Employment & General Business	Industrial & Open Space/Amenity		No submission
35	Mountrath	Industrial	Open Space/Amenity		No submission
36	Stradbally	Residential 1. Established	Open Space/Amenity		No submission
37	Stradbally	Strategic Reserve	Countryside		No submission
38	Stradbally	Enterprise and Employment	Countryside		No submission
39	Stradbally	Residential 2	Open Space/Amenity		No submission
40	Rathdowney	General Business	Open Space/Amenity		No submission
41	Rathdowney	Open Space/Amenity & Industrial	Countryside		No submission
42	Rathdowney	Open Space/Amenity & Industrial	Countryside		No submission
43	Rathdowney	Open Space/Amenity & Industrial	Utilities		No submission
44	Rathdowney	Residential 2	Residential 1. Established		No submission
45	Rathdowney	General Business	Mixed Use		No submission
46	Rathdowney	Industrial	Residential 1. Established		No submission
47	Rathdowney	Strategic Reserve	Countryside		No submission
48	Durrow	Village Centre	Open Space/Amenity		No submission
49	Durrow	Horticulture	Open Space/Amenity		No submission
50	Durrow	Enterprise and Employment	Residential 2 & Dezoned		No submission
51	Durrow	Residential 2	Open Space/Amenity & Residential 1. Established		No submission
52	Ballylynan	Strategic Reserve	Countryside		No submission
53	Ballylynan	Open Space/Amenity	Countryside		No submission
54	Ballylynan	Residential 1. Established	Countryside		No submission
57	Ballylynan	Residential 2	Strategic Reserve		No submission
60	Clonaslee	Open Space/Amenity	Residential 1. Established		No submission
61	Clonaslee	Community-Educational-Institutional	Open Space/Amenity		No submission
62	Ballyroan	Residential 1. Established	Open Space/Amenity		No submission
63	Ballyroan	Residential 2	Open Space/Amenity		No submission
64	Ballyroan	Open Space/Amenity & Residential 2	Residential 1. Established		No submission
65	Borris In Ossory	Enterprise and Employment	Countryside		No submission

Zone Amendment Site ID*	Settlement Name	Old Zone Type	New Zone Type	Motion Number from 1/9/21 (where applicable)	No submission or support?
66	Ballybrittas	Open Space/Amenity	Residential 1. Established		No submission
67	Ballinakill	Not Zoned & Tourism	Open Space/Amenity		No submission
68	Killeen	Residential 2	Open Space/Amenity		No submission
69	Killeen	Residential 2	Open Space/Amenity		No submission
70	Killeshin	Residential 1. Established	Open Space/Amenity		No submission
71	Killeshin	Residential 1. Established	Open Space/Amenity		No submission
72	Killeshin	Residential 1. Established	Open Space/Amenity		No submission
73	Killeshin	Residential 1. Established	Open Space/Amenity & Dezoned		No submission
74	Camross	Community-Educational-Institutional	Open Space/Amenity		No submission
75	Castletown	Residential 2	Residential 1. Established		No submission
76	Castletown	Residential 2	Residential 1. Established		No submission
77	Castletown	Residential 2	Residential 1. Established		No submission
78	Emo	Residential 2	Community-Educational-Institutional		No submission
79	Rosenallis	Residential 1. Established	Open Space/Amenity		No submission
80	Rosenallis	Residential 1. Established	Open Space/Amenity		No submission
81	Timahoe	Not Zoned & Village Centre	Residential 2 & Open Space/Amenity		No submission
82	Timahoe	Village Centre	Open Space/Amenity		No submission
83	Timahoe	Community-Educational-Institutional	Open Space/Amenity		No submission
84	Timahoe	Village Centre	Residential 1. Established		No submission
88	Portlaoise	Open Space & Amenities	Residential 2 - New Proposed Residential	11	No submission
90	Abbeyleix	Not Zoned	Residential 2 - New Proposed Residential	14	No submission
93	Stradbally	Residential 2 - New Proposed Residential	Open Space & Amenities	18	No submission
95	Mountmellick	Not Zoned	Employment and Enterprise	13	No submission
96	Ballylynan	Not Zoned, Residential 2 - New Proposed Residential & Strategic Reserve	Residential 2 - New Proposed Residential & C.E.I	20	No submission
97	Borris In Ossory	Strategic Reserve	C.E.I	22	No submission
99	Timahoe	Residential 2 - New Proposed Residential	Residential 1 - Established	24	No submission

*Please note zoning amendment ID 10, 34, 55, 56, 58, and 59, were not accepted by Councillors on the 1st September 2021, directing the Chief Executive to retain the existing zonings contained within the Draft Laois County Development Plan (2021 – 2027) or amending the phasing. As they are not regarded to be a material amendments to the Draft Plan, these were not consulted on any further

APPENDICES AND ENVIRONMENTAL REPORTS

Document Reference	Reference	Location	Recommendation	No submission or support?
Appendix 1 – Record of Protected Structures				
	Appendix 1 – RPS – 1.2	Clough	Add to RPS list	No submission
	Appendix 1 – RPS – 1.3	Emo – Gates and Gate Lodge	Add to RPS list	No submission
	Appendix 1 – RPS – 1.4	Great Heath Racecourse - Ruined hexagonal-plan stone structure	Add to RPS list	No submission
	Appendix 1 – RPS – 1.5	Portlaoise – Newpark House	Add to RPS list	No submission
	Appendix 1 – RPS – 1.6	Clonad – Old School House	Add to RPS list	No submission
	Appendix 1 – RPS – 1.7	Clonad - Former schoolteacher's house	Add to RPS list	No submission
	Appendix 1 – RPS – 1.8	Emo - The Gamekeeper's Cottage	Add to RPS list	No submission
	Appendix 1 – RPS – 1.9	Emo - The Gardener's Cottage	Add to RPS list	No submission
	Appendix 1 – RPS – 1.10	Emo - The original walled garden (to the south-east of the house)	Add to RPS list	No submission
	Appendix 1 – RPS – 1.11	Emo - Eastern walled garden (adjoining original walled garden to east)	Add to RPS list	No submission
	Appendix 1 – RPS – 1.12	Emo - Eastern farmyards (including store buildings, stables and houses)	Add to RPS list	No submission
	Appendix 1 – RPS – 1.13	Emo - Walled garden and meathouse (to west of Bachelor's Wing)	Add to RPS list	No submission
	Appendix 1 – RPS – 1.14	Emo - Western farmyard, including former dairy building (adjoining walled garden to west of Bachelor's Wing)	Add to RPS list	No submission
	Appendix 1 – RPS – 1.15	Emo - Entirety of enclosing boundary wall, and all gateposts and gates	Add to RPS list	No submission
	Appendix 1 – RPS – 1.16	Emo - The Gate Lodge (at entrance from Emo Village)	Add to RPS list	No submission
	Appendix 1 – RPS – 1.17	Emo - The Deer Lodge (to north of Emo Court)	Add to RPS list	No submission
	Appendix 1 – RPS – 1.18	Emo - The South Lodge (at southern entrance to the Wellingtonia avenue, to south of Emo Court)	Add to RPS list	No submission
	Appendix 1 – RPS – 1.19	Abbeyleix - Former Railway Bridge (stone arch on approach to Abbeyleix from south)	Add to RPS list	No submission
	Appendix 1 – RPS – 1.20	Ballinakill - demesne walls of Heywood	Add to RPS list	No submission
Appendix 4 – Retail Strategy	Appendix 4 – Retail Strategy – 1.1	Abbeyleix Core Retail Area Stradbally Core Retail Area Mountrath Core Retail Area	Amend as shown on the maps	No submission

Document Reference	Reference	Location	Recommendation	No submission or support?
Appendix 5 – Wind Energy Strategy	Appendix 5 – Wind Energy Strategy – 1.2	N/A	Amend WES 2	No submission
	Appendix 5 – Wind Energy Strategy – 1.2	N/A	Amend Section 6.12	No submission

SECTION 3. RESPONSE ON THE OFFICE OF THE PLANNING REGULATOR SUBMISSION

Notice of the proposed material amendments was issued to the Office of the Planning Regulator under section 12(7)(a) of the Planning and Development Act 2000 (as amended).

A further Notice under 12(5)(aa), was also issued to the Office as required, setting out, following consideration of the draft plan and the Report of the Chief Executive, where the planning authority, after considering the submission of the Office of the Planning Regulator, decided not to comply with any recommendation made in the draft plan and Report of the Chief Executive, together with reasons for the decision.

3.1 INTRODUCTION

This section contains, under a series of themes (as set out in the submission received), a summary of the recommendations raised in the submission of the Office of Planning Regulator (OPR) to the proposed material alterations to the Draft Plan together with the response and recommendations of the Chief Executive in relation to the issues raised.

One of the key functions of the Office of the Planning Regulator (the Office) includes strategic evaluation and assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the material alterations to the draft Plan under the provisions of sections 31AM(1) and (2) of the *Planning and Development Act 2000* (as amended), and within the context of the Office's earlier recommendations and observations.

As outlined in the submission of the Office to the draft Plan, the Office considered the draft Plan to be generally consistent with policies in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area, and recommended changes to enhance its alignment with national and regional policies in the aforementioned, and for consistency with, inter alia, the following guidelines:-

- *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* (2009),
- *Urban Development and Building Heights Guidelines for Planning Authorities* (2018),
- *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012), the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (2017), and
- *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009).

The Office states that while it is acknowledged that the material alterations have generally responded in a positive manner to the Office's recommendations and observations, a number of the alterations introduced by the elected members very clearly result in significant breaches of national policy.

The Office states that it would like to commend the Planning Authority for the material alterations that have been informed by the Housing Supply Target figures (for the plan-period), the revised Strategic Flood Risk Assessment (SFRA), the Infrastructural Assessment Report and acknowledges the significant work

that was involved in amending the core strategy table and making consequential changes to land zoning across many settlements.

The Office would like to point out that the draft Plan, save for the material alterations introduced by the elected members, is a sound plan with a high level of consistency with the national and regional policy frameworks. In particular, the Office strongly commends the planning authority for the information provided on baseline modal share and for the inclusion of mode share targets.

Notwithstanding, the Office has identified specific matters below that will need to be addressed in particular the renewable energy policy, including setback distances from wind turbines, the rural housing policy changes and the 3-storey height limit for greenfield sites. The Office has also identified a number of specific zoning amendments that are contrary to national policies or Ministerial Guidelines under section 28.

The planning authority is advised that section 12(10) of the Act provides the members of the planning authority with scope to make a further modification to an alteration subject to the limitations set out in subsection 10(c) parts (i) and (ii).

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

RENEWABLE ENERGY

MA Recommendation 1 - Setback distance from wind farms

Having regard to the government's commitment in the *Climate Action Plan 2019* to achieve 70% of electricity from renewable sources by 2030 (adding 12GW of renewable energy capacity nationally), National Policy Objective 55 which promotes renewable energy use and generation to meet national targets, and section 28 guidelines *Wind Energy Development Guidelines* (2006) and the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (2017), the planning authority is required to omit the 1.5km separation distance from Appendix 5 – Wind Energy Strategy.

To avoid repetition and for the sake of completeness, all responses regarding the 1.5km set back is responded to here. Submissions were received from the following:

- LS-C24-33 (Coillte)
- LS-C24-32 (Wind Energy Ireland)
- LS-C24-24 (OPR)
- LS-C24-20 (ESB)

Summary of Issues Raised:

- LS-C24-33
 - We welcomed the Chief Executive (CE) proposed removal of all references to a 1.5km setback distance to windfarm developments and his suggestion that these be replaced by a cross reference to national policy guidelines. We note however this did not translate into this material amendment and the 1.5km reference remains. This contravenes the OPRs recommendation, and the resultant proposed additional text in Section 6.1 is contradictory and confusing. We respectfully propose that this be removed.
- LS-C24-32
 - The 1.5km should not have been included as it went against national and regional policies efforts to increase renewable energy to help meet our climate action targets.
 - The setback of 1.5km set out in Section 6.1 is unduly restrictive, is almost double the current practice of four-times rotor diameter and it is recommended that any setback would follow the Department's new Wind Energy Development Guidelines when published.
 - Imposing separate criteria from neighbouring counties and national policy will exclude otherwise potentially suitable areas for wind development.
 - The addition of the text "in accordance with the requirements of adopted National Policy Guidelines at the time of the determination of the planning application." is welcomed, it does not go far enough to ensure setback distances match that of the new Wind Energy guidelines when finalised. Following this path will inevitably result in a Ministerial Direction having to be issued to bring Laois County Council back in line with national policy.
- LS-C24-20
 - While the text in section 6.1 Buffer Zones in the WES has been modified, the development management standard continues to reference the 1.5km separation distance. A setback of this size will have the effect of seriously diminishing the land area potentially available for wind energy projects with consequent implications for the non-attainment of binding national obligations in relation reducing emissions

- The continued inclusion of the 1.5km setback undermines other policy objectives in the plan e.g. CM RE 6, which states:
 - “Ensure a setback distance for Wind turbines from schools, dwellings, community centres and all public roads in all areas open for consideration for wind farm development as per the Guidelines for Planning Authorities on Wind Energy Development (Department of Housing, Planning and Local Government).”
- The 2006 Guidelines on Wind Energy Development did not set out limits on the height of turbines but rather highlighted that the scale of the surrounding landscape should dictate height. However, a review of the Wind Energy Development Guidelines 2006 has been underway since 2013. In June 2017 a “preferred draft approach” was jointly announced between the Dept. of Housing, Planning, Community & Local Government (DHPCLG) and the Department of Communications, Climate Action and Environment (DCCA). The recently published Draft Revised Wind Energy Development Guidelines (2019) confirm the “preferred draft approach”.
- The “preferred draft approach” for visual amenity comprises a setback distance of 4 times the tip height between a wind turbine and the nearest point of the curtilage of any residential property, subject to a mandatory minimum setback of 500 metres. Setback requirements would also be subject to compliance with noise limits. Development policies for wind energy projects should be consistent with Government Guidelines and the “preferred approach” as outlined by the Department.
- We note from the Chief Executives Report, dated 22 June 2021, that Recommendation No. 13 from the Office of the Planning Regulator was to delete section 6.1 of the WES in its entirety and it was accepted by the Planning Authority that the 1.5km development management standard should be removed. Therefore, reference to a setback distance as set out in 6.1 of the WES should be removed as its inclusion may unnecessarily restrict the potential for wind farm development in the county. Its inclusion also undermines other supportive wind energy policies and is contrary to national policy and Ministerial guidance on wind farm development.

CE Opinion

The most up-to-date Government guidance on this matter remain the ‘Wind Energy Developments Guidelines for Planning Authorities, 2006’.

In December 2019, the DoHPLG published a draft Revised Wind Energy Development Guidelines, for which the responses will inform the final Guidelines. To date, given that the Department has not finalised its review of the current guidelines, the guidelines remain in full effect, and the Planning Authority must be consistent with the standards set out in same.

The Chief Executive refers to amendment no. 3.28 which outlines that *the Local Authority will support the delivery on commitments under the Programme for Government (2020), which commit to a 7% average yearly reduction in overall greenhouse gas emissions over the next decade and to achieving net zero emissions by 2050*. Amendment no. 3.28 also states that *in line with the Climate Action Plan 2019, Ireland aims to increase reliance on renewables within the electricity generation sector from 30% to 70% adding up to a total of 8.2 GW (8200 MW) of renewable onshore wind energy capacity by 2030*.

The Chief Executive is of the opinion that retaining the 1.5km buffer contradicts this part of the Draft Plan, and would also undermine the overarching national policy and Climate Action Plan, 2019 which seeks to increase renewable onshore wind energy capacity by 2030.

The Chief Executive therefore accepts that the 1.5km development management standard be removed from Section 6.1 of Appendix 5.

CE Recommendation

Reword Section 6.1 of Appendix 5, to exclude reference to 1.5km. The proposed wording below includes the proposed material amendment response to the OPR Recommendation 13 (Wind Energy Strategy) as follows:

Ensure a setback distance of wind turbines from schools, dwellings, community centres and all public roads in all areas open for consideration for windfarm development in accordance with the requirements of adopted National Policy Guidelines at the time of the determination of the planning application.

MA Recommendation 2 - National renewable energy targets

In accordance with the provisions of section 28(1C) of the *Planning and Development Act 2000* (as amended), and having regard to the government's commitment in the *Climate Action Plan 2019* to achieve 70% of electricity from renewable sources by 2030 (adding 12GW of renewable energy capacity nationally), National Policy Objective 55 which promotes renewable energy use and generation to meet national targets, and section 28 guidelines *Wind Energy Development Guidelines (2006)* and the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017)*, the planning authority is required to include specific targets, based on relevant and meaningful metrics, for how County Laois will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts).

CE Opinion

The OPR will note that there is still an absence of national and regional guidance on how local authorities can set a target for wind energy generation within their functional area.

The Development Plan will contribute towards meeting national renewable energy targets and it should be noted that the Planning Authority has included a standalone chapter in the Draft Plan to address climate adaptation and mitigation. In terms of the contribution of the Plan to realising targets on renewable energy and climate change mitigation, the Plan is committed to reducing carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.

Chapter 3 Climate Action and Energy, the Council commits to working with key stakeholders in the carrying out of an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.

The Council has demonstrated its commitment to promoting renewable energy development by granting approximately 330ha of solar farms in recent years.

Laois County Council has also designated Portlaoise as a Decarbonisation Zone and as such the following

text will be added to Chapter 3 to highlight Laois County Council's commitment to climate change and achieving any future renewable energy targets.

Nevertheless, in accordance with the Specific Planning Policy Requirement for the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017), Table XXX (Renewable Energy Target) demonstrates County Laois's contribution to realising overall national targets (under the Climate Action Plan) on renewable energy and climate change mitigation. In setting these targets, the Council has had regard to wind farm and solar farm developments, permitted and undeveloped as well as those under construction, which have the potential to be delivered in the plan period.

These targets will be reviewed subsequent to the emergence of regional targets for wind and solar energy, and in doing so it will be of paramount importance to reflect County Laois's existing (operational) and committed contribution to Ireland's 2030 target for onshore wind energy development, as well as other potential sources of renewable energy.

Recommendation

Amend Section 3.5.5 as follows:

The Local Authority will support the delivery on commitments under the Programme for Government (2020), which commit to a 7% average yearly reduction in overall greenhouse gas emissions over the next decade and to achieving net zero emissions by 2050. A number of actions within Programme for Government must be delivered on to ensure Local Authorities can effectively deliver on this commitment in conjunction with the key stakeholders namely –

- Finalise and publish the Wind Energy Guidelines, having regard to the public consultation that has just taken place.
- Develop a Solar Energy Strategy, including for rooftop and ground based photovoltaics, to ensure that a greater share of our electricity needs is met through solar power.

Notwithstanding this and in line with the Climate Action Plan 2019, Ireland aims to increase reliance on renewables within the electricity generation sector from 30% to 70% adding up to a total of 8.2 GW (8200 MW) of renewable onshore wind energy capacity by 2030. Laois has to date contributed to renewable wind energy generation, with permitted wind farms constructed and granted on the following locations detailed in the Table below ;

Table xx – Wind Energy Outputs for County Laois (completed and granted)

Location of wind farm	Planning Application Reference	No of turbines	Rated Energy output
Constructed			
Baunaghra	10/129	4	12 MW
Gorthahile, Bilboa	09/237	1	2.5 MW
Gorthahile, Bilboa	04/935	7	17.5 MW
Sub Total		12	32 MW
Planning granted / awaiting construction			
Graigueadrisley, Rathdowney	20/386	2	7.2MW
Knockardugal, Boleybawn, Garrintaggart, Ironmills and Graiguenahown	16/260	11	35.2MW
East of Ballyroan Village and South West of Timahoe	13/268	18	45MW
Sub Total		31	87.4MW Approx
Total		43	119.4 MW

- The installed wind capacity in Co Laois in 2021 is 32MW. This represents 0.7% of the total installed wind capacity in the Republic of Ireland to date based on the national installed wind capacity of 4,235 MW in 2020.
- A potential additional 87.4 MW of energy to be generated from permission already granted for additional wind farms in the south east of the county would bring the total output in Laois to 120 MW.
- If the potential from granted permissions were to be constructed , together with what has been built , it would represent a contribution from Co Laois at nearly 1.5% of the total (8,200 MW) by 2030.

~~Due to the absence of national guidance on how local authorities can set a target for wind energy generation within their functional area, it is not possible to set a specific target for renewable energy generation in the county during the plan period.~~

However, as outlined in a specific objective in Chapter 3 Climate Action and Energy, the Council commits to working with key stakeholders in the carrying out of an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.

In addition to wind , Laois County Council has permitted the following solar farms in the county

Table xx – Solar Energy Outputs for County Laois (completed and granted)

Location	Planning Application Reference	Energy output
Kilcoran, Rathdowney	18/674	47 MWp
Nigbog, Coolnabacky, Esker, Money Lower and Lughteeog, Stradbally	17/532	76 MW
Sronagh, Mountmellick	16/505	6.5MV
Rathleague, Portlaoise	16/500	4 MW
Derry More, Mountrath	16/217	4.2 MW
Total		137.7 MW

An Anaerobic Digester planned for Portlaoise has the potential to use up to 80,000 tonnes of biodegradable waste as feedstock per year, which has a potential Green House Gas emissions saving of 270,160 tonnes of CO₂ equivalent. This project has the potential to produce approximately 7,000,000m³ of biomethane and used as an alternative fuel to fossil fuels for regional energy and heat production. The biomethane from the proposed development will be injected into the gas network and it will then form a portion of gas used in the network for residential, commercial and industrial purposes.

The Planning Authority notes that there is still an absence of national guidance on how local authorities can set a target for wind energy generation within their functional area. However, in accordance with the *Specific Planning Policy Requirement for the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (2017), Table XXX demonstrates County Laois's contribution in terms of permitted applications to realising overall national targets (under the Climate Action Plan) on renewable energy and climate change mitigation.

The Council has had regard to the wind farm, solar farm and Anaerobic Digestion developments, permitted and undeveloped as well as those under construction, which have the potential to be delivered in the plan period if constructed . It is apparent from the table below that decarbonized energy infrastructure in County Laois, for which statutory consent exists, can provide the following energy to the local and national grid.

Wind Energy Output by the end of the Plan Period	119.4MW
Solar Energy Output by the end of the Plan Period	137.7 MW
Anaerobic Digestion Output by the end of the Plan Period	4,300 MWh per year

The specific targets for the Region and County will be designed on foot of a Regional Renewable Energy Strategy which will also identify targets at a county level, taking into account the complexities of the receiving environment , a consistent approach to designations and cross boundary issues.

MA Observation 1 – Development Plan Policy CM RE 1

The planning authority is requested to amend policy CM RE 1 to state that the planning authority will prepare a Renewable Energy Strategy for County Laois within 6 months of the adoption of the development plan.

To avoid repetition and for the sake of completeness, all responses regarding the CM RE 1 (Amendment 3.17) is responded to here. Submissions were received from the following:

- LS-C24-35 (IFI)
- LS-C24-33 (Coillte)
- LS-C24-27 (Keep Ireland Open)
- LS-C24-24 (OPR)
- LS-C24-20 (ESB)

Summary of Responses

- LS-C24-35
 - Surface Water Management - Wind farms also have considerable potential to affect surface water hydrology. The zoning of areas for their development should take into consideration ground conditions, gradient, subsoil conditions etc as well as the vulnerability of receiving waters.
- LS-24-33
 - While we would have preferred this to occur as part of the current Plan making process (and requested this in our Issues Paper submission at the outset, March 2020), we are aware of the strict County Development Plan making timeline and the resources of the Planning Authority and acknowledge this is a compromise.
 - However, in so concurring we do not see how the Draft Wind Energy Strategy (WES) in Appendix 5 can be adopted as part of the new Plan. To do so in the face of significant issues of compliance with the Interim Guidelines and the Planning and Development Act would be to misguide the appropriateness of development in this sector between the period of adoption of the new Plan and the adoption of the new Renewable Energy Strategy (RES).
 - In this regard we note comments in the CE report in relation to non-compliance with the SPPR that *“the Council commits to working with key stakeholders in the carrying out of an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource.”* Similarly in relation to coordinating objectives with those of neighbouring counties the CE notes it was not always possible to resolve inconsistencies *“based on [adjoining] landscape designations and views and amenities”* (pg. 55).
 - This issue highlights the urgency of adopting a new RES which must incorporate a fully compliant WES. In addition, the analysis contained in our submission on the draft Plan found only a very small % of land to be favourably designated for wind and the Coillte site at Cullenagh, which has an extant planning permission, to continue to be designated not ‘not open for consideration, notwithstanding policy support for such sites elsewhere in the Draft Plan. (This is discussed further under general comments below.) It is also therefore imperative to ensure the new RES is not only prepared, but completed, in a

timely manner. To this end we strongly request the following revisions to this proposed policy:

- CM-RE1 - Prepare **and complete** a RES **including a Wind Energy Strategy** for County Laois within 1 year of adoption of the Plan. This will be by way of variation to the Laois CDP.
- As stated above, adopting the WES in Appendix 5 gives the impression that a proper compliant and updated wind energy strategy is being adopted. Currently, this is not the case. We believe the Council must consider removing the WES in Appendix 5 in its entirety. This in turn will give significant and appropriate emphasis to completing CM-RE1 as soon as possible
- LS-C24-27
 - Supports the amendment
- LS-24-20
 - The Minister of Communications, Climate Action and Environment committed to raise the amount of electricity generated from renewable sources to 70% by 2030 in the Climate Action Plan with no generation from peat and coal. This ambition is needed to honour the Paris Agreement. It represents a significant change for the electricity industry and ESB is committed to doing its part in supporting and delivering on the Government's energy policy. In this regard, we support Amendment 3.17 that proposes to specifically state that a Renewable Energy Strategy (RES) will be prepared within 1 year of adoption of the County Development Plan (CDP).

CE Opinion

The Planning Authority is of the opinion that 12 months is more appropriate and realistic, given the time required to undertake the following key tasks to prepare the RES:

- 1) Procure and appoint consultants
- 2) Review baseline data
- 3) Undertake a comprehensive landscape character assessment
- 4) Co-ordinate and incorporate all assessments into a comprehensive mapping format for the CDP
- 5) Consultation with key stakeholders and members
- 6) Process to instigate the variation to the Laois County Development Plan (2021-2027)

Nevertheless, for the sake of clarity the Chief Executive believes CM RE 1 could be clearer regarding the steps the Planning Authority is seeking to undertake, and therefore proposes to amend CM RE 1.

Recommendation

It is therefore recommended that Policy CM RE 1 wording is amended to read:

CM RE 1 – Prepare a Renewable Energy Strategy (RES) for County Laois and commencement of the variation to the County Development Plan within 1 year of adoption of the plan. Once adopted tThis will be by way of a variation to the Laois County Development Plan.

ZONING AMENDMENTS

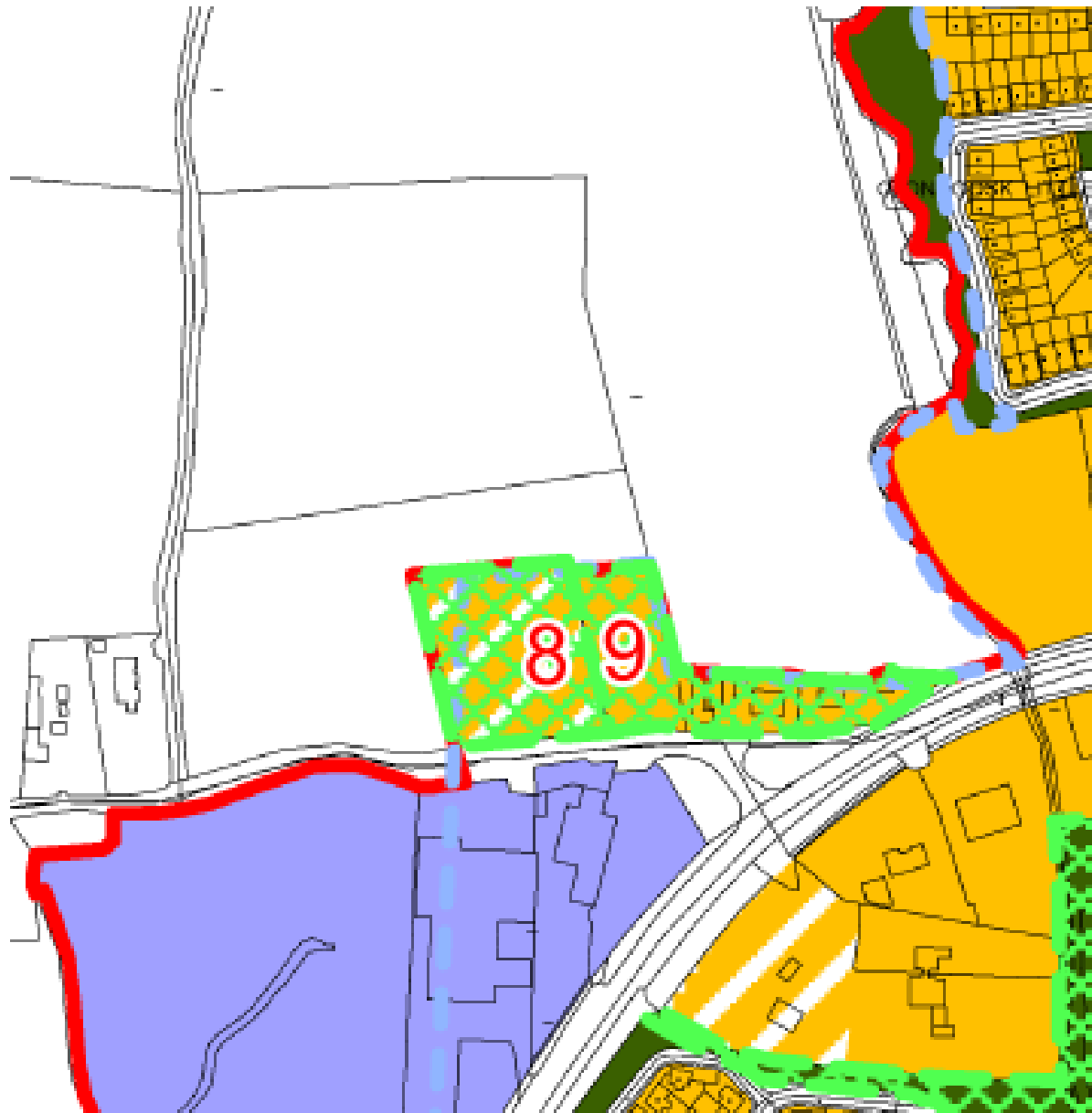
MA Recommendation 3 - Zoning amendments

Having regard to national and regional policy objectives promoting compact growth namely NPO 3c and RPO 3.2, section 4.19 of *Development Plans Guidelines for Planning Authorities* (2007) in respect of the sequential approach, the Housing Supply Target (HST) and quantum of land zoned for housing in Portlaoise, Abbeyleix and Stradbally in the Core Strategy, and the Strategic Environmental Assessment report, the planning authority is required to omit the following zoning amendments from the draft Plan:

- Portlaoise: Zoning amendments 8, 9, 85, 86, 87, and 89
- Abbeyleix: Zoning amendment 91
- Stradbally: Zoning amendment 92
- Timahoe: Zoning amendment 98.

Portlaoise

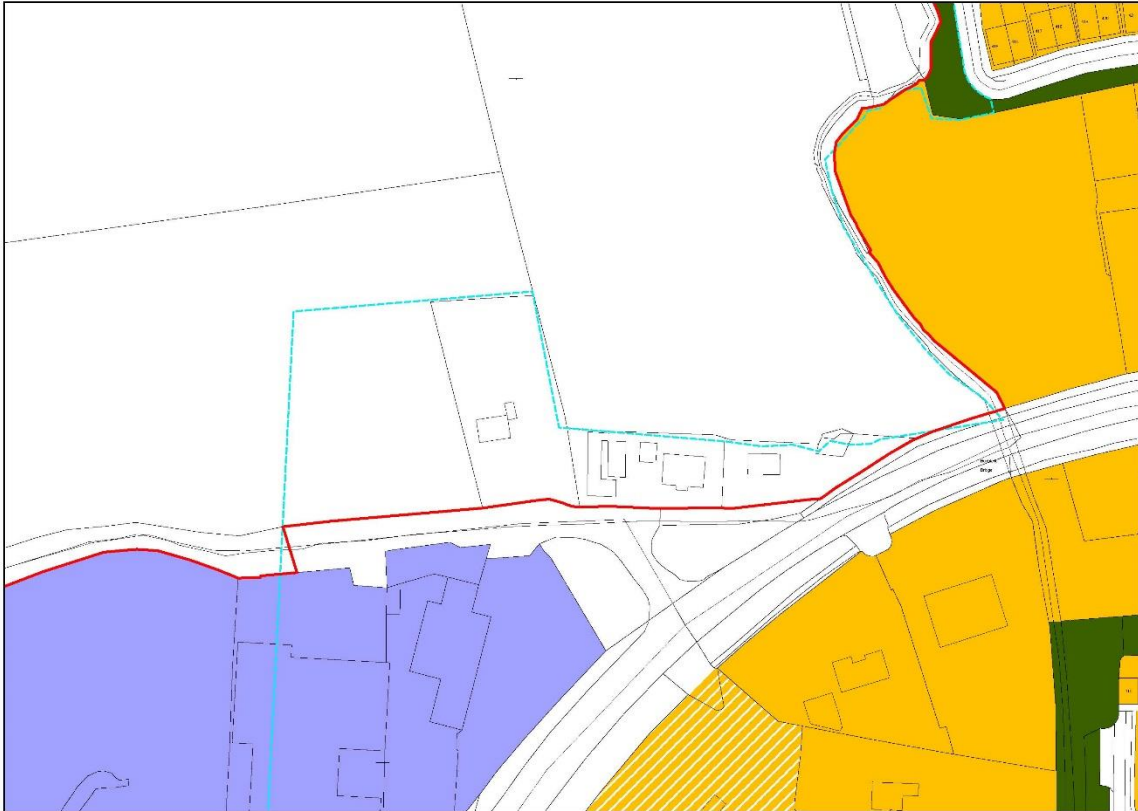
Zoning Amendment 8, 9



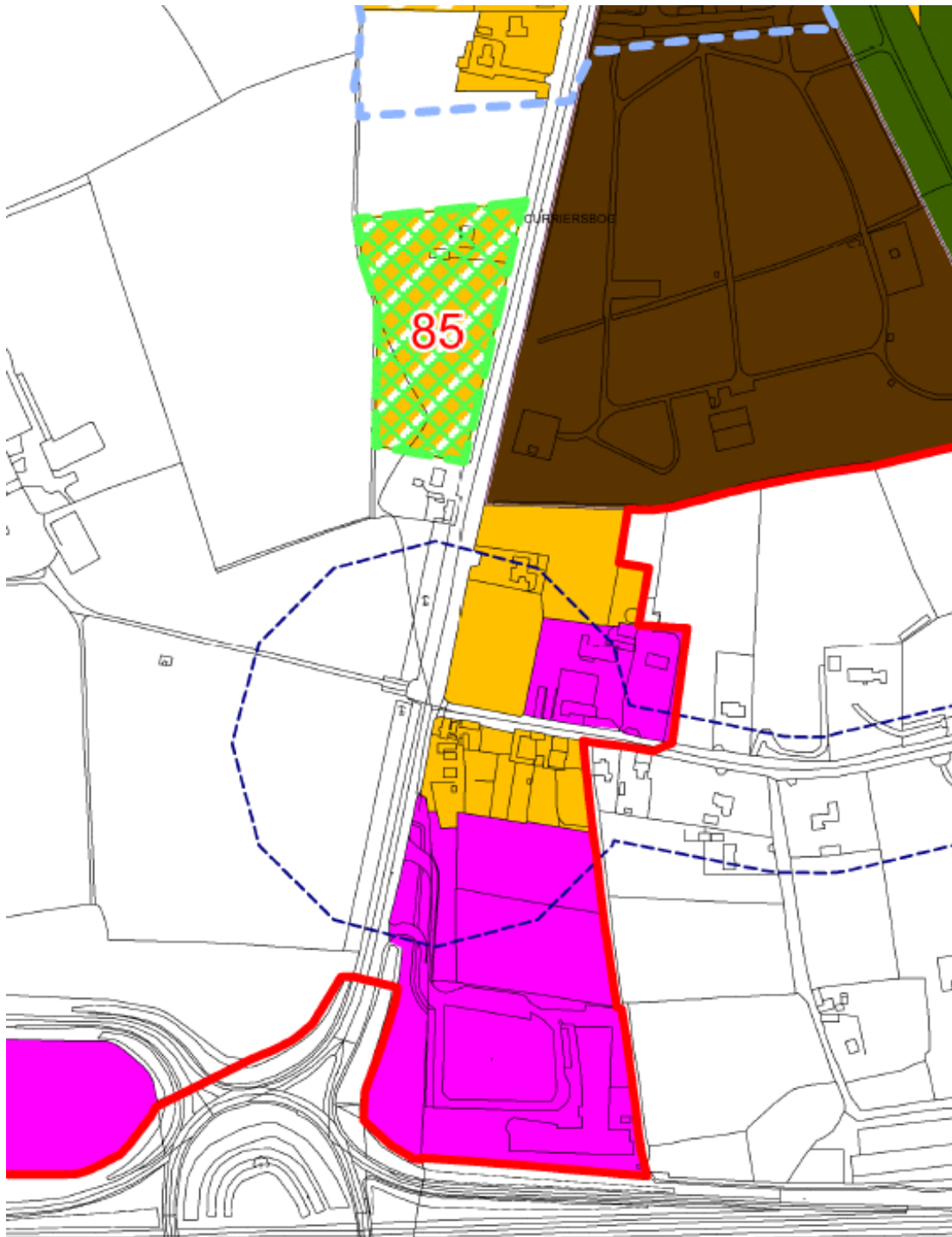
The Planning Authority notes the site comprises two elements, namely an existing detached dwelling and a further field to the west. Further to the submission by OPR, the Executive has reviewed the matters, and accepts that the inclusion of these lands would be inconsistent with compact growth and sequential development, and having regard to the Housing Supply Targets set out in the Draft Plan.

Chief Executive Recommendation

The residential zoning of these lands is omitted, reverting back to open countryside and outside the Portlaoise development boundary as per the Draft Plan. An extract from the Land Use Zoning Map is shown below showing the recommended change:.



Zoning Amendment 85

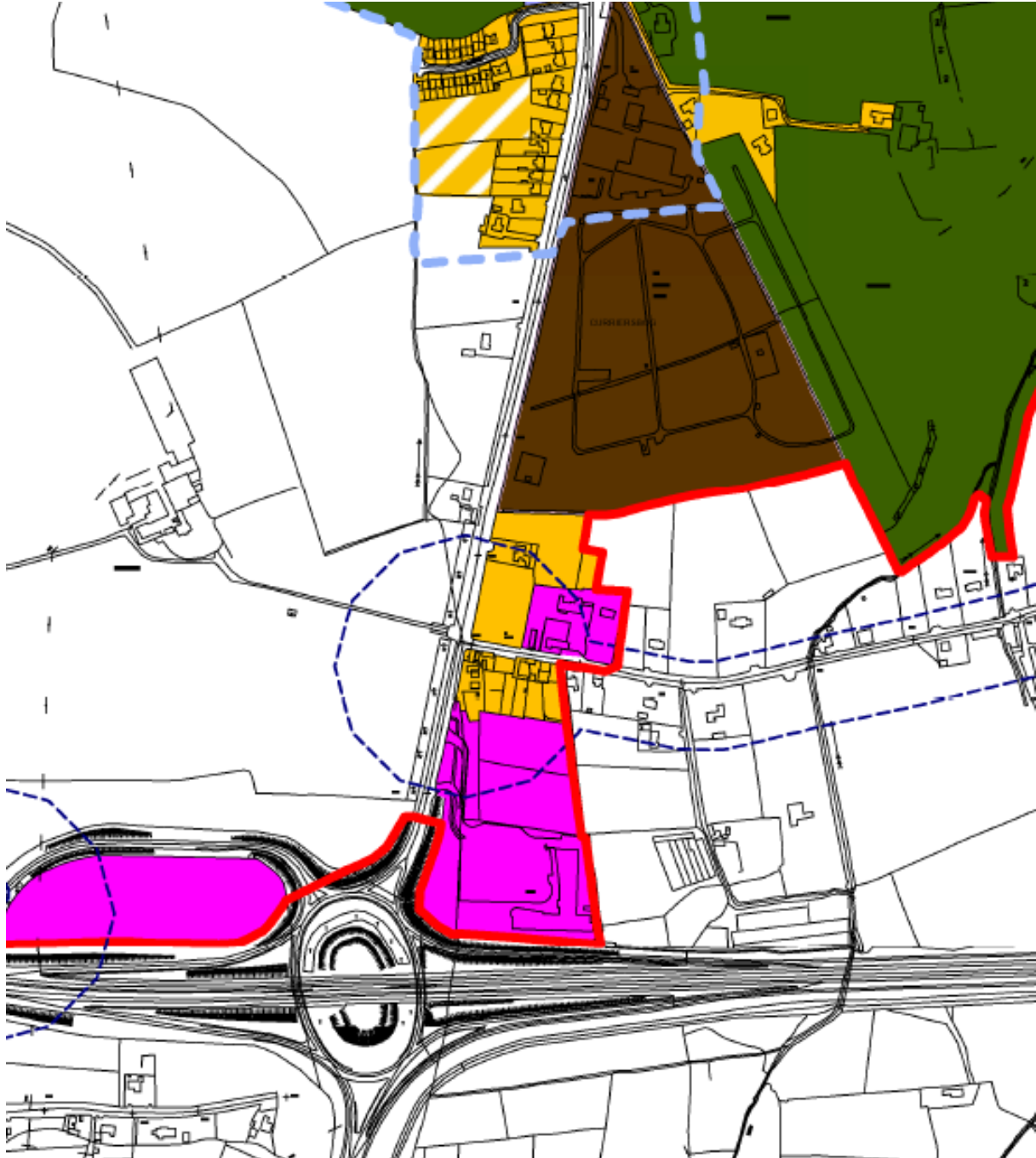


The Chief Executive Report of the Draft Plan (June 2021) includes the justification why the Executive is opposed to zoning these lands for residential and commercial development. A summary is set out below of why the Chief Executive is opposed to the zoning of this land.

- **Location** – The sites are detached from the existing built urban area and lies entirely outside the CSO settlement boundary.
- **Sequential Approach** - The **sequential approach** in effect favours town centre, edge of centre and inner suburban locations over suburban locations for reasons of promoting sustainability, urban compactness and ease of serviceability. There is a **strong** presumption against the leapfrogging effect which leads to ad-hoc and disjointed development at relatively long distances [such as in this case] from the town centre.
- **Contrary to National and Regional Policy** – National Strategic Outcome 1 (NSO 1) of the NPF seeks “Compact Growth” across towns, with the NPF stating we will need to deliver a greater proportion of residential development within existing built-up areas of our towns. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) states that residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.’ This site does not meet these objectives/
- **Housing Land Requirement** - Based on the overall household requirement of 3998 units over the plan period, residential units will be accommodated within existing town and village urban area, brownfield and infill sites and within the remaining greenfield sites (133 hectares up to target year 2027), as set out in Chapter 2 “Core Strategy”. Therefore there is no need for additional residentially zoned lands in the town. If this land were to be zoned, it would be at the expense of [and not additional to] other more suitably located lands as identified by application of the sequential approach.
- **Access** - The creation of an access onto the N77 that is subject to an 80 kph speed limit is contrary to TRANS18 of the LCDP 2021-2027.
- **Services** - In relation to Water supply - Development can be accommodated but would likely require infrastructure upgrades to accommodate the full growth projection and this is subject to funding from IW.

Chief Executive Recommendation

The residential zoning of these lands is omitted, and it reverts back to being unzoned as per the Draft Plan. An extract from the Land Use Zoning Map is shown below, showing the recommended change:



Zoning Amendment 86



Chief Executive Response

The Chief Executive Report of the Draft Plan (June 2021) includes the justification why the Executive is opposed to zoning these lands for residential and commercial development. A summary is set out below of why the Chief Executive is not in favour of zoning of this land.

- **Location** – The bulk of the lands is outside CSO settlement boundary as indicated in the draft Laois County Development Plan 2021-2027
- **Sequential Approach** - The sequential approach in effect favours town centre, edge of centre and inner suburban locations over suburban locations for reasons of promoting sustainability, urban compactness and ease of serviceability. There is a **strong** presumption against the leapfrogging effect which leads to ad-hoc and disjointed development at relatively long distances [such as in this case] from the town centre.

- **Contrary to National and Regional Policy** – National Strategic Outcome 1 (NSO 1) of the NPF seeks “Compact Growth” across towns, with the NPF stating we will need to deliver a greater proportion of residential development within existing built-up areas of our towns. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) states that residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.’ This site does not meet these objectives.
- **Access** - The creation of an access onto the N77 that is subject to an 80 kph speed limit is contrary to TRANS18 of the LCDP 2021-2027.
- **Services** - In relation to Water supply - Development can be accommodated but would likely require infrastructure upgrades to accommodate the full growth projection and this is subject to funding from IW.

Chief Executive Recommendation

That the residential zoning of these lands is omitted, and it reverts back to Transport Utilities as per the Draft Plan. An extract from the Land Use Zoning Map is shown overleaf, showing the recommended change.



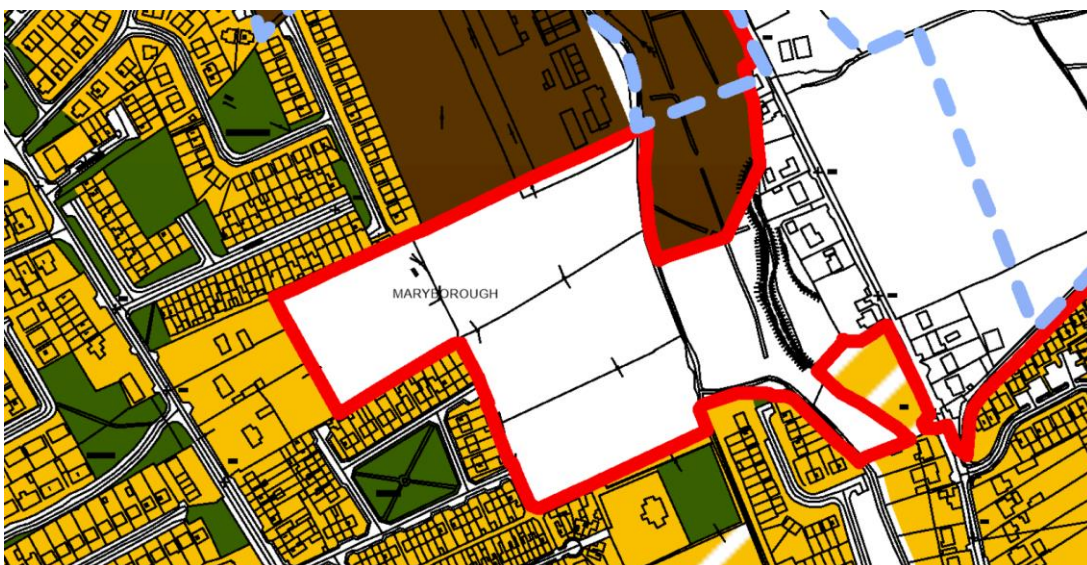
Zoning Amendment 87



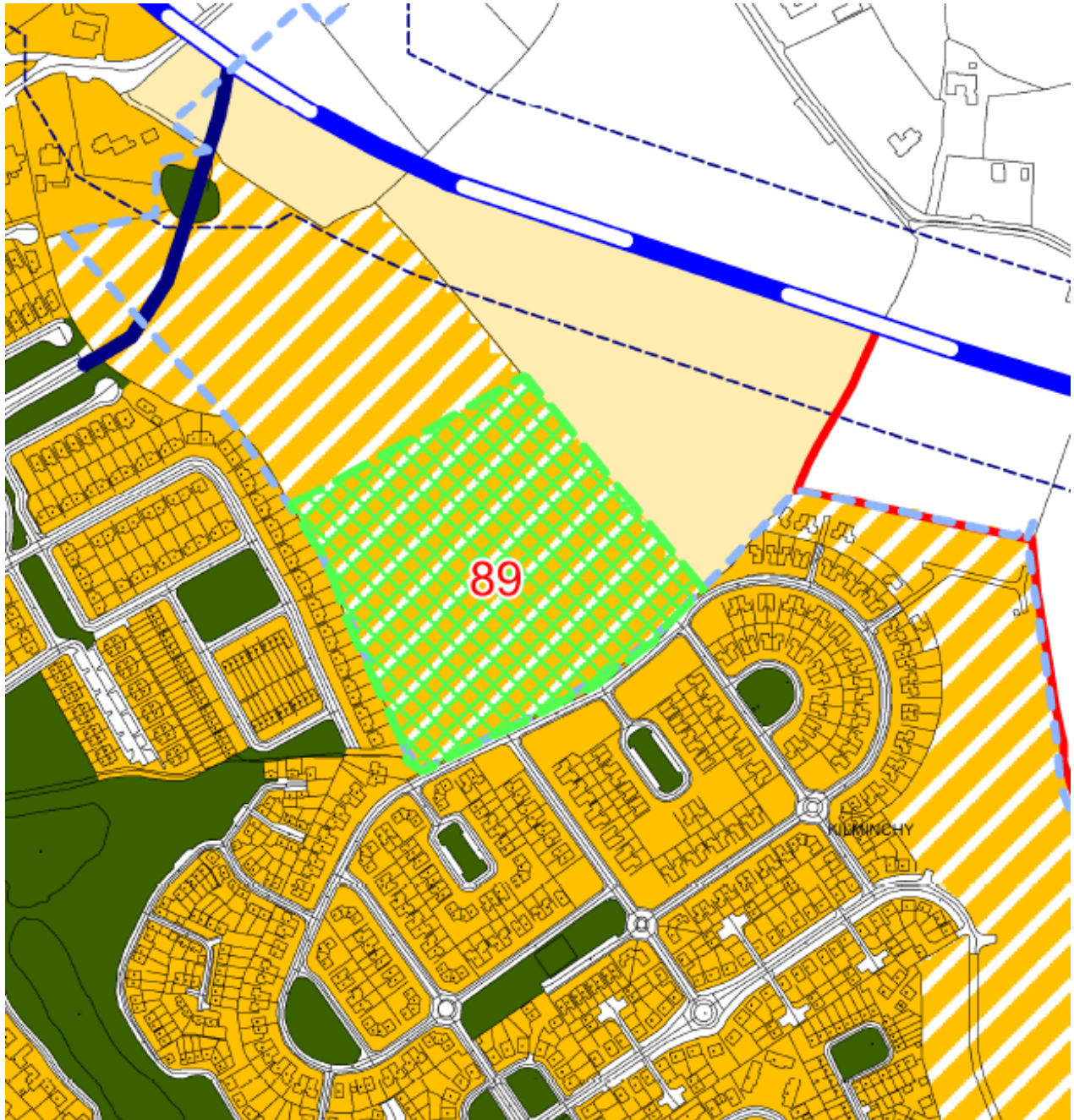
The Chief Executive Report of the Draft Plan (June 2021) includes the justification why the Executive is opposed to zoning these lands for residential development at this time, and why at that stage it was recommended to include the lands as Strategic Reserve, Open Space and Amenity. However, further to the submission by OPR, the Executive has reviewed the matters, and accepts that the inclusion of these lands would be inconsistent with compact growth and sequential development, and having regard to the Housing Supply Targets set out in the Draft Plan.

Chief Executive Recommendation

That the residential zoning of these lands is omitted, and it reverts back to open countryside and outside the development boundary as set out in the Draft Plan (January 2021). An extract from the Land Use Zoning Map is shown below, showing the recommended change:



Zoning Amendment 89



To avoid repetition and for the sake of completeness, all responses to zoning amendment 89 are included in this part of the report, which are:

- LS-C24-34 (Hazel Thompson)
- LS-C24-31 (Alan and Michelle Redmond)
- LS-C24-29 (Joe and Aisling Byrne)
- LS-C24-26 (Christy Bannon)

- LS-C24-25 (Iga and Naresh Dagar)
- LS-C24-24 (OPR)
- LS-C24-18 (Matthew Cahill)
- LS-C24-15 (Rita Walsh)
- LS-C24-12 (Rosdarragh Ratheven Residents Association)

Summary of Issues Raised:

- Amount of land zoned – a vast amount of Residential 2 zoning has been added since the first public consultation of the Draft County Development Plan 2021-2027 without any further allocation of local infrastructure/facilities.
- Type of zoning – A more beneficial zoning would be Community-Educational-Institute as this will provide a much-needed infrastructure/facilities required to support its residents. Ideally the whole site should be considered Community-Educational-Institute zoning to maximise the potential in supporting objective SS 5.
- Lack of access, congestion, lack of services and drainage issues.

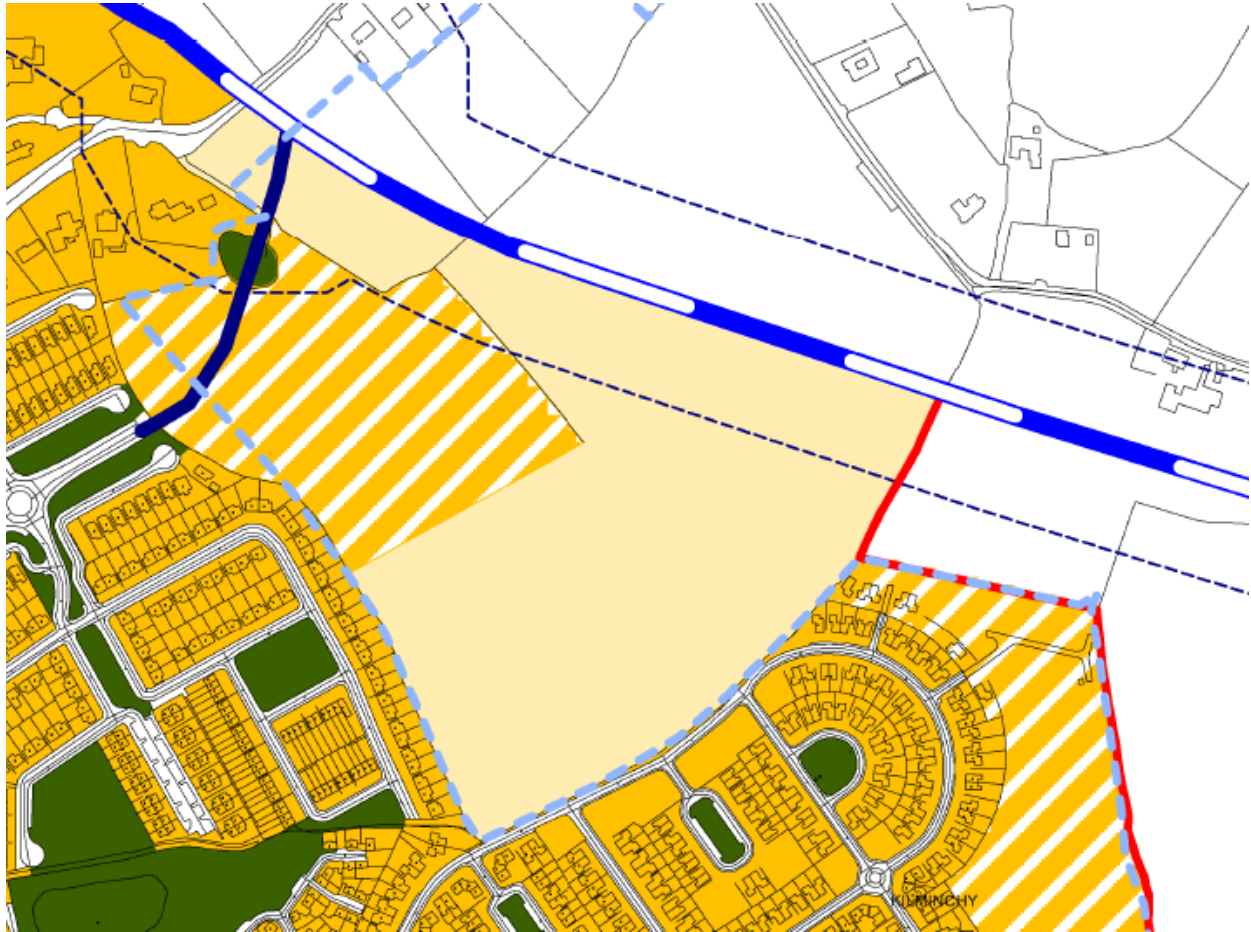
Chief Executive's Response

The Chief Executive Report of the Draft Plan (June 2021) includes the justification why the Executive is opposed to zoning these lands for residential development at this time. A summary is set out below of why the Chief Executive is not in favour of zoning of this land:

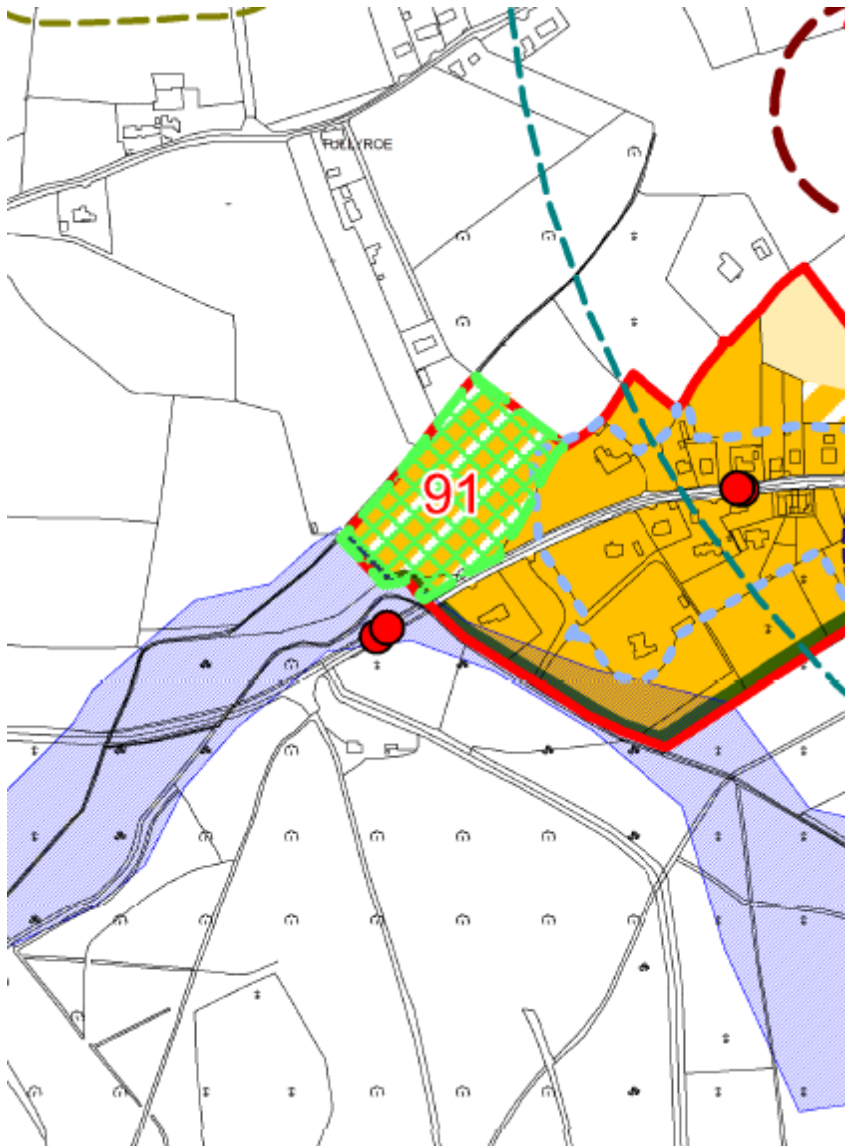
- **Location** – The site referred to is outside the CSO settlement boundary as indicated in the draft Laois County Development Plan 2021-2027.
- **Scale** - A development here of the scale proposed would be at variance with the principle of the sequential approach to the location of new development
- **Sequential Approach** - The sequential approach in effect favours town village centre, edge of centre and inner suburban locations over suburban locations for reasons of promoting sustainability, urban compactness and ease of serviceability. There is a strong presumption against the leapfrogging effect which leads to ad-hoc and disjointed development at relatively long distances [such as in this case] from the town centre.
- **Contrary to National and Regional Policy** – National Strategic Outcome 1 (NSO 1) of the NPF seeks “Compact Growth” across towns, with the NPF stating we will need to deliver a greater proportion of residential development within existing built-up areas of our towns. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) states that residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.’ This site does not meet these objectives.
- **Housing Land Requirement** - Based on the overall household requirement of 3998 units over the plan period, residential units will be accommodated within existing town and village urban area, brownfield and infill sites and within the remaining greenfield sites (133 hectares up to target year 2027), as set out in Chapter 2 “Core Strategy”. Therefore there is no need for additional residentially zoned lands in the town. If this land were to be zoned, it would be at the expense of [and not additional to] other more suitably located lands as identified by application of the sequential approach.
- **Services** - In relation to Water supply - Development can be accommodated but would likely require infrastructure upgrades to accommodate the full growth projection and this is subject to funding from IW.

Chief Executive Recommendation:

That the residential zoning of these lands is omitted, and it reverts back to Strategic Reserve as per the Draft Plan, and as recommended in the Chief Executive Report (June 2021) to the Draft Plan. An extract from the Land Use Zoning Map is shown below, showing the recommended change:



Abbeyleix
Zoning Amendment No. 91

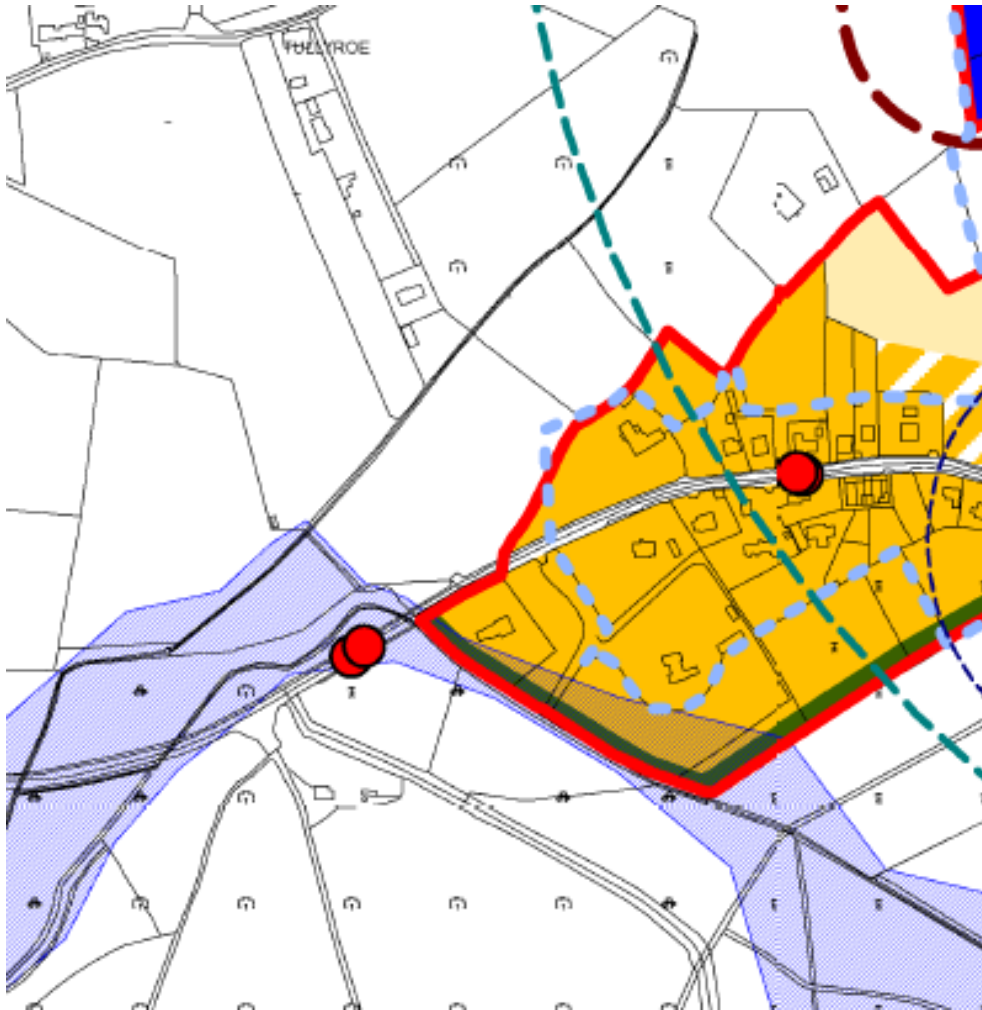


The Chief Executive Report of the Draft Plan (June 2021) includes the justification why the Executive is opposed to zoning these lands for residential development. These are summarised as follows:

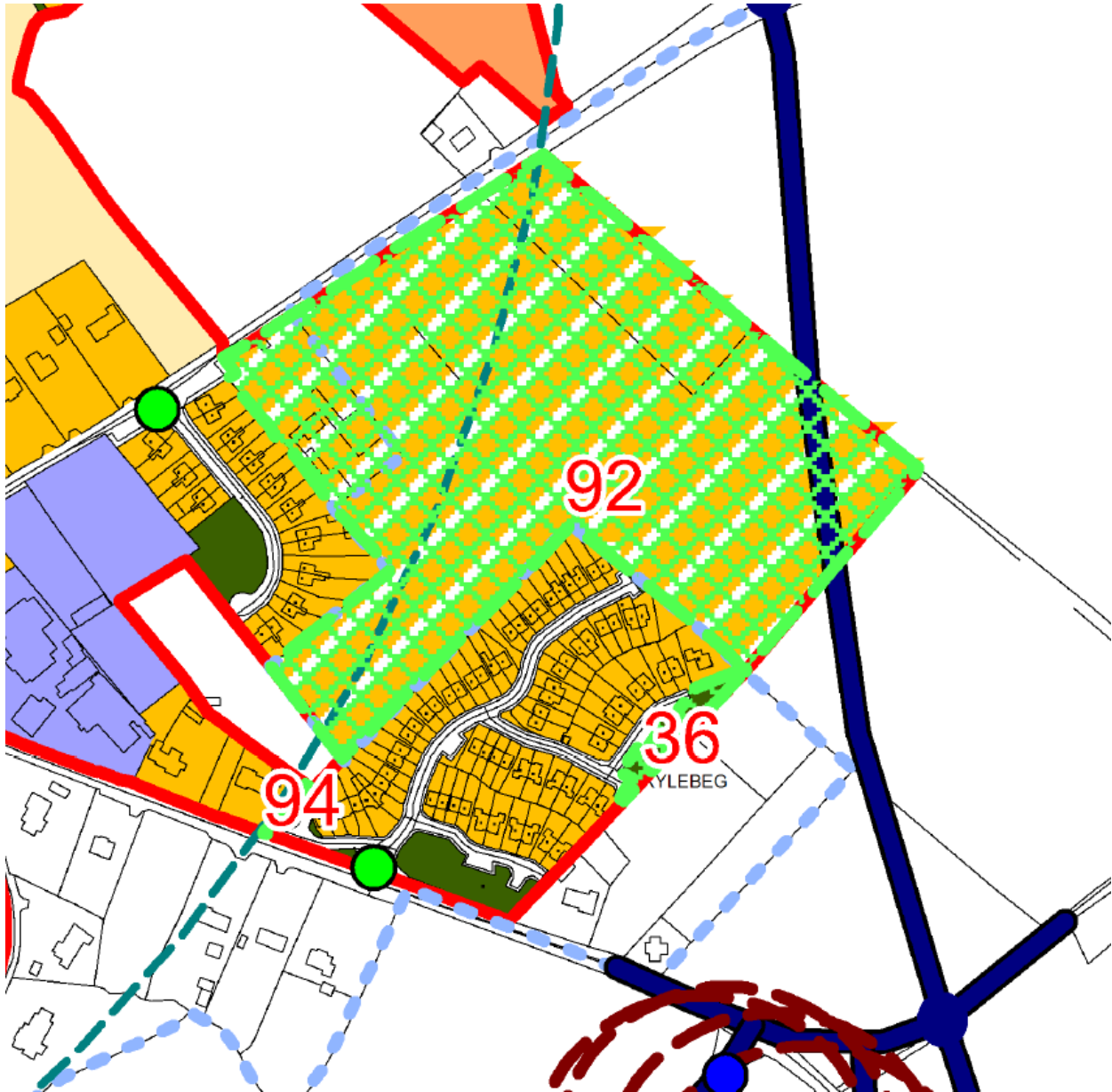
- The zoning of this site would not support compact growth as there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the development plan, consistent with NSO 1 and RSO 2;
- The site would constitute undesirable urban sprawl; and
- The zoning of this site would result in population growth for the town significantly in excess of that allocated for 80 units in the Core Strategy for the county in Chapter 2 of the Draft Plan, and accordingly it is recommended that this site remain not zoned.

Chief Executive Recommendation:

That the residential zoning of these lands is omitted, and it reverts back to open countryside as outlined at the Draft Plan stage. An extract from the Land Use Zoning Map is shown below, showing the recommended change:



Stradbally



Zoning amendment 92

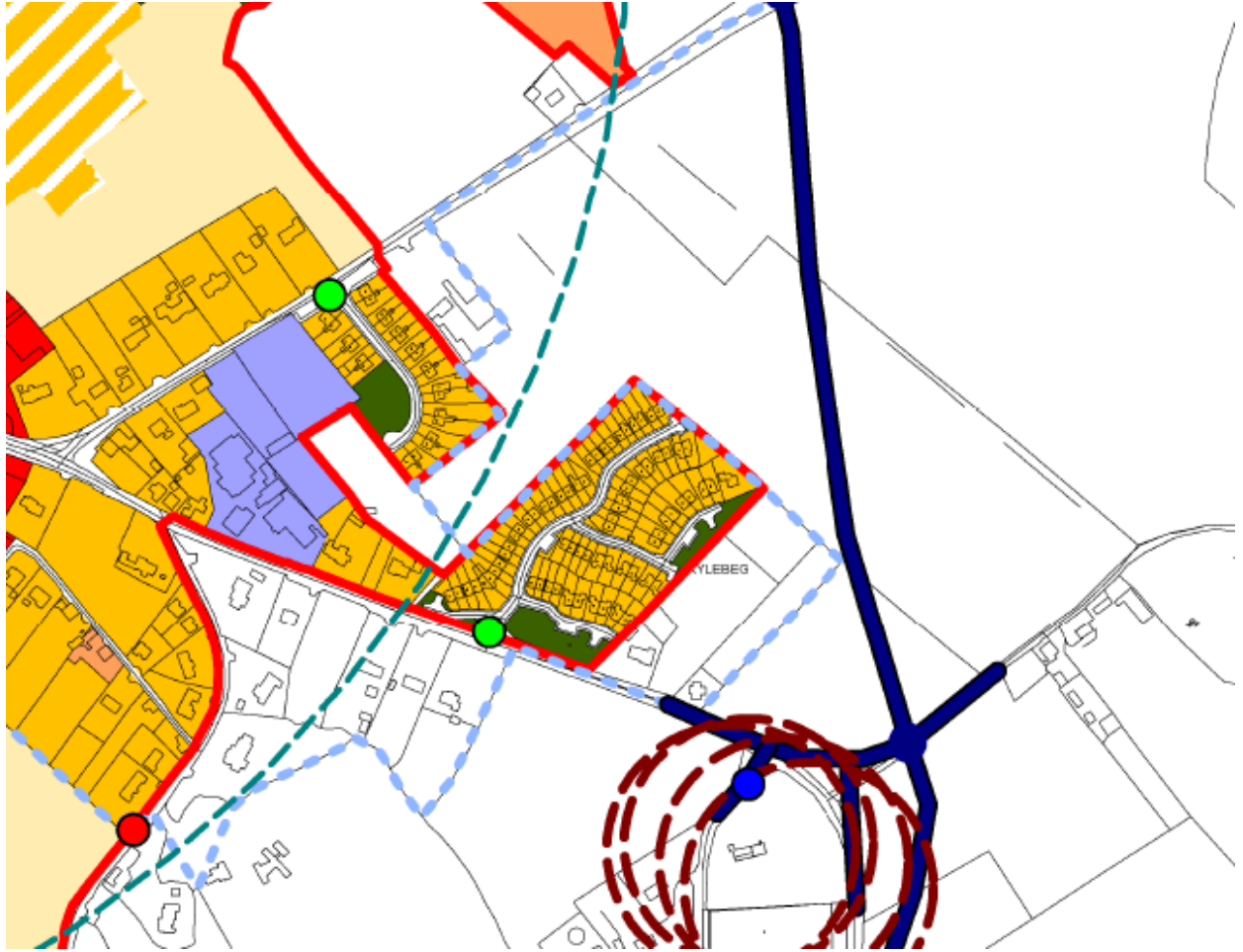
The Chief Executive Report of the Draft Plan (June 2021) includes the justification why the Executive is opposed to zoning these lands for residential development. A summary is set out below of why the Chief Executive is not in favour of zoning of this land:

- **Location** – The bulk of the site referred is outside the CSO settlement boundary as indicated in the draft Laois County Development Plan 2021-2027.
- **Scale** - A development here of the scale proposed would be at variance with the principle of the sequential approach to the location of new development

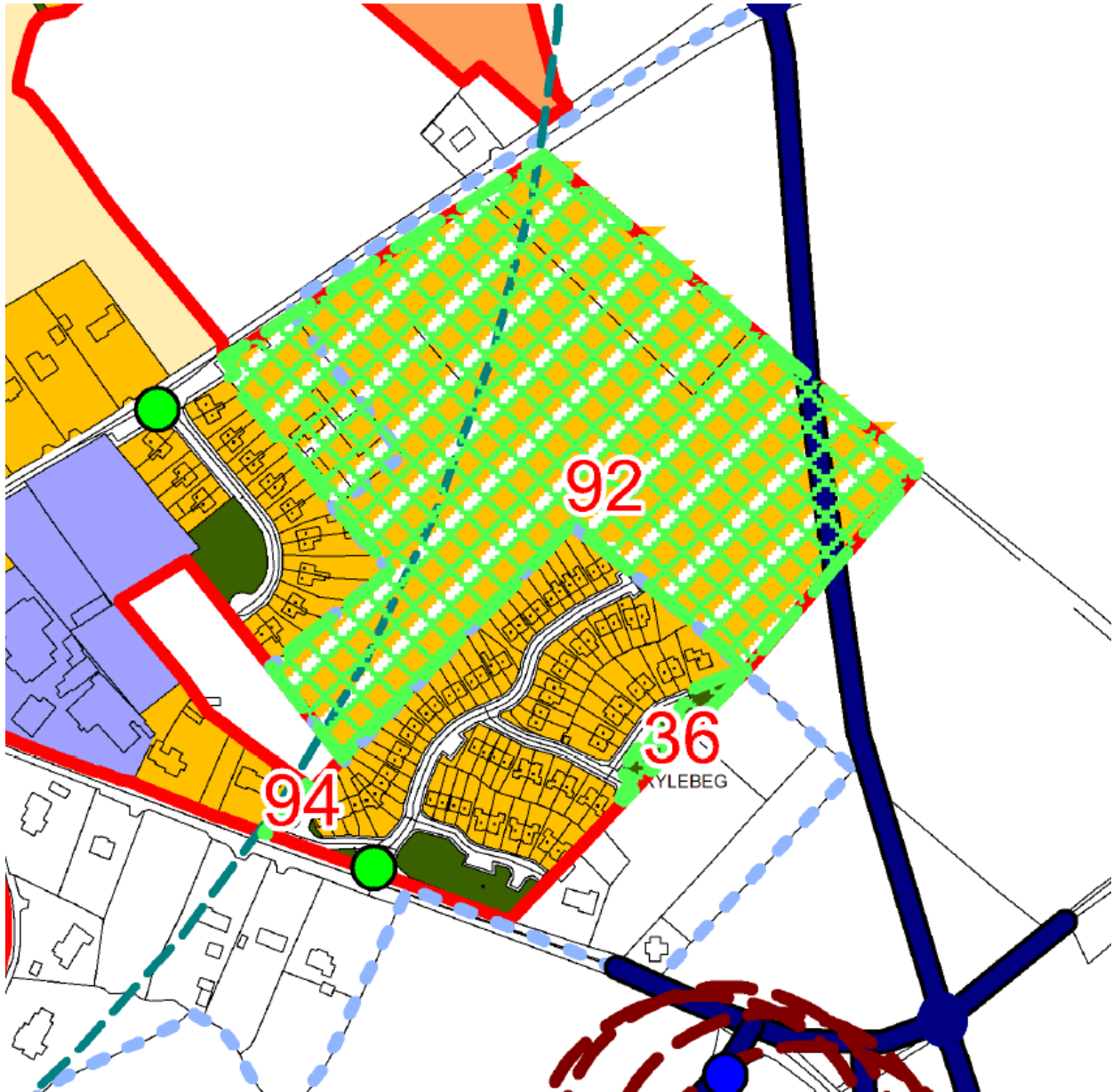
- **Sequential Approach** - The sequential approach in effect favours town village centre, edge of centre and inner suburban locations over suburban locations for reasons of promoting sustainability, urban compactness and ease of serviceability. There is a **strong** presumption against the leapfrogging effect which leads to ad-hoc and disjointed development at relatively long distances [such as in this case] from the town centre.
- **Contrary to National and Regional Policy** – National Strategic Outcome 1 (NSO 1) of the NPF seeks “Compact Growth” across towns, with the NPF stating we will need to deliver a greater proportion of residential development within existing built-up areas of our towns. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) states that residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.’ This site does not meet these objectives/
- **Housing Land Requirement** - Based on the overall household requirement of 3998 units over the plan period, residential units will be accommodated within existing town and village urban area, brownfield and infill sites and within the remaining greenfield sites (133 hectares up to target year 2027), as set out in Chapter 2 “Core Strategy”. Therefore there is no need for additional residentially zoned lands in the town. If this land were to be zoned, it would be at the expense of [and not additional to] other more suitably located lands as identified by application of the sequential approach.

Recommendation

The residential zoning of these lands is omitted, and it reverts back to open countryside as outlined at the Draft Plan stage. An extract from the Land Use Zoning Map is shown overleaf, showing the recommended change:

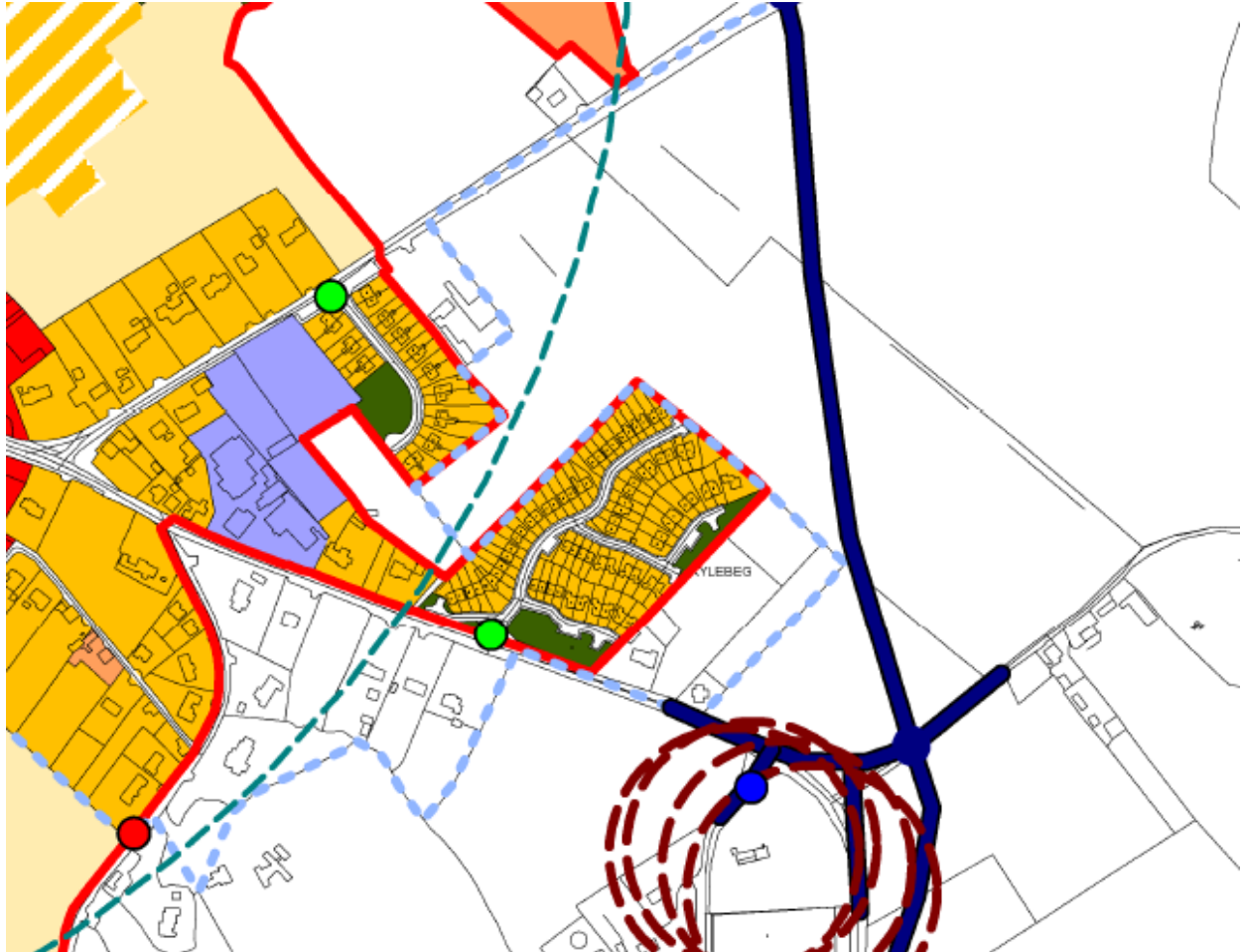


Zoning amendment 94

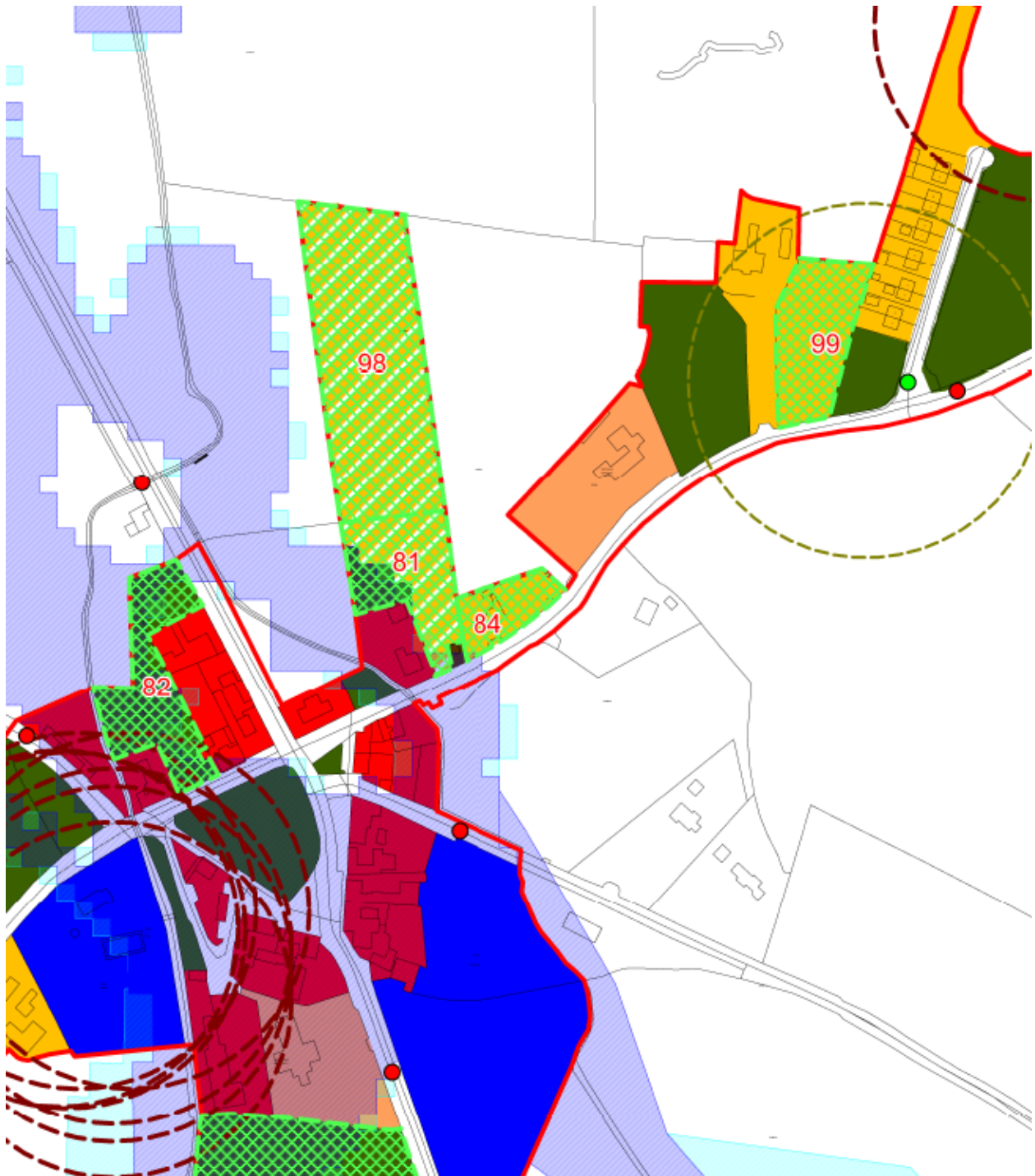


Recommendation.

It is proposed to amend the boundary of these lands from not zoned (outside development boundary) to not zoned (inside development boundary), which as a consequence of zoning amendment 92 above.



Timahoe
Zoning amendment 98.



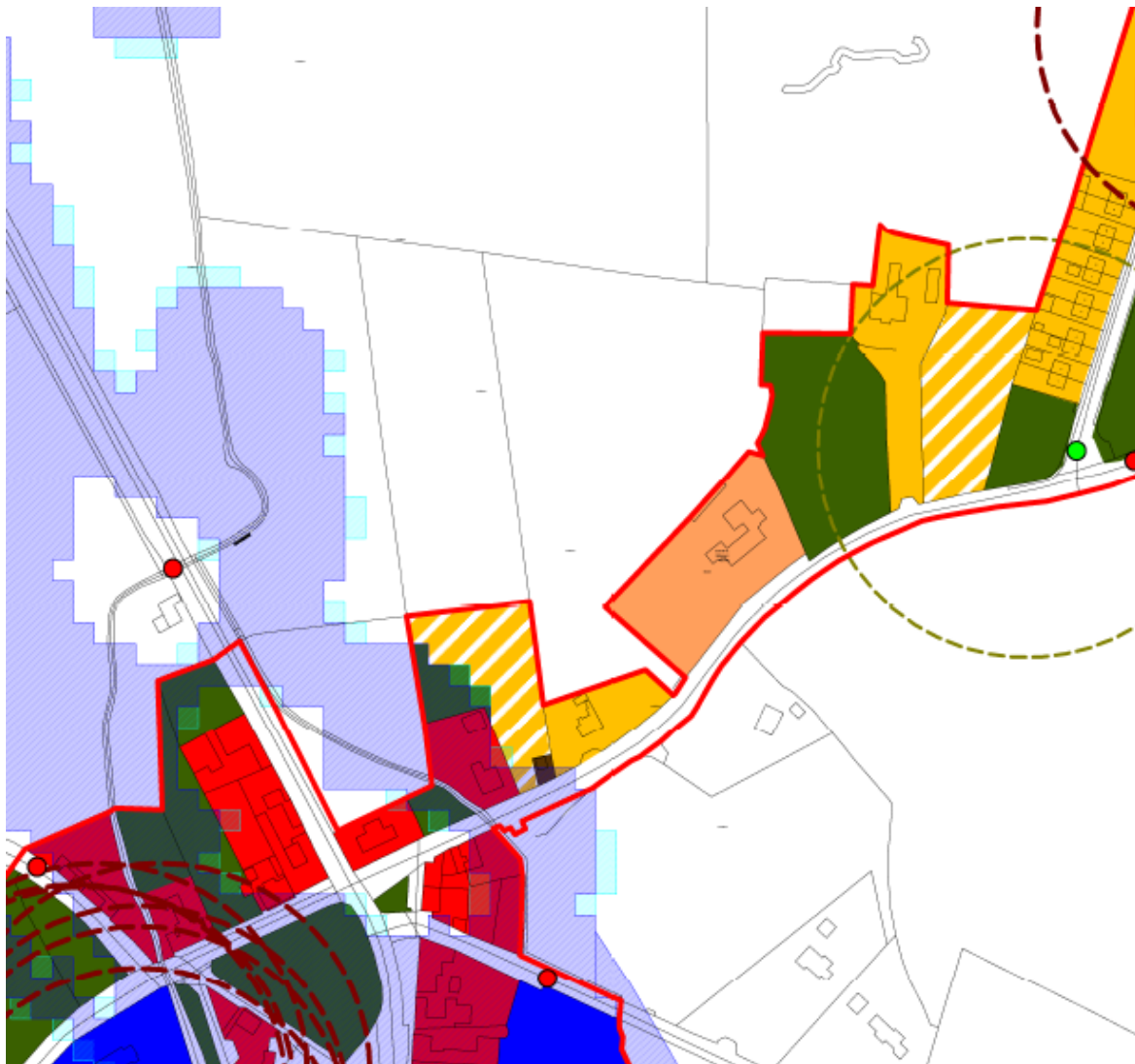
The Chief Executive Report of the Draft Plan (June 2021) includes the justification why the Executive is opposed to zoning these lands for residential development. These are summarised as follows:

- Low density serviced site could be considered in this settlement, albeit on proportionate scale that does not undermine the compactness of the settlement, and Architectural Conservation Area.

The Executive is of the opinion that proposed zoning amendment for this substantial area of land beyond the settlement boundary, where in the absence of wastewater infrastructure to serve this small rural settlement, and where other zoning changes for residential development in the vicinity are also proposed is not necessary.

Recommendation

That the residential zoning of these lands is omitted, and it reverts back to open countryside as outlined as per the Draft Plan, and as recommended in the Chief Executive Report (June 2021) to the Draft Plan.



Other Changes

Please note that the following changes to other parts of the Draft Plan and Appendices will need to be undertaken as a result of the zoning amendments referred above:

Table 2.12

Table 2.12: Residential Zoned Land

	CDP 2017 - 2023	CDP 2021 - 2027
Land zoned to accommodate residential development	273 ha	149 ha 155 ha 133 ha
No of residential units	3,216 ¹	5,202 3998

Core Strategy Table

The Core Strategy table has been updated to reflect the recommended zoning amendments.

¹ This figure did not account for rural one off dwellings

	2016	2016 – 2027		Existing Zoning HA		Mixed Use		Brownfield / Infill			Greenfield		Total land for New Residential			2027 - 2031		
	CSO POP 2016	NPF Total Pop 2016 - 2027	Housing Allocation based on ESRI Household Projections 2021 - 2027	Existing Residential Lands (ha)	Existing Lands that permit residential (ha)	Potential Units on Mixed Uses	Mixed Use Lands for Residential HA	Potential Units on Brownfield / Infill	Land Required for Brownfield / Infill HA	% of Brownfield / Infill	Potential Units on Greenfield	Greenfield Land HA	Total Land Zoned for Residential Uses (HA)	Land within Built Up Footprint (HA)	% of Land within the Built Up Footprint	NPF Total Pop 2016 - 2031	Housing Allocation based on ESRI Household Projections 2027 - 2031	Housing Land Requirement 2027 - 2031 in HA (Strategic Reserve)
COUNTY LAOIS	84,697	94,700	3998	1030.8	571.6	508	21	1814	68	49%	1,711	66-48	155-133	95.2	61%	97500	2275	59
KEY TOWNS																		
Portlaoise	22,050	26,366	1725	383	171	388	15.7	899	26.3 21.4	39.1	872	25.2 17	67.2 54.1	59.2	88.1	27,359	982	24
Graigucullen ²	4,692	5,392	280	74.0	6.1	0	0.0	140	4.0	50.0	140	4.0	8.0	NA	NA	5,553	159	5
SELF SUSTAINING GROWTH TOWN																		
Portarlinton ³	6,596	7,596	400	104.7	44.4	0	0.0	310	10.3	77.5	90	3.0	13.3	NA	NA	7,826	228	8
SELF SUSTAINING TOWNS																		
Mountmellick	4,777	5,227	180	90	45.5	0	0.0	60	2.0	44.4	120	2.5	4.5	4.0	88.9	5,331	102	3
Abbeyleix	1,770	1,970	80	81	48.6	30	1.0	7	1.7	15.7	270	8.1 6.1	10.8 8.8	5.1	47.2	2,016	46	2
Stradbally	1,350	1,550	80	28.0	26.8	18	0.6	25	0.5	4.2	37	10.3 2.5	11.8 4.0	4.0	33.9	1,596	46	2
Mountrath	1,774	2,024	100	43.2	31.4	19	0.6	54	3.6	76.6	7	0.5	4.7	4.7	100.0	2,082	57	2
SMALL TOWNS																		
Durrow	835	935	40	20.0	15.4	0	0.0	14	1.0	29.4	26	2.4	3.4	3.4	100.0	958	23	1
Rathdowney	1,271	1,396	50	41	30.3	23	0.9	12	0.8	29.6	15	1.0	2.7	1.2	44.4	1,425	28	1
Ballylnan	1101	1,226	50	21.2	10.3	8	0.5	103	4.1	60.3	66	2.2	6.8	2.3	33.8	1,255	28	1
VILLAGES (>500 POPULATION)																		
Clonaslee	566	616	20	8.2	14.6	0	0.0	20	3.1	100.0	0	0.0	3.1	2.5	80.6	628	11	1
Borris In Ossory	508	558	20	9.5	16.2	0	0.0	20	2.0	100.0	0	0.0	2.0	1.0	50.0	570	11	1
Ballyroan	563	613	20	10.0	10.9	10	0.4	10	1.0	71.4	0	0.0	1.4	1.0	71.4	625	11	1
Killenard	671	671-721	0-20	37.3	27.6	0	0.0	0-20	0-0 1.0	0-0 100	0	0.0	0	0.0	0.0	671 733	0 11	0 1
SMALLER VILLAGES (<500) AND OPEN COUNTRYSIDE																		
	36,173	38,5509	9534 ⁴	79.8	72.5	12	1.2	70.0	7.4	NA	68.4	7.2	15.8	NA	NA	39,607	543	9

² A Joint Local Area Plan for Graiguecullen shall be carried out in collaboration with Carlow County Council. A zoning map has therefore not been included within Volume 2 of this Plan, until such time as the Joint LAP has been completed and incorporated through a variation of the CDP. The total amount of land zoned within the built-up footprint of the settlement has not been indicated as it may be subject to change. The projected growth and housing allocation will, however, be incorporated into the Joint LAP.

³ A Joint Local Area Plan for Portarlinton shall be carried out in collaboration with Offaly County Council. A zoning map has therefore not been included within Volume 2 of this Plan, until such time as the Joint LAP has been completed and incorporated through a variation of the CDP. The total amount of land zoned within the built-up footprint of the settlement has not been indicated as it may be subject to change. The projected growth and housing allocation will, however, be incorporated into the Joint LAP.

⁴ This figure includes an approximation of 100 rural one off dwellings per annum over the lifetime of the Plan. Refer to Section 6.2 of the Laois Draft Housing Strategy and Housing Needs Demand Assessment for analysis of rural one-off dwellings

RURAL SETTLEMENT POLICY

MA Recommendation 4 - Rural Housing Policy

Having regard to the Government's commitment to climate action and the need to transition to a low carbon society, the *Sustainable Rural Housing Guidelines* (2005), NPOs 20 and 36 of the National Planning Framework, and the Regional Spatial and Economic Strategy (pages 18, 19 and 95), the planning authority is required to review the written statement of the plan and maps relating to rural settlement policies, including the rural area types under the proposed material amendment numbers 2.10, 4.6 and 4.7, to ensure that the evidence basis for the policy framework is consistent with national and regional policy.

Where the planning authority cannot satisfy itself that the subject material alterations are consistent with up to date data, mapping and policy, the planning authority should reconsider the material alterations and revert to the original draft Plan concerning same.

To avoid repetition and for the sake of completeness, all responses regarding the 1.5km set back is responded to here. The responses were received from the following submissions:

- LS-C24-24 (OPR)
- LS-C24-13 (Laura Bergin)
- LS-C24-8 (TII)
- LS-C24-3 (Dolores Keogh)

Summary of Issues Raised:

- LS-C24-13
 - I wish to oppose any change in regulations on rural planning for the next 6yrs 're your current proposals.
 - Curtailing the sections under which planning in rural areas can be sought to 2 i.e. (Areas under strong urban influence) & (Structurally weak areas) along with the stipulation that a person has to live within 8km of where they are from or farm seems ludicrous
 - I would have thought that the opposite should be the case, where people from any part of the country or indeed anyone wishing to live in Ireland should not only be allowed but indeed encouraged to build in such areas.
 - People are choosing to work from home now-a big change in our society and are moving from cities to many rural areas around Ireland where the quality of life is much better.
 - This movement of people will bring numbers up in local areas for voluntary groups but more especially sporting organisations like the GAA which have seen people having to immigrate in the past decade but a lot of these people are now returning. Homes in rural parts of Cork and Kerry can't be bought for love or money now there's such a shortage.
 - I would ask you again to rethink your proposals on this.
- LS-C24-8
 - TII notes the proposed amendment to the Rural Housing Policy and acknowledges the statement included that outlines that the 'Council will resist one-off housing proposals, where such development involves the creation of a new direct access point or the generation of increased traffic flows from existing direct access/egress points to the national road network where speed limits greater than 60km/h apply, in accordance with Policy Trans 7'.

- Recommendation - TII would welcome consideration by the Council of the following: TII welcomes the inclusion of such a statement in the interests of clarity and to assist applicants in preparing development proposals. However, TII recommends review of the reference to Policy Trans 7 which appears to have been updated. Reference to Objective Trans 17 of the Draft Plan that was on display may be more applicable
- LS-C24-3
 - I would very much appreciate if Laois County Council would retain the CURRENT housing regulations for the next 6 years.
 - It is vital for the survival of rural Communities and the people living there to be able to build a home in their own area and continue to live there if they wish.

CE Opinion

The Chief Executive is of the opinion that the revised rural housing policy agreed by members on the 1st September 2021 does not reference the current NPF and RSES or climate action legislation and the need to transition to a low carbon society.

Members will note that the Planning Authority has prepared an evidenced based Draft Laois County Development Plan (2021 – 2027), in accordance with the NPF and RSES, which included an alternative rural housing policy.

The policy provided for local rural people subject to compliance with planning and sustainable development and site suitability requirements.

Recommendation

The Chief Executive recommends that the plan be reverted to the original Draft Plan (January 2021), which will also address the matter raised by LS-C24-8 and LS-C24-13 above. It is recommended to delete the following text and this version of Map 4.1.

Delete the following text:

~~4.6 Open Countryside and Rural Housing~~

~~Laois County Council's rural housing policy has had careful regard to national advice and guidelines as set out in the National Spatial Strategy and Sustainable Rural Housing: Guidelines for Planning Authorities (DEHLG, 2005) and also including the Habitats Directive with regard to Appropriate Assessment and the Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009).~~

~~The Council's rural development strategy is based on promoting sustainable rural development aimed at Maintaining vibrant and viable rural communities while also seeking to protect the amenity, recreational and heritage value of the rural landscapes and countryside of the county.~~

~~The implementation of the Settlement Strategy, as set out in Section 2 and the conservation and protection measures in Section 7 Heritage Strategy are considered to be essential towards achieving this aim. The designation of settlements for development enables the Council to promote the strengthening of villages and settlements and to provide for the development of rural communities.~~

~~The approach taken towards the accommodation of residential development in the countryside has been twofold. In the first instance small scale settlements were identified. These are small scale settlements or small villages with an established identity that were considered suitable for the development of small scale housing schemes and/or single dwelling houses.~~

~~The second part of the approach was to determine the capacity of the countryside to absorb one-off housing having regard to issues in terms of environmental sensitivity, population trends, vacancy rates and the existing level of development in the area. In this regard the following actions were taken:~~

1. Environmentally sensitive areas including;—Special Areas of Conservation, Natural Heritage Areas, Special Protection Areas, Scenic Areas were identified and mapped.

2. Population trends have been mapped in terms of each Electoral Division (ED). The period taken was from 2006 to 2011.

3. Local areas within each ED that are clearly under significant development pressure for example northeast County Laois, the environs of the main urban settlements.

In County Laois the following three rural housing area designations apply:

- Areas under Strong Urban Influence,
- Stronger Rural Areas and
- Structurally Weak Areas.

The policy in relation to rural housing is, in certain areas, based on the local need factor which required applicants to demonstrate that they are functionally or socially related to the rural community in which the proposed site was located.

Other areas, where population stagnation or decline has been occurring, are not subject to housing need to the same extent or at all.

While the Council acknowledges the role of rural housing in sustaining rural communities, it also recognises that uncontrolled and excessive one-off urban generated housing in the countryside is not sustainable in the long term and measures need to be put in place to regulate this form of development. A concern arises that if 'one-off rural housing' is permitted at the current levels, then irreparable damage will be done to the environment including water quality and landscape character and the legitimate aspirations of those brought up in the countryside to continue to live within their own communities is likely to be jeopardized.

One-off housing refers to individually designed, detached houses primarily located on large un-serviced sites in the open countryside. The overriding aim of the Council's approach to one-off houses in the countryside is guided by the *Sustainable Rural Housing: Guidelines for Planning Authorities (DEHLG, 2005)*. This approach seeks to accommodate within rural areas, people who are functionally or socially part of the rural community and to resist demand for urban-generated housing in the countryside.

The Council will resist one-off housing proposals, where such development involves the creation of a new direct access point or the generation of increased traffic flows from existing direct access/egress points to the national road network where speed limits greater than 60km/h apply, in accordance with Policy Trans-7.

4.6.1 Rural Area Types

In accordance with the NSS and *Sustainable Rural Housing: Guidelines for Planning Authorities (DEHLG, 2005)* document, the county has been defined into different rural area types based on different development demands and needs. These areas are described below and the extent of each is shown on the Rural Settlement Strategy Map.

The Council recognises the needs of local rural people who wish to live or work in the area in which they grew up. The following three criteria arise in assessing applicants under this category:

- The applicant must come within the definition of a 'Local Rural Person'
- The proposed site must be situated within their 'Local Rural Area'
- The applicant must have a 'Local Rural Housing Need'

Table X—Rural Area designation

RURAL AREA DESIGNATION	DEFINITION	CRITERIA
RURAL AREAS UNDER STRONG URBAN INFLUENCE	<p>Those rural areas within easy commuting distance of the main urban centres in County Laois and adjacent counties including the GDA 6 which are experiencing pressure from the development of urban generated housing in the open countryside. These areas are essentially:—</p> <ul style="list-style-type: none"> • The north and eastern areas in the County • 5 km buffer zones around the Principal town, Key service Town and Service Towns of Graiguecullen and Mountmellick • National, Strategic Regional Routes and Regional Routes as defined in Section 7 <p>Continued high levels of single rural houses in these locations would inhibit the growth of the County's urban areas which would result in a failure to achieve the growth targets. It would also cause further deterioration of rural amenities. The key development plan objectives in these areas seeks to facilitate the genuine housing requirements of the rural community as identified by the planning authority in the light of local conditions while on the other hand directing urban generated development to areas zoned for new housing development in towns and village</p>	<p>It is an objective to recognise the individual housing needs of people intrinsic to the rural areas located within the areas defined as 'rural areas under strong urban influence'. Such needs may be accommodated on land s within the rural area under strong urban influence, subject to the availability of a suitable site and normal proper planning and sustainable development criteria.—</p> <p>It is an objective of the Council only to permit single houses in the area under strong urban influence to facilitate those with a local rural housing need² in the area, in particular those that have lived in an rural area.—</p> <p>In order to demonstrate a genuine rural housing need, any of the following criteria shall be met:—</p> <p>a) (a) the application is being made by a long term landowner or his/her son or daughter seeking to build their first home on the family lands; or—</p> <p>b) (b) the applicant is engaged in working the family farm and the house is for that persons own use; or—</p> <p>c) (c) the applicant is working in rural activities³ and for this reason needs to be accommodated near their place of work; or—</p> <p>d) (d) the application is being made by a local rural person(s) who have spent a substantial period of their life living in the local rural area, and, who for family</p>

STRONG RURAL AREA		and/or work reasons need to live in the rural area.
	The rural areas that traditionally have had a strong agricultural base, that are restructuring to cope with changes in the agricultural sector and have an extensive network of smaller rural towns, villages and other settlements. In these areas, the focus of urban generated housing should be in the network of settlements to support the development of services and infrastructure and to take pressure off development in the open countryside	It is an objective to recognise the individual housing needs of people intrinsic to the rural area located within the rural areas defined as strong rural areas. It is an objective of the Council to permit single houses in the strong rural areas to facilitate those with a rural housing need in the area. In order to demonstrate a rural housing need, any of the following criteria should be met:— a) the application is being made by a long term landowner or his/her son or daughter seeking to build their first home on the family lands; or b) the applicant is working in rural activities and for this reason needs to be accommodated near their place of work; or c) the application is being made by a local rural person(s) ⁹ who for family and/or work reasons wish to live in the local rural area in which they have spent a substantial period of their lives and are seeking to build their first home in the local rural area ¹⁰ —
STRUCTURALLY WEAK RURAL AREAS	The rural areas generally exhibit characteristics such as persistent and significant population decline as well as a weaker economic structure based on indices of income, employment and economic growth. These rural areas are more distant from the major urban areas and the associated pressure from urban generated housing.	To help stem decline and strengthen structurally weak areas, it is an objective of the Council that in general, any demand for permanent residential development should be accommodated, subject to meeting normal planning and environmental criteria.

6 Greater Dublin Area

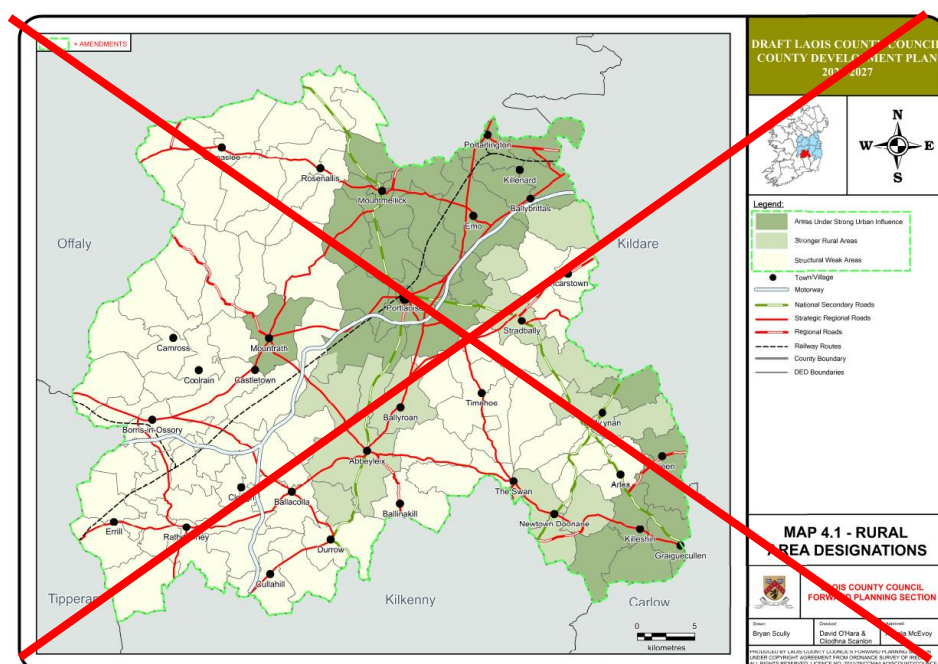
7 An applicant who satisfies a 'Local Rural Housing Need' is defined as a person who does not or has never owned a house in the 'local rural area' and has the need for a permanent dwelling for their own use in the rural area.

8 Such rural activities will normally encompass persons involved in full time farming, forestry, in land water ways or related occupations as well as part time occupations where the predominant occupation is farming/ natural resource related. Such circumstances could also encompass persons whose work is intrinsically linked to rural areas such as teachers in rural schools or other persons whose work predominantly takes place in rural areas—

9 A 'Local Rural Person' is a person who is living or has lived in the local rural area for a substantial period of time prior to making the planning application

10 The 'Local Rural Area' for the purpose of this policy is defined as the area generally within a 10km radius of the applicant's family home.

Figure X: Rural Area Designations



Insert the following text and maps which includes the proposed amendments outlined in the Chief Executive Report to the Draft Plan (June 2021) in response to the OPR Recommendation 7 (Rural Housing).

4.6 Open Countryside and Rural Housing

In support of the overall pattern of rural and small town development in Ireland, the NPF seeks to protect areas that are under strong urban influence from unsustainable over-development on the one hand, and to encourage population to be sustained in more structurally weak areas, that have experienced low growth or decline in recent decades, on the other, while sustaining vibrant rural communities. However, the NPF, through National Policy Objective 19 requires a clear distinction to be made between areas under urban influence and elsewhere in providing for the development of rural housing.

National Policy Objective 19: Ensure, in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and elsewhere:

- In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements;
- In rural areas elsewhere, facilitate the provision of single housing in the countryside based on siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.

Laois County Council's rural housing policy has had careful regard to national advice and guidelines as set out in the National Planning Framework, Regional Spatial and Economic Strategy, Climate Action legislation, *Sustainable Rural Housing: Guidelines for Planning Authorities* (DEHLG, 2005) and also the Habitats Directive with regard to Appropriate Assessment and the *Planning System and Flood Risk Management: Guidelines for Planning Authorities* (DoEHLG, 2009).

The Council's rural development strategy is based on promoting sustainable rural development aimed at maintaining vibrant and viable rural communities while also seeking to transition to a low carbon society and protect the amenity, recreational and heritage value of the rural landscapes and countryside of the county.

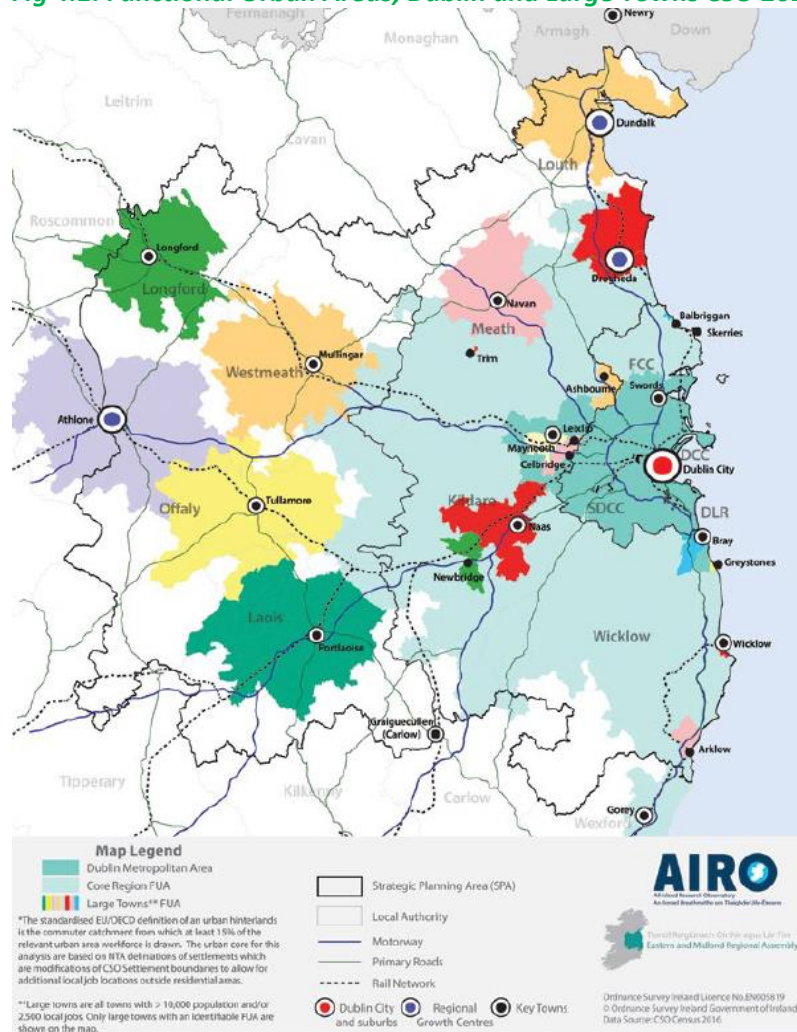
The implementation of the Settlement Strategy, as set out in Chapter 2 and the actions required to transition to a low carbon economy and society (Chapter 3) together with the conservation and protection measures in Chapter 11 Biodiversity and Natural Heritage of this Plan are considered to be essential towards achieving this aim. The designation of settlements for development enables the Council to promote the strengthening of villages and settlements which will sustain the development of rural communities.

4.6.1 RURAL AREA DESIGNATIONS/TYPOLOGIES

The RSES indicates the EMRA Functional Urban Areas (FUA) which is indicated in Figure 4.1. Within County Laois, much of the County is split between two Large Town FUAs – stemming from Portlaoise and Tullamore. The eastern county boundary also lies along the 'Core Region' FUA boundary, which is the peri urban hinterlands within the commuter catchment.

Laois County Council is sensitive to the needs of the rural community and recognises the need to facilitate housing development for people who are an intrinsic part of a rural community. The HNDA accounts for the potential demand for single rural dwellings over the lifetime of this Development Plan which is indicated at approximately 100 dwellings per annum.

Fig 4.1: Functional Urban Areas, Dublin and Large Towns CSO 2016



The approach taken towards the accommodation of residential development in the countryside has been twofold. In the first instance small scale settlements were identified. These are small scale settlements or small villages with an established identity that were considered suitable for the development of small scale housing schemes and/or single dwelling houses. The second part of the approach was to determine the capacity of the countryside to absorb one-off housing having regard to issues in terms of environmental sensitivity, population trends, vacancy rates and the existing level of development in the area. In this regard the following actions were taken:

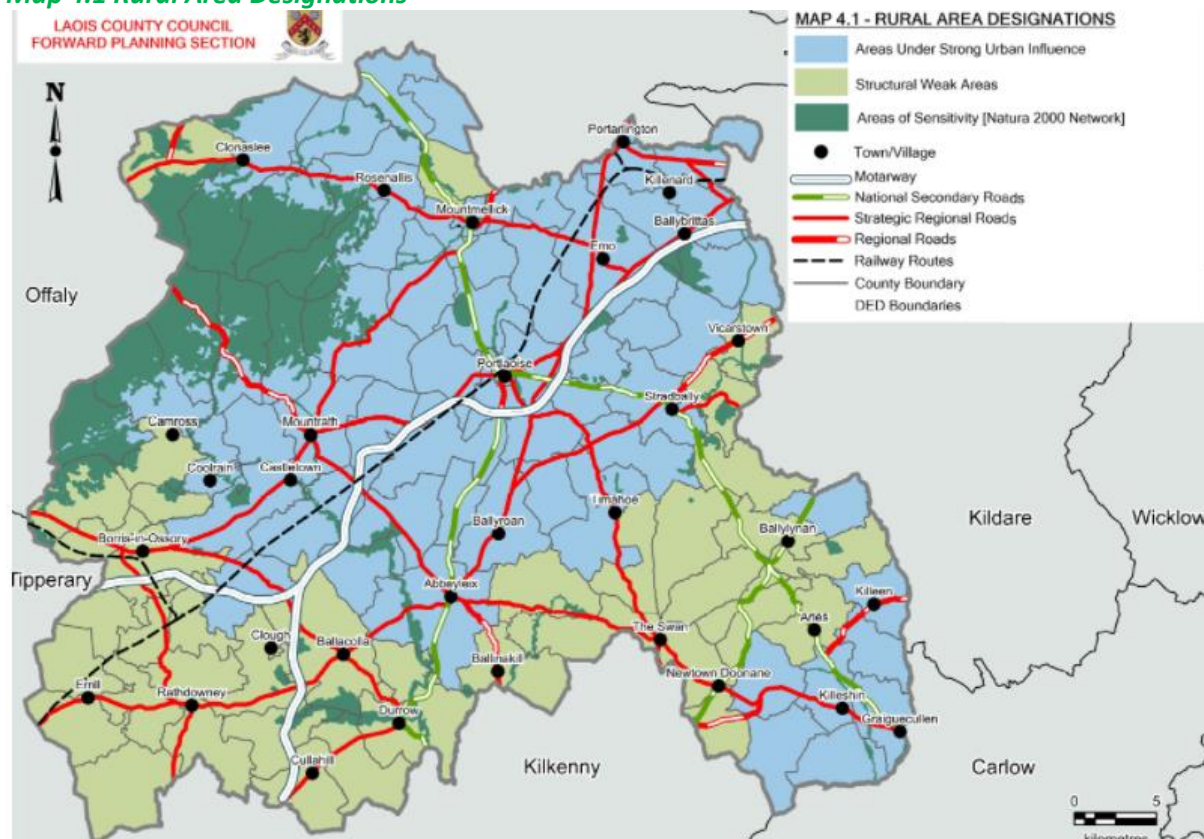
1. Commuter flows to Dublin Metro (as pre RSES) and then all other urban settlements with population >10k or >2,500 jobs;
2. Environmentally sensitive areas including; – Special Areas of Conservation, Natural Heritage Areas, Special Protection Areas, Scenic Areas were identified and mapped.
3. Population trends have been mapped in terms of each Electoral Division (ED). The period taken was from 2006 to 2011.
4. Local areas within each ED that are clearly under significant development pressure for example north-east County Laois, the environs of the main urban settlements.

While the Council acknowledges the role of rural housing in sustaining rural communities, it also recognises that uncontrolled and excessive one-off¹ urban generated housing in the countryside is not sustainable in the long-term by virtue of the impact one off housing has on the landscape, travel patterns, energy demands, water quality, etc and measures need to be put in place to regulate this form of development to ensure that people have fully considered the impact of living in the countryside versus living in a serviced town. The overriding aim of the Council's approach to one-off houses in the countryside is guided by the *Sustainable Rural Housing: Guidelines for Planning Authorities (DEHLG, 2005)*.

The Sustainable Rural Housing Guidelines (2005) states that 'Structurally Weak Rural Areas' will exhibit characteristics such as persistent and significant population decline as well as a weaker economic structure based on indices of income, employment and economic growth. In contrast, 'Strong Rural Area under Significant Urban Influence' will exhibit characteristics such as proximity to the immediate environs or close commuting catchment of large cities and towns, rapidly rising population, evidence of considerable pressure for development of housing due to proximity to such urban areas, or to major transport corridors with ready access to the urban area, and pressures on infrastructure such as the local road network.

The Rural Area Designations Map for Laois, Map 4.1, highlights the extent of lands which are encompassed within these defined areas, for the purposes of informing policy in relation to the delivery of rural housing over the plan period. The policy in relation to rural housing is, in certain areas, based on the local need factor which required applicants to demonstrate that they are functionally or socially related to the rural community in which the proposed site was located. Other areas, where population stagnation or decline has been occurring, are not subject to housing need to the same extent.

Map 4.1 Rural Area Designations



4.6.2 LOCAL NEEDS CRITERIA

Rural generated housing demand will be managed having regard to (1) the rural housing designations - **Structurally Weak Areas** and **Areas Under Strong Urban Influence**, and (2) the applicant's genuine local need, together with the protection of key economic, environmental, natural and heritage assets, such as the road network, water quality, important landscapes, habitats and the built heritage (3) **Areas of Sensitivity (European sites)**. In order to determine if a site lies within either of the rural area designations, please refer to Map 4.1.

4.6.2.1 Areas of Sensitivity (European sites).

The Areas of Sensitivity identified as European sites require protection and the key objectives in these areas seeks to facilitate the genuine housing requirements of the rural community as identified by the planning authority in the light of local conditions while on the other hand directing urban generated development to areas zoned for new housing development in towns and villages. For this purposes these area will be dealt with in the same manner as **Areas Under Strong Urban Influence**.

In order for the Applicant to be considered for a rural one off dwelling in the open countryside within Areas of Sensitivity, the Applicant **must be from one** of the following **categories** and meet all of the **supporting local needs criteria** as indicated for each category in Table 4.3 below.

4.6.2.2 Structurally Weak Areas

The rural areas generally exhibit characteristics such as persistent and significant population decline as well as a weaker economic structure based on indices of income, employment and economic growth. These rural areas are more distant from the major urban areas and the associated pressure from urban generated housing.

To help stem decline and strengthen structurally weak areas, it is an objective of the Council that in **general**, demand for **permanent** residential development should be accommodated, **subject** to the following criteria being met in Table 4.2 below:

Table 4.2: Structurally Weak Area Criteria

CRITERIA

- The proposed development must meet the normal planning and environmental criteria
- The applicant does not or has never owned a house in the open countryside
- Climate action measures^[2] have been proposed as part of the application to ensure a transition to a low carbon economy

To prohibit speculative development in these areas, any application for a single permanent dwelling must be made in the name of the person for whom it is intended. An occupancy condition will be attached to any grant of permission.

4.6.2.3 Areas Under Strong Urban Influence

Such rural areas are those within easy commuting distance of the main urban centres in County Laois and adjacent counties including the Greater Dublin Area which are experiencing pressure from the development of urban generated housing in the open countryside. Continued high levels of single rural houses in these locations would inhibit the growth of the County's urban areas which would result in a failure to achieve the growth targets. It would also cause further deterioration of rural amenities. The key objectives in these areas seeks to facilitate the genuine housing requirements of the rural community as identified by the planning authority in the light of local conditions while on the other hand directing urban generated development to areas zoned for new housing development in towns and villages.

In order for the Applicant to be considered for a rural one off dwelling in the open countryside within Areas Under Strong Urban Influence, the Applicant **must be from one** of the following **categories** and meet all of the **supporting local needs criteria** as indicated for each category in Table 4.3 below:

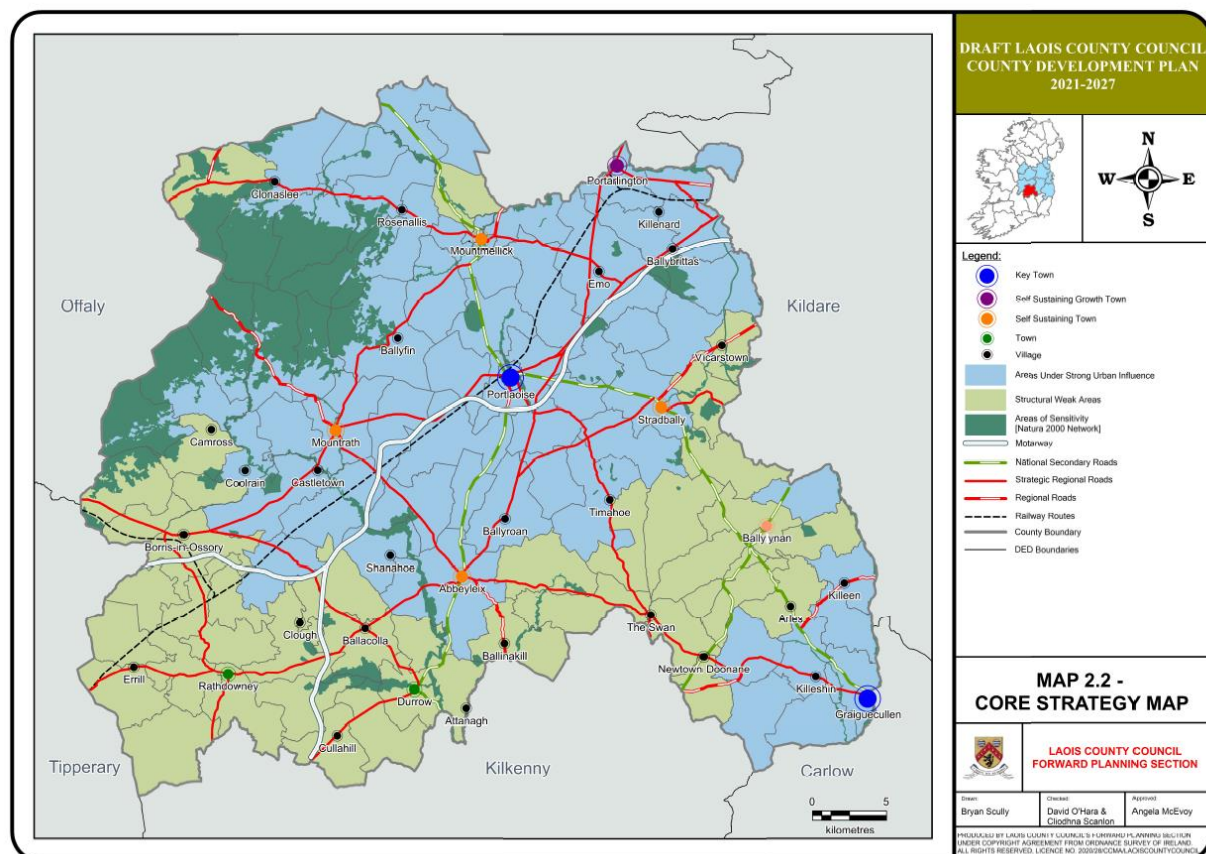
Table 4.3: Local Needs Criteria for Areas Under Strong Urban Influence

<p>CATEGORY 1: A member of a farming family</p>
<p>OR</p>
<p>CATEGORY 2: A member of the rural community</p>
<p>AND Meet ALL of the LOCAL NEED CRITERIA set out for each category</p>
<p><u>For the purposes of this Plan, the rural area refers to areas outside built up settlements which have zoning for residential purposes.</u></p>
<p>CATEGORY 1 <u>A Member of a Farming Family</u> The applicant must demonstrate a genuine local need to reside in the area through active and direct involvement in the running of the family farm. The farm must be in the ownership of the applicant's immediate family for a minimum of five years preceding the date of the application for planning permission</p>
<p>REQUIRED LOCAL NEEDS CRITERIA (all criteria must be met)</p> <ul style="list-style-type: none"> • The applicant must be engaged in full time farming • The applicant must demonstrate that they have been engaged in farming at that location for a continuous period of over 5 years prior to making the application • The application must be for the applicant's first home in the rural area • The family home must be in the rural area within 5km of the proposed site • Climate action measures have been proposed as part of the application to ensure a transition to a low carbon economy
<p>CATEGORY 2 <u>A Member of the Rural Community</u> The applicant must demonstrate a genuine local need to reside in the rural area for economic or social purposes reasons by reason of immediate family ties or their active and direct involvement in rural employment. <u>One of the following local needs criteria (ie Local Needs Criteria A or B) below must be met</u></p>
<p>REQUIRED LOCAL NEEDS CRITERIA (A) (all criteria must be met)</p> <ul style="list-style-type: none"> • The applicant must have grown up and spent substantial periods of their lives (12 years) living in the rural area of Laois as members of the rural community. • The application must be for the applicant's first home in the rural area, on the family landholding and within 5km of the family home. • Where no land is available in the family ownership, a site within 5km of the original family home may be considered • Climate action measures have been proposed as part of the application to ensure a transition to a low carbon economy

Map 2.2

Recommendation

As a consequence of the changes above, Map 2.2 is recommended to be changed for consistency. The recommended change is shown overleaf:



⁵ Such **rural activities** will normally encompass persons involved in full time farming, forestry, inland waterways or related rural occupations.

HEIGHT LIMIT FOR GREENFIELD SITES

MA Recommendation 5 - Height limit for greenfield sites

Having regard to Specific Planning Policy Requirement 1 of the *Urban Development and Building Heights Guidelines for Planning Authorities* (2018) and National Policy Objective 13 of the National Planning Framework, the planning authority is required to omit the policy – ‘Developments shall be no more than 3 storey on greenfield sites’ (material amendment no. 13.3) as the introduction of such a blanket height limitation without any evidential basis is contrary to the aforementioned national policies and would undermine other objectives in the development plan that promote compact growth and more efficient use of land.

CE Opinion

The Chief Executive refers members to Specific Planning Policy Requirement (SPPR) 1 of the *Urban Development and Building Heights Guidelines for Planning Authorities* (2018), which states the following:

*‘In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies **and shall not provide for blanket numerical limitations on building height**’.* (Emphasis added)

The NPF also places an emphasis on the use of performance based criteria with NPO 13 stating that:

‘In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.’

Therefore, having regard to SPPR1 of the Guidelines, and NPO 13 of the NPF, without any evidence to demonstrate why there should be a blanket limitation of 3 storey restriction on greenfield sites, the Executive is of the opinion that the introduction is inconsistent with national policy and would undermine other objectives in the development plan that promotes compact growth and more efficient use of land.

Recommendation

It is recommended that the proposed policy is omitted from the Development Plan.

FLOOD RISK MANAGEMENT

MA Observation 2 – Flood Risk Mitigation

The planning authority is requested to insert additional policy objectives into the final plan consistent with the mitigation measures arising from the justification tests contained in the Strategic Flood Risk Assessment (SFRA). In this regard, the planning authority is advised to include general policy objectives which point to the more specific requirements outlined in the SFRA.

To avoid repetition and for the sake of completeness, all responses regarding the flood risk mitigation measures is responded to here. The responses were received from the following submissions:

- LS-C24-24 (OPR)
- LS-C24-4 (OPW)

Summary of Response

The OPW welcomes the inclusion of Plan Making Justification Tests in the SFRA, and the mitigation measures outlined therein. However, these mitigation measures have not been incorporated into the plan.

Furthermore, proposed land use zones classified as highly vulnerable development in the Guidelines within Flood Zones A and B are shown in the zoning maps, where no commentary has been provided to demonstrate that the Plan Making Justification Test has been applied. Examples of these are detailed in the *“Comments on Specific Settlements”* section below.

For sites that are intended to be zoned for development following the application of a Justification Test where only a small proportion of the site is at risk of flooding, a policy objective might be attached to such zoning. Such an objective might require that the sequential approach be applied in the site planning, whereby to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as *Open Space* would be permitted for the lands which are identified as being at risk of flooding within that site. Planning permission for these sites might then be subject to the sequential approach having been adopted and applied as above, following a detailed FRA.

Such objectives, applied at a settlement level, could incorporate the mitigation measures outlined in the Justification Tests into the plan, as detailed further in the *Comments on Specific Settlements* section. Comments are provided by the OPW on the following settlements

- Abbeyleix
- Ballyroan
- Camross
- Clonaslee
- Coolrain
- Durrrow
- Killeen
- Killeslin
- Mountmellick
- Mountrath
- Portlaoise

- Rosenallis
- Stradbally
- The Swan
- Timahoe

CE Opinion

The matters raised regarding the need to insert additional policy objectives into the final plan consistent with the mitigation measures arising from the justification tests contained in the SFRA are noted and accepted. With regards to the settlement specific matters raised, there is broad overlap in the matters raised by LS-C24-4 which generally recommends that these mitigations and recommendations for each settlement be incorporated into the Development Plan supported by settlement policy objectives.

There are specific points for some settlements, which are responded to individually with the Strategic Flood Risk Assessment section later in this report.

Having reviewed the LCDP, the Chief Executive is of the opinion that DM FRM 1 (Flood Risk Assessments) could be amended to include specific reference to mitigation, and would address the mitigation matters raised by LS-C24-4.

Recommendation

It is therefore recommended to amend DM FRM 1 (Flood Risk Assessments) as follows:

Flood risk management will be carried out in accordance with the Flood Risk Management Guidelines for Planning Authorities, Department of Environment, Community and Local Government (2009). Development proposals on lands that may be at risk of flooding should be subject to a flood risk assessment, prepared by a suitably qualified person, in accordance with the guidelines.

Proposals for minor development to existing buildings in areas of flood risk (e.g. extensions or change of use) should include a flood risk assessment of appropriate detail.

For any development proposal in an area at moderate or high risk of flooding that is considered acceptable in principle (i.e. has passed the Plan Making Justification Test), the site specific FRA must demonstrate that appropriate mitigation measures can be put in place and that residual risks can be managed to acceptable levels. This includes a number of mitigation measures, which could include:

- Site Layout and Design
- Ground Levels, Floor Levels and Building Use
- Raised Defences
- Green Corridor

The precise solution will depend on the site specific details, all of which shall adhere to the Flood Risk Management Guidelines for Planning Authorities, Department of Environment, Community and Local Government (2009), or where relevant more up to date guidance.

OTHER MATTERS

In respect of Material Amendment Appendix 1 - RPS 1.1, the Strategic Environmental Assessment (page 105) states 'This alteration would reduce the protection of architectural heritage by removing a structure that merits inclusion on the Record of Protected Structures (the structure is identified as being of regional importance by the NIAH).

The planning authority is advised to review the removal of the above from the Record of Protected Structures in consultation with the Department of Housing, Local Government and Heritage

CE Opinion and Recommendation

Having considered the matter further, taking into consideration the original report from the Chief Executive Report to the Draft Plan (June 2021), the case for the removal of the structures from the Record of Protected Structures, and matters raised in the Strategic Environmental Assessment, the Chief Executive recommends the following:

- Retain Fishterown House on the Record of Protected Structures
- Do not include the outbuildings, farmyard and associated stone rubble walls within the RPS entry.

SECTION 4. ANALYSIS OF SUBMISSIONS RECEIVED ON THE MATERIAL AMENDMENTS TO THE DRAFT PLAN

The proposed material amendments submissions to Volume 1 are set out in the following chapters:

- Chapter 2: Core and Settlement Strategies
- Chapter 3: Climate Action and Energy
- Chapter 8: Tourism
- Chapter 9: Rural Laos
- Chapter 10: Infrastructure
- Chapter 14: Implementation and Monitoring

The proposed material amendments submissions to Volume 2 are set out by Settlement, with amendments to the Appendices described thereafter.

VOLUME 1 WRITTEN STATEMENT

CHAPTER 2 CORE AND SETTLEMENT STRATEGIES

Section / Policy Objective / Policy	CS 08
Submission / NOM Numbers	LS-C9-DCDP-154
Proposed Material Amendment No and text.	2.5
<p>Reword CS08 as follows:</p> <p>CS 08: Review the Local Area Plans for Portlaoise and Mountmellick. During the transition period between adoption of this county development plan and the adoption of the Local Area Plans for Portlaoise and Mountmellick, the objectives (including zoning objectives), policies and standards in this county development plan shall apply. The Local Area Plan for Portlaoise will be supported by a Local Transport Plan prepared in consultation with the National Transport Authority and Transport Infrastructure Ireland.</p>	
Proposed Material Amendment Submission Reference	LS-C24-19
<p>Summary of Issue:</p> <p>The NTA would like to reiterate the concern that there seems to be an emphasis within the Draft Development Plan on the provision of partial bypasses or relief roads for a number of settlements without an accompanying strategic rationale for their development in the manner in which they have been configured. Furthermore, in the absence of such a strategic rationale, these schemes may no longer be appropriate in the context of the requirement to promote walking, cycling and public transport in order to reduce transport emissions. The level of road scheme investment is maintained from the draft.</p> <p>The NTA welcome Amendment 10.6 which clarifies the role of the NTA with other stakeholders in the undertaking of the LTPs in addressing modal shift in the identified towns. The strategic aim of LTP is set out clearly in the Draft Plan. The NTA propose that the text as proposed is amended to clarify that for each of the LAPs that the LTP is prepared concurrently, e.g. Amendment 2.5, amending Policy CS 08 should state‘</p> <p><i>The Local Area Plan for Portlaoise will be supported by a Local Transport Plan prepared <u>concurrently</u>, in consultation with the National Transport Authority and Transport Infrastructure Ireland. <u>The LTP will provide the strategic rationale for the development of any transport infrastructure objectives.</u></i></p>	
<p>Chief Executive’s Response:</p> <p>The matters raised by the NTA is noted and accepted.</p>	
<p>Chief Executive Recommendation:</p> <p>CS08 to be amended to read:</p> <p>CS 08: Review the Local Area Plans for Portlaoise and Mountmellick. During the transition period between adoption of this county development plan and the adoption of the Local Area Plans for Portlaoise and Mountmellick, the objectives (including zoning objectives), policies and standards in this county development plan shall apply. The Local Area Plan for Portlaoise will be supported by a Local Transport Plan prepared concurrently, in consultation with the National Transport Authority and Transport Infrastructure Ireland. The LTP will provide the strategic rationale for the development of any transport infrastructure objectives.</p>	

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	LS-C9-DCDP-136
Proposed Material Amendment No and text.	N/A
N/A	
Proposed Material Amendment Submission Reference	LS-C24-6
Summary of Issue:	
Offaly County Council is seeking that Portarlinton be designated as a Self-Sustaining Town.	
Chief Executive's Response:	
<p>This matter was addressed on pages 87 and 88 of the Chief Executive Report to the Draft Plan (June 2021), justifying why in the Chief Executive's opinion that Portarlinton is a Self-Sustaining Growth Town in the Laois County Development Plan (2021 – 2027). The issue has not arisen in the context of the OPR or EMRA submissions.</p> <p>The settlement hierarchy is reflected in the Laois County Development Plan, including Map 2.2 (Core Strategy Map), which identified Portarlinton as a Self-Sustaining Growth Town. Laois County Council maintain the position regarding designation as it fully accords with the principles of such a designation which is indicated in Table 4.2 Settlement Hierarchy of the RSES with respect to: moderate level of jobs and services and is a commuter town on the main Dublin to Cork railway line. The Core Strategy supports the continued growth in terms of population, housing and employment opportunity sites to become a more self-sustaining town. Laois County Council welcome and is committed to preparing a Joint Local Area Plan with Offaly County Council when the County Development Plan process is complete.</p> <p>This was approved by members on the 1st September 2021, and was not the subject of consultation in the Proposed Material Amendments to the Laois County Development Plan (2021 – 2027).</p>	
Chief Executive Recommendation:	
No change to the Draft Plan	

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	N/A
N/A	
Proposed Material Amendment Submission Reference	LS-C24-14
Summary of Issue:	
No observations from the Safety Regulation Division.	
Chief Executive's Response:	
Noted.	
Chief Executive Recommendation:	
No change to the Draft Plan	

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	N/A
N/A	
Proposed Material Amendment Submission Reference	LS-C24-35
<p>Summary of Issue:</p> <p>The housing strategy for Co. Laois needs to take place in parallel with appropriate development of the water and wastewater treatment infrastructure. For larger developments, IFI recommend the inclusion of the impact of the development on the capacity of the specific water / wastewater plants to which connection is being sought.</p> <p>It should be incumbent upon developers to demonstrate sufficient capacity exists for the development proposed. This should include a calculation of organic and hydraulic loads and the available headroom in the proposed treatment plant. This would allow for more transparent assessment of these developments at the planning stage.</p> <p>Calculations regarding drinking water abstraction and assimilative capacity for wastewater should account for changes in surface and groundwater hydrology due to climate change, including the increased frequency, severity and duration of droughts.</p> <p>Where infrastructure upgrades are required these should precede the development and specific timeframes should be required for such upgrades. In addition, water-use efficiency targets should be established for large developments and for commercial, industrial or agricultural developments. Consideration of planning applications should also consider the cumulative impact on surface and ground waters of development, particularly within Natura2000 sites. Each development cannot be considered in isolation. This is particularly true of development which have the potential to cause a deterioration in the ecological quality of waters, or prevent them from reaching Good status.</p> <p>Laois County Council should also seek to identify missed connections in housing developments and restore connectivity to the mains sewerage network. IFI also advocates that all commercial and industrial premises, or any premises involved in the preparation of food for commercial purposes, should be obliged to install grease traps or interceptors so as not to compromise the efficacy of the foul sewer network.</p>	
<p>Chief Executive's Response:</p> <p>The response submitted does not explicitly refer to a proposed material amendment. However with regards to the matters raised, the Chief Executive notes the following:</p> <ul style="list-style-type: none"> • The housing strategy is in accordance with the national and regional policy, which is based on a sound evidence base. Appendix 9 (Infrastructure Assessment) sets out those areas which are tier 1 and tier 2 locations, which is in accordance with Appendix 3 of the National Planning Framework. • With regards to drainage and other detailed matters referred, these are points that are considered at the planning application stage. The Chief Executive is also satisfied that the Draft Plan includes sufficient policies which address the matters raised and for which planning applications should have due regard to. 	
<p>Chief Executive Recommendation:</p> <p>No change to the Draft Plan</p>	

CHAPTER 3 CLIMATE ACTION AND ENERGY

Section / Policy Objective / Policy		Section 3.4 – Action Area 1
Submission / NOM Numbers		LS-C9-DCDP-154
Proposed Material Amendment No and text.		3.7
Section 3.4. the following Action Area 1 to be amended to include the following:		
ACTION AREA 1 – SUSTAINABLE TRANSPORT		
COMMENTARY	NATIONAL TARGET	LOCAL COUNTY TARGET
<p>The transport sector is one of the biggest contributor of GHG emissions in the County where the predominant mode of transport is the private car. This is evident in the number of commuters leaving the county for work purposes which equates to 12,000 per day. How we travel between places will also need to be addressed, promoting a modal shift away from car dependency for more sustainable and active transport modes.</p>	<ul style="list-style-type: none"> • Reduce CO2 eq. Emissions From The Sector By 45 % To 50 % Pre NDP Projections • Increase the no of EV to 936,000 • Build the EV charging network to support the growth of EVs at the rate required 	<ul style="list-style-type: none"> • Delivery of a public transportation hub in the key town of Portlaoise by 2027;
		<ul style="list-style-type: none"> • The prioritization and delivery of Public bus measures in the key towns of Portlaoise and Graiguecullen by 2027; • The prioritisation of pedestrian linkages and creation of blueways / Greenways in the key town of Portlaoise/ Graiguecullen and Portarlinton • Additional 30 EV charge Points in Portlaoise by 2027 • Achieve Modal Shift in line with national targets and Table xx above

Section / Policy Objective / Policy	CM ST6
Submission / NOM Numbers	LS-C9-DCDP-1
Proposed Material Amendment No and text.	3.8
Include additional text within the following policy objective:	
CM ST 6: Support the provision of electricity charging infrastructure for electrical vehicles throughout County Laois, both on street and in new developments in towns and villages and also at key tourist destination such as Sliabh Bloom Trail Heads, in accordance with car parking standards and best practice.	

Section / Policy Objective / Policy	TM12
Submission / NOM Numbers	LS-C9-DCDP-1
Proposed Material Amendment No and text.	8.10
Amend as follows:	
TM 12: Increase connectivity and accessibility to public transport, and walking and cycling infrastructure and the provision of Electric Vehicle Charging Points to from key tourist destination hubs to encourage more sustainable modes of transport.	
Proposed Material Amendment Submission Reference	LS-C24-20
<p>Summary of Issue:</p> <p>The proposed Amendments above aim to strengthen the existing Laois County Council policy of promoting electric vehicle charge points. ESB welcome the above initiatives. However, since our submission to the Draft Plan earlier this year, there has been a change in standards required for EV charging infrastructure.</p> <p>The EU Energy Performance of Buildings Directive calls for an increase to 20% for the number of parking spaces which should have provision for electric vehicle charging infrastructure. In preparing the final CDP, an opportunity exists to ensure availability is expanded, in line with the new directive so that the County is consistent with National and Regional Policy in relation to the provision of electric vehicle infrastructure over the lifetime of the new plan.</p>	
EV Charging Points	
Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces).	A minimum of 1 EV charge point space per five car parking spaces (ducting for every parking space shall also be provided)
New dwellings with in-curtilage car parking.	Installation of appropriate infrastructure to enable installation of recharging point for EV's.
Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g. office developments)	Provide at least 1 recharging point, and a minimum of 1 space per five car parking spaces should be equipped with one fully functional EV Charging Point.
Developments with publicly accessible spaces (e.g. supermarket car park, cinema etc.)	Provide at least 1 recharging point, and a minimum of 1 space per five car parking spaces should be equipped with one fully functional EV Charging Point.

Table 1. Proposed EV Charging Point Standards

Therefore, to ensure that the Laois County Development Plan increases the usage of electric vehicles to the levels required, we request that the standards as set out in Statutory Instrument No. 393/2021 – European Union (Energy Performance of Buildings) Regulations 2021 are fully implemented. The standards in the table above are consistent with the above Regulation and should be considered for inclusion under section 10.1.6 *Electric Vehicles* to replace the proposed standards TRANS 33, 34 & 35.

Chief Executive’s Response:

The matters raised are noted. Policies TRANS 33, 34 and 35 states:

TRANS 33 - Support the growth of Electric Vehicles with support infrastructure, through a roll-out of additional electric charging points in collaboration with relevant agencies at appropriate locations, both on street and in new developments

TRANS 34 - All developments should provide facilities for the charging of battery-operated cars at a rate of up to 10% of the total car parking spaces. The remainder of the parking spaces should be constructed so as to be capable of accommodating future charging points, as required.

TRANS 35 - - New residential development should accommodate at least one car parking space equipped with an EV charging points for every ten car parking spaces being provided for the associated development

The Draft Plan has been prepared in accordance with National and Regional policy, which sets out that the Council is supporting the provision of electivity charging infrastructure throughout County Laois.

The Chief Executive notes is of the opinion that the existing policies are considered to be broadly in accordance with Statutory Instrument No. 393/2021 – European Union (Energy Performance of Buildings) Regulations 2021 for the following reasons:

- TRANS 33 – This policy provides an overarching framework to support growth of Electric Vehicles and the roll out of additional electric charging points. Therefore as the Regulations are seeking an increase in the number of EV charging point spaces per car parking spaces, this is in accordance with the aim of TRANS 33.
- TRANS 34 –The reference to up to 10% of total car parking spaces is referred, with no minimum number of spaces referred, with the remainder of spaces to be constructed to be capable of accommodating future charging points. The Chief Executive is of the opinion that this is broadly in accordance with the criteria referred, which applies to all developments (with no minimum number of spaces), whereas the EU Regulations only applies when at least five or more car parking spaces are provided.
- TRANS 35 – The policy refers to at least one car parking space equipped for every ten spaces, which is considered to be broadly consistent with the reference to a minimum of 1 EV charge point per five car parking spaces

Chief Executive Recommendation:

No changes to Draft Plan

Section / Policy Objective / Policy	Additional Policy Objective
Submission / NOM Numbers	LS-C9-DCDP-154
Proposed Material Amendment No and text.	3.15
<p>Insert the following</p> <p>CM ST XX: promote more compact development forms that reduce overall demand for private transport and private transport infrastructure and support proposals that encourage modal shift towards sustainable travel modes.</p>	
Proposed Material Amendment Submission Reference	LS-C24-19
<p>Summary of Issue:</p> <p>The NTA reiterates concerns related to permeability and filtered permeability and recommends that the following text is added to Objective CM ST XX as set out in amendment 3.15.</p> <p><u>New development areas should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to give a competitive advantage to these modes for local trip making; and</u></p> <p><u>Where possible, new residential developments should provide for filtered permeability, i.e. provide for walking, cycling, public transport and private vehicle access while restricting or discouraging private car through trips</u></p>	
<p>Chief Executive's Response:</p> <p>The matters raised are noted, however it is considered that the points raised are already incorporated into other parts in the Draft Plan, including 3.2.3.4, 7.2.6, 13.3.1, TC 6 and TRANS 24.</p>	
<p>Chief Executive Recommendation:</p> <p>No changes to Draft Plan</p>	

Section / Policy Objective / Policy	CMRE 5
Submission / NOM Numbers	LS-C9-DCDP-36
Proposed Material Amendment No and text.	3.19
<p>Amend policy to read:</p> <p>Promote and facilitate wind energy development in accordance with the Guidelines for Planning Authorities on Wind Energy Development (Department of Housing, Planning and Local Government) and the Appendix 5 Wind Energy Strategy of this Plan, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, and the Draft Revised Wind Energy Guidelines published in December 2019, which are expected to be finalised in the near future and subject to compliance with normal planning and environmental criteria</p>	
Proposed Material Amendment Submission Reference	LS-C24-20 LS-C24-27
<p>Summary of Issue:</p> <p>LS-C24-20 states that based on SEAI analysis, February 2020 provided a record-breaking month with 56% of energy demand met by wind energy, the highest monthly total since records began. In the 12 months to end of January 2020, wind and other renewable sources, hydro, solar and biomass accounted for 37% of demand. This is an encouraging trend, but further acceleration of deployment is necessary to achieve the Government's target for 2030.</p> <p>In this regard, we welcome the alteration to the text for Policy Objective CM RE 5 that will ensure that proposals for wind energy developments will be promoted and facilitated having regard to the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, and the Draft Revised Wind Energy Guidelines published in December 2019.</p> <p>LS-C24-27 supports the amendment.</p>	
<p>Chief Executive's Response:</p> <p>Support is welcomed. Please refer to the response to LS-C24-33 which recommends a change to the wording above.</p>	
<p>Chief Executive Recommendation:</p> <p>Amend CMRE 5 as follows:</p> <p>Promote and facilitate wind energy development in accordance with the Guidelines for Planning Authorities on Wind Energy Development (Department of Housing, Planning and Local Government) and any update thereof and the Appendix 5 Wind Energy Strategy of this Plan, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, and the Draft Revised Wind Energy Guidelines published in December 2019, which are expected to be finalised in the near future and subject to compliance with normal planning and environmental criteria</p> <p>Please note reference to Appendix 5 (Wind Energy Strategy) would need to be amended at the time of the variation of the plan when the Renewable Energy Strategy is introduced.</p>	

Section / Policy Objective / Policy	CMRE 8
Submission / NOM Numbers	LS-C9-DCDP-99 LS-C9-DCDP-121
Proposed Material Amendment No and text.	3.20
<p>CMRE 8</p> <p>Delete the following text</p> <p>SOLAR FARMS</p> <p>The following factors will be used to assess applications for Solar Farm Development within the county:</p> <ul style="list-style-type: none"> • Preference for use of brownfield sites/ contaminated land and non productive agricultural land versus productive agricultural lands; • Proximity to electricity infrastructure • Effect of glint and glare • The extent to which there may be additional impacts of solar rays follow the daily movement of the sun; • Need for security measures – lights fencing etc ; • Visual impact on heritage assets , designated sites , views and prospects; • Impact on ecology of the site – An ecological Impact Assessment will be required in relation to the site as part of any application; • Landscape/ Biodiversity Plan – Potential to mitigate landscape and visual impacts through appropriate siting , design and screening with native hedges; • The cumulate impacts of the propose with other renewable energy installations in the area; • An appraisal of the existing roads infrastructure and the potential impact of the proposed development including – Traffic numbers and movements to and from site during construction, operation and decommissioning phases of the proposal shall be undertaken; • Proposals to adequately deal with drainage, surface water runoff flooding; • Preparation of a Construction Environmental Management Plan; • Restoration plan <p>Insert the following</p> <p>SOLAR FARMS</p> <p>The following factors will be used to assess applications for Solar Farm Development within the county:</p> <p>(i) Site Selection:</p> <ol style="list-style-type: none"> a. Preference for use of brownfield sites/ contaminated land and non productive agricultural land versus productive agricultural lands; b. Proximity to electricity infrastructure <p>(ii) Assessment of Impacts</p> <ol style="list-style-type: none"> a. Effect of glint and glare; b. Visual impact on heritage and landscape assets, designated sites, views and prospects; c. The extent of additional impacts of solar rays follow the daily movement of the sun; 	

- d. Ecology including biodiversity, flora and fauna
 - e. Cumulative impacts of the proposal with other renewable energy installations in the area;
 - f. Traffic impact on road infrastructure during all phases of development (construction, operation and decommissioning)
 - g. Drainage, surface water runoff, flooding
- (iii) As a minimum the following will be required to be submitted in support of a planning application:
- a. Drawings, including those addressing all drainage matters
 - b. Landscape/ Biodiversity Plan
 - c. Construction Environmental Management Plan; and
 - d. Decommissioning / Restoration plan.

However, it is advised this to be agreed with the Planning Authority through pre-planning consultation.

Proposed Material Amendment Submission Reference	LS-C24-28
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Summary of Issue:

The Department of Housing, Local Government and Heritage note that within this section of the material alterations to the Laois County Development Plan 2021-2017, there is no reference to the need to assess the impact on the archaeological Heritage within Section (3.20, ii, a-g).

Any amendment to the assessment of solar farms should state that such proposed development must be carried out in a manner compatible with protection of the archaeological heritage and therefore proposed solar farms must be subject to an appropriate form and level of archaeological assessment.

This assessment should:

A planning application for a solar farm development should be accompanied by an archaeological impact statement which includes the following:

1. Examination of the relevant documentary sources (SMR, RMP etc.).
2. Report on field inspection of the entire site.
3. Quantification of the ground-disturbance impact on the 'site' identifying in particular areas of serious ground disturbance (e.g., trenching, sub-stations) but also quantifying the cumulative level of ground disturbance from piles to support solar arrays and assessing possible impact from driving machinery over land while inserting piles or subsequently removing them and ways in which such machine disturbance will be reduced or eliminated.
4. Visual impact assessment. It is especially important that such an assessment address any visual impacts on national monuments of which the Minister is owner or guardian or on World Heritage Sites or candidate World Heritage Sites.
5. Geo-physical survey and/or archaeological testing of areas of archaeological potential (e.g. areas in proximity to known archaeological monuments or of potential archaeological features) and avoidance of any areas confirmed by such survey or testing to be of archaeological importance (in general, solar farms should avoid all direct impact on known archaeological monuments and preservation by record of such monuments should be an option of last resort).
6. (Geo-physical survey of any other areas where there would be extensive ground disturbance with likely serious negative impact on unidentified archaeological features, with appropriate provision for archaeological testing and avoidance, as necessary, of features identified in such geo-physical survey.

7. Measures to minimise impacts from the driving of machinery over land.
8. Measures to reduce or eliminate any adverse visual impacts.

Chief Executive's Response:

The matter regarding the need for an archaeological impact statement is noted, and it is acknowledged that this would need to be undertaken in some instances. It is therefore agreed that an additional criteria be inserted.

Chief Executive Recommendation:

h. Effect on potential archaeological heritage, and therefore a planning application should be accompanied by an archaeological impact statement.

Section / Policy Objective / Policy	Additional Policy Objective, 3.5.9, Section 3.5 of Appendix 5 (WES)
Submission / NOM Numbers	LS-C9-DCDP-92 LS-C9-DCDP-129 LS-C9-DCDP-92
Proposed Material Amendment No and text.	3.25, 3.32 and Appendix 5 – Wind Energy Strategy – 1.2
<p>Insert the following additional Policy Objective</p> <p>CM RE 18</p> <p>Promote the use of efficient energy storage systems and infrastructure that supports energy efficiency and reusable energy system optimization, in accordance with proper planning and sustainable development.</p> <p>3.5.9 Energy Storage</p> <p>Renewable energy sources have vast potential to reduce dependency on fossil fuels and Green House Gas emissions. However, many of the resources have intermittent or variable output and if they are not harnessed, the energy goes to waste. There is an increased need for energy storage when energy demand is low so it can be used when energy demand is high. There are a number of storage systems which could provide this function including battery storage, liquid air storage and synchronous condensers.</p> <p>Insert the following paragraph.</p> <p>Renewable energy sources have vast potential to reduce dependency on fossil fuels and Green House Gas emissions. However, many of the resources have intermittent or variable output and if they are not harnessed, the energy goes to waste. There is an increased need for energy storage when energy demand is low so it can be used when energy demand is high. There are a number of storage systems which could provide this function including battery storage, liquid air storage and synchronous condensers.</p>	

Proposed Material Amendment Submission Reference	LS-C24-20
<p>Summary of Issue:</p> <p>ESB wish to highlight that the area of renewable technology is evolving. Energy Storage systems such as batteries, liquid air and synchronous condensers are some of the technologies being explored that will be essential to smoothing out the natural variability that occurs in renewable energy sources and to provide electricity at times of peak demand. Utility-scale battery storage systems are being utilised to enable more efficient use of renewable energy.</p> <p>ESB is installing Battery Energy Storage Systems (BESS) at existing generating facilities across Ireland. BESS will operate by charging batteries using electricity exported from the national grid. When the stored energy is required, it can be released to stabilise the frequency of the electricity network or provide energy during periods of electricity shortages.</p> <p>Green Hydrogen, which is produced from renewable energy sources, offers potential for large scale seasonal storage of variable renewable energy. This enables zero carbon backup to the power system when intermittent renewables such as wind and solar are not available. Large scale Green Hydrogen production and storage could leverage the continental scale of Ireland’s renewable energy potential to enhance Ireland’s energy security and to make Ireland a net exporter of energy.</p> <p>In this regard, we welcome the proposed addition of text to section 3.5.9 Energy Storage and section 3.5 of the WES. The support for the above evolving technologies is underpinned by the proposed additional Policy Objective CM RE 18 which states</p> <p><i>“Promote the use of efficient energy storage systems and infrastructure that supports energy efficiency and reusable energy system optimisation, in accordance with proper planning and sustainable development.”</i></p>	
<p>Chief Executive’s Response:</p> <p>Support for additional Policy Objective CM RE 18 is welcomed</p>	
<p>Chief Executive Recommendation:</p> <p>No change to Draft Plan</p>	

Section / Policy Objective / Policy	Section 3.5.9
Submission / NOM Numbers	LS-C9-DCDP-92
Proposed Material Amendment No and text.	3.32

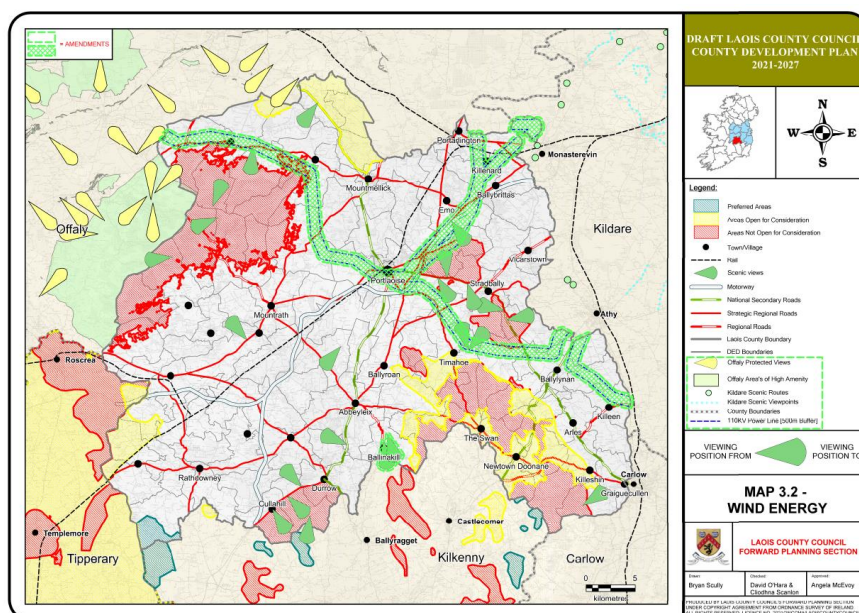
3.5.9 Energy Storage

Renewable energy sources have vast potential to reduce dependency on fossil fuels and Green House Gas emissions. However, many of the resources have intermittent or variable output and if they are not harnessed, the energy goes to waste. There is an increased need for energy storage when energy demand is low so it can be used when energy demand is high. There are a number of storage systems which could provide this function including battery storage, liquid air storage and synchronous condensers.

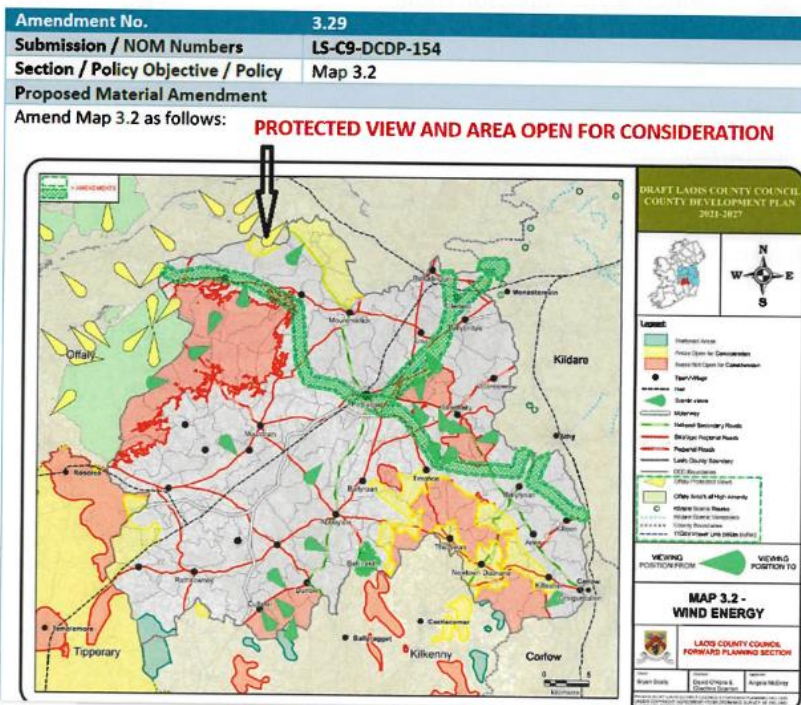
Proposed Material Amendment Submission Reference	LS-C24-32
Summary of Issue: Supports the inclusion of the paragraph	
Chief Executive's Response: Support welcomed	
Chief Executive Recommendation: No change to Draft Plan	

Section / Policy Objective / Policy	Map 3.2
Submission / NOM Numbers	LS-C9-DCDP-154
Proposed Material Amendment No and text.	3.29

Amend Map 3.2 as follows:



Proposed Material Amendment Submission Reference	LS-C24-6
Summary of Issue: The proposed materially altered Laois Wind Energy Map has not addressed the concerns of Offaly County Council as the subject area still remains in situ in the amended map as an Area Open for Consideration. The subject area of concerns are identified below:	



The recently adopted Offaly County Development Plan 2021 – 2027) was subject to an extensive “step by step” sieve mapping analysis. Including this area as an “Area Open for Consideration” on map 3.2 is at variance with the protected views in the Offaly County Development Plan. The designation of an area around a “Scenic View” on the N80 on the Laois side as an “Area Not Open for Consideration” (depicted as red shading in West Laois) is inconsistent with the approach taken to the protected views in County Offaly and advice in the 2006 Wind Energy Guidelines and Draft Wind Energy Guidelines.

Based on the significance of these viewpoints, Offaly County Council respectively request again that the area between these viewpoints towards the Slieve Bloom Mountains in County Laois be classified as an area where wind energy development will generally be discouraged. In order to ensure a consistent approach across county boundaries, Offaly County Council request that Laois County Council consider the Wind Strategy of the adopted Offaly County Council Development Plan (2021-2027) in the preparation of the Wind Strategy for the Laois County Development Plan, and omit the subject area from the Area Open for Consideration.

Chief Executive’s Response:

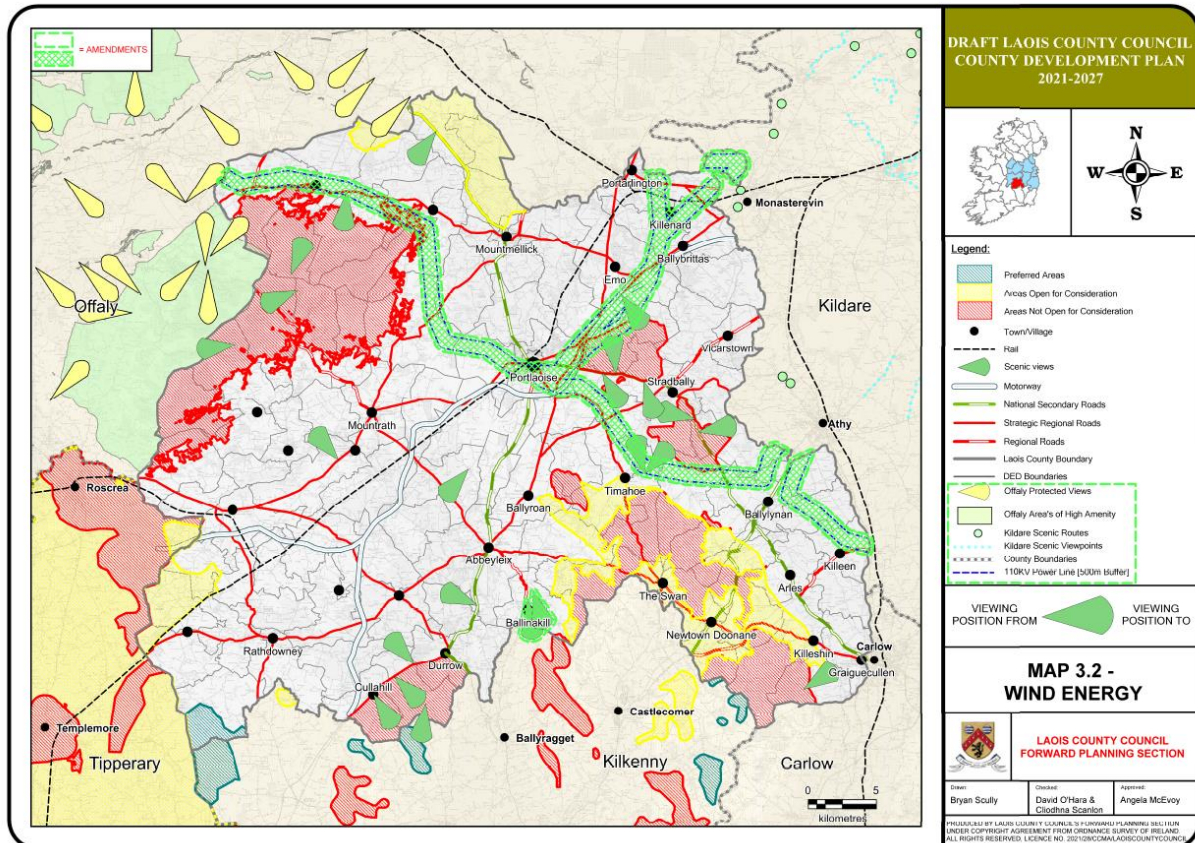
The Chief Executive refers to the Planning Authority’s commitment to prepare a Renewable Energy Strategy within 1 year of the adoption of the Laois County Development Plan (2021 – 2027). Once this has been undertaken and completed, the Planning Authority will be able to amend Map 3.2 at that stage. Making any further changes without the necessary evidence base prepared to support the RES is considered premature.

Chief Executive Recommendation:

No change to the Draft Plan.

Section / Policy Objective / Policy	Map 3.2
Submission / NOM Numbers	LS-C9-DCDP-154
Proposed Material Amendment No and text.	3.29

Amend Map 3.2 as follows:

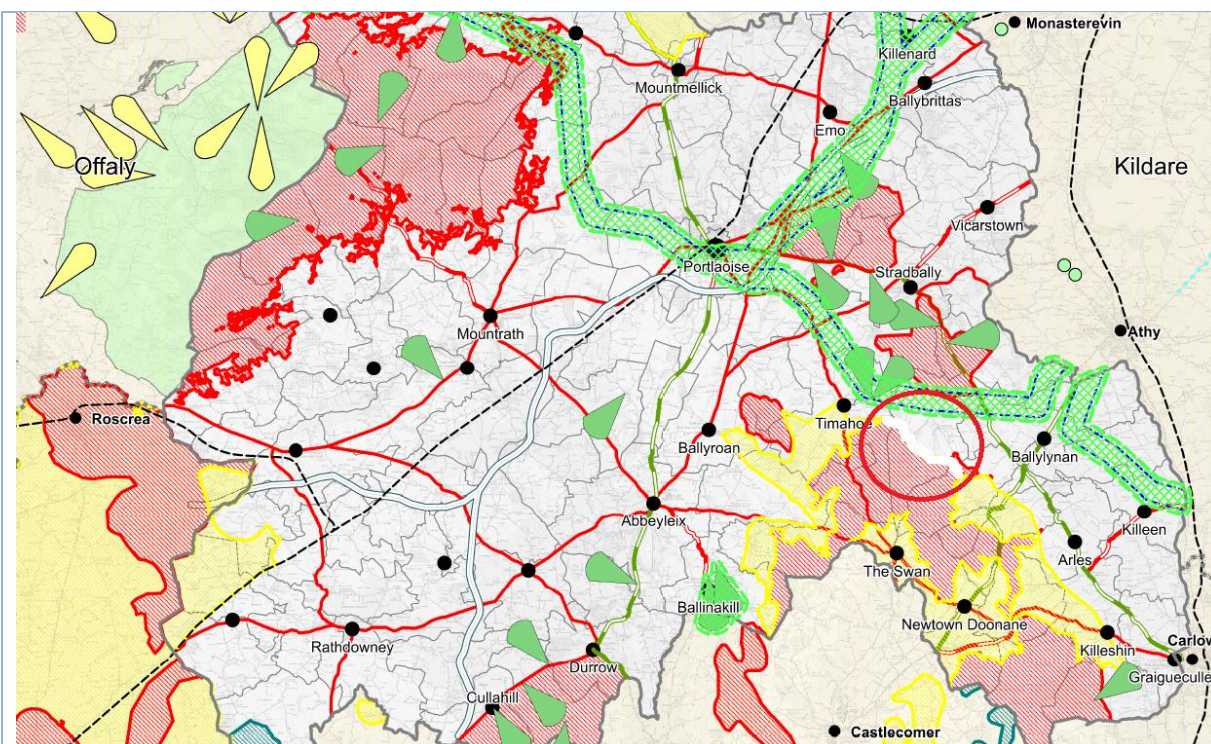


Proposed Material Amendment Submission Reference LS-C24-30

Summary of Issue:

Regarding Amendment 3.29 and Map 3.2, wind turbines require a large area of space, and therefore it makes no sense to have a yellow line running from Timahoe in the direction of Arles, see area in circle below. It is unclear for both developers and the population of Laois what this means.

Proposal: Remove the Yellow line between the yellow areas open for considerations in Timahoe and south of Ballylynan, as per proposed map below:



Regarding Amendment 3.29 and Map 3.2, the cumulative effect of all the areas open for consideration especially around Timahoe and The Swan is frightening for the local population and could alter the landscape of these towns with their unique heritage completely.

Proposal: Include the following text: Laois County Council will explicitly consider the cumulative effect of wind farms in the county. If permission for a wind farm has been granted in an area, the cumulative effect of any additional wind farms in adjacent areas will be strongly considered in the planning review.

Chief Executive's Response:

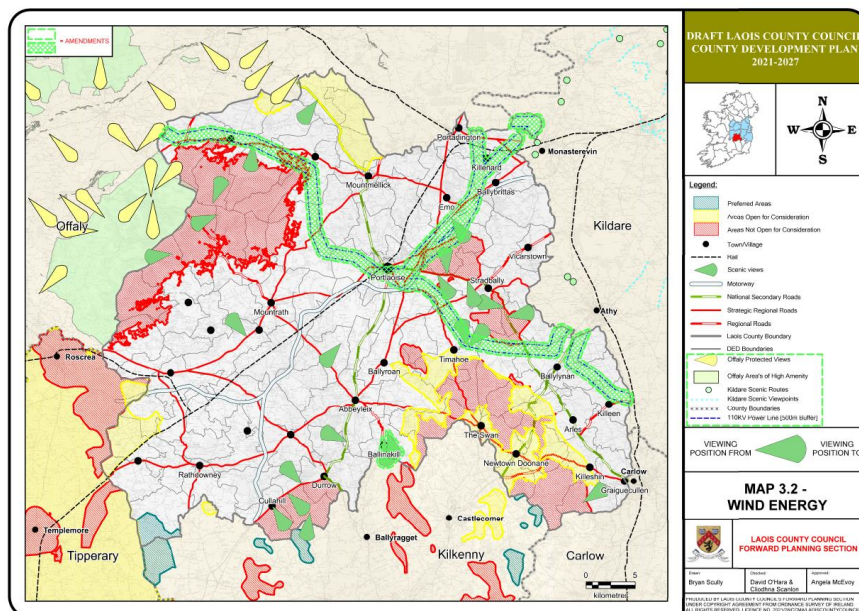
The Chief Executive refers to the Planning Authority's commitment to prepare a Renewable Energy Strategy within 1 year of the adoption of the Laois County Development Plan (2021 – 2027). Once this has been undertaken and completed, the Planning Authority will be able to amend Map 3.2 at that stage. Making any further changes without the necessary evidence base prepared to support the RES is considered premature.

Chief Executive Recommendation:

No change to the Draft Plan.

Section / Policy Objective / Policy	Map 3.2
Submission / NOM Numbers	LS-C9-DCDP-154
Proposed Material Amendment No and text.	3.29

Amend Map 3.2 as follows:



Proposed Material Amendment Submission Reference	LS-C24-33
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Summary of Issue:

In relation to the CE's comment that the Council commits to working with key stakeholders in the carrying out of an assessment of how the implementation of the Plan will contribute to realising overall national targets on renewable energy, we would welcome the opportunity to be a key stakeholder in this.

We have experience and expertise in understanding issues relating to onshore wind and made a number of observations in our submission that we believe remain important considerations for the Council as set out in the following bullets.

- We undertook a preliminary review of the available land for wind based on the proposed wind map in the Draft Plan and found there is between 0.8 and 1.6% of the county only designated for wind energy development.
- We pointed out that the reference to wind in the table in Section 3.4, 'Action Area 4 – Energy', states the Council will "support the development of wind energy that has been permitted to date within the county by 2030". However, a large portion of the permitted wind energy development at Cullenagh (12 out of 18 wind turbines) has been included in an area 'not open for consideration'. (We note the Wind Energy Map in Appendix 5 of the Draft Plan is the same map as in the current Plan.)
- We believe the consideration of wind speed and grid constraints should not be considered hard constraints in designating lands for development.

Getting the balance of considerations right is key to a successful WES and we hope the Council will welcome our industry perspective in fulfilling CM-RE1.

Chief Executive's Response:

The Chief Executive refers to the Planning Authority's commitment to prepare a Renewable Energy Strategy within 1 year of the adoption of the Laois County Development Plan (2021 – 2027). Once this has been undertaken and completed, the Planning Authority will be able to amend Map 3.2 at that stage. Making any further changes without the necessary evidence base prepared to support the RES is considered premature.

Chief Executive Recommendation:

No change to the Draft Plan.

Section / Policy Objective / Policy	Section 3.5.6.
Submission / NOM Numbers	LS-C9-DCDP-54
Proposed Material Amendment No and text.	3.30
<p>Geothermal energy refers to heat energy stored in the ground. Solar thermal radiation is absorbed by the surface of the earth each day. This heat can be extracted by using a ground source heat pump which transfers the heat stored in the earth or in ground water to buildings in winter and the opposite in summer for cooling. The Council will encourage the provision of ground source heat pumps, also known as geothermal heat pumps. These are used for space heating and cooling, as well as water heating for both residential and commercial developments. The following link provides a source of information:</p> <p>https://dcenr.maps.arcgis.com/apps/webappviewer/index.html</p>	
Proposed Material Amendment Submission Reference	LS-C24-7 and LS-C24-27
<p>Summary of Issue</p> <p>Recommend using the following link and then clicking on the Geothermal Tab to view the geothermal online maps and data.</p> <p>LS-C24-27 supports the change</p>	
<p>Chief Executive's Response:</p> <p>Noted and accepted</p>	
<p>Chief Executive Recommendation:</p> <p>Amend as follows:</p> <p>Geothermal energy refers to heat energy stored in the ground. Solar thermal radiation is absorbed by the surface of the earth each day. This heat can be extracted by using a ground source heat pump which transfers the heat stored in the earth or in ground water to buildings in winter and the opposite in summer for cooling. The Council will encourage the provision of ground source heat pumps, also known as geothermal heat pumps. These are used for space heating and cooling, as well as water heating for both residential and commercial developments. The following link provides a source of information:</p> <p>https://dcenr.maps.arcgis.com/apps/webappviewer/index.html</p>	

<https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228> then clicking the Geothermal Tab to view the geothermal online maps and data.

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	N/A
N/A	
Proposed Material Amendment Submission Reference	LS-C24-10
<p>Summary of Issue: General</p> <p>To avoid the most severe impacts of climate change, global temperatures must be kept below 1.5C above pre-industrialised levels, and we will need rapid and deep action to decarbonise our energy systems. Burning fossil fuels is the single biggest cause of climate change, and taking climate action means developing fossil free communities in every county in Ireland. County and city councils play a hugely important role in helping communities to transition from fossil fuels to renewable energy, and planning is a key area of influence. This encompasses processes for carbon-proofing major decisions, programmes and projects, including investments in transport and energy infrastructure. We make the following recommendations regarding your new development plan.</p> <p>1. Fossil fuels and new fossil fuel infrastructure</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • The County Development Plan should ensure a rapid phasing out of all fossil fuels including gas across the county using all tools at the council's disposal including the planning system. • The County Development Plan should not allow the expansion of the gas grid. • The County Development Plan should ban fracked gas in its energy mix. • Any new large scale fossil fuel infrastructure projects must be mandated to undertake climate impact assessment to ensure they are consistent with Ireland's fair share net cumulative carbon dioxide (CO2) quota in line with the Paris agreement. <p>Impacts of Fossil Gas Projects</p> <p>Research states that if we are to keep global temperature rise below 1.5°C and avoid catastrophic climate change, fossil gas must be phased out of the energy mix in Europe by 2035 {i}, discrediting claims that gas is a "transition fuel" in the transition to a decarbonised economy {ii}{iii}.</p> <p>Research also states that we can't develop any new fossil fuel infrastructure from 2019 onwards if we are to have a 64% chance of limiting temperature rise to less than 1.5°C {iv}. Currently, 69% of all gas produced in the US and imported to Europe as Liquefied Natural Gas (LNG) is sourced through hydraulic fracturing, or fracking {v}. New LNG exports will super-charge additional fracking, as 80% of the increased exports will come from new, i.e, fracked, wells {vi}. Recent investigation shows that this is 40% more damaging to the climate than coal {vii}.</p> <p>The lifespan of a project like LNG is at least 30 years which would increase our dependence on dirty fossil fuels and discourage the development of renewable energy projects {viii}.</p>	

Energy Security and LNG

New gas infrastructure is not required for energy security. A 2020 study by leading independent consultancy, Artelys concluded that “existing EU gas infrastructure is sufficiently capable of meeting a variety of future gas demand scenarios in the EU28, even in the event of extreme supply disruption cases” {ix}.

The European body of gas network operators, ENTSO-G, in its 2017 Security of Supply Review, found that Ireland and the UK would suffer no curtailment in gas supply if faced with a variety of supply disruption scenarios {x}. Historically, the UK has provided most of Ireland’s gas supply, and Ervia states that in the UK “there is ample import capacity over and above demand” {xi}.

Demand for gas in the UK has decreased by a fifth since 2004 and gas-fired electricity generation is expected to drop by 40% by 2025 {xii}. This is due to the existing over-capacity of the EU gas grid; gas import infrastructures have import capacity 200% higher than what Europe actually imports {xiii}.

2. Data Centres

Recommendations:

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

Eirgrid estimates that data centres could account for up to 27% of Ireland’s electricity demand by 2028, and up to 50% of new electricity demand growth {xiv}. The Irish Academy of Engineering predicts that data centre development will add at least 1.5 million tonnes to Ireland’s carbon emissions by 2030, a 13% increase on current electricity sector emissions, and will require an investment in energy generation and storage of €9 billion by 2027 {xv}.

For example, if Amazon’s eight centre project in Mulhuddart, Dublin 15, is realised, by 2026 it would use c. 4.4% per cent of the State’s entire energy capacity, the equivalent of Galway city, but employ only 30 people post-construction, largely in facility maintenance {xvi}. The Apple data centre proposed for Athenry, Co. Galway, would have ultimately used “over 8% of the national capacity...,more than the daily entire usage of Dublin, and “would require 144 large diesel generators as back-up” {xvii}.

The government has acknowledged that “data centres pose considerable challenges to the future planning and operation of Ireland’s power system” {xviii}. These challenges include higher electricity costs for consumers {xix}. The Danish Council on Climate Change recommended in April 2019 that the Danish government legally binds data centre owners and developers to contribute to the infrastructure required to supply the centres with renewable energy, such as wind and solar farms {xx}.

Currently, many companies claim to operate data centres powered by 100% renewable energy. However, the energy is largely sourced indirectly through Renewable Energy Certificates or Purchase Power

Agreements {xxi}, which means that the energy is sourced from the grid, which in Ireland is 69% fossil fuel-powered {xxii}.

If we continue to allow companies to virtually purchase clean energy where it is cheapest to create, while actually using and increasing demand for dirty energy in Ireland, we allow them to profit while our real emissions continue to rise. It is crucial therefore that data centres are powered directly by onsite renewable energy generation such as rooftop solar farms or genuinely new offsite generation such as offshore wind or solar farms. Data Centres also generate large quantities of waste heat which could be utilised in district heating systems {xxiii}.

To meet the greenhouse gas emissions targets set out in the Paris Agreement, and in the recently published Climate Action and Low Carbon Development Bill, it is paramount to examine the impact that energy supply of data centres will have on net emissions. Furthermore, it is crucial that every City and County Council takes into consideration the cumulative impact of data centres' energy demand on a nationwide basis, as opposed to examining impact solely on a case-by-case basis.

3. Public Participation and People-led Policy

Recommendations:

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

Throughout the lifetime of this county development plan, Ireland's transition to a low carbon society is entering its most crucial decade. It's vital that it should be centred around providing people and communities with clean, affordable and reliable energy. The best way to do so is to ensure citizen participation at all levels and stages of the energy transition.

There are many different ways in which people can participate in governance, ranging from informing to consultation to partnership to citizen control, whereby community members control the process (Armstein, 1969) {xxiv}. While all of these methods of participation are useful and valid at different stages of policymaking, different forms of participation should be incorporated into major decisions (such as energy infrastructure projects) to create a thoroughly participative process; for example, informing and

consulting at the stage of technical impact assessments. Ideally, there should be citizen participation in the design of the participatory process itself, for example through focus groups or workshops which feed directly into sub-national and national policymaking.

Community participation and ownership has proved important for public acceptance of the energy transition in countries where the transition is more advanced than in Ireland. For example, in Germany, 70% of the tax paid by wind turbine operators goes directly to the municipality where the turbines are based. In Denmark, taxes on energy go into funds to subsidise local initiatives for environmental improvement and community generation. Denmark also requires that local communities have a 20% share in onshore or near-shore wind turbines. Ownership measures like this are shown to increase community acceptance of energy transition infrastructure, and can take the form of individual shares in an energy project, community ownership of part of the infrastructure, or joint ventures between communities and developers {xxv}. There are many renewable energy projects that, with the support of the Council, can be developed. Numerous renewable energy exemplar projects exist around Europe, such as the Edinburgh Community Solar Co-operative, which empowers the public to be part of the transition to a low carbon society {xxvi}.

We trust the above will be taken into account when reviewing the draft plan.

Chief Executive's Response:

The matters raised are noted, however it is not directly related to a specific Proposed Material Amendment which was the subject of the Stage 3 consultation. Nonetheless, a response to the matters raised is set out below.

1. Fossil fuels and new fossil fuel infrastructure and 2. Data Centres

The Laois County Development Plan (2021 – 2027) has been drafted to support and support and facilitate European and national objectives for climate adaptation and mitigation as detailed in the following documents, taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage):

- Climate Action Plan (2019 and any subsequent versions);
- National Climate Change Adaptation Framework (2018 and any subsequent versions);
- Any Regional Decarbonisation Plan prepared on foot of commitments included in the emerging Regional Spatial and Economic Strategy for the Eastern and Midland Region;
- Relevant provisions of any Sectoral Adaptation Plans prepared to comply the requirements of the Climate Action and Low Carbon Development Act 2015, including those seeking to contribute towards the National Transition Objective, to pursue, and achieve, the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of the year 2050; and
- Laois Climate Change Adaptation Strategy 2019-2024.

Chapter 3 (Climate Action and Energy) includes details of how Laois County Council is committed to developing sustainable building practices in terms of energy efficiency and low environmental impact, to reduce dependence on fossil fuels. Policy SCPO 11 includes a policy on the provision of photovoltaic solar panels to reduce dependence on imported fossil fuels. The plan also contains a range of development management policies that would be used to consider infrastructure projects.

3. Public Participation and People-led Policy

The Laois County Development Plan has been subject to extensive public consultation over a 2 year period, which is now at the final stage of the consultation process.

Chief Executive Recommendation:

No change to the Draft Plan

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	N/A
N/A	
Proposed Material Amendment Submission Reference	LS-C24-35
Summary of Issue:	
Surface Water Management	
<p>Landscape management has an important role to play in protecting water quality. This includes maintaining vegetation along river corridors, and reducing impermeable surfaces. Run-off from hard surfaces and roads can also be managed to protect water courses. Incorporation of Sustainable drainage systems (SuDS) into site layout and design can attenuate pollution and add amenity and recreational value. Reference should be made to the Inland Fisheries Ireland document <i>Planning for Watercourses in the Urban Environment</i> for further information.</p>	
<p>Proper surface water and storm water management techniques along roads can significantly reduce the impact on receiving waters of multiple pollutants, including heavy metals, fuels and oils, and microplastics. For example, research by the European Commission estimates that 176,300 tonnes of microplastics are emitted to EU surface waters each year, over 50% of which is from road tyre wear.</p>	
Chief Executive's Response:	
<p>The response submitted does not explicitly refer to a proposed material amendment. However with regards to the matters raised, the Chief Executive notes the following:</p>	
<ul style="list-style-type: none">The matters raised are points that are considered at the planning application stage. The Chief Executive is also satisfied that the Draft Plan includes sufficient policies which address the matters raised by the submission and for which planning applications should have due regard to.	
Chief Executive Recommendation:	
No change to the Draft Plan	

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	N/A
N/A	
Proposed Material Amendment Submission Reference	LS-C24-35
<p>Summary of Issue:</p> <p>Climate, Biodiversity and Amenity</p> <p>Alignment of the housing strategy with the National Adaptation Framework in the national Climate Action Plan should give particular consideration to the co-benefits of measures to protect surface water quality and habitat. These include increased biodiversity, improved flood resilience, access to nature, and the contribution to general wellbeing.</p> <p>Due recognition should be given to the value of watercourses as amenity areas which can provide a natural setting for outdoor recreation in a safe environment, especially in the context of the Covid pandemic, which has encouraged a re-evaluation of our relationship with the natural world.</p> <p>For example, Strategic Flood Risk Assessment plans should consider the protection of vulnerable areas for recreational and amenity use rather than development. Laois County Council should consider introducing river corridor management plans and provide a mechanism for the strategic integration of rivers and wetlands into development plans.</p>	
<p>Chief Executive's Response:</p> <p>The response submitted does not explicitly refer to a proposed material amendment. However with regards to the matters raised, the Chief Executive notes the following:</p> <ul style="list-style-type: none"> • The Draft Plan has had regard to the National Planning Framework, as the Climate Action Plan (2019). It is also accompanied by a Strategic Flood Risk Assessment which has been produced in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). • The matters raised are points that are considered at the planning application stage. The Chief Executive is also satisfied that the Draft Plan includes sufficient policies which address the matters raised by the submission and for which planning applications should have due regard to. 	
<p>Chief Executive Recommendation:</p> <p>No change to the Draft Plan</p>	

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	N/A
N/A	
Proposed Material Amendment Submission Reference	LS-C24-35
<p>Summary of Issue:</p> <p>Instream Habitat Protection</p> <p>Instream works may only take place during the period 1 July to 30 September and outside of that only with the prior written agreement of Inland Fisheries Ireland. All instream works must be notified to Inland Fisheries Ireland in advance. Any engineering works which take place should not negatively impact the hydro-morphological or ecological status of any water courses, for example by disconnecting watercourses from riparian zones and natural flood plains.</p> <p>Reference should be made to Inland Fisheries Ireland's Guidelines on Protection of Fisheries during construction works in and adjacent to Waters when construction works are being planned or carried out. Any bridges, culverts etc should take into consideration the passage of fish and the access of anglers, where relevant. Well-designed water crossings should minimize interference with instream habitats and the river channel. IFI also request that the County Development Plan formally acknowledge that the removal of gravel from rivers and streams constitutes development.</p> <p>Every attempt should be made to restore connectivity in river systems. This includes lateral connectivity along river channels to allow fish migration upstream and downstream, and longitudinal connectivity, for example by restoring wetlands and flood plains.</p> <p>Where there is potential for the removal or replacement of barriers to fish passage, for example weirs, and poorly designed and/or undersized bridges and culverts, these should be considered. Consultation should be carried out with Inland Fisheries Ireland in the design phase before such proposals are submitted for planning approval.</p> <p>Furthermore, restoring sinuosity to river channels which have been artificially straightened increases their habitat diversity and holding capacity. Increasing the natural storage of surface water systems also increases their resilience to extreme weather events. The restoration of wetlands also provides co-benefits in terms of biodiversity, flood and drought resilience and carbon sequestration.</p>	
<p>Chief Executive's Response:</p> <p>The response submitted does not explicitly refer to a proposed material amendment. However with regards to the matters raised, the Chief Executive notes the following:</p> <ul style="list-style-type: none"> The matters raised are points that are considered at the planning application stage. The Chief Executive is also satisfied that the Draft Plan includes sufficient policies which address the matters raised by the submission and for which planning applications should have due regard to. 	
<p>Chief Executive Recommendation:</p> <p>No change to the Draft Plan</p>	

CHAPTER 8 TOURISM

Section / Policy Objective / Policy
Submission / NOM Numbers
Proposed Material Amendment No and text.
Amend Table 8.1 bullet points 2 and 8 to read: <ul style="list-style-type: none"> 2. Events (including sports events) and Festivals have proven to be a successful and a key driver of the Laois local economy and a means of revitalising and maintaining local culture as well as showcasing the people and places of Laois 8. Explore the potential of the Upper Nore Blueway and Development of the Barrow Blueway and Erkina Blueway
Proposed Material Amendment Submission Reference
<p>Summary of Issue:</p> <p>The Department is concerned with the material amendment of Table 8.1 to ‘explore the potential of the Upper River Nore Blueway’ and the inclusion in Policy Objective ABT1 to support the development of the amenities and recreational potential of the River Nore. The River Nore is designated as a Special Area of Conservation under the EU Habitat Directive (92/43/EEC) and contains a number of very sensitive qualifying interest species including the endemic Nore Pearl Mussel. The Department considers that these material amendments are likely to undermine the conservation objectives of this site and its integrity and should be subject to appropriate assessment.</p> <p>Chief Executive’s Response:</p> <p>The matter is noted, however the proposed change only includes reference to exploring the potential of the Upper Nore Blueway. It provides the framework within the County Development Plan for the potential to be explored. Any subsequent proposals would need to take into consideration the sensitive qualifying interest specifics at that time.</p> <p>Chief Executive Recommendation:</p> <p>No change to the Draft Plan.</p>

Section / Policy Objective / Policy	Additional policy objective after Section 8.3
Submission / NOM Numbers	LS-C9-DCDP-114
Proposed Material Amendment No and text.	8.13
<p>Include the following additional policy objective will be included after Section 8.3</p> <p>TM XXX Collaborate with the relevant stakeholders and landowners to prepare a Masterplan for Emo Court Demesne which will identify opportunities as well as landscape protection areas and views into and out of Emo Court</p>	
Proposed Material Amendment Submission Reference	LS-C24-11
<p>Summary of Issue:</p> <p>Due to reasons and the justification provided below, on Coillte’s behalf we request removal of Amendment No. 8.13.</p>	

Alternatively, if the planning authority consider it necessary to embed policy, focused on how recreation and tourism development proposals should take account of the visual context of Emo Court, we provide a text revision for policy 'TM XXX'. This we consider will give clarity to the intention of the policy and will align with other draft development objectives that seek to enhance the recreational role for Emo Park.

The policy being introduced through Amendment 8.13 states how the Planning Authority will "collaborate with the relevant stakeholders and landowners to prepare a Masterplan for Emo Court Demesne".

Coillte are major landholders in the area, where their Emo Park estate covers approximately 195 hectares of mixed woodland located to the west and south of the formal house and gardens of Emo Court. Coillte have been operating commercial forestry within Emo Park for over 50 years. However, Coillte's interest for Emo extends beyond its commercial forestry remit to embrace the use of the lands for recreation for both the local community and wider national population and for the enhancement of biodiversity in the area. This is evidenced by Coillte's open woodland policies, the provision of existing of walking, cycling and road infrastructure at Emo Park and the woodland conservation practices undertaken by Coillte.

The Draft Laois County Development Plan 2021-2027 indicates how the new development plan will provide for a significantly enhanced recreational role for lands at Emo Park. Policy objective NPRO 14 seeks to establish a 'National Natural Playground' at Emo that will build on its magnificent historic and natural setting. This important strategic goal will be supported by policy objective TRANS 43, to create links between the Barrow Blue Way and Emo, and the proposed policy TM 8 (Amendment 8.8) which will provide planning policy support for forestry-based tourism accommodation and recreational facilities.

Coillte is very enthusiastic about engaging with Laois County Council and other stakeholders to identify opportunities to enhance recreational use of their lands at Emo Park. These stakeholders include the local community and businesses in and around Emo Village, the Office of Public Works(OPW), Laois County Council, and the National Parks and Wildlife Service (NPWS), amongst others. For Coillte one of the key aims of engagement with stakeholders will be to provide an opportunity to understand and address how features of the historic landscape can be embraced and reflected into future development opportunities.

However, Coillte are greatly concerned that by specifying that a 'Masterplan' would be prepared in the new policy 'TM XXX', that development proposals at Emo Park would be stalled for an indefinite period until a Masterplan was completed. The difficulty being with the proposed text of 'TMXXX' is that there is no timeline on when preparation of the Masterplan would commence or be completed. Of equal importance is that the current text of policy 'TM XXX' does not make clear what will be the statutory basis for the Masterplan when complete, i.e. would the Masterplan be formally adopted into county development plan policy, perhaps as a development plan variation or would the Masterplan be merely advisory?

Coillte are also unclear on what area or spatial extent "Emo Court Demesne" covers. The term, or really the concept of a 'Demesne' is commonly taken to mean the historic extent of formal estate lands, however the precise spatial extent of this can be open to different interpretations. Thus, does Emo Court Demesne refer only to the formal gardens and house at Emo Court or would it require the inclusion of Emo Park and Emo village itself as these were linked to the historic estate development of Emo Court. Indeed,

would the term Demesne used in the amendment text also include all the private agricultural lands extending in the northwestern to southeastern directions from Emo Court.

The concept of a Masterplan can mean different things to different people and groups. Thus, a Masterplan can be a highly prescriptive plan that sets out at a very detailed level with the precise land uses, layout and development activities that are required for a defined area. Alternatively, a Masterplan may function at a conceptual level that provides a less rigid set of broad goals or intentions for the area or locality. We consider that when including a requirement that a Masterplan is prepared as part of a formal development plan policy, be it at detailed or conceptual level, it is vital that there is a definition of the area that it covers, that a timeframe for its completion is provided, that the process involved in the Masterplan preparation is specified and its statutory role is made clear. These are not provided in the current form of the text proposed in Amendment 8.13.

Coillte support a collaborative approach to enhancing the tourism and recreational role of their estate at Emo Park. Engagement with other stakeholders including, in particular the OPW, will provide the basis for assessment of the visual and historic landscape which can be fully reflected in specific development proposals at Emo Park. In preparing development proposals and seeking planning permission for development in sensitive historic landscapes it is normal practice for the Planning Authority to expect that a thorough, evidence-based, landscape and visual impact assessment is provided. This enables the planning authority to examine the historic views and prospects that may be affected by a development proposal and consider what impacts to the historic landscape may occur, based the opinions and technical knowledge provided by stakeholders, consultees, and relevant experts. A Masterplan is therefore not required to ensure protection of the historic landscape at and around Emo Court.

For reasons set out above Coillte consider the wording of Amendment 8.13 to be impractical, ambiguous, and unnecessary in light of best practice for development control in sensitive historic landscapes. We consider that the Amendment 8.13 should be omitted from the Laois County Development Plan 2021-2027. Policy objective 'TM XXX' is well intentioned, however without a clearer definition of the area and terms of the Masterplan for Emo Court Demesne and its statutory role it will be difficult to achieve those intentions.

Alternatively, given the importance that the planning authority wishes to attribute to the historic landscape of Emo Court we suggest the following text would achieve this aim while also avoiding the risk of delaying and impeding proper consideration of tourism and recreational enhancements at both Emo Park and Emo Court itself:

TM XXX Engage with the relevant stakeholders and landowners at Emo Park and Emo Court in the assessment of tourism and recreation opportunities to ensure development proposals will include consideration of the historic landscape and views into and out of Emo Court

Chief Executive's Response:

The matter and reasons raised are noted.

Having reviewed the landowners concerns with the existing Draft Plan text, and the proposed alternative the Executive notes that reference to producing a masterplan has been removed. The Executive accepts that this could lead to issues regarding the interpretation of when a masterplan should be produced (i.e. at development plan stage or development management stage). For clarity the Executive would encourage

that a masterplan be produced as part of a major development, and not one for more minor proposals. Nonetheless, this can be a matter that can be discussed at a potential planning application stage, and does not need to be prescribed in a policy for Emo Court or its environs.

The response sets out how development proposals will include a consideration of the historic landscape and views into and out of Emo Court. Whilst this is noted, given the importance of the landscape of Emo, the Executive is of the opinion that the policy is clear that such an assessment would identify both opportunities as well as potential landscape protection areas.

Chief Executive Recommendation:

It is recommended to delete:

~~TM XXX Collaborate with the relevant stakeholders and landowners to prepare a Masterplan for Emo Court Demesne which will identify opportunities as well as landscape protection areas and views into and out of Emo Court~~

And replace it with the following:

TM XXX Engage with the relevant stakeholders and landowners at Emo Park and Emo Court in the assessment of tourism and recreation opportunities to ensure development proposals will include consideration of the historic landscape and views into and out of Emo Court, including the identification of opportunities as well as potential landscape protection areas.

CHAPTER 9 RURAL LAOIS

Section / Policy Objective / Policy	DM RL2
Submission / NOM Numbers	LS-C9-DCDP-121
Proposed Material Amendment No and text.	9.4
<p>Amend as follows:</p> <p>DM RL 2 COMMERCIAL DEVELOPMENT IN RURAL AREAS</p> <p>COMMERCIAL DEVELOPMENT IN RURAL AREAS</p> <p>Development proposals in the open countryside should satisfy a high standard of siting and design, while being properly located to ensure their assimilation into their rural setting. The following considerations should be taken into account:</p> <ol style="list-style-type: none"> 1. Buildings should be kept simple and should be finished with materials appropriate to a rural setting such as nap plaster, stone and slate; 2. Buildings should reflect the scale and pattern of the rural development in the vicinity; 3. Building height should be restricted to that required for the normal operation of the premises, buildings of excessive height will not be permitted; 4. Buildings should be sited to make use of existing hedgerows and topography to provide natural screening, buildings in open landscapes should be avoided; 5. Access roads and driveways should respect existing site contours; 6. Car parking should be located to the rear of the building and in compliance with the car parking standards in Table 18; 7. Advertising signs should be kept to a minimum; 8. Large advertising signs at the road frontage will be resisted; 9. Hedgerows or stone walls should be used for boundary treatments; 10. Any new building will be required to respect the appearance of and character of the landscape. 11. It will not be acceptable where it is unduly prominent in the landscape, where it results in build-up of development when viewed with existing and/or approved building or where the impact of the ancillary works, including the creation of visibility splays would damage rural character or impact negatively on the environment or which fails to protect Natura Sites, conservation areas, natural heritage or the environment or fails to protect and improve or is injurious to amenities(including visual amenities). <p>A justification as to why the proposed development is to be located in a rural area over a settlement where adequate zoning is in place shall be submitted</p>	
Proposed Material Amendment Submission Reference	LS-C24-8
<p>Summary of Issue</p> <p>Amendment no. 9.4 and Amendment 9.5</p> <p>TII acknowledges that rural areas play a key role in driving the economy and policies associated with economic and rural development understandably seek to facilitate enterprise and employment proposals in a rural environment. The Authority supports the need to sustain these rural communities in County Laois.</p> <p>Proposed Amendment no. 9.4 outlines the criteria the Council will consider in relation to Commercial Development in Rural Areas. TII would welcome inclusion in this Proposed Amendment, in the interests of clarification and as an advisory to potential applicants for development in rural areas, of the requirement</p>	

to adhere to the provisions of official policy on access to national roads in relation to rural development typologies that may seek access to the national road network at variance with the requirements of official policy.

Similar to the objective addressed above, relating to 'Open Countryside and Rural Housing', TII would welcome a cross reference included in Proposed Amendment no. 9.4 referring to Objective Trans 17 of the Draft Plan and the objective to avoid the creation of any new direct access points from development or the generation of increased traffic from existing direct access/egress points to the national road network to which speed limits greater than 60kmph apply.

TII is of the opinion that such a cross reference would provide clarification and early assistance to applicants in the preparation of any planning application where there may be implications for the strategic national road network in the area and clearly identify, at an early stage, any policy conflicts related to access to national roads for the applicants to consider.

A similar approach would be welcome in Proposed Amendment 9.5 which addresses Mining and Aggregate Developments.

Recommendation

TII would welcome consideration by the Council of the following:

- TII would welcome a cross reference included in Proposed Amendment 9.4 and Proposed Amendment 9.5 referring to Objective Trans 17 of the Draft Plan and the objective to avoid the creation of any new direct access points from development or the generation of increased traffic from existing direct access/egress points to the national road network to which speed limits greater than 60kmph apply

Chief Executive's Response:

The matter is noted, however, the Executive is of the opinion that the Plan should be considered as a whole when applicants are considering development proposals, especially matters relating to access and what the speed limit is.

Chief Executive Recommendation:

No change to the Draft Plan

Section / Policy Objective / Policy	DM RL3
Submission / NOM Numbers	LS-C9-DCDP-121
Proposed Material Amendment No and text.	9.5
<p>Include the following:</p> <p>DM RL 3 Mining and Aggregates Development Control Standard</p> <p>Applications for new development for aggregate extraction, processing and associated processes, shall</p> <ol style="list-style-type: none"> 1) identify existing public rights of way and walking routes which may be impacted on or are adjacent to the development site. They shall be kept free from development as a Rights of Way/Walking Route 2) ensure the protection, conservation, preservation and safeguarding of recorded monuments and areas in their vicinity, World Heritage Sites(including Tentative Sites), NHA's, Euro Sites, Nature Reserves, scenic views and prospects archaeological sites and features, natural heritage, natural environment, features of natural beauty or interest and prescribed sites, geological sites and areas of geological/geomorphological or historic interest and areas of high scenic amenity from inappropriate development that might be detrimental to them. 3) minimise adverse effect on the environment and visual and natural amenities to the greatest possible extent must be carried out during all life cycle stages, whether in respect of new quarries or extensions to existing ones and development will be prohibited if the quality of the environment or landscape, particularly sensitive landscape, is adversely affected or there is a reduction of the visual amenity of areas of high amenity. 4) be landscaped either by the retention of existing vegetation or by screening to minimise the detracting from the visual quality of the landscape. 5) Require that development proposals on or in proximity to a quarry site should investigate the nature and extent of the risks associated with the development together with appropriate mitigation. 	
Proposed Material Amendment Submission Reference	LS-C24-8
<p>Summary of Issue</p> <p>Amendment no. 9.4 and Amendment 9.5</p> <p>TII acknowledges that rural areas play a key role in driving the economy and policies associated with economic and rural development understandably seek to facilitate enterprise and employment proposals in a rural environment. The Authority supports the need to sustain these rural communities in County Laois. Proposed Amendment no. 9.4 outlines the criteria the Council will consider in relation to Commercial Development in Rural Areas. TII would welcome inclusion in this Proposed Amendment, in the interests of clarification and as an advisory to potential applicants for development in rural areas, of the requirement to adhere to the provisions of official policy on access to national roads in relation to rural development typologies that may seek access to the national road network at variance with the requirements of official policy.</p>	

Similar to the objective addressed above, relating to 'Open Countryside and Rural Housing', TII would welcome a cross reference included in Proposed Amendment no. 9.4 referring to Objective Trans 17 of the Draft Plan and the objective to avoid the creation of any new direct access points from development or the generation of increased traffic from existing direct access/egress points to the national road network to which speed limits greater than 60kmph apply.

TII is of the opinion that such a cross reference would provide clarification and early assistance to applicants in the preparation of any planning application where there may be implications for the strategic national road network in the area and clearly identify, at an early stage, any policy conflicts related to access to national roads for the applicants to consider.

A similar approach would be welcome in Proposed Amendment 9.5 which addresses Mining and Aggregate Developments.

Recommendation

TII would welcome consideration by the Council of the following:

- TII would welcome a cross reference included in Proposed Amendment 9.4 and Proposed Amendment 9.5 referring to Objective Trans 17 of the Draft Plan and the objective to avoid the creation of any new direct access points from development or the generation of increased traffic from existing direct access/egress points to the national road network to which speed limits greater than 60kmph apply

Chief Executive's Response:

The matter is noted, however, the Executive is of the opinion that the Plan should be considered as a whole when applicants are considering development proposals, especially matters relating to access and what the speed limit is.

Chief Executive Recommendation:

No change to the Draft Plan

Section / Policy Objective / Policy	DM RL3
Submission / NOM Numbers	LS-C9-DCDP-121
Proposed Material Amendment No and text.	9.5
<p>Include the following:</p> <p>DM RL 3 Mining and Aggregates Development Control Standard</p> <p>Applications for new development for aggregate extraction, processing and associated processes, shall</p> <ol style="list-style-type: none"> 1) identify existing public rights of way and walking routes which may be impacted on or are adjacent to the development site. They shall be kept free from development as a Rights of Way/Walking Route 2) ensure the protection, conservation, preservation and safeguarding of recorded monuments and areas in their vicinity, World Heritage Sites(including Tentative Sites), NHA's, Euro Sites, Nature Reserves, scenic views and prospects archaeological sites and features, natural heritage, natural environment, features of natural beauty or interest and prescribed sites, geological sites and areas of geological/geomorphological or historic interest and areas of high scenic amenity from inappropriate development that might be detrimental to them. 3) minimise adverse effect on the environment and visual and natural amenities to the greatest possible extent must be carried out during all life cycle stages, whether in respect of new quarries or extensions to existing ones and development will be prohibited if the quality of the environment or landscape, particularly sensitive landscape, is adversely affected or there is a reduction of the visual amenity of areas of high amenity. 4) be landscaped either by the retention of existing vegetation or by screening to minimise the detraction from the visual quality of the landscape. 5) Require that development proposals on or in proximity to a quarry site should investigate the nature and extent of the risks associated with the development together with appropriate mitigation. 	
Proposed Material Amendment Submission Reference	LS-C24-7
<p>Summary of Issue Supports inclusion of part 2 above</p>	
<p>Chief Executive's Response: Noted and accepted</p>	
<p>Chief Executive Recommendation: No change to plan</p>	

Section / Policy Objective / Policy		Additional Policy Objective
Submission / NOM Numbers		LS-C9-DCDP-135
Proposed Material Amendment No and text.		Proposed Amendment Chapter 9
<p>It is proposed to include the following policy objective</p> <p>RL xx “Laois County Council will implement the objectives and targets at county level of the EU ‘A Farm to Fork strategy’, published in May 2020. The Council will also implement the targets of the 14 point EU Nature Restoration Plan in the ‘EU Biodiversity Strategy for 2030 - Bringing nature back into our lives’. Agricultural development proposals must demonstrate compliance with the targets and policies of both strategies.”</p>		
Proposed Material Amendment Submission Reference		LS-C24-28
<p>Summary of Issue</p> <p>The Department recommends that in order to ensure that European sites, in particular, peatland sites such as the Slieve Blooms and raised bogs, are protected from nitrogen deposition impacts resulting from intensive agricultural installations below the Industrial Emissions Directive thresholds for EPA licencing, that all such developments should be subject to appropriate assessment screening and that assessment of these impacts should follow EPA Guidance published in May 2021¹.</p> <p>1 https://www.epa.ie/publications/licensing--permitting/industrial/ied/Assessment-of-Impact-of-Ammonia-and-Nitrogen-on-Natura-sites-from-Intensive-Agriculture-Installations.pdf</p>		
<p>Chief Executive’s Response:</p> <p>The matter regarding the need to protect such sites from nitrogen depositions impact from insensitive agricultural installation is noted, and the Council accepts that such installation below the Industrial Emissions Directive thresholds for EPA licensing are subject to the EPA Guidance referred.</p>		
<p>Chief Executive Recommendation:</p> <p>It is recommended that the policy objective is amended as follows:</p> <p>RL xx “Laois County Council will implement the objectives and targets at county level of the EU ‘A Farm to Fork strategy’, published in May 2020. The Council will also implement the targets of the 14 point EU Nature Restoration Plan in the ‘EU Biodiversity Strategy for 2030 - Bringing nature back into our lives’. Agricultural development proposals must demonstrate compliance with the targets and policies of both strategies, with those agricultural installations below the Industrial Emissions Directive thresholds for EPA licencing will be subject to appropriate assessment screening and that assessment of these impacts should follow EPA Guidance published in May 2021¹.</p> <p>1 https://www.epa.ie/publications/licensing--permitting/industrial/ied/Assessment-of-Impact-of-Ammonia-and-Nitrogen-on-Natura-sites-from-Intensive-Agriculture-Installations.pdf</p>		

Section / Policy Objective / Policy	11.4.4.4
Submission / NOM Numbers	LS-C9-DCDP-23
Proposed Material Amendment No and text.	11.2
<p>Add additional policy objectives and development control standards in relation to the provision of features and re-number others accordingly.</p> <p>Add the following text prior to heading “Policy Objectives for Biodiversity and Designated Sites”</p> <p>Policy objectives</p> <p>It is an policy objective of the Council to require new developments to identify, protect and enhance ecological features by making provision for local biodiversity (for example, through provision of swift boxes or bricks, bat roost boxes, green roofs, etc.) and provide links to the wider Green Infrastructure network as an essential part of the design process.</p> <p>It is an objective of the Council to protect existing swift roosts as identified in the County Swift Survey and ensure existing nest sites are not lost through inappropriate renovation or destruction.</p>	
Proposed Material Amendment Submission Reference	LS-C24-27 LS-C24-28
<p>Summary of Issue</p> <p>Support from LS-C24-27.</p> <p>The Department (LS-C24-28) considers that the phrase ‘to provide links to the wider Green Infrastructure network’ could result in degradation of green infrastructure if the links were to increase access which could result in disturbance of wildlife and therefore advises the council that this phrase should be changed to ‘improve the ecological coherence of wider green infrastructure’. This is unambiguous and would be in keeping with the wording of Article 10 of the EU Habitats Directive.</p>	
<p>Chief Executive’s Response:</p> <p>The matter raised is noted, and accepted.</p>	
<p>Chief Executive Recommendation:</p> <p>It is an policy objective of the Council to require new developments to identify, protect and enhance ecological features by making provision for local biodiversity (for example, through provision of swift boxes or bricks, bat roost boxes, green roofs, etc.) and provide links to the wider Green Infrastructure network as an essential part of the design process. improve the ecological coherence of wider green infrastructure.</p> <p>It is an objective of the Council to protect existing swift roosts as identified in the County Swift Survey and ensure existing nest sites are not lost through inappropriate renovation or destruction.</p>	

CHAPTER 10 INFRASTRUCTURE

Section / Policy Objective / Policy	Additional Policy
Submission / NOM Numbers	LS-C9-DCDP 57 LS-C9-DCDP 154
Proposed Material Amendment No and text.	10.15
<p>Insert the following:</p> <p>TRANS XX To develop policy that provides a framework for a less restrictive approach to non-residential development of strategic or national importance or extensions to such developments accessing onto the National Road Network in accordance with the provisions of Section 2.6 of the 'Spatial Planning and National Roads -Guidelines for planning authorities' (2012) with TII within 1 years of adoption of the County Development Plan.</p>	
Proposed Material Amendment Submission Reference	LS-C24-8
<p>Summary of Issue:</p> <p>Amendment no. 10.15</p> <p>TII notes the proposals to develop a policy framework for a less restrictive approach to development of strategic or national importance accessing national roads in accordance with the provisions of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines.</p> <p>TII welcomes the commitment identified in Amendment no. 10.15 and is available to assist the Council in the development of such 'exceptional circumstances' cases subject to the development of the appropriate evidence base as required by Section 2.6 of the DoECLG Guidelines.</p> <p>In the interests of clarity, TII is of the opinion that such 'exceptional circumstances' cases are required to be identified plan-led for incorporation into the Development Plan by variation or amendment and a piecemeal approach to such development proposals in advance of an agreed policy framework for inclusion in the Development Plan is considered contrary to the provisions of the Guidelines.</p> <p>Recommendation</p> <p>TII would welcome consideration by the Council of the following:</p> <ul style="list-style-type: none"> TII welcomes the commitment identified in Amendment no. 10.15 and is available to assist the Council in the development of such 'exceptional circumstances' cases subject to the development of the appropriate evidence base as required by Section 2.6 of the DoECLG Guidelines 	
<p>Chief Executive's Response:</p> <p>The support from TII is welcomed. The matter raised regarding "exceptional circumstances" is noted, and the Chief Executive is of the opinion that this issue can be addressed as part of this overall process when considering the revised agreed policy framework, that takes into consideration the evidence base.</p>	
<p>Chief Executive Recommendation:</p> <p>No change to the Draft Plan.</p>	

Section / Policy Objective / Policy	TEL 5
Submission / NOM Numbers	LS-C9-DCDP-92
Proposed Material Amendment No and text.	10.23
Amend as follows:	
Facilitate the delivery of high-capacity telecommunications infrastructure at appropriate locations throughout the county having regard to the guidelines for “Telecommunications Antennae and Support Structures”, Circular Letter PL07/12 and any updated documents issued by the DoECLG or relevant authority	
Proposed Material Amendment Submission Reference	LS-C24-20
Summary of Issue:	
We welcome proposed Amendment 10.23, as it provides clarity in relation to the status of DoELG Circular Letter PL 07/12 and the updating of the existing guidelines.	
The updated Guidelines facilitate the improved development of telecommunications infrastructure and promotion of a policy of co-location. All ESB Telecoms Mast sites are open for co-location and duplication of infrastructure is reduced as a result. ESB encourages policies consistent with the Department Circular to allow for the improved development of telecommunications infrastructure, particularly broadband capability in the area.	
Chief Executive’s Response:	
Support is welcomed	
Chief Executive Recommendation:	
No change to Draft Plan	

Section / Policy Objective / Policy	Additional Policy
Submission / NOM Numbers	LS-C9-DCDP 80
Proposed Material Amendment No and text.	NA
N/A	
Proposed Material Amendment Submission Reference	LS-C24-19
Summary of Issue:	
The NTA notes that the following matters raised in our submission on the draft plan have not been addressed satisfactorily:-	
<ul style="list-style-type: none"> • An overemphasis on new roads; • Car parking standards are not expressed as maxima;and • Light Rail in Portlaoise. 	
Chief Executive’s Response:	
The Executive refers members to the response to the above matters in the Chief Executive Report to the Draft Plan (June 2021), and the reasons why material amendments were not proposed on these matters. These were accepted by members, and no further consultation has been undertaken.	
Chief Executive Recommendation:	
No change to the Draft Plan.	

CHAPTER 14 IMPLEMENTATION AND MONITORING

Section / Policy Objective / Policy		Section 14.1		
Submission / NOM Numbers		LS-C9-DCDP-154		
Proposed Material Amendment No and text.		14.1		
Insert the following at the end of Section 14.1				
The mode share targets set for County Laois are focused on internal work and college trips.				
In terms of sustainable modes, "A New Transport Policy for Ireland 2009-2020" set out key National modal share targets for achievement by 2020.				
These targets were aimed at reducing work-related commuting by car as a modal share from 73% to 45% and accommodating car drivers on other modes of transport such as walking, cycling, public transport and car sharing. Although these targets have not been achieved, County Laois would aim to achieve this modal shift by 2040 and are putting in place many initiatives to deliver on this which are supported in policy objectives throughout the Draft plan. The figures will be adjusted in accordance with Government policy and updated once a new census has been carried out in 2022.				
The development of multi-modal options has been based on these mode share targets.				
Table xx Modal share targets for Co Laois 2040				
Modal share Targets for County Laois 2040				
Mode Share	Walk	cycle	Public Transport	Car
2016	6%	1%	4%	73%
2040	20%	15%	20%	45%
Proposed Material Amendment Submission Reference			LS-C24-19	
Summary of Issue:				
The NTA notes the addition of Amendment 14.1 which sets out the mode share targets. The NTA will support Laois County Council in seeking to achieve this modal shift by 2040 and in implementing projects, programmes and policies which contribute to their delivery.				
Chief Executive’s Response:				
The support is welcomed				
Chief Executive Recommendation:				
No change to Draft Plan				

VOLUME 2 – SETTLEMENT PLANS

GRAIGUECULLEN

Section / Policy Objective / Policy	Section 2
Submission / NOM Numbers	LS-C9-DCDP-125
Proposed Material Amendment No and text.	Volume 2 – Graiguecullen 1.1
<p>Insert the following text in Section 2 in relation to the preparation of the future Joint Plan for Graiguecullen – Carlow -</p> <p>Laois County Council supports the preparation of a cross-boundary Joint Urban Area Plan (LAP) for Graiguecullen /Carlow Town in conjunction with Carlow County Council having regard to its location within the combined functional area of both local authorities.</p> <p>i. The Joint UAP (LAP) provides a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of Carlow to ensure it achieves targeted compact growth of a minimum of 30% and ensure a co-ordinated approach is taken to the future growth and development of the town to ensure that it has the capacity to grow sustainably and secure investment as a Key Town. The Joint UAP shall identify a boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater co-ordination and sequential delivery of serviced lands for development. Regard shall be had to the respective housing, retail and other strategies that may be in place. The selection of sites for regeneration and expansion should be supported by a quality site selection process and subject to detailed environmental assessment. This could be achieved through a coordinated management plan in collaboration between EMRA, Laois County Council, IFI and NPWS that could address the key issues of visitor pressure, supporting infrastructure pressure and management of the spread of invasive species;</p> <p>ii. The Assembly will foster collaboration in the allocation of funds to support and enable cross boundary collaboration in the Greater Carlow and Graiguecullen Urban Area in the delivery of strategic infrastructure;</p> <p>iii. There shall be consistency of approach on land use terminology across strategies prepared by Carlow County Council and Laois County Council for the cross-boundary Joint Local Area Plan;</p> <p>iv. The distribution of population between the two local authorities should be decided by both local authorities in the joint local area plan.</p>	
Proposed Material Amendment Submission Reference	LS-C24-28
<p>Summary of Issue:</p> <p>The Department recommends the inclusion of a Strategic SUDs / Rainwater Management Plan is included in this new section. Nature-based water sensitive urban design at a strategic level will be of greater benefit to biodiversity than individual fragmented measures.</p>	
<p>Chief Executive's Response:</p> <p>The Chief Executive considers that the existing wording, including reference to infrastructure investment requirements sufficiently covers matters relating strategic SUDS / Rainwater Management Plan, which would be addressed in more detail at the Joint LAP stage</p>	
<p>Chief Executive Recommendation:</p> <p>No change to the Draft Plan</p>	

MOUNTMELICK

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	N/A
N/A	
Proposed Material Amendment Submission Reference	LS-C24-1 LS-C24-5
<p>Summary of Issue:</p> <p>LS-C24-1 states that on inspection of Map 3.10, Mountmellick, Draft Laois County Development Plan 2021 – 2027, the estate of Grove Park is included in the “Special area of conservation” in the revised plan. By virtue of granting permission for the estate, circa 2000, the “Special area of Conservation/ Area of Special Amenity” would be extinguished with a new boundary line drafted to exclude the dwellings. Having read the associated documentation for the Special Area of Conservation it refers primarily to the River Barrow and Oak Woodlands. Having checked other sites & towns in the County Development Plan, it would appear that the residents of Grove Park are the only dwellings included in a “Special area of conservation/ Area of special amenity” within the development boundary of Mountmellick. This would seem to extend to the County of Laois. As can be appreciated this has an effect on planning exemptions and certification within the estate.</p> <p>LS-C24-5 submitted by the same agent refers to just Map 3.10. For the purposes of this report, it is assumed that this is regarding to the same matter above.</p>	
<p>Chief Executive’s Response:</p> <p>The submission is noted, however, this is not in response to a Proposed Material Amendment, and therefore cannot be considered at this stage.</p>	
<p>Chief Executive Recommendation:</p> <p>No change to the Draft Plan</p>	

KILLENARD

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	N/A
N/A	
Proposed Material Amendment Submission Reference	LS-C24-22
<p>Summary of Issue:</p> <p>Settlement Hierarchy</p> <p>We note from the Material Alterations proposed in the Draft Laois County Development Plan 2021-2027, that there are no projected changes to be made regarding Killenard and the Core Strategy for Killenard. As seen in Appendix 1 of this submission, the core strategy for Killenard remains at 0 with a projected growth rate of 0%. There is validity in re-assessing the core strategy proposed for Killenard, with regard to the actual growth rate of 8% experienced between the 2011 and 2016 Census. Killenard, is notably the only village with >500 population in Co. Laois that is projected for a 0% growth rate, with no explanation given in the Chief Executive's Report of the Draft Plan or the Material Alterations Stage.</p> <p>There is no justification given to this decision, especially in consideration of the lack of alignment with policy objectives (Local, Regional, and National) that support growth in villages and village centres. Whilst it is mentioned that the core strategy of 0 is given with regard to the settlement strategy and hierarchy, we note that Killenard is the only village in Co. Laois that has been subject to a core strategy of 0, despite other villages being on the same level of the settlement hierarchy</p> <p>Considering this recognition of growth in Killenard during the last census period, the predicted growth projections for the entire county of 4,910 by 2027, and the main aim of the County Development Plan to accommodate this growth in the settlements and rural areas, the lack of population allocation for Killenard within the Draft Plan is unjustifiable.</p> <p>Volume 2: Settlement Strategy: Section 6 – Villages Population > 500</p> <p>There is a discrepancy between the policy objectives and the proposed core strategy of 0. Policy KD 2 and 3 state the following:</p> <ul style="list-style-type: none"> • KD 2 Retain a modest building scale along the main thoroughfare of Killenard; • KD 3 Housing developments shall be of a density compatible with the prevailing density of the village, higher densities may be considered within the village centre; <p>It is our understanding that based on the policies and objectives of the Draft Plan, which support National and Regional population targets and aims, that the Core Strategy for Killenard should be amended by the Planning Authority.</p> <p>Zoning of Lands</p> <p>The zoning of these lands as 'Strategic Reserve Area' with the objective to provide lands for future development in line with national and regional targets should not be required in this instance Figure 2. Map 6.4 (A) Land Use Zoning designations taken from the Draft Plan 9 where the lands are available and serviceable for development at present and should remain as 'Residential'.</p>	

The Chief Executive's Report of the Draft Plan did not comment on the request for a change of the land use zoning objective, giving no explanation on the reasoning for a down zoning of land. These lands have been subject to several past grants of permission, with our client committed to progressing with residential development on these lands as approved previously by both Laois County Council and An Bord Pleanála.

Summary

Given the points outlined above, we respectfully request that further consideration is given to the contents of this submission. The justification of the Core Strategy and Land Use Zoning Objectives within Killenard, were not explained in the Chief Executive's Report or the Material Alterations Stage.

Chief Executive's Response:

Settlement Hierarchy and Zoning of Lands

The Laois County Development Plan (2021 – 2027) is an evidence based plan, that has been produced and supported by a range of documents, including the Laois Housing Needs Demands Assessment, Strategic Flood Risk Assessment and Infrastructure Assessment. The matter of settlement hierarchy and zoning of lands is interlinked is considered together, summarised as follows:

- The Chief Executive Report – First stage of Public Consultation: In responding to LCDP 53, the Chief Executive responded that:
 - *Each settlement within the County will be reviewed within Volume 2 of the Draft Plan – Settlement Plans, in accordance with the Settlement Hierarchy of the RSES. A full review of existing policies and objectives for each settlement will be undertaken and address future upgrades to existing infrastructure and facilities, economic and community development, regeneration and housing.*
 - The Draft Plan will support improvement of the public realm and provision of community and cultural facilities.*
 - Some of the projects identified in the submitted Plan are, however, outside the scope of the County Development Plan and may be more appropriate to refer to various community groups or town teams.*
- The Chief Executive Report – Draft Laois County Development Plan (2021 – 2027) – In responding to respondent LS-C9-DCDP-120, the Chief Executive Report set out the reasons for rezoning the lands from residential 2 to strategic reserve, which are summarised as follows:
 - **Location –**
 - The bulk of the lands referred to are outside the proposed town boundary
 - A development here of the scale proposed would be completely at variance with the principle of the sequential approach to the location of new development.
 - **Sequential Approach**
 - The sequential approach in effect favours town village centre, edge of centre and inner suburban locations over suburban locations for reasons of promoting sustainability, urban compactness and ease of serviceability. There is a strong presumption against the leapfrogging effect which leads to ad-hoc and disjointed development at relatively long distances [such as in this case] from the village centre.

- In terms of zoning land for 'New Residential', the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'
- **Housing Land Requirement**
 - The future population [and by extension the housing land requirement] of County Laois is governed by and shall comply with the housing targets as set out in the section 28 of the Planning and Development Act, 2000 (as amended), the '*Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities*' were issued on 18th December 2020.
 - This has informed the core strategy of the draft Laois County Development Plan 2021-2027 and where future growth is directed to in a sustainable manner.
- **Services**
 - In relation to Water supply - Development can be accommodated but would likely require infrastructure upgrades to accommodate the full growth projection and this is subject to funding from IW.
 - In relation to Wastewater Treatment Level of projected growth can be accommodated currently in the Draft Plan for Killenard
 - It is however noted that water services are an issue within the Killenard area. It is therefore premature at this point in time to zone additional lands for "Residential 2".
 - Until such time as these issues are resolved by IW, the lands shall remain unzoned and can be reviewed during a further county development plan review.

These matters have already been considered at Stages 1 and 2, and hence why they were not of public consultation at the Proposed Material Alterations stage.

The Chief Executive does however accept that settlement could continue to evolve and develop within the existing development limits, referred to as "Residential 1" lands.

Given the matters raised by the submission, the matter has been reviewed in respect of Killenard, and similar to other settlements within this category 0.5% growth rate was applied which would see a rise from 671-721 people and would equate to an additional 20 households within the plan period. This can be accommodated within the existing zoned areas on unfinished housing estates and infill areas.

The Core Strategy Table will be amended to reflect this but there will be no additional housing land requirement at this point and can be subject to a review once the CSO population census is carried out.

Chief Executive Recommendation

Refer to the amendments to the Core Strategy table on page 50 of this report.

CASTLETOWN

Section / Policy Objective / Policy		Additional Policy Objective
Submission / NOM Numbers		LS-C9-DCDP-86
Proposed Material Amendment No and text.		Volume 2 – Castletown – 1.1
Insert as follows:		
<p>“Examine the feasibility of developing a new circular riverside walkway upriver from Castletown Weir, while ensuring the protection of the River Barrow And River Nore SAC and the River Nore SPA. The walkway route on the map is indicative and would subject to amendment in order to ensure compliance with Habitats and Birds Directives. ”</p>		
Proposed Material Amendment Submission Reference		LS-C24-28
<p>Summary of Issue:</p> <p>Regarding the proposed material amendment to ‘examine the feasibility of developing a new circular riverside walkway upriver from Castletown Weir, while ensuring the protection of the River Barrow and River Nore SAC and the River Nore SPA. The walkway route on the map is indicative and would be subject to amendment in order to ensure compliance with Habitats and Birds Directive.’ The Department advises that the inclusion of the route on a map is premature and should be reconsidered.</p>		
<p>Chief Executive’s Response:</p> <p>The matter is noted, however the wording of the text states that the walkway route on the map is <u>indicative and would be subject to amendment in order to ensure compliance with Habitats and Birds Directive</u></p>		
<p>Chief Executive Recommendation:</p> <p>No change to the Draft Plan</p>		

BALLYROAN

Section / Policy Objective / Policy		N/A
Submission / NOM Numbers		LS-C9-DCDP-116 LS-C9-DCDP-117
Proposed Material Amendment No and text.		Volume 2 – Ballyroan
N/A		
Proposed Material Amendment Submission Reference		LS-C24-2
Summary of Issue: Just checked Ballyroan map. A submission was made for inclusion of a site on the Bog Road. Would you confirm if this was considered?		
Chief Executive's Response: This relates to Submission References LS-C9-DCDP-116 and LS-C9-DCDP-117 which were considered in the Chief Executive Report to the Draft Plan (June 2021). The recommendation was no change to the Draft Plan, which was accepted by members on the 1 st September 2021. These sites were not part of the Proposed Material Amendment consultation, and therefore no changes can be made to the Draft Plan at this stage		
Chief Executive Recommendation: No change to the Draft Plan		

Section / Policy Objective / Policy		N/A
Submission / NOM Numbers		LS-C9-DCDP-116
Proposed Material Amendment No and text.		Volume 2 – Ballyroan
N/A		
Proposed Material Amendment Submission Reference		LS-C24-16
Summary of Issue: Seeks to zone the site for residential development		
Chief Executive's Response: This relates to Submission References LS-C9-DCDP-116 which were considered in the Chief Executive Report to the Draft Plan (June 2021). The recommendation was no change to the Draft Plan, which was accepted by members on the 1 st September 2021. These sites were not part of the Proposed Material Amendment consultation, and therefore no changes can be made to the Draft Plan at this stage		
Chief Executive Recommendation: No change to the Draft Plan		

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	LS-C9-DCDP-117
Proposed Material Amendment No and text.	Volume 2 – Ballyroan
N/A	
Proposed Material Amendment Submission Reference	LS-C24-17
<p>Summary of Issue:</p> <p>A representation was made to have lands on the Bog Road zoned. Having read the reason for refusal, it should be reconsidered on the following grounds:</p> <ul style="list-style-type: none"> • The land in question is less than 200m from the village centre considerably closer than other previous permitted developments including the Local Authority scheme that was recently extended • The land sits on the north west of the village and is gravity fed towards the public sewer. • The land sits well within the 50km/h speed limit. • The land will eliminate linear development which is present on the opposite side of the road. • Ballyroan has seen a population increase of 23% over the past two census register. There is demand to live in the village. • Planning history on the site shows a refusal for water deficiency in Ballyroan at the time 2006/2007. The land was considered suitable for development albeit a lack of public infrastructure that is now addressed. • Any proposed development can be designed to open up backlands on the north west axis of the village. Something that is limited at the minute. 	
<p>Chief Executive's Response:</p> <p>This relates to Submission References LS-C9-DCDP-117 which were considered in the Chief Executive Report to the Draft Plan (June 2021). The recommendation was no change to the Draft Plan, which was accepted by members on the 1st September 2021.</p> <p>These sites were not part of the Proposed Material Amendment consultation, and therefore no changes can be made to the Draft Plan at this stage</p>	
<p>Chief Executive Recommendation:</p> <p>No change to the Draft Plan</p>	

Section / Policy Objective / Policy		Section 6.1, Additional Policy
Submission / NOM Numbers		LS-C9-DCDP-92
Proposed Material Amendment No and text.		Appendix 5 – Wind Energy Strategy - 1.1
<i>Life Extension and Repowering</i>		
Insert the following Policy in Appendix 5 as follows:		
WES 9: Life Extension and Repowering		
It is Council policy to consider the repowering of existing windfarm development on a case by case basis where the proposal does not result in a net increase in the number of turbines and it is demonstrated that there is no adverse impact on the receiving environment, landscape, designated sites or residences in the area.		
Proposed Material Amendment Submission Reference		LS-C24-20 LS-C24-32
Summary of Issue:		
Repowering can grant a new lease of life to existing renewable energy projects. This entails extending the planning lifetime of existing windfarm or solar farm with no or minimal new development. Well-maintained renewable energy projects and associated plant can operate safely after a planning expiry date of 20-30 years. Existing developments have the benefit of acceptance by local communities and contribute economically to the County through the payment of rates and community benefit funds. Therefore, we support the insertion of a new Policy Objective CM RE 16 and the updating of the WES to include WES 9, Life Extension and Repowering:		
<i>“It is Council policy to consider the repowering of existing windfarm development on a case by case basis where the proposal does not result in a net increase in the number of turbines and it is demonstrated that there is no adverse impact on the receiving environment, landscape, designated sites or residences in the area.”</i>		
Chief Executive’s Response:		
Support of the change is welcomed		
Chief Executive Recommendation:		
No change to the Draft Plan		

Section / Policy Objective / Policy	DM RE 2
Submission / NOM Numbers	LS-C9-DCDP-114 LS-C9-DCDP-129
Proposed Material Amendment No and text.	Appendix 5 – Wind Energy Strategy – 1.2
Amend bullet point as follows: Impact on human health in relation to noise disturbance (including consistency with the WHO 2018 Environmental Noise Guidelines for the European Region, showdown flicker and air quality;	
Proposed Material Amendment Submission Reference	LS-C24-30
Summary of Issue: Appendix 5, DM RE2, please reinstate the struck out text “including consistency with the WHO 2018 Environmental Noise Guidelines for the European Region”. Why would Laois County Council not be willing to explicitly comply with this?	
Chief Executive’s Response: Page 542 of the Chief Executive Report to the Draft Plan (June 2021) states that in respect of DM RE 2 <i>“It is agreed to delete the reference to the WHO guidelines, which would avoid confusion. It will be a matter which will be considered in the context of national guidelines, and standard environmental criteria.”</i> This is the reason for the change, which is considered to be reasonable.	
Chief Executive Recommendation: No change to the Draft Plan	

Section / Policy Objective / Policy	DM RE 2
Submission / NOM Numbers	LS-C9-DCDP-114 LS-C9-DCDP-129
Proposed Material Amendment No and text.	Appendix 5 – Wind Energy Strategy – 1.2
Amend bullet point as follows: Impact on human health in relation to noise disturbance (including consistency with the WHO 2018 Environmental Noise Guidelines for the European Region, showdown flicker and air quality;	
Proposed Material Amendment Submission Reference	LS-C24-33
Summary of Issue: We welcome the proposed amendment to this policy to remove references to WHO 2018 noise guidelines for the EU region, which will ensure compliance with adopted Department’s Wind Energy Development Guidelines and any updates thereof.	
Chief Executive’s Response: The support for the change is welcomed. Page 542 of the Chief Executive Report to the Draft Plan (June 2021) states that in respect of DM RE 2 <i>“It is agreed to delete the reference to the WHO guidelines, which would avoid confusion. It will be a matter which will be considered in the context of national guidelines, and standard environmental criteria.”</i> This is the reason for the change, which is considered to be reasonable.	
Chief Executive Recommendation: No change to the Draft Plan	

APPENDIX 9 INFRASTRUCTURE ASSESSMENT

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	Appendix 9 – Infrastructure Assessment
N/A	
Proposed Material Amendment Submission Reference	LS-C24-21
<p>Summary of Issue:</p> <p>We acknowledge your notice, of 21st September 2021, in relation to the proposed Material Alterations to the Draft Laois County Development Plan 2021-2027.</p> <p>We have reviewed the proposed Alterations and we welcome the inclusion of our observations therein.</p> <p>We note the addition of a new report in Appendix 9 – Infrastructural Assessment.</p> <p>We agree with your assessment but would like to note that the Small Towns and Villages Growth Programme is subject to the constraints of the Capital Investment Plan.</p>	
<p>Chief Executive's Response:</p> <p>Support of the inclusion of the IA welcomed. The IA has been amended to reflect the amendments in the zoning maps following the response the LS-C24-24 (OPR).</p>	
<p>Chief Executive Recommendation:</p> <p>Please refer to the amended Infrastructure Assessment.</p>	

STRATEGIC ENVIRONMENTAL ASSESSMENT

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	Strategic Environmental Assessment
N/A	
Proposed Material Amendment Submission Reference	LS-C24-9
<p>Summary of Issue:</p> <p>Specific Comments on the Alterations.</p> <p>We note your determination that a number of the Proposed Alterations require full SEA. Where you have identified the potential for likely significant effects in respect of any of the Alterations, you should provide appropriate mitigation measures to avoid or minimise these.</p> <p>In proposing the Alterations, Laois County Council should ensure that the Plan, as amended, is consistent with the need for proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Plan.</p> <p>In considering the Alterations, Laois County Council should consider the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans.</p> <p>Laois County Council should also ensure that the Plan is consistent with key relevant higher-level plans and programmes.</p> <p>Future Modifications to the Draft Plan</p> <p>Where further changes to the Draft Plan are proposed, these should be screened for likely significant effects in accordance with SEA Regulations. They should be subject to the same method of assessment applied in the “environmental assessment” of the Draft Plan.</p> <p>EA Statement–“Information on the Decision</p> <p>“Once the Plan is adopted/made, you should prepare an SEA Statement that summarises the following</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Plan. • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan. • The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Plan. <p>A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process</p>	

Chief Executive's Response:**Proposed SEA Determination**

The EPA's 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' document has been and will be taken into account in undertaking the SEA and preparing the Plan.

Specific Comments on the Alterations.

The Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments, including those relating to climate action, the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.

Future Modifications to the Draft Plan

Proposed Material Alterations will be screened for likely significant effects in accordance with SEA Regulations and subject to the same method of assessment applied in the assessment of the Draft Plan as relevant.

SEA Statement – "Information on the Decision"

Once the Plan is adopted, an SEA Statement will be prepared and made available containing the required information and taking into account the EPA's Guidance in preparing SEA Statements.

Environmental Authorities

Relevant environmental authorities have been and will, as appropriate, continue to be consulted with throughout the SEA/Plan preparation process.

Chief Executive Recommendation:

No change to the Draft Plan

STRATEGIC FLOOD RISK ASSESSMENT

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	Strategic Flood Risk Assessment
N/A	
Proposed Material Amendment Submission Reference	LS-C24-4
Summary of Issue In Table 4-1 of the SFRA www.floodmaps.ie is noted as a source. Please note that the www.floodmaps.ie website is no longer available and historic flood events are now available on www.floodinfo.ie	
Chief Executive's Response: The matter is noted, and whilst it was not consulted as a proposed material amendment, the point is accepted, which can be a minor editorial change	
Chief Executive Recommendation: Amend reference from in Table 4.1 from www.floodmaps.ie to www.floodinfo.ie in the SFRA	

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	Strategic Flood Risk Assessment
N/A	
Proposed Material Amendment Submission Reference	LS-C24-4
Summary of Issue: <p>It is stated in section 4.1 that “When the National Indicative Flood Mapping (NIFM) is issued to Local Authorities the data will be used in conjunction with the other available datasets and site visits to provide a countywide Flood Zone dataset, subject to further verification.” The OPW acknowledge that National Indicative Fluvial Mapping outputs were not available at the time of development of this Plan. The outputs are now available on request to Local Authorities.</p> <p>The flood maps, including those for potential future scenarios taking account of the possible impacts of climate change, may be obtained in GIS format from the OPW Data Management Section via email (flood_data@opw.ie).</p>	
Chief Executive's Response: <p>The matter is noted, and whilst it was not consulted as a proposed material amendment, the point is accepted, which can be a minor editorial change</p>	
Chief Executive Recommendation: <p>There amend the SFRA as follows:</p> <p>When the The National Indicative Flood Mapping (NIFM) is issued to Local Authorities the data will be used in conjunction with the other available datasets and site visits to provide a countywide Flood Zone dataset,</p>	

~~subject to further verification~~ including those for potential future scenarios taking account of the possible impacts of climate change, may be obtained in GIS format from the OPW Data Management Section via email (flood_data@opw.ie).

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	Strategic Flood Risk Assessment - Abbeylax
N/A	
Proposed Material Amendment Submission Reference	LS-C24-4
<p>Summary of Issue:</p> <p>Abbeylax</p> <p>The mitigation measures outlined in the Plan Making Justification Test for the Existing Residential zoned lands limit development in Flood Zones A and B to extensions renovations and changes of use, and require an FRA for future development.</p> <p>The mitigation measures for Industrial zoned lands require that the sequential approach be applied, and that less vulnerable development be located in Flood Zones B and C.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p>	
<p>Chief Executive's Response:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Abbeylax already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p>	
<p>Chief Executive Recommendation:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which addresses this matter.</p>	

Section / Policy / Policy Objective / Zoning Map		SFRA and Map 6.2 (A) - Ballyroan
Draft Plan Submission / NOM Numbers		LS-C9-DCDP-98
Amendment No.		Strategic Flood Risk Assessment – Zoning Amendment No. 62
Proposed Material Amendment		
<ul style="list-style-type: none"> Ballyroan <ul style="list-style-type: none"> Zoning Amendment No. 62 Residential 1 to Open Space / Amenity 		
Proposed Material Amendment Submission Reference		LS-C24-4
<p>Summary of Issue:</p> <p>The OPW welcomes Zoning Amendments numbers 62 and 63 rezoning lands from <i>Existing Residential</i> and <i>New Residential</i> to <i>Open Space/Amenity</i>.</p> <p>The OPW notes the commentary in the Justification Test for the <i>Existing Residential</i> zoned lands, that the areas in Flood Zones A and B are subject to extant planning permissions with SSFRAs, that any further development in Flood Zones A and B be restricted to extensions, renovations and changes of use, and subject to detailed FRAs.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p> <p>There is no commentary to indicate that a Plan Making Justification Test has been carried out in respect of <i>Community Educational & Institutional</i> which could include highly vulnerable development that has been zoned in Flood Zone A to east of the village.</p>		
<p>Chief Executive's Response:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Ballyroan already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p> <p>There is a small overlap and JT will pass on basis of the riparian strip/application of Sequential Approach. Please refer to the updated SFRA which includes the Justification Test on the Educational & Institutional lands.</p>		
<p>Chief Executive Recommendation:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which addresses this matter.</p> <p>Please refer to the updated SFRA which includes the Justification Test on the Educational & Institutional lands.</p>		

Section / Policy / Policy Objective / Zoning Map		SFRA and Map 6.2 (A) - Ballyroan
Draft Plan Submission / NOM Numbers		LS-C9-DCDP-98
Amendment No.		Strategic Flood Risk Assessment – Zoning Amendment No. 63
Proposed Material Amendment		
<ul style="list-style-type: none"> • Ballyroan <ul style="list-style-type: none"> ○ Zoning Amendment No. 63 Residential 2 to Open Space / Amenity 		
Proposed Material Amendment Submission Reference		LS-C24-4
<p>Summary of Issue:</p> <p>The OPW welcomes Zoning Amendments numbers 62 and 63 rezoning lands from <i>Existing Residential</i> and <i>New Residential</i> to <i>Open Space/Amenity</i>.</p> <p>The OPW notes the commentary in the Justification Test for the <i>Existing Residential</i> zoned lands, that the areas in Flood Zones A and B are subject to extant planning permissions with SSFRAs, that any further development in Flood Zones A and B be restricted to extensions, renovations and changes of use, and subject to detailed FRAs.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p> <p>There is no commentary to indicate that a Plan Making Justification Test has been carried out in respect of <i>Community Educational & Institutional</i> which could include highly vulnerable development that has been zoned in Flood Zone A to east of the village.</p>		
<p>Chief Executive's Response:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Ballyroan already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p> <p>There is a small overlap and JT will pass on basis of the riparian strip/application of Sequential Approach. Please refer to the updated SFRA which includes the Justification Test on the Educational & Institutional lands.</p>		
<p>Chief Executive Recommendation:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which addresses this matter.</p> <p>Please refer to the updated SFRA which includes the Justification Test on the Educational & Institutional lands.</p>		

Section / Policy / Policy Objective / Zoning Map		SFRA and Map 8.3 (A) - Camross
Draft Plan Submission / NOM Numbers		LS-C9-DCDP-98
Amendment No.		Strategic Flood Risk Assessment – Zoning Amendment No. 74
Proposed Material Amendment		
<ul style="list-style-type: none"> • Camross <ul style="list-style-type: none"> ○ Zoning Amendment No. 74 CEI to Open Space / Amenity 		
Proposed Material Amendment Submission Reference		LS-C24-4
<p>Summary of Issue:</p> <p>The OPW welcomes Zoning Amendment number 74 rezoning lands from Community-Educational & Institutional to Open Space/Amenity.</p> <p>The mitigation measures outlined in the Plan Making Justification Test for the Village Centre and Community-Educational & Institutional zoned lands limit development in Flood Zones A and B to extensions, renovations and changes of use, and require an FRA for future development.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives</p>		
<p>Chief Executive's Response:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Camross already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p> <p>There is a small overlap and JT will pass on basis of the riparian strip/application of Sequential Approach. Please refer to the updated SFRA which includes the Justification Test on the Educational & Institutional lands.</p>		
<p>Chief Executive Recommendation:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which addresses this matter.</p>		

Section / Policy / Policy Objective / Zoning Map	SFRA and Map 6.1 (A) - Clonaslee
Submission / NOM Numbers	LS-C9-DCDP-98
Amendment No.	Strategic Flood Risk Assessment – Zoning Amendment No. 61
Proposed Material Amendment	
<ul style="list-style-type: none"> • Clonaslee <ul style="list-style-type: none"> ○ Zoning Amendment No. 61 CEI to Open Space / Amenity 	
Proposed Material Amendment Submission Reference	LS-C24-4
<p>Summary of Issue:</p> <p>The OPW welcomes Zoning Amendment number 61 rezoning lands from Community- Educational & Institutional to Open Space/Amenity.</p> <p>The mitigation measures outlined in the Plan Making Justification Test for the Village Centre and Existing Residential zoned lands limit development in Flood Zones A and B to extensions, renovations and changes of use, and require an FRA for future development.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p> <p>It is noted that there are small sections of Community-Educational & Institutional zoned lands in Flood Zones A and B which have not been referenced in the Justification Test.</p>	
<p>Chief Executive's Response:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Camross already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p> <p>Please refer to the updated SFRA which includes the Justification Test on the Community - Educational & Institutional lands.</p>	
<p>Chief Executive Recommendation:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation and updated SFRA which addresses this matter.</p>	

Section / Policy / Policy Objective / Zoning Map		SFRA – Coolrain
Draft Plan Submission / NOM Numbers		LS-C9-DCDP-98
Amendment No.		N/A
Proposed Material Amendment		
N/A		
Proposed Material Amendment Submission Reference		LS-C24-4
<p>Summary of Issue:</p> <p>The mitigation measures outlined in the Plan Making Justification Test for the Existing Residential zoned lands limit development in Flood Zones A and B to extensions, renovations and changes of use, and require an FRA for future development.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p> <p>Chief Executive’s Response:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Coolrain already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p> <p>Chief Executive Recommendation:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation.</p>		

Section / Policy / Policy Objective / Zoning Map		SFRA and Map 5.2 (A) - Durrow
Amendment No.		Strategic Flood Risk Assessment – Zoning Amendment No. 48
Draft Plan Submission / NOM Numbers		LS-C9-DCDP-98
Proposed Material Amendment		
<ul style="list-style-type: none"> • Durrow <ul style="list-style-type: none"> ○ Zoning Amendment No. 48 Village Centre to Open Space / Amenity 		
Proposed Material Amendment Submission Reference		LS-C24-4
Summary of Issue: <p>The OPW welcomes Zoning Amendments number 48 and 49 rezoning lands from Town Centre and Horticulture to Open Space/Amenity. The mitigation measures outlined in the Plan Making Justification Test for the Town Centre and Existing Residential zoned lands limit development in Flood Zones A and B to extensions, renovations and changes of use, and require an FRA for future development.</p> <p>The mitigation measures outlined in the Plan Making Justification Test for the Horticultural zoned lands limit development in Flood Zone A and B to open space and planting areas, and restrict infill buildings and glass houses to Flood Zone C.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p>		
Chief Executive's Response: <p>The Chief Executive welcomes the support for Zoning Amendment Number 62. Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Durrow already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p>		
Chief Executive Recommendation: <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation.</p>		

Section / Policy / Policy Objective / Zoning Map		SFRA and Map 5.2 (A) - Durrow
Amendment No.		Strategic Flood Risk Assessment – Zoning Amendment No. 49
Draft Plan Submission / NOM Numbers		LS-C9-DCDP-98
Proposed Material Amendment		
<ul style="list-style-type: none"> • Durrow <ul style="list-style-type: none"> ○ Zoning Amendment No. 49 Horticulture to Open Space / Amenity 		
Proposed Material Amendment Submission Reference		LS-C24-4
Summary of Issue: <p>The OPW welcomes Zoning Amendments number 48 and 49 rezoning lands from Town Centre and Horticulture to Open Space/Amenity. The mitigation measures outlined in the Plan Making Justification Test for the Town Centre and Existing Residential zoned lands limit development in Flood Zones A and B to extensions, renovations and changes of use, and require an FRA for future development.</p> <p>The mitigation measures outlined in the Plan Making Justification Test for the Horticultural zoned lands limit development in Flood Zone A and B to open space and planting areas, and restrict infill buildings and glass houses to Flood Zone C.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p>		
Chief Executive's Response: <p>The Chief Executive welcomes the support for Zoning Amendment Number 62. Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Durrow already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p>		
Chief Executive Recommendation: <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation.</p>		

Section / Policy / Policy Objective / Zoning Map		SFRA and Map 7.5 (A) - Killeen
Amendment No.		Strategic Flood Risk Assessment – Zoning Amendment No. 68
Draft Plan Submission / NOM Numbers		LS-C9-DCDP-98
Proposed Material Amendment		
<ul style="list-style-type: none"> • Killeen <ul style="list-style-type: none"> ○ Zoning Amendment No. 68 Residential 2 to Open Space / Amenity 		
Proposed Material Amendment Submission Reference		LS-C24-4
<p>Summary of Issue: The OPW welcomes Zoning Amendments number 68 and 69 rezoning lands from New Residential to Open Space/Amenity.</p> <p>The mitigation measures outlined in the Justification Tests for the Existing Residential, New Residential and Village Centre zoned lands limit development in Flood Zones A and B to extensions, renovations and changes of use, and require an FRA for future development.</p> <p>The mitigation measures set out for the General Business zoned lands at Maganey Industries Ltd set out that any further development should be subject to a Stage 3 Detailed FRA, which, among other measures, should require that the sequential approach be applied to development, and that less vulnerable elements should be located in Flood Zones B or preferably C.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p> <p>It is noted in the Justification Test that there is extant planning permission for the New Residential zoned lands. However, as it is also stated that the sequential approach has been applied, and all building footprints are in Flood Zone C, this should not be an impediment to such an objective.</p>		
<p>Chief Executive's Response: The Chief Executive welcomes the support for Zoning Amendment Number 62. Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Killeen already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p>		
<p>Chief Executive Recommendation: Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation.</p>		

Section / Policy / Policy Objective / Zoning Map		SFRA and Map 7.5 (A) - Killeen
Amendment No.		Strategic Flood Risk Assessment – Zoning Amendment No. 69
Draft Plan Submission / NOM Numbers		LS-C9-DCDP-98
Proposed Material Amendment		
<ul style="list-style-type: none"> • Killeen <ul style="list-style-type: none"> ○ Zoning Amendment No. 69 Residential 2 to Open Space / Amenity 		
Proposed Material Amendment Submission Reference		LS-C24-4
<p>Summary of Issue: The OPW welcomes Zoning Amendments number 68 and 69 rezoning lands from New Residential to Open Space/Amenity.</p> <p>The mitigation measures outlined in the Justification Tests for the Existing Residential, New Residential and Village Centre zoned lands limit development in Flood Zones A and B to extensions, renovations and changes of use, and require an FRA for future development.</p> <p>The mitigation measures set out for the General Business zoned lands at Maganey Industries Ltd set out that any further development should be subject to a Stage 3 Detailed FRA, which, among other measures, should require that the sequential approach be applied to development, and that less vulnerable elements should be located in Flood Zones B or preferably C.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p> <p>It is noted in the Justification Test that there is extant planning permission for the New Residential zoned lands. However, as it is also stated that the sequential approach has been applied, and all building footprints are in Flood Zone C, this should not be an impediment to such an objective.</p>		
<p>Chief Executive's Response: The Chief Executive welcomes the support for Zoning Amendment Number 62. Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Killeen already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p>		
<p>Chief Executive Recommendation: Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation.</p>		

Section / Policy / Policy Objective / Zoning Map		SFRA and Map 7.6 (A) - Killeshin
Draft Plan Submission / NOM Numbers		LS-C9-DCDP-98
Amendment No.		Strategic Flood Risk Assessment – Zoning Amendment No. 70
Proposed Material Amendment		
<ul style="list-style-type: none"> • Killeshin <ul style="list-style-type: none"> ○ Zoning Amendment No. 70 Residential 1 to Open Space / Amenity 		
Proposed Material Amendment Submission Reference		LS-C24-4
<p>Summary of Issue:</p> <p>The OPW welcomes Zoning Amendment number 70 and 71 rezoning lands from Existing Residential to Open Space/Amenity.</p> <p>It is noted in the Justification Tests for the Existing Residential that the building footprints are located in Flood Zone C, and the mitigation measures outlined limit any infill development to Flood Zone C, and require an FRA for future development.</p> <p>The mitigation measures for Village Centre zoned lands limit development in Flood Zones A and B to extensions, renovations and changes of use, and require an FRA for future development.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p>		
<p>Chief Executive's Response:</p> <p>The Chief Executive welcomes the support for Zoning Amendment Number 70. Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Killeshin already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p>		
<p>Chief Executive Recommendation:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation.</p>		

Section / Policy / Policy Objective / Zoning Map	SFRA and Map 7.6 (A) - Killeshin
Draft Plan Submission / NOM Numbers	LS-C9-DCDP-98
Amendment No.	Strategic Flood Risk Assessment – Zoning Amendment No. 71
Proposed Material Amendment	
<ul style="list-style-type: none"> • Killeshin <ul style="list-style-type: none"> ○ Zoning Amendment No. 70 Residential 1 to Open Space / Amenity 	
Proposed Material Amendment Submission Reference	LS-C24-4
<p>Summary of Issue:</p> <p>The OPW welcomes Zoning Amendment number 70 and 71 rezoning lands from Existing Residential to Open Space/Amenity.</p> <p>It is noted in the Justification Tests for the Existing Residential that the building footprints are located in Flood Zone C, and the mitigation measures outlined limit any infill development to Flood Zone C, and require an FRA for future development.</p> <p>The mitigation measures for Village Centre zoned lands limit development in Flood Zones A and B to extensions, renovations and changes of use, and require an FRA for future development.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p>	
<p>Chief Executive's Response:</p> <p>The Chief Executive welcomes the support for Zoning Amendment Number 70. Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Killeshin already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p>	
<p>Chief Executive Recommendation:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation.</p>	

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	Strategic Flood Risk Assessment - Mountmellick
N/A	
Proposed Material Amendment Submission Reference	LS-C24-4
<p>Summary of Issue:</p> <p>The Justification Test for New Residential zoned lands at Twomey Gardens and Pattisons Estate notes that both sites have extant planning permissions which have had FRAs submitted as part of the application, that all building footprints are in Flood Zone C, and that the Justification Test found it appropriate to retain its existing zoning on the basis that development is constructed as per the planning application.</p> <p>It is then stated that any future development should be subject to an FRA, in which “the sequential approach should be applied if possible”. The OPW recommends that any future highly vulnerable development be restricted to Flood Zone C, and that this be supported by means of a policy objective.</p> <p>The mitigation measures outlined in the Plan Making Justification Test for the Town Centre and Existing Residential zoned lands limit development in Flood Zones A and B to extensions, renovations and changes of use, and require an FRA for future development. The Justification Test for Community-Educational & Institutional, sets out that further expansion of the schools and neighbourhood centre should be subject to an FRA which would require application of the sequential approach, and restrict highly vulnerable development to Flood Zone C, and less vulnerable development to Flood Zone B.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p> <p>It is noted and welcomed that the Justification Test for Community-Educational & Institutional recommends moving the Fire Station to Flood Zone C.</p>	
<p>Chief Executive’s Response:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Mountmellick already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p>	
<p>Chief Executive Recommendation:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which addresses this matter.</p>	

Section / Policy / Policy Objective / Zoning Map		SFRA and Map 4.3 (A) - Mountrath
Submission / NOM Numbers		LS-C9-DCDP-98
Amendment No.		Strategic Flood Risk Assessment – Zoning Amendment No. 31
Proposed Material Amendment		
<ul style="list-style-type: none"> • Mountrath <ul style="list-style-type: none"> ○ Zoning Amendment No. 31 Town Centre to Open Space / Amenity 		
Proposed Material Amendment Submission Reference		LS-C24-4
<p>Summary of Issue:</p> <p>The OPW welcomes Zoning Amendments number 31, 32 and 35 rezoning lands from Town Centre, Existing Residential and Industrial to Open Space/Amenity. The mitigation measures outlined in the Justification Test for the Town Centre and Existing Residential zoned lands limit development in Flood Zones A and B to extensions, renovations and changes of use, and require an FRA for future development.</p> <p>The Justification Test for General Business and Industrial zoned lands references Enterprise & Employment zoning in part 2(v). This should be General Business.</p> <p>The mitigation measures outlined for these zonings set out that any further development should be subject to an FRA which would require application of the sequential approach, and restrict less vulnerable development to Flood Zone B, or preferably C.</p> <p>The mitigation measures outlined in the Justification Test for the Community-Educational & Institutional zoned lands sets out that for the undeveloped lands to the east of the town centre the sequential approach must be applied, and only water compatible use will be possible within Flood Zone A. For the schools and neighbourhood centre to the west of the White Horse River, it is set out that any future expansion of the schools/church/community hall should be subject to an FRA. This would require that the sequential approach be followed, that highly vulnerable elements of development be located in Flood Zone C, and that Flood Zone A be restricted to water compatible usage.</p> <p>The mitigation measures for the undeveloped lands should also stipulate that highly vulnerable development is not appropriate in Flood Zone B. The OPW recommends that all mitigation measures be incorporated into the plan supported by settlement policy objectives.</p>		
<p>Chief Executive's Response:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Mountrath already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>. The SFRA has been updated to correctly refer to General Business in part 2(v).</p>		
<p>Chief Executive Recommendation:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation and updated SFRA.</p>		

Section / Policy / Policy Objective / Zoning Map		SFRA and Map 4.3 (A) - Mountrath
Draft Plan Submission / NOM Numbers		LS-C9-DCDP-98
Amendment No.		Strategic Flood Risk Assessment – Zoning Amendment No. 32
Proposed Material Amendment		
<ul style="list-style-type: none"> • Mountrath <ul style="list-style-type: none"> ○ Zoning Amendment No. 32 Residential 1 to Open Space / Amenity 		
Proposed Material Amendment Submission Reference		LS-C24-4
<p>Summary of Issue:</p> <p>The OPW welcomes Zoning Amendments number 31, 32 and 35 rezoning lands from Town Centre, Existing Residential and Industrial to Open Space/Amenity. The mitigation measures outlined in the Justification Test for the Town Centre and Existing Residential zoned lands limit development in Flood Zones A and B to extensions, renovations and changes of use, and require an FRA for future development.</p> <p>The Justification Test for General Business and Industrial zoned lands references Enterprise & Employment zoning in part 2(v). This should be General Business. The mitigation measures outlined for these zonings set out that any further development should be subject to an FRA which would require application of the sequential approach, and restrict less vulnerable development to Flood Zone B, or preferably C.</p> <p>The mitigation measures outlined in the Justification Test for the Community-Educational & Institutional zoned lands sets out that for the undeveloped lands to the east of the town centre the sequential approach must be applied, and only water compatible use will be possible within Flood Zone A. For the schools and neighbourhood centre to the west of the White Horse River, it is set out that any future expansion of the schools/church/community hall should be subject to an FRA. This would require that the sequential approach be followed, that highly vulnerable elements of development be located in Flood Zone C, and that Flood Zone A be restricted to water compatible usage. The mitigation measures for the undeveloped lands should also stipulate that highly vulnerable development is not appropriate in Flood Zone B. The OPW recommends that all mitigation measures be incorporated into the plan supported by settlement policy objectives.</p>		
<p>Chief Executive's Response:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Mountrath already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>. The SFRA has been updated to correctly refer to General Business in part 2(v).</p>		
<p>Chief Executive Recommendation:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation and updated SFRA.</p>		

Amendment No.		Strategic Flood Risk Assessment – Zoning Amendment No. 35	
Draft Plan Submission / NOM Numbers		LS-C9-DCDP-98	
Section / Policy / Policy Objective / Zoning Map		SFRA and Map 4.3 (A) - Mountrath	
Proposed Material Amendment			
<ul style="list-style-type: none">• Mountrath<ul style="list-style-type: none">○ Zoning Amendment No. 35Industrial to Open Space / Amenity			
Proposed Material Amendment Submission Reference		LS-C24-4	
Summary of Issue:			
<p>The OPW welcomes Zoning Amendments number 31, 32 and 35 rezoning lands from Town Centre, Existing Residential and Industrial to Open Space/Amenity. The mitigation measures outlined in the Justification Test for the Town Centre and Existing Residential zoned lands limit development in Flood Zones A and B to extensions, renovations and changes of use, and require an FRA for future development.</p> <p>The Justification Test for General Business and Industrial zoned lands references Enterprise & Employment zoning in part 2(v). This should be General Business. The mitigation measures outlined for these zonings set out that any further development should be subject to an FRA which would require application of the sequential approach, and restrict less vulnerable development to Flood Zone B, or preferably C.</p> <p>The mitigation measures outlined in the Justification Test for the Community-Educational & Institutional zoned lands sets out that for the undeveloped lands to the east of the town centre the sequential approach must be applied, and only water compatible use will be possible within Flood Zone A. For the schools and neighbourhood centre to the west of the White Horse River, it is set out that any future expansion of the schools/church/community hall should be subject to an FRA. This would require that the sequential approach be followed, that highly vulnerable elements of development be located in Flood Zone C, and that Flood Zone A be restricted to water compatible usage.</p> <p>The mitigation measures for the undeveloped lands should also stipulate that highly vulnerable development is not appropriate in Flood Zone B. The OPW recommends that all mitigation measures be incorporated into the plan supported by settlement policy objectives.</p>			
Chief Executive’s Response:			
<p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Mountrath already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>. The SFRA has been updated to correctly refer to General Business in part 2(v).</p>			
Chief Executive Recommendation:			
<p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation and updated SFRA.</p>			

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	Strategic Flood Risk Assessment - Portlaoise
N/A	
Proposed Material Amendment Submission Reference	LS-C24-4
<p>Summary of Issue:</p> <p>The mitigation measures outlined in the Justification Test for Town Centre and Existing Residential zoned lands set out that additional development in Flood Zones A and B be limited to extensions and renovations, and that any future development be subject to an FRA.</p> <p>The mitigation measures in the Justification Tests for Enterprise and Employment and Industrial zoned lands, for Neighbourhood Centre zoned lands, and also for Community-Educational & Institutional zoned lands set out that any development should be subject to an FRA, that the sequential approach must be applied, and that less vulnerable elements of the site be located in Flood Zone B or preferably C.</p> <p>It is noted in the commentary on the settlement, and in the Justification Test for Enterprise & Employment that the undeveloped area in Flood Zone A and B is proposed for floodplain storage.</p> <p>The OPW notes that the area proposed for floodplain storage in the Togher Area Masterplan is smaller than the extents of Flood Zone A and B.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p> <p>While it is noted that the highly vulnerable New Residential lands to the north of Woodgrove Estate in Flood Zone B are subject to a live planning application and site works have begun, no commentary has been included to indicate that a Plan Making Justification Test has been carried out for these lands.</p>	
<p>Chief Executive's Response:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Portlaoise already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p> <p>The matter regarding Togher is noted, which would be subject to further review by the Planning Authority. Please refer to the updated SFRA which includes the Justification Test that includes the commentary of the Estate.</p>	
<p>Chief Executive Recommendation:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation and updated SFRA.</p>	

Section / Policy / Policy Objective / Zoning Map		SFRA and Map 8.9 (A) - Rosenallis
Draft Plan Submission / NOM Numbers		LS-C9-DCDP-98
Amendment No.		Strategic Flood Risk Assessment – Zoning Amendment No. 80
Proposed Material Amendment		
<ul style="list-style-type: none"> • Rosenallis <ul style="list-style-type: none"> ○ Zoning Amendment No. 80 Residential 1 to Open Space / Amenity 		
Proposed Material Amendment Submission Reference		LS-C24-4
<p>Summary of Issue:</p> <p>The OPW welcomes Zoning Amendment number 80 rezoning lands from Existing Residential to Open Space/Amenity. The mitigation measures outlined in the Justification Test for the Existing Residential zoned lands set out that development be restricted to extensions and renovations and changes of use, and that any future development be subject to an FRA.</p> <p>The measures outlined for the General Business zoned lands set out that the sequential approach must be applied, that less vulnerable elements should be located in Flood Zone B, or preferably C, and that only water compatible uses be located in Flood Zone A.</p> <p>The OPW recommends that these mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p> <p>Chief Executive's Response:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Rosenallis already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p> <p>Chief Executive Recommendation:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation.</p>		

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	Strategic Flood Risk Assessment - Stradbally
N/A	
Proposed Material Amendment Submission Reference	LS-C24-4
<p>Summary of Issue:</p> <p>The mitigation measures outlined in the Justification Test for the Town Centre and Existing Residential zoned lands set out that less vulnerable development in Flood Zone A be restricted to extensions and renovations, that highly vulnerable development can only take place in Flood Zone , and that an FRA is required for future development.</p> <p>The mitigation measures outlined in the Justification Test for the Industrial and Community Educational & Institutional zoned lands require that a detailed FRA is required for any further development, requiring that the sequential approach be applied, and that less vulnerable elements of the site be located in Flood Zone B or preferably C.</p> <p>The OPW recommends that these mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p>	
<p>Chief Executive's Response:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Stradbally already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p>	
<p>Chief Executive Recommendation:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation</p>	

Section / Policy Objective / Policy	N/A
Submission / NOM Numbers	N/A
Proposed Material Amendment No and text.	Strategic Flood Risk Assessment – The Swan
N/A	
Proposed Material Amendment Submission Reference	LS-C24-4
<p>Summary of Issue:</p> <p>The mitigation measures outlined in the Justification Test for the Village Centre and Existing Residential zoned lands set out that less vulnerable development in Flood Zone A be restricted to extensions and renovations, that highly vulnerable development can only take place in Flood Zone, and that an FRA is required for future development.</p> <p>The mitigation measures outlined in the Justification Test for the Industrial zoned lands require that a detailed FRA is required for any further development, requiring that the sequential approach be applied, and that less vulnerable elements of the site be located in Flood Zone B or preferably C.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p>	
<p>Chief Executive's Response:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>The Swan already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p>	
<p>Chief Executive Recommendation:</p> <p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation</p>	

Section / Policy / Policy Objective / Zoning Map	SFRA and Map 8.11 (A) - Timahoe
Draft Plan Submission / NOM Numbers	LS-C9-DCDP-98
Amendment No.	Strategic Flood Risk Assessment – Zoning Amendment No. 82
Proposed Material Amendment	
<ul style="list-style-type: none"> • Timahoe <ul style="list-style-type: none"> ○ Zoning Amendment No. 82 Village Centre to Open Space / Amenity 	
Proposed Material Amendment Submission Reference	LS-C24-4
Summary of Issue:	
<p>The OPW welcomes Zoning Amendment number 82 and 83 rezoning lands from Village Centre and Community-Educational & Institutional to Open Space/Amenity.</p> <p>The mitigation measures outlined in the Justification Test for the Village Centre and Existing Residential zoned lands set out that less vulnerable development in Flood Zone A be restricted to extensions and renovations, that highly vulnerable development can only take place in Flood Zone, and that an FRA is required for future development.</p> <p>The mitigation measures outlined in the Justification Test for the Community-Educational & Institutional and Tourism zoned lands require that a detailed FRA is required for any further development, requiring that the sequential approach be applied, and that less vulnerable elements of the site be located in Flood Zone B or preferably C.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p>	
Chief Executive's Response:	
<p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Timahoe already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p>	
Chief Executive Recommendation:	
Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation	

Section / Policy / Policy Objective / Zoning Map		SFRA and Map 8.11 (A) - Timahoe
Draft Plan Submission / NOM Numbers		LS-C9-DCDP-98
Amendment No.		Strategic Flood Risk Assessment – Zoning Amendment No. 83
Proposed Material Amendment		
<ul style="list-style-type: none"> • Timahoe <ul style="list-style-type: none"> ○ Zoning Amendment No. 83 CEI to Open Space / Amenity 		
Proposed Material Amendment Submission Reference		LS-C24-4
Summary of Issue:		
<p>The OPW welcomes Zoning Amendment number 82 and 83 rezoning lands from Village Centre and Community-Educational & Institutional to Open Space/Amenity.</p> <p>The mitigation measures outlined in the Justification Test for the Village Centre and Existing Residential zoned lands set out that less vulnerable development in Flood Zone A be restricted to extensions and renovations, that highly vulnerable development can only take place in Flood Zone, and that an FRA is required for future development.</p> <p>The mitigation measures outlined in the Justification Test for the Community-Educational & Institutional and Tourism zoned lands require that a detailed FRA is required for any further development, requiring that the sequential approach be applied, and that less vulnerable elements of the site be located in Flood Zone B or preferably C.</p> <p>The OPW recommends that the above mitigations and recommendations be incorporated into the Development Plan supported by settlement policy objectives.</p>		
Chief Executive's Response:		
<p>Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation which includes a revised DM FRM 1 (Flood Risk Assessments), which now includes wording referring to mitigation measures arising from the justification tests contained in the SFRA are noted and accepted.</p> <p>Timahoe already includes settlement policy objectives, which are considered to be consistent with the overarching strategy within the County Development Plan. In addition, the Draft Plan includes a range of flood risk and flood management policies, which have been drafted in accordance with the National Planning Framework, as well as and the <i>Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG, 2009)</i>.</p>		
Chief Executive Recommendation:		
Please refer to the response to the response to OPR MA Observation 2 – Flood Risk Mitigation		

SECTION 5. SEA / AA SCREENING OF THE MATERIAL AMENDMENTS TO THE DRAFT PLAN

The likely significant effects on the environment of implementing the proposed Material Amendments have been assessed and determinations in accordance with Section 12 (7) (aa) of the Planning & Development Act 2000 (as amended) prepared in relation to information on the likely significant effects on the environment of implementing the proposed Material Amendments.

Submission WM-C2-MA-2 from the EPA notes the proposed determination regarding the need for SEA of the Amendments and that SEA is not required for the amendments to the Draft Plan. Reference is made to the guidance document '*SEA of Local Authority Land Use Plans – EPA Recommendations and Resources*' which should be considered in the drafting of the SEA Determination together with the amendments to the Draft Plan. It is stated that the Council is required to ensure that the amended plan is consistent with national policy and the key actions and sustainable development goals contained within the EPA publication "Ireland's Environment: An assessment 2020". Reference is also made to a number of EPA websites and GIS Webtools. The submission also provides advice on the content of the SEA Statement which is to accompany the final Plan. It is advised that the Planning Authority consult with a number of Prescribed Environmental Authorities.

CHIEF EXECUTIVE'S RESPONSE & RECOMMENDATION

The following documents have been taken into account in undertaking the SEA for the plan and associated proposed material amendments:

- '*SEA of Local Authority Land Use Plans – EPA Recommendations and Resources*' guidance document
- Sustainable Development Goals
- Guidance, resource documents and webtools cited

Future modifications to the plan will be examined in compliance with the Regulations. The SEA has been and will continue to be informed by the cited webtool. The above authorities have been consulted with in compliance with the Regulations.

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

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

SEA and AA documents will be updated at adoption of the Plan to take account of decisions of the Members with regard to the Proposed Material Alterations and any further modifications.

SECTION 6. CONCLUSION

6.1 PROCEDURE FOLLOWING CONSIDERATION OF THE CHIEF EXECUTIVE'S REPORT

In accordance with Section 12(10) of the Planning and Development Acts 2000 as amended, the Members, having considered the Chief Executive's Report, shall, by resolution, make the plan with or without the proposed amendments, except where a decision is made to accept the amendment subject to any modifications of a minor nature.

The Laois County Development Plan 2021-2027 will have effect 6 weeks from the day that it is made.

John Mulholland

Chief Executive

Laois County Council

APPENDIX 1 LIST OF SUBMISSIONS

SUBMISSION REFERENCE	AUTHOR
LS-C24-1	BCF Architects
LS-C24-2	BCF Architects
LS-C24-3	Dolores Keogh
LS-C24-4	OPW
LS-C24-5	BCF Architects
LS-C24-6	Offaly County Council
LS-C24-7	Geological Survey Ireland
LS-C24-8	Transport Infrastructure Ireland
LS-C24-9	Environmental Protection Agency
LS-C24-10	Not Here Not Anywhere
LS-C24-11	Coillte
LS-C24-12	Rosdarragh Rathevan Residents Association
LS-C24-13	Laura Bergin
LS-C24-14	Irish Aviation Authority
LS-C24-15	Rita Walsh
LS-C24-16	BCF Architects
LS-C24-17	BCF Architects
LS-C24-18	Matthew Cahill
LS-C24-19	NTA
LS-C24-20	Electricity Supply Board
LS-C24-21	Irish Water
LS-C24-22	MKO
LS-C24-23	Department of Education
LS-C24-24	Office of the Planning Regulator
LS-C24-25	Iga & Naresh Dagar
LS-C24-26	Christy Bannon
LS-C24-27	Keep Ireland Open
LS-C24-28	Department of Housing, Local Government and Heritage
LS-C24-29	Joe & Aisling Byrne
LS-C24-30	Marc van den Bergh
LS-C24-31	Alan & Michelle Redmond
LS-C24-32	Wind Energy Ireland
LS-C24-33	Coillte
LS-C24-34	Hazel Thompson
LS-C24-35	Inland Fisheries Ireland
LS-C24-36	HSE