

SUBMISSION TO CLARE 2023 to 2029 DRAFT DEVELOPMENT PLAN

The scope of our submission is limited to access to and protection of our heritage, the countryside and the provision of walking and cycle routes for recreational purposes

Counties in bold are adjoining or in the Southern Region.

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

There are no provisions in the Draft to which we object.

We are concerned that many of the excellent provisions in the 2017 Plan haven't been carried forward to the Draft without any apparent reason. We will be referring to them in the course of our Submission. Therefore, we would ask you to look again to see if they could be included.

Index We submit that you should provide an Index, as recommended in the Development Plan Guidelines (5.15), and that the page numbers where topics are primarily dealt with should be bolded. See 2015 Plan.

Layout We submit that this can be improved by sub-numbering or sub-lettering lists of points and paragraphs. The present layout creates difficulties when referring to particular points.

Introduction

1 *The Planning and Development Act 2000 Sec 9(4) requires that the Plan must have regard to plans in adjoining counties.* See Carlow 1.1 1st para 2nd sentence.

2 *Co-ordinate the objectives in this plan with those in the adjoining counties, except where it is considered to be in appropriate or unfeasible and shall take into account any significant likely effects the implementation of the plan may have on the area of any adjoining county.* Taken from Wicklow Vol 1 1.4 4th para 1st sentence.

3 *This Plan must conform to the RSES for the Southern Region.*

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

5 *Ensure that the development plan is consistent with the strategy of the NTA.* Taken from Wicklow 1.4 5th para.

CHAPTER 8 Rural Development and Natural Resources

8.2.2 Development Plan Objective: Rural Innovation, Enterprise and Employment

CDP8.2 d)

We submit that you should include additional Objs:

1 *Only grant planning permission for new buildings or the expansion of existing industrial business enterprises in the countryside where the development would not cause a detrimental impact and is compatible with neighbouring land use. Any new building will be required to respect the appearance of and character of the landscape. It will not be acceptable where it is unduly prominent in the landscape, where it results in the build-up of development when viewed with existing and/or approved*

building or where the impact of 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 tor fails to protect and improve or is injurious to amenities(including visual amenities). Buildings should be kept simple and finished with material appropriate to rural settings and should reflect the size, scale and pattern of development in the area. Buildings of excessive height will not be permitted and should be sited to make use of existing hedgerows and topography to provide natural screening. Based on

Limerick County 5.6.1 Obj ED 025a), Nth Tipp 6.10 ENCON 12b) & d), Carlow 3.5 E.D Pol 6 2nd pt last phrase, 11.1.12.7 6th sentence & 11.12.12 & many other plans.

2 Only grant planning permission for a building in the countryside where the development would not cause a detrimental impact or erode rural character new building, will not be acceptable where it is unduly prominent in the landscape, where it results in the build-up of development when viewed with existing and/or approved buildings or where the impact of ancillary works, including the creation of visibility splays would damage rural character. Taken from Monaghan 15.16 RCP 1 1st, 2nd & last pts.

8.2.4 Development Plan Objective: Agriculture

CDP8.4 a)

We submit that you should include additional provisions:

Text

Commonage and other rough grazing land should be regarded primarily as an important recreational, environmental and amenity resource. Based on Galway City 4.6.2 1st para 1st sentence 1st phrase & Kilkenny 7.2.3 1st para last sentence.

Objs

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

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

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

3 Protect and conserve rural amenities, archaeological and natural heritage, landscape and the environment generally, from adverse impacts of agricultural practices and development particularly in high amenity areas. Ensure that it is appropriate in nature and scale and must be necessary for the efficient use of the farm. Ensure that it does not have an undue negative impact on the visual/scenic amenity of the countryside and identify mitigating measures where required. Integrate into the landscape. Ensure the highest standards of environmental protection in assessing planning applications. Based on Waterford County 6.7.1 2nd para (a), (d) & (e) & another plan.

8.3 Development Plan Objective: Natural Objective

CDP8.8

8.3.2 Development Plan Objective: Forestry

CDP8.10c)

We submit that you should include additional Objs:

Commercial forestry

1 Recognising the contribution that forestry makes to well being, develop, promote, provide, protect, improve and encourage the provision of greater public access to new and existing forestry, both state and private, for recreational activities such as walking, hiking, cycling, and other non-noise generating activities and the provision of nature trails, mountain trails, bridle paths and orienteering as part of a connected network of walking and cycle routes in cooperation with Coillte, the Forest Service, private landowners, local interest groups and other relevant stakeholders and agencies. Based on **Smarter Travel 2009-2020** Act 17 2nd sentence page 45, **2017 Plan** 9.3.9 10c), **Wexford** 15.5 RS 12 & 14, **Limerick County** 6.11 Obj 031a), **Kilkenny** 7.4 last para 1st sentence, **Nth Tipp** 4.5 EV27 & many other plans.

2 Retain existing rights of way and identify them and established walking routes before planting commences and maintain them as rights of way/walking routes. Taken from Cavan 3.9 EDP15 & EDO 31 & Sligo 4.3.2 P FOR 3.

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

4 Ensure that existing public rights of way, traditional walking routes are not obstructed. Taken from **Carlow** 3.5.12 E.D 18 3rd pt & many other plans.

5 Forestry must not be visually obtrusive in the landscape and ensure that it is carefully managed so that it doesn't result in damage to visual amenity or have a negative visual effect on the rural environment and character of the countryside and that it must enhance and be in harmony with the landscape, natural waters and wildlife habitats. Protect and safeguard scenic and exposed/elevated landscapes, nature conservation, monuments, archaeological sites, NHAs, Euro and other designated sites, archaeological sites and other historical or heritage features.

Based on **Kilkenny** 7.4 last para last sentence last phrase, **Laois** 5.10 Afforestation last sentence, **Limerick County** 5.6.2 Pol ED 20a), **Wexford** 6.4.8 Obj ED22, **Sth Tipp** 9.20 1st para (i) & (ii), **Nth Tipp** 4.5 Pol ENV 26 a) & c) & many other plans.

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

7 Ensure that development is appropriate in scale and character and doesn't have a negative visual impact on the countryside and is compatible with protection of the environment and nature conservation areas. Based on **Cork County** 6.10 EE 10-1 Forestry Last phase & another plan.

Commercial Forestry and Amenity Woodlands

8 Recognising the potential of forestry including Coillte's "open forest" policy, protect access to forestry and woodlands in co-operation with private owners for walking routes (including long-distance and looped walks), mountain trails, nature trails etc.

Based on **Carlow** 3.5.12 E.D Pol 18 2nd pt & another plan.

8.3.4 Development Plan Objective: Renewable Energy Development

CDP8.12

We submit that you should include additional Objs:

1 Developments must be appropriately/suitably located. Taken from Limerick County 8.5.4 Obj IN 056 1st phrase.

2 The Council will adopt a positive approach to renewable developments including any ancillary facilities or buildings, providing that proposals must be considered individually by taking into account their scale and layout and their incremental/cumulative effect due to other proposals, the degree to which impacts are highly visible over a vast area, their visual impact on scenic landscape as well as local visual impacts, impacts on archaeology. They should not create a hazard or nuisance, including the risk of land instability and take into account the character and appearance of the surrounding area, the openness and visual amenity of the countryside, landscapes, protected areas such as NHA,s, SPAs ,SAC,s and sites of historic or archaeological interest or in proximity to National Monuments. Development will only be permitted where they will not have an adverse impact on the environment including the protection of amenities and landscapes. Where impacts are inevitable mitigation measures must be taken into account or in the case of European conservation sites. Facilities can only be accepted if they comply with Art 6 of the Habitats Directive. Based on Nth Tipp Policy SERV 22: Renewable Energy Sources last phrase, Limerick County 8.5.4 Obj IN 056 d) &e) & many other plans.

3 In assessing development proposals the Council will take into account/take cognisance of public access to the countryside, the impact on the landscape, public rights of way and walking routes, protected or designated areas - NHAs, SPAs, national monuments and mitigation features where impacts are inevitable. Taken from Meath 11.15.1 1st para 3rd , 4th 6th & last para.

4 Support the development of a Regional Renewable Energy Strategy with stakeholders. Taken from RSES Southern Region Environment & Renewable Energy RPO 98.

B Wind Energy

5 Prepare Maps showing the degree of acceptability from prohibition to preferred including areas in adjoining counties considered unsuitable: See Cork County Fig 9.2.

Done: Cork Limerick Kerry & another county.

6 Undertake an analysis of suitable areas for wind energy and prepare a map showing the Landscape Suitability for Wind Energy Development in accordance with national guidelines including section 3.5 of the Wind Energy Guidelines(2006) and any subsequent revisions and as recommended in the LCA. Taken from Sligo 11.1 SO EN 2.

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

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

9 Ensure that the assessment of wind energy development proposals will have regard to the impacts on public rights of way and walking routes. Taken from Kildare 8.5 WE2 3rd pt last phrase.

10 *The assessment of wind energy proposals will include consideration the sensitivity of the landscape and adjoining landscapes, the scale, size and layout of the project, any cumulative effects due to other projects and the degree to which impacts are highly visible over extensive areas, the visible impact on protected views and prospects, designated scenic landscapes, local visual impacts, the impact on nature conservation and archaeology and the visual and environmental impacts of access roads and plant and grid connections* Taken from Kildare 17.11 1st para last sentence 1st to 4th & 6th pts.

11 *in assessing planning applications Council will have regard to existing and future international, European, national and regional policy directives and legislation.* Taken from Offaly 3.8 CAEP-37 (e).

12 *When considering an application for wind energy development Council may consider some, if not all, of the following: Landscape and visual impact assessment including the size, scale and layout and the degree to which the wind energy project is visible over a certain areas and in certain views, the visual impact of ancillary impact such as grid connections and access roads, the potential impact on natural heritage including direct and the indirect effects on protected sites, habitats of ecological sensitivity and, where necessary, management plans to deal with the satisfactory co-existence of the development in particular species /habitats identified and the potential impact on archaeological heritage.* Taken from Kilkenny 11.5.3 Development Management Guidance 5th to 9th pts.

Hydro Power

13 *In assessing hydro energy schemes proposals the Council will take into account the impact on public rights of way and walking routes.* Taken from Carlow 6.3.2 Pol 6 2nd pt.&

14 *Development must not have a negative effect on the surrounding environment, landscape and local amenities.* Taken from Fingal 7.3 Hydro Energy Obj EN7 last phrase.

15 *Due consideration should be given to protected species, nature conservation areas including SACs, SPAs & NHAs.* Taken from Offaly 3.8 CAEP-32.

Solar Power

16 *Make representations to the appropriate government department to make Planning Guidelines for ground mounted solar farms.*

8.3.6 Development Plan Objective: Minerals, Mining and Quarrying CDP8.14

We submit that you should include additional Objs:

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

Reason

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

2 *Restrict development of aggregate extraction, processing and associated concrete production which could impinge or impact on public rights of way or walking routes*

and satisfactorily address the **potential impact on recreational activities**. Based on Carlow 11.16 last para 1st pt & many other plans.

3 Prohibit development which could significantly impact on designated sites where these impacts cannot be satisfied by mitigation to ensure that development for aggregates/mineral extraction, processing and associated processes, in the vicinity of a recorded monument, sensitive landscapes and World Heritage Sites. Based on Wexford 6.4.5 EDO 9 1st sentence, Galway County 6.21 Obj EQ 1, Carlow 3.5.7 P 13 1st pt last phrase & many other plans .

4 In assessing applications for new quarries or extension to existing quarries the council will have regard to the visual impact on sensitive landscapes. Taken from Louth 3.8.1 DMC 1st para 2nd pt.

5 Take into consideration the retention of existing and additional screening either by natural or alternative means. Taken from Longford 4.6 MA 2m).

6 Applicants must recognise that the aggregates(stone and gravel deposits) and the concrete products industry have a particularly sensitive role. Taken from Laois 8.5 DM69 f) 1st phrase.

We submit that you should include an additional Sub Sec: **Electricity Transmission (including telephone & TV cables & Gas Infrastructure)**

Development Plan Objectives: Electricity Transmission

1 *Seek to locate electricity transmission lines in non-scenic areas where possible.

Taken from Galway County 13.9 DM Standard 31a) 1st sentence 1st phrase

* It would be better if **seek to** was omitted

2 The undergrounding of transmission lines (including telephone and TV cables) shall be considered first as part of a detailed consideration and evaluation of all available options and having regard to national guidance. Where avoidance is not possible full consideration should be given to the undergrounding of the lines. where technically feasible and environmentally appropriate, HV and other powerlines(including existing powerlines) and associated equipment should be placed underground to reduce the visual impact on the natural environment, possible interference with or damage to areas of archaeological importance from the visual intrusion of energy infrastructure in cooperation with other agencies as appropriate. Protect areas of recognised landscape importance and significant views from visually intrusive large scale energy transmission infrastructure especially in sensitive areas or areas of high visual amenity. Based on Nth Tipp 7.13.7 Pol SERV 28 1st sentence, Limerick County 8.5.3 IN 053b) & many other plans.

3 If, for whatever reason, Council has decided to permit overhead powerlines and television cables it is acknowledged that these powerlines can have an adverse impact on the natural environment and the character of its setting and natural heritage. Ensure that they are designed to have regard to possible interference with or damage to heritage sites, areas of archaeological importance, designated sites including pNHAs, cSACs, SPAs or sites of nature conservation. Minimise their obstructive impact and their visual intrusiveness particularly in mountain areas by their being integrated with their surroundings. Safeguard Natura sites and the sensitive, open character of areas of high visual amenity, high landscape designations and scenic

views. The route should be identified with due consideration for environmental impacts. Where impacts are inevitable mitigation must be taken into account in respect of Natura Sites. Networks must comply with Art 6 of the Habitats Directive. Based on Galway City Pol 9.14 last para, 2nd & 3rd pts, Limerick County 8.5.3 IN 049d) & e) IN 053a), Nth Tipp 7.13.7 Pol SERV 28 2nd sentence 1st to 3rd pts, Galway City Pol 9.14 last para 4th pt & many other plans.

4 Landscape Impact and Visual Assessments shall be submitted where a proposed development is located in landscapes in high amenity and mountain areas or have the potential to impact upon county landscape designations and important designated sites. They shall be screened for potential impacts on Natura 2000 sites. Based on Galway County 13.9 DMStandard 31a) last sentence & many other plans.

5 Ensure that proposed development is consistent with international best practice. Taken from Longford 5.5.1 EC 1 last pt.

6 When processing applications involving the siting of electricity powerlines and other overhead cables the following should be considered: Avoid areas of high value landscapes, where practicable, and areas of nature conservation and archaeological interest and minimise their visual impact. Taken from Limerick County 9.6.2 Last sentence 1st to 3rd pts.

CHAPTER 9 Tourism

9.2.3 Development Plan Objective: Tourist Developments and Tourist Facilities CDP9.4

9.2.7 Development Plan Objective: Tourism Corridors CDP9.6 a) & g)

9.2.8 Development Plan Objective: Business Tourism CDP9.7 a)

9.2.9 Development Plan Objective: Activity and Adventure Tourism CDP9.8 b) to e)

9.2.11 Development Plan Objective: Rural Tourism and Forestry Tourism CDP9.10

9.2.13 Development Plan Objective: Coastal Tourism CDP9.12 a) & b)

9.2.14 Development Plan Objective: Lakeland and Waterway Tourism CDP9.13

9.2.1 Development Plan Objective: Signage Management CDP 9.21 d)

9.3.2 Development Plan Objective: Tourism in South Clare and the Limerick-Shannon/ Metropolitan Area CDP9.22 a)

9.3.6 Development Plan Objective: Tourism and the Islands CDP9.27 a)

We submit that you should include additional Objs:

1 Protect the landscape from inappropriate tourism development by ensuring that developments and other activities associated with tourism or recreational activity do not cause damage, be detrimental to or detract from the traditional character or appearance of areas of scenic or visual amenities and ensure that the layout, design and associated infrastructure are of highest quality. Developments must be sensitively located and be sympathetic in manner with the environment, heritage and amenities. They must ensure the protection, maintenance and conservation of amenities, be compatible with their intensity, scale and balance and ensure that are not located where they would be detrimental to environmentally sensitive landscapes. Ensure the highest quality standards of design and materials so that there are no significant adverse impact on the environment in coastal areas, Natura 2000 sites, historic or archaeological sites, maritime heritage or the countryside generally. They must be integrated, assimilated and absorbed into the landscape to take advantage of natural screening and topography. Based on Waterford County 10.26 2nd pt, Cork County 8.8 Obj TO: 9-1 b) 2ndline, Limerick County 5.5.2 EDO17 1st phrase, Kerry 5.12 T-60, Galway County 4.14 Pol EDT – 1 & many other plans.

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

3 Safeguard our natural and cultural assets for future generations from unsuitable tourism projects. Taken from Kilkenny 5.3.6 para last phrase under Pol 5.3.6 Tourism Objectives.

CHAPTER 10 Sustainable Communities

10.12 Development Plan Objective: Physical Recreation and Active Living

CDP10.10 c) & d)

10.13 Development Plan Objective: Recreational Routes

CDP 10.11 a), c) & f) to h)

10.15 Public Rights of Way

AllText

We submit that you should include additional Text:

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

2 The Planning and Development (Amendment) Act 2000 makes it mandatory that the preservation of a public right way which give access to seashore, mountain, lakeshore, riverbank and other place of natural beauty or recreational utility which public right of way shall be identified both by marking them on at least one of the maps forming part of the development plan and by indicating their location on a list appended to the development plan. This is, by its nature, a lengthy process which will be conducted throughout the lifetime of this plan. Taken from Offaly 6.6 2nd & last para 1st sentence.

See also Cork County 13.7 & 2017 Plan 8.12.2 last sentence.

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

4 There is an excellent modus operandi for listing: Identify the existing public rights of way which give access to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity using the following methodology: Place an advert in local papers seeking submissions from the public to identify public rights of way which give access to seashores, mountains, riverbanks or other places of natural beauty or recreational utility. Identify existing rights of ways, paths and access points to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity. Identify access points to seashores, mountains, riverbanks or other places of natural beauty or recreational activity which the Council have maintained or repaired with a view to identifying public rights of way. Carry out a desktop analysis of public records, maps, aerial photographs and newspaper accounts to identify reputations of public rights of way. Once the list is compiled, advertise and put it on display, the public will be invited to make submissions on the validity of the public rights of way. Endeavor to verify and list the public rights of way and begin the formal process for designating rights of way under Section 14 of the Planning and Development Act 2000 (as amended). Vary the Plan to include the list. Taken from Wexford 15.9 RS 35.

**Development Plan Objective: Public Rights of Way
CDP 10.13**

We submit that you should include additional Objs:

1 Existing Public Rights of Way shall be identified prior to any new forestry planting, new infrastructural, energy/telecommunications or golf course developments. Taken from Kildare 14.12.2 RW 3 & Offaly 6.7 TRP-13. See also Carlow 8.12 Pol 6 2nd pt.

2 * Seek to identify further existing rights of way (Accompanied by mapping) and include any additional public rights of way identified in the Plan, by Variation. Taken from Meath 9.7.9 NH OBJ 9.

*It would be better if seek to was omitted

3 In accordance with the provisions of either Sections 206 or 207 of the Planning and Development Act 2000 encourage and facilitate the creation of additional rights of way and extend existing ones for pedestrian or amenity reasons to facilitate the development either by agreement/cooperation with landowners or by the use of compulsory powers, for the creation of public rights of way, particularly in areas of high amenity and recreational in the coast, uplands, seashores, lakeshores, river banks, forests, heritage and scientific sites, areas of historic, archaeological and recreational importance and National Monuments, to create a meaningful network and promote their greater use. Provide linkages from built up areas to the countryside and the coast. During the lifetime of the Plan carryout a survey of green links, footpaths, cycle ways and assess the potential of creating public rights of way. Based on Galway City 4.5.1 4th para 4th sentence 1st phrase, Kerry 9.10 last para, Carlow 5.3.2 Lat para 1st sentence & 8.12 Obj 4 1st pt, Sth Tipp 6.3.7 Pol AEH10 Access and Public Rights of Way last phrase, Kilkenny 8.6 last para & many other plans.

4 Ensure the provision of, and improvement to signposting and waymarking on all public rights of way. Based on Carlow 8.12 Obj 4 last pt last phrase & another plan.

Reason: Its most important that public rights of way are marked on the ground because:

- 1 Walkers need to know of their existence to encourage usage
- 2 Signage would alert local residents to planning applications affecting the integrity of public rights of rights of way
- 3 Directional signage during the course of the route would prevent involuntary trespass on private property and prevent walkers getting lost which might impinge on walker safety.

5 Designate Pilgrim Paths as public rights of way.

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

penal mass stations and consider designating them as public rights of way.

6 Examine the feasibility of identifying and mapping new Public Rights of Way in recreational and amenity areas in the context of emerging national guidance. Taken from Offaly 6.8 TRO-22.

7 Council recognises the importance of promoting and supporting the preservation, protection, enhancement, maintenance and improvement, for the common good, of all public rights of way particularly those giving/providing access to state and semi state land and to seashores, mountains, uplands, lakes, water corridors, river banks, archaeological sites, National Monuments, geomorphological features of heritage value, and other places of natural beauty or recreational utility/activity by ensuring that development doesn't impinge thereon. Based on Kilkenny 8.6.1 1st phrase, 8.6 Obj 2, 8.6 2nd para 1st sentence 1st phrase & 14.12.2 1st phrase, Kerry 9.10 SC 50, Galway County 10.13 PRW1, Wexford 15.9 Obj RS34 1st sentence & many other plans.

8 Prohibit development that might have a negative effect on public rights of way and keep them free from obstruction, particularly those at seashores, mountains, lakeshores, along inland waterways, riverbanks or other places of natural beauty or recreational activity and take legal action, if necessary, to prevent any attempt to close them off. Based on Wexford 15.9 Obj RS36 & many other plans.

9 Look favourably on planning applications which include proposals to improve the condition and appearance of existing rights of way. Taken from Carlow 8.12 Pol 6 7th pt.

10 Development will not be permitted where a public right of way might be prejudiced, unless specific arrangements are made for suitable alternative linkages and that the developer can demonstrate that the level of amenity is maintained by:
(i) **the footpath/bridleway being diverted by the minimal practical distance and that the route continues to be segregated from vehicular traffic;**
(ii) **Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it;**
(iii) **the diverted route is of at least equal character and convenience.** Based on Mayo Vol 2 40.2, DLR 4.1.2.3 LHB14 5th pt, Laois 7.21 PRW6, Leitrim 4.5.12 & Fingal 5.2 Obj RF118 2nd phrase.

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

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

13 *Council will use its powers under the Planning Acts to preserve, protect, maintain and enhance existing rights of way which give access to seashore, uplands, riverbank or other places of natural beauty or recreational use.* Taken from **Kilkenny** 8.6 2nd para last sentence.

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

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

We submit that you should include an additional Sub Sec: Recreation and Sport Development Plan Objective: Recreation and Sport

a) *Support development, in co-operation with various stakeholders to promote, preserve, improve, encourage public access to lakes, beaches, coasts, riversides, uplands and other areas that have been traditionally used for outdoor recreation and extend recreational amenities including riverside and XXXcanal walks.* Based on **2000 Planning and Development Act** Sec 10(2)(j), **Galway County** 10.11 Pol RA 1 & many other plans.

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

c) *Implement the "Outdoor Recreation Plan for Public Lands and Waters in Ireland 2017-2021" and any subsequent edition in conjunction with stakeholders in the design of recreational facilities.* Taken from **Offaly** 6.8 TRO-17.

d) *Continue the development of projects for submission under the Outdoor Recreation Infrastructure Scheme and other funding schemes (e.g. LEADER Programme).* Taken from **Kilkenny** 5.3.6 5H.

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

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

f) *Development proposals for Noise Generating Sports will not normally be permitted unless there is no conflict with the enjoyment of areas used for informal recreation or unacceptable disturbance to wildlife.* Taken from **Kilkenny** 8.5.5 Development Management Requirements 2nd & 3rd pts.

g) Adopt Bye-laws banning the use of motor bikes and quads (except for bona fide agricultural purposes) in privately- owned areas of rough grazing (including commonage) and motorised para gliders.

Note: Louth & Sligo have adopted bye-laws.

h) Development won't normally be permitted unless it doesn't result in damage to sites of nature conservation or important features of archaeological heritage or where it could cause harm to the appearance and character of the landscape and where it can be readily absorbed into its surroundings by taking advantage of existing vegetation and/or topography, or where enjoyment of the countryside isn't adversely affected by the nature, scale, extent, frequency or timing of the proposed activities including any noise likely to be generated and where ancillary development shall be small in scale, designed to a high standard and be sympathetic to the environment in its setting, layout and landscaping. Taken from Carlow 8.11.2 Outdoor Recreation in the Countryside 1st, 3rd, 4th pt last phrase & 5th pts.

i) Support the protection, improvement and extension of recreational amenities and preserve their recreational attractions such as scenic beauty, woodlands, waterways, coastal areas and beaches, natural heritage, the character and distinctiveness of scenic landscape and environmental quality. Based on Offaly 6.8 TRO-03 & Wicklow Vol 1 7.3 Strategic Objs 8th & last pts.

CHAPTER 11 Physical Infrastructure, Environment and Energy

11.2 5 Development Plan Objective: Walking and Cycling

CDP1.5 b) to d), f) & h)

WALKING

We submit that you should include a **Table with maps of Way-marked Ways including medium/long-long distance walking routes, Greenways, Sli na Slainte, heritage/historic walking trails, pilgrim paths, paths to mass rocks and holy wells, looped walks, hill walks, forest walks and other defined walking trails. A data base should be set-up and up-dated as new trails emerge and should be included in your web-site. See Kerry 5.4 1st para last sentence & M 5.1, Kilkenny Fig 8.1.1 & many other counties.**

To this you should add: **Following the adoption of the Plan a temporary register of additional routes shall be maintained and should be included on the web site pending inclusion in the next Plan.**

We submit that you should include additional Objs:

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

2 Support the provision of proposed long distance walking trails that provide access to scenic uplands, riverine and coastal features. Taken from Fingal Chpt 5 Obj Walking Trails RF114 1st phrase.

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

4 The Council will co-operate with relevant agencies, both public and private, including the National Trails Office, the NWMWAC, Coillte, the Heritage Council, adjoining councils, community groups local landowners and other relevant bodies to support the development, maintenance, facilitation and enhancement of short, medium and long distance hiking/walking routes, community walks, looped walks, heritage trails and off-road trails particularly in the uplands. This will include consultation with adjoining councils with a view to promoting routes extending beyond the county boundary. Based on Kildare 14.12 CR6 1st phrase, DLR 4.1.2.16 para under Pol 2nd & 3rd sentences, Laois 5.13 TM21 1st sentence & Meath 4.6.8 ED OBJ9.

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

6 Established walking routes shall be identified prior to any new forestry planting, new infrastructural, energy/telecommunications or golf course developments. Taken from Kildare 14.12.2 RW 3. See also Carlow 8.12 Pol 6 3rd pt.

7 Preserve and protect and, where possible, enhance, the integrity of existing public walking and access routes (including long distance walking routes) which contribute to the general amenity. Based on Carlow 5.3.2 Pol 8 8th pt 1st phrase, Cork County 10 2 TM 2 1b) 1st phrase & many other plans.

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

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

10 Prohibit the intrusion of development along public walking routes, particularly those in scenic areas so that development does not impinge on or have negative impact on these routes particularly at seashores, mountains, lakeshores, river banks or other places of natural beauty or recreational activity and those in scenic and high amenity areas and along inland waterways. Based on Wexford 15.9 Obj RS36, Carlow 5.3.2 Pol 8 7th pt & another plan.

11 Maintain and signpost walking and pedestrian routes. Based on Leitrim 3.10 7 Obj 109 & Meath 4.6.8 2nd para 1st sentence. See also Carlow 8.11.10 Obj 3 1st pt in line 1.

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

CYCLING

We submit that you should include a Table of Cycle routes with maps: See Kilkenny Fig 8.1 & many other counties. To this you should add: **Following the adoption of the Plan a temporary register of additional routes shall be maintained and should be included on the web site pending inclusion in the next Plan.**

13 Cycle routes/lanes should be designed and maintained using current thinking and best practice from experience in other locations, lower speed limits and priority over

motorised transport to ensure road safety for pedestrians and cyclists and in accordance with the Cycle Manual NTA 2011. Based on Roscommon 8.7.1 42 2nd sentence & Offaly 8.9 SMAO-07.

14 Promote, support and facilitate the development and enhancement of long distance routes by implementing the recommendations and proposals within the NCN Scoping Study(2010). Based on 2017 Plan 8.2.9 13a) & Galway County 5.4 Obj TI 19.

15 Support the development, maintenance and enhancement of trails and routes in co-operation with the Sports Council, the NTA, the NTO, the NWMWAC, the Heritage Council and other bodies to develop cycle touring routes including those linking with adjoining counties particularly in areas of high amenity. Based on Kerry 5.5 T26 1st phrase, Carlow 5.3.2 Pol 8 16th pt & another plan.

16 Produce cycle maps. Taken from NCPF 2009 Pol 6.2 1st sentence.

17 Support community, authority or agency led projects that would deliver identified strategic cycling links. Taken from Laois 6.1.1 TRANS 38 1st phrase.

18 Promote, maintain, enhance, facilitate and support the development of an integrated coherent countrywide cycle network as part of a wider National Cycle Network (2009). Based on Limerick County 6.10.3 Obj COM 026& Cork County 10.2 TM 2 2d) 1st sentence.

WALKING & CYCLING

19 Support, promote, identify establish and actively encourage the provision, development, extension and design of off road interlinked walkways and cycleways (mention routes) including long distance walkways and particularly those with historic associations in conjunction with the Irish Sports Council, IW and other stakeholders to link with a strategic network of trails from residential areas, open spaces and existing or new public rights of way to provide access to scenic, mountain, lakeshore and river features and to link with adjoining counties, including cross border counties in partnership with their councils, the state, private and voluntary sectors. Based on Kilkenny 8.3 1st para last sentence, Carlow 8.11.10 Pol 5 2nd pt & many other plans

20 Support the progression of long distance linear green ways and further develop and improve cycleways, walking trails and paths and develop links with adjoining counties. Taken from Kilkenny 8.4 7th para.

21 Walking and Cycling will be promoted, developed, facilitated and encouraged in accordance with initiatives contained in "Smarter Travel 2009" by improving existing cycleways and by developing a network of safe maintained and guarded cycle routes and footpaths on existing roads. Ensure, where possible, that cycleways and footpaths are effectively separated from major vehicular carriageways. Provide, promote, improve and extend the network of off road cycle and walking routes on all new road improvement or redesigned schemes including regional, local distributor and local collector roads and on roads being up-graded, to ensure personal safety, particularly at night and a more convenient, pleasant, attractive and comfortable environment. Support the installation of infrastructure measures e.g new and wider pavements, road crossings, retrofitted, if necessary, which would facilitate and encourage safe walking and cycling. Based on Smarter Travel 2009 - 2020 Cycling and Walking 1st para 2nd sentence last phrase, Limerick County 6.10.3 Obj COM 029 b), Kerry 5.4 T20 & many other plans.

22 Signpost and waymark walking and cycle routes with appropriately designed quality signage and information boards. Based on Nth Tipp 6.11.3 3rd line, Carlow 5.3.2 Pol 8 12th pt 2nd line & many other plans.

23 Encourage the provision of access routes to amenity areas in co-operation with landowners and protect amenity areas from inappropriate development and will seek to extend those spaces and pathways that can usefully form green links, footways and cycleways to connect residential areas with parks and open space and with each other. Taken from Kilkenny 8.4 4th para last sentence.

24 Seek opportunities for the development of suitable walking routes, cycle tracks and bridle paths along historic access routes. Explore the potential of inter-county trails(named). Augment existing networks and trails at key heritage sites. Based on Action Plan for Rural Development 2017 Pillar 3 Action 200, Leitrim 3.6.3 Obj 29 & Longford 4.5 Mid-Shannon Wilderness Park(sic) last para & 5.1.3 PED 3: 2nd sentence 1st phrase.

25 Develop and promote a Walking and Cycling Policy/Strategy within two years of the adoption of the Plan, working in partnership with statutory bodies, private and voluntary sectors, landowners and other stakeholders with a view to establishing a register of walking routes and the legal status of same, the mapping and promotion of guided walks developing links with adjoining counties. The Strategy should list trails, evaluate these routes and make recommendations for their promotion that would address, inter alia, the possibility of cycle-ways in recreational areas and along river banks, car parking for walkers and cyclists and improved signage. Based on National Physical Activity Plan for Ireland App1 32, Limerick County 6.10.3 Obj COM O27 b) & many other plans.

26 Provide adequate car parking and/or lay-bys for walkers and cyclists, (from your local knowledge name important locations) **and other appropriate points to facilitate access to amenity/scenic areas from 9am until dark.** Based on Kerry 5.4 T-20 3rd line, Nth Tipp 7.5.7 Obj INF 28 7th line & many other plans.

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

Note: The primary responsibility for the provision of car parking lies with councils

27 Establish new Walkways and cycle routes on a legal and permanent basis. Taken from Carlow 5.3.2 Pol 8 12 pt 1st line & another plan.

28 Develop a strategy to support and underpin funding for the development, extension and enhancement of walking/cycling trails, greenways and continue to engage with funding agencies such as the DoTTS, the NTA, the Heritage Council and associated transport agencies and LEADER. Based on Action Plan for Rural Development 2017 Pillar 3 Action 167, Galway City 4.7 Community Spaces Medium/Long Term 3rd pt 8th sub pt & many other plans.

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

30 Bring mountain amenities closer to residential communities by promoting the establishment of a network of formal footpaths, off road paths and cycleways that are attractive and that facilitate casual walkers and cyclists. Taken from Sth Dublin 9.4.0. Pol 16.5.

31 Actively encourage the use of off road routes including disused railines and bridle paths to develop medium and long distance walking and cycle as well as the development of linkages between existing and new trails particularly those with historic associations in adjoining counties, in co-operation with IW and other relevant stakeholders to provide linkages with trails in adjoining counties in partnership with their councils. Taken from Roscommon 8.7.1 Pol 8.39 1st sentence.

32 Support alternative “quiet” routes which are signposted for cycling and walking to improve the experience and uptake of active travel. Taken from RSES Southern Region 6.3.6.10 Walking and Cycling 9th pt.

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

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

35 Council may seek to incorporate the provision of pedestrian and cycleways routes to link amenities and points of interest as a condition of planning permission. Taken from Kilkenny 8.4 4th para 1st sentence.

36 Ensure the protection and maintenance and where feasible improvement of walking and cycling routes and the public footpaths network are. Based on Roscommon 8.7.1 Pol 8.37, Mayo Vol 1 Chpt 3 Pedestrians & Cyclists 1st sentence & Cavan 9.6.1 RTO3 last phrase.

11.2.12 Public Rights of Way Text

Development Plan Objective: Public Rights of Way CDP11.20

We submit that this should be replaced by: *Preserve public rights of way as set out in Appendix 6.*

11.6 Noise, Air and Light Pollution

11.6.1 Noise Pollution

All

11.6.3 Light pollution

All

11.8.5 Development Plan Objective: Renewable Energy

CDP11.47 b) to d) f) & h)

Development Plan Objective: Renewable Energy Strategy

CDP11.48

Development Plan Objective: Renewable Energy

CDP 11.49 Development Plan Objective: Power Stations and Renewable Energy

CDP11.50 b)

11.8.9 Development Plan Objective: Telecommunications Infrastructure

CDP 11.55

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

1 Require the identification of Public Rights of Way and established walking routes prior to any new telecommunication developments (including associated processes) which will be prohibited if they impinge or impact thereon or on recreational amenities or public access to the countryside or on the natural environment. Taken from Sth Dublin 7.4 Obj 6. See also Wexford 9.3.1 Obj TC07 & Carlow 6.1 Pol 1 7th pt.

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

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

CHAPTER 13 Marine, Coastal and Island Management

13.3 Development Plan Objective: Environmental Designations in Coastal Areas

CDP13.1 b) & c)

13.5.5 Development Plan Objective: Marine Spatial Planning

CDP13.3 a) & d)

13.6 Development Plan Objective: Offshore Renewable Energy Development

CDP13.15 a)

13.12 Development Plan Objective: Jetties, Harbours, Quays and Piers

CDP13.9 c) & d)

13.4.1 Development Plan Objective: Coastal Erosion and Flooding

CDP13.11

13.16 Development Plan Objective: Protection of Beaches and Sand Dunes

CDP13.133

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

1 Promote, plan, develop and support, in conjunction with the Councils in adjoining counties and other partner agencies the development and use of a strategic waymarked coastal path/greenway along the entire coastline. Based on Wexford 13.7

CZM2 1st sentence, 15.5 RS22 1st phrase & 23 1st phrase, **Galway City** 4.5.1 1st para 1st phrase & another plan.

Notes:

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

2 Promote and support the development of an inter-county coastal path linking, Galway Mayo and Sligo. Taken from Mayo Vol 1 Chpt 4 Access to Heritage and Amenities AC 03.

3 Provide, support, actively promote, maintain, protect, improve and enhance public access to the coast, beaches, seashore, coastal heritage and scenic landscapes in co-operation with landowners, relevant stakeholders, local groups and with statutory and relevant organisations for recreational activities including walking and cycling. Where feasible, develop walkways/cycleways between the coast and green spaces in built-up areas. Based on **Wexford** 13.7 CZM22 1st phrase, 24 1st phrase, 26 1st sentence 1st phrase & 2nd sentence 1st phrase, 13.9 CZM31 & 15.6 RS 23 1st phrase, **Kerry** 5.4 T22, 5.9 T38 & T44 1st phrase, **Cork County** 4.9 RC1 9 5a), **Waterford County** 6.13 Pol ECD 24, & 8.15 Obj CP5 & many other plans.

4 Examine the designation of traditional walking routes to the coast as public rights of way. Taken from Fingal 9.5 Obj NH65 3rd phrase.

5 Protect, conserve, safeguard, preserve, manage and enhance the special character of the coast and beaches for its visual, scenic, economic, recreational and environmental quality and distinctiveness, its seascapes and as a valuable local amenity. Based on **Project Ireland 2040 NPF** National Policy Obj 41a, **Galway County** 9.9 Obj 10 1st & 3rd sentences, **Kerry** 5.1 T4 & many other plans.

6 Proposals for tourism development in coastal areas must demonstrate that there will be no negative impacts on amenities or the integrity of the natural environment. Taken from **2017 Plan** CDP 9.12 in line 2.

7 Prohibit mineral extraction along the coast, particularly in proximity to estuaries except in exceptional circumstances, where it can be demonstrated that there will be no significant adverse impact on the environment, visual amenity, heritage or the conservation objectives of Euro Sites. Taken from Fingal 5.3 Obj RF94.

8 Prohibit development of facilities for fishing and leisure developments where the siting of such installations and supporting infrastructure could cause landscape and environmental degradation or instability, have adverse effects on natural heritage or designated sites, detract from the visual amenity of an area or public access to beaches. Based on **Waterford County** 6.15 Pol RCD 25 last phrase & another plan.

9 Introduce bye-laws restricting or prohibiting jet-skiing and water skiing. See Louth Harbour Bye-Laws 200.

10 Protect established rights of way to coastal areas. Taken from Louth 2.7 CON33.

11 In assessing proposals for Water Sports Development Ensure that the following criteria are satisfied: that proposals are fully compatible with existing use, will not result in damage to nature conservation or archaeological features, can be integrated

into the seascape landscape, will not have an unacceptable impact on visual amenity especially in locally important scenic areas and will not unduly restrict access. Taken from DLR 8.2.10.5 (ii) 1st pt 1st phrase, 2nd pt, 3rd pt 1st phrase, 4th & 6th pts.

12 Strictly control the nature and pattern of development and ensure that it is designed and landscaped to the highest standards and sited so as not to detract from visual amenities. Development must accord with its surroundings in scale, density, height, massing, layout and must not have a detrimental impact on skylines or important views. Development shall be prohibited where it poses a significant or potential threat to coastal features.

Galway County 9.9 NHB 8 c), **Kerry** 10.16.1 NE59, **2017 Plan** 12.3.15.14a) & many other plans.

13 Protect the special character of the coast by preventing inappropriate development along the coastline, particularly along the seaward side of coast roads. Taken from Fingal 9.5 Obj NH 59 1st sentence.

**13.18 Development Plan Objective: Island Development
CDP13.15**

CHAPTER 14 Landscape

14.2.1 Landscape Character Assessment

14.2.1.2 Landscape Character Types

All

14.2.1.3

Text

Development Plan Objective: Landscape Character Assessment

CDP14.1

14.3 Living Landscapes

14.3.2.1 Development Plan Objective: Settled Landscapes

CDP14.2 1st para II & III

14.3.2.3 Development Plan Objective: Heritage Landscapes

CDP14.5

14.4 Seascape Character Areas

All

14.5 Views and Prospects

All

Map 14A Landscape Designations

We submit that you should include additional Objs:

1 Provide and increase managed public access to interesting and attractive

landscapes or to semi-natural and landscape amenity areas for recreational purposes.
Based on **Cork City** Obj 10.3 & another plan.

2 Preserve, maintain and enhance the visual integrity of the rich heritage of hill and upland areas which have retained a predominately undisturbed upland character.

Based on
Laois 7.19 LS01 1st phrase & 30 & Kildare 14.8.3 LU 4.

3 Preserve the status of traditionally open/unfenced landscapes including commonages and other hill land. Taken from **Galway County** 9.11 Obj LCM 3 1st sentence..

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

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

Text

1 It is a requirement of the Planning Regulations 2001 Art 9(1)(a)(x) that the fencing or enclosure of land open to or used by the public during the ten years preceding such fencing or enclosure for recreational purposes or as a means of access to any seashore, mountain or other place of natural beauty or recreational utility, requires planning permission. Taken from **Kilkenny** 7.2.4 1st para 1st sentence.

2 Wire fencing constitutes visual pollution and destroys the “away from it all” feeling which makes upland areas such an attraction. Taken from **Kilkenny** 7.2.4 1st para 2nd sentence.

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

Obj

As new fencing of land open to or used by the public during the ten years preceding is not exempt development in accordance with Art 9(1)(a)(x) of the Planning and Development Regulations the following criteria will be used when assessing planning applications for new fencing of hitherto open land. Fencing, particularly in upland, highly scenic or amenity areas, will not normally be permitted unless such fencing is essential to the viability of the farm. The nature of the material to be used, the height of the fence, and in the case of a wire fence the type of wire to be used will be taken into account. Stiles or gates at appropriate places will be required. Barbed-wire will not be used for the top line of wire. Based on
Kilkenny 7.7.1 Development Management Requirements last para, & many other plans.

Notes

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

2 As wild goats are now being extensively used in fighting gorse fires it is recommended not to fence in these areas.

CHAPTER 15 Biodiversity, Natural Heritage and Green Infrastructure

15.2.2 Development Plan Objective: Biodiversity CDP15.1 b), e) & f)

CDP15.2

We submit that you should include additional Objs:

1 *Work with the Heritage Forum (if any) in order to deliver, support and promote the aims, objectives and actions of the County Heritage Plan and any revision thereof in relation to the protection of the natural heritage and implement, promote and actively work in partnership with the Heritage Council, the OPW, the NPWS, the NMS, community groups, the public and other relevant stakeholders. See our web-site (insert address). Based on Sth Tipp 6.5 Pol AEH 14 & many other plans.*

2 *Investigate the possibility of re-establishing a Heritage Forum during the course of this Heritage Plan.* Taken from Heritage Plan 2.1.1.

Development Plan Objective: European Sites CDP15.3

We submit that you should include an additional Obj:

1 *Maintain and where necessary restore, the conservation value of Euro, NHA, SPA and SAC Sites.* Taken from Sth Tipp 6.3.3 Designated Environmental Sites 2nd para 1st pt 1st phrase & Nth Tipp 8.4.10 4th para 1st pt 1st phrase.

15.2.3 Appropriate Assessment All

15.2.4 Development Plan Objective: Natural Heritage Areas and proposed National Heritage Areas CDP15.5

We submit that you should include an additional Obj:

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

We submit that you should include additional Sub Secs:

A Ramsar and other similar sites

Conserve, preserve and protect the integrity of and maintain the favourable conservation value/status within or adjacent to Ramsar Sites, Statutory Nature Reserves, Biogenetic Reserves, and Wildfowl Sanctuaries, all existing and future NHAs and proposed NHAs. These should be designed and sited so as to minimise their impact on the ecological and landscape values of these sites under National and European legislation (including the Convention on Wetlands of International Importance) and International Agreements and maintain and develop linkages between them. Prohibit development which would damage or threaten their integrity. Based on Kerry 10.2 NE-13 1st sentence, Wexford 14.2 Obj NHO1 & many other plans.

B Other Sites

1 Conserve and protect habitats and species listed in the Annexes of the EU Habitats Directive(92/43/EEC) (as amended), the Birds Directive (2009/147/EC), Directive Annex 2, the Wildlife Acts 1976 to 2000, The Wildlife Acts 1976(as amended) and the Flora Protection Order No 94 of 1999. Based on Waterford County 8.18 Pol 14 & another plan

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

3 Identify and map protect local areas of high nature conservation value and support the landscape features which are of major importance for wild fauna and flora in accordance with Art 10 of the Habitats Directive. Based on Kilkenny 9.2.2 Obj 9A 1st phrase & another plan.

4 Support and co-operate with statutory authorities and others in support of measures taken to manage proposed or designated sites in order to achieve conservation objectives. Taken from Offaly 4.16 BLP-3.

5 Ensure that development does not have an impact, incapable of satisfactory avoidance or mitigation on plant, animal or bird species protected by law. Taken from Offaly 4.16 BLP-05.

6 Protect, and where possible, enhance, wildlife habitats and landscape features which act as ecological corridor/networks and stepping stones, such as river corridors, hedgerows and road verges so as to minimise the loss of habitats and features of the wider countryside (such as ponds, wetlands and trees) which are not within designated sites. Taken from Kilkenny 9.2.2 Development Management Requirements 2nd pt.

7 *Seek to control the impact of visitor numbers to avoid significant effects including loss of habitat and disturbance. Taken from Kilkenny 9.2.1.1 Visitor and Habitat Management 1st sentence 1st phrase.
*It would be better if seek to was deleted.

15.2.5 Development Plan Objective: County Geological Sites CDP15.6 a)

We submit that you should include additional Objs:

1 Promote, encourage, facilitate and support access and public rights of way to geological and geo-morphological features of interest in cooperation/consultation with landowners(when appropriate/practicable). Based on Kilkenny 9.2.4 last para last sentence & many other plans.

2 Increase pedestrian access and co-ordinate the continuing development of strategic walking routes/cycling trails and other countryside recreational opportunities. Based on Cavan Geological Heritage Obj 8.5 NHEO11 & Offaly 4.17 BLO-08 1st phrase.

3 Where appropriate restore geological sites. Taken from Mayo Vol 1 4 Natural Heritage (e) last phrase.

4 Promote the preservation of sites of Geological and Geomorphological importance, including proposed NHAs and CGs that become designated during the lifetime of the Plan. Taken from DLR 4.1.3.9 Pol LHB27.

5 Protect and preserve county geological sites, including those in their vicinity and maintain the character and conservation value of features and areas of geological interest, from inappropriate development that would adversely affect their existence or value. Based on Offaly 4.16 BLP-09 1st phrase, Wicklow Vol 1 10.3.5 NH26 & Roscommon 7.2 Obj 23 1st phrase. **See also Cork County 12.2 Geological Sites HE 2-6, Waterford County 8.28 Pol NH 27, Galway City Pol 4.2 6th para, Waterford County Pol NH 27 & Kerry 10.5 NE 27 last phrase.**

**15.2.6 Development Plan Objective: Burren National Park, Wildlife Sanctuaries and Nature Reserves
CDP15.7**

We submit that you should include an additional Obj:
Enhance and promote our National Parks. Taken from Action Plan for Rural Development 2017 Table 1 Pillar 3 last pt last phrase.

**15.2.7 Development Plan Objective: Non Designated Sites and Biodiversity
CDP15.8**

**Development Plan Objective: Natural Heritage and Infrastructure schemes
CDP 15.9**

1. We submit that you should include additional Objs:

1 Designate traditional walking routes to the uplands as public rights of way. Taken from Sligo 6.7.4 POR 16 last phrase.

2 *Seek to negotiate access to lands for amenity purposes using access agreements, where appropriate and feasible. Taken from Fingal 5.2 Obj RF 119.
*It would be better if seek to was omitted.

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

4 Recognizing the role played by natural amenities and landscapes, support, promote, encourage and facilitate, public access to heritage sites, features of archaeological interest, natural heritage, amenity areas, including Natura 2000 sites, nature reserves, mountains, uplands, moorlands, forests, rivers, lakes, valleys, scenic areas, areas of natural beauty and other natural amenities traditionally used for recreation, and to the countryside generally, by creating a meaningful network of access routes as the opportunity or need arises in co-operation with landowners and other relevant stakeholders. Based on Nth Tipp 8.3.5 Pol HERT 19 1st phrase, Sth Tipp 6.3.7 Pol AEH10 last phrase & many other plans.

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

6 Adopt a regional approach to the protection, conservation and management of the environment by co-operating with adjoining councils to ensure that the natural environment is maintained to encourage a collaborative and consistent policy that

could identify threats to the integrity of sites through a transboundary approach.

Based on Leitrim 1.10.2 g) 1st phrase & Monaghan 6.5 HLP 10.

7 Protect amenity areas from inappropriate development. Taken from Nth Tipp Policy HERT 19 last phrase.

8 Council recognises the important role of the environment through diversity, quality, integrity and quality of life by promoting the protection, conservation and enhancement of the natural environment as an integral part of all development.

Taken from Kilkenny 9.2 last para.

9 Preserve the open character of commonage land and other hill land and secure access over paths and tracks through consensus with landowners, particularly in mountain areas. Taken from Wicklow Vol 1 10.3.7.

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

15.2.8 Environmental Impact Assessment

All

15.2.10 Development Plan Objective: Biodiversity and Habitat Protection
CDP15.12 a) to d)

15.2.12 Habitat Fragmentation

All

15.2.13 Development Plan Objective: Biodiversity on Local Authority Lands
a) & c) to e)

15.2.14 Development Plan Objective: Inland Waterways and River Corridors
CDP15.16

a), b), c) 1st phrase, d), e) 1. & II

Table

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

We submit that you should include additional Objs:

1 Recognising the importance of rivers, riparian corridors and buffer zones for their natural amenity and scenic values including rivers and XXXcanals in the facilitation and creation of linear parks, in co-operation with landowners, WI, the NPWS, Government Departments, community groups and other councils to develop their infrastructure, quality and amenity. Provide promote, develop, maximise/expand, create and facilitate/accommodate access for suitable walking, cycling tracks/routes, bridle paths and other compatible recreational activities. Based on Carlow 8.11.8 1st para 1st sentence 1st phrase, Wexford 15.6 Obj RS 24st phrase & many other plans.

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

3 Provide land adjacent to river and canal banks and lakeshores free from development. Reserve, preserve and set aside, for public access, an undisturbed buffer zone between new development and river corridors and other water bodies to facilitate the creation of linear parks to accommodate walking and cycling routes and

to encourage increased recreational opportunities. Based on **Waterford City** 10.3 Pol 4th pt last phrase & another plan

4 Take into account any proposal to increase and enhance public access to inland waterways as a condition of any development granted. Based on **Carlow** 8.11.8 1st para last sentence c) & another plan.

5 Strengthen the network of waterways at regional level. Taken from **Kildare** 13.10.2 GI 18 last phrase.

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

7 Promote the removal of historic culverts and infilling of water courses. Taken from **Offaly** 4.16 BPL-22.

8 Improve aquatic riparian strips free from inappropriate. development. Taken from **Kerry** 10.7.1 NE 36.

9 Where necessary, restore the conservation value of waterways. Taken from **Mayo** Vol 1 Chpt 4 Natural Heritage Text & NH-01f) 1st line.

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

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

12 Improve existing public rights of way and, where possible, provide additional access to inland waterways including lake shores, river banks, through the acquisition of land for public rights of way and parking and lay-by facilities, through agreement with existing landowners*. Taken from **Longford** 6.2.2.7 ILW 5 1st sentence & 6.

*You should add: *or by the use of compulsory powers.*

13 Where a proposed development adjoining or adjacent to a river or XXXcanal bank or other watercourses reserve land to promote and facilitate the creation of waterside linear parks to link with existing parks and open spaces and to facilitate the provision of walking and cycling routes along canals and watercourses. Taken from **Dublin City** App 23.9 1st para 1st sentence.

14 Council will co-operate with other agencies in the development of blueways along existing watercourses as considered appropriate with existing greenways and blueways. Taken from **Kilkenny** 8.4 6th para.

15 All proposed developments shall be in accordance with the Birds and Habitats Directives and other relevant EC Directives. Taken from **2017 Plan** CDP.9.13.

16 Normally only permit development proposals associated with water sports adjacent to waterways(including lakes)where the proposed facilities are compatible with existing use of water including non-recreational uses, which will not result in damage to important features of archaeological heritage or Natura Sites and where it

can be satisfactorily integrated into the landscape so that it will not have an unacceptable impact on visual or environmental amenities especially in areas of high amenity or scenic importance. Based on **Kilkenny 8.4.3 1st to 4th pts, Carlow 8.11.9 1st pt, 2nd pt 1st phrase, 3rd pt 1st phrase, 4th pt, 5th pt & last pt 1st phrase, Limerick County 6.12 Obj COM034, a), b), c) 2nd pt, 3rd pt 1st phrase & last pt** and many other plans.

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

18 Adopt bye laws prohibiting or restricting jet-skiing, water skiing and any other noise generating activities within one year of the adoption of the Plan. Adapted from **Carlow 8.11.9 1st para 6th pt & another plan.**

Note: Fingal & Mayo have adopted bye laws

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

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

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

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

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

*You should add: *or by the use of compulsory powers.*

24 Any existing blockages to permeability such as redundant buildings should be resolved where possible. Taken from **Dublin City 23.9 2nd para 2nd sentence.**

25 Uncover existing culverts where possible. Taken from **Sth Dublin 8.2.0 Obj 4 1st phrase.**

26 Prohibit development along canal and river banks and other navigable and non-navigable waterways and preserve, conserve, enhance and protect these areas, their quality, natural heritage, landscape character and features at or close to them. Ensure the protection of riparian strips as vulnerable areas. Maintain river and stream corridors and river valleys free from inappropriate developmentary development that

will adversely affect the visual integrity of distinctive linear sections of water corridors, river valleys by maintaining buffer zones where development should be avoided. Based on **Carlow** 9.1.8 1st para 6th sentence last phrase, **Galway County** 9.9 Pol NHB 4 last phrase, **Wexford** 14.4.3 L03 & many other plans.

27 ***Development will not be permitted if it materially or detrimentally affects natural conditions.*** Taken from Leitrim 4.1.1 4th para 8.

28 ***Maintain and protect rivers, streams, stream corridors and riparian zones in an open state by discouraging land filling, culverting or realignment.*** Based on **Kilkenny** 8.2.6 last para 1st sentence, **Nth Tipp** 8.4.11 HERT 31: Lakes and inland Waterways last phrase, **Carlow** 9.1.7 Obj 3 1st pt & many other plans.

CANALS

29 ***Ensure, where feasible, that canal towpaths are made available for the development of designated cycle and walking trails routes and encourage and promote their use for both as recreational amenities and the promotion of links with any designated walking cycling routes, existing or proposed.*** Based on **Smarter Travel 2009-2020** Act 17 2nd sentence page 45 & **Longford** 6.2.2.7 ILW 10 1st sentence.

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

LAKES

31 ***Promote the provision of access to lakes.*** Taken from **Galway County** 9.3.4.1 HL55 8th pt.

32 ***Maintain the amenity value of major lakes and their environs by restricting and regulating development that would prejudice the use of these areas.*** Taken from **Cavan** 8.8.1 NHEO33 1st phrase.

RIVERS

33 ***Factors that will be taken into account when considering proposals including any landscape or archaeological designation for the area, any proposals to increase the extent of public access, the extent of any environmental improvements to the water environment and its surroundings, the nature of any recreation proposed and any conflict or compliance with proposals for walking and cycling routes.*** Taken from **Kilkenny** 8.4.2.

SHANNON

34 ***Promote and develop the towpaths along the River Shannon Navigation to expand recreation and in co-operation with WI.***

Taken from **Action Plan for Rural Development 2017** Pillar 3 Act 168 1st phrase.

15.2.16 Development Plan Objective: Peatlands CDP15.18

We submit that you should include additional Objs:

1 ***Support the provision of outdoor pursuits, walking and cycle routes.*** Taken from **Offaly BLP-16** 1st phrase.

2 ***Support the implementation of any relevant recommendations in the National Peatlands Strategy and any subsequent revisions.*** Taken from **Offaly** 3.8 CAEP-20.

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

4 *Ensure that renewable energy projects located on or near peatlands do not negatively impact on any rehabilitation measures including enhanced rehabilitation measures (i.e blocking and re-wetting).* Taken from Offaly 3.9 CAEO-07.

5 *Protect peatlands from inappropriate development having regard to their visual sensitivity value.* Taken from **Kilkenny** 9.2.8 last para.

15.2.17 Development Plan Objective: Amenity Woodlands
CDP15.19 a) to f), h) & i)

We submit that you should include additional Objs:

1 *Where appropriate, protect mature trees not formally protected by TPOs.* Taken from **Cork County** 12.2. HE 2 5c).

2 *Protect existing woodlands and trees which are of amenity value and/or contribute to landscape character and ensure that proper provision is made for their protection and management when undertaking , approving or authorising development.* Taken from **Kilkenny** 9.2.5.1 Development Management Requirements 1st pt.

Development Plan Objective: Natural Resources & Climate Change

CDP15.20 c)

15.2.19 Development Plan Objective: Wetlands

CDP15.22

We submit that you should include additional Objs:

1 *Support and protect the recreational and amenity potential of wetlands.* Based on **Kerry** 10.6 NE-29, & another plan.

2 *Resist development (including land reclamation) which would impact on destroy, fragment or degrade wetlands, coastal wetlands, estuarine marshland by controlling adjacent development by the use of buffer zones.* Based on **Galway County** 8.7 Obj FL3 & many other plans.

15.2.20.1 Development Plan Objective: Burren National Park

CDP15.23

15.2.20.2 Development Plan Objective: Limestone Habitats

CDP15.24

15.2.20.3 Development Plan Objective: Burren and Cliffs of Moher Geopark

CDP15.25

15.2.21 Development Plan Objective: World Heritage Site Status

CDP15.26

We submit that you should include an additional Obj:

Undertake a feasibility study to report on areas considered worthy of inclusion in the Tentative List of World Heritage Sites to report within two years of the adoption of the Plan.

**Development Plan Objective: Development Proposals in Designated World Heritage Sites
CDP15.27**

**15.2.22 Dark Sky Reserves
All**

**15.3 Development Plan Objective: Green Infrastructure and Climate Change
a), b) e), f) & h)**

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

Development Plan Objective:

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

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

b) Prepare and implement a strategy for access to heritage routes by identifying, promoting and supporting the development of a network of walking and cycling routes and heritage trails, with a focus on publicly accessible heritage sites and attractions in co-operation community groups, landowners and other stakeholders incorporating features of heritage interest. Based on Heritage Plans in Clare 2.3.1 and many other counties.

CHAPTER 16 Architectural, Archaeological and Cultural

Heritage

**16.3 Architectural Heritage
All**

**16.3.1 Protected Structures
All**

**16.3.2 Industrial Heritage
All**

**16.3.3 Vernacular Heritage
All**

**16.3.4 Architectural Conservation Areas
All**

**16.3.5 Protected Species
All**

**16.3.6 Supporting the Improvement of Architectural Heritage
All**

16.4 Development Plan Objective: Sites, Features and Objects of Archaeological Interest

CDP16.8

We submit that you should include additional Objs:

1 Recognising the importance of archaeology and National Monuments as part of our heritage, promote, enhance, facilitate, encourage, support, improve and protect public access to National Monuments, Archaeological Sites, castles, sites of historic interest and to archaeological landscapes, in the direct ownership, guardianship or control of the Council, and/or the State or private ownership, including those listed in the RMP, in co-operation with landowners. Based on Kerry 5.12 T 53, Carlow 8.5.2 Obj 2 & 9.2 Pol 3 4th pt 1st phrase, Wexford 14.5 AHO6 1st phrase, & 09 & many other plans

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

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

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

5 When dealing with development proposals that would impact upon archaeological sites and or features, there will be a presumption in favour of preservation in situ of archaeological remains and settings in accordance with Government policy. Taken from 6 Offaly 10.11 BHP-37 2nd sentence.

6 Support and promote the protection and appropriate management and sympathetic enhancement of archaeological heritage and in particular by implementing the Planning & Development Act 2000(as amended) and the National Monuments Act (as amended). Taken from Offaly 10.11 BHP-33.

7 Ensure the support and promote the protection and appropriate management and sympathetic enhancement of archaeological heritage and in particular by implementing the Planning & Development Act 2000(as amended) the National Monuments Act (as amended) and implementation of the legislative, statutory and policy provisions relevant to the conservation of archaeological heritage. Based on Galway County 9.7 Pol ARC 1 2nd sentence & another plan.

8 When assessing planning applications for development have regard to the RMP and archaeological sites identified since the publication of the RPM. Taken from Kildare 12.9.1 AH2 1st sentence.

9 Protect archaeological sites, including those listed in the RPM, their settings and visual amenities in the ownership or guardianship of the State and National Monuments or that are the subject of Preservation Orders. Based on Galway County Obj ARC 1 & another plan.

10 Development within a 20m radius of a recorded monument will not be permitted and proposed developments within 75m radius will be discouraged. Taken from Longford 6.2.1 ARC1 last sentence.

11 Resist development or proposed development, either above or below ground, taking place within or adjacent to archaeological sites or National Monuments should be designed to ensure that it will not seriously detract from, impact upon or damage features of historic or archaeological interest and shall respect their character and settings, which could be seriously injurious to the settings, character of sites or RPMs by reason of their bulk or detailing and shall be sited and designed in a manner which minimises its impact on settings. Based on DPG Archaeological Heritage 4.28 General Policies on Archaeology 2nd para last sentence, Limerick County 7.5.2 EH 027, Galway County 9.7 Obj 7, 2017 Plan 15.4 CDP 15.8 c) 2nd pt & many other plans.

**Development Plan Objective: Newly Discovered Archaeological Sites
CDP16.9**

**Development Plan Objective: Zones of Archaeological Potential
CDP 16.10**

**Development Plan Objective: Archaeology and Infrastructure Schemes
CDP16.11**

**Development Plan Objective: Raising Archaeological Awareness
CDP 16.12 b)**

**16.4.1 Underwater Archaeology
All**

We submit that you should include an additional Sub Sec:

Development Plan Objective: Mass Rocks & Holy Wells

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

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Appendix 6

We note that you have made no change to the list which comprises two short public rights of way which are of little interest or value. We submit that this is mere tokenism and certainly is not in keeping with the concept of providing legal and permanent access to the many walking routes particularly in the Burren.

We submit, therefore, that you should include a provision that within two years of the adoption of the Plan that an advertisement be placed in all newspapers circulating in the area seeking suggestions from the public on walking routes which they would like to be listed. In this connection the format set out in Sec 10.15 4th para could be followed. Following which the Council should examine each proposed route to see if they should be added to the list.

OVERVIEW

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

Planning & Development Acts

Plans in adjoining counties

DoECLG Guidelines

Heritage Act 1995

National Heritage Plan

Southern Region RSES

KEEP IRELAND OPEN
March 2022

