



An
Bord
Pleanála

Inspector's Report

ABP-314886-22

Development	198 lodges and new facilities and extensions/alterations to buildings and all associated site works.
Location	Longford Forest, Newcastle Road, Newcastle, Ballymahon, Co. Longford
Planning Authority	Longford County Council
Planning Authority Reg. Ref.	22189
Applicants	Centre Parcs Ireland Limited
Type of Application	Permission
Planning Authority Decision	Grant Permission
Type of Appeal	Third Party
Appellants	PJ Walsh Sustainability 2050
Date of Site Inspection	23 rd February 2023
Inspector	Dolores McCague

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1.0 Background to Addendum Report

- 1.1.1. This addendum report is required, in response of the Board Direction of 29th September 2023, to provide a planning assessment which identifies and addresses the relevant national, regional and local policy which applies, (as referenced in the planning report submitted by the applicant with the application documentation), and any relevant updates in statutory policy since the time of preparation of same.

2.0 Legal & Policy Context

2.1. National Policy

2.2. National Planning Framework (NPF), 2018-2040

This plan sets out a strategic national planning framework for the country. It recognises the need to move toward a low carbon and climate resilient society, to harness the country's renewable energy potential, achieve a transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy.

The National Planning Framework (NPF) National Strategic Outcome 4 includes:

Expand attractive public transport alternatives to car transport to reduce congestion and emissions and enable the transport sector to cater for the demands associated with longer term population and employment growth in a sustainable manner.

- 2.2.1. Referenced by the applicant are the following provisions:

National Policy Objective 1c Eastern and Midland Region: around 320,000 additional people in employment, i.e. 1.34 million in total; The Northern and Western Region: around 115,000 additional people in employment, i.e. 450,000 (0.45m) in total; The Southern Region: around 225,000 additional people in employment, i.e. 880,000 (0.875m) in total.

National Policy Objective 15 Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.

National Policy Objective 21 Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICTbased industries and those addressing climate change and sustainability.

National Policy Objective 22 Facilitate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.

National Policy Objective 23 Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.

The NPF makes specific reference to growing employment and the tourism sector in the midlands and enhancing the economic competitiveness of rural areas.

2.3. National Development Plan, 2021-2030

This plan underpins the NPF and sets a framework for investment priorities.

2.4. Climate Action Plan (CAP) 2021 – Securing Our Future

A roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050. It includes:

Transport

The plan calls for a significant cut in transport emissions by 2030 through measures including:

- 500,000 extra walking, cycling and public transport journeys per day by 2030,
- Increasing the proportion of kilometres driven by passenger electric cars to between 40 and 45% by 2030, in addition to a reduction of 10% in kilometres driven by the remaining internal combustion engine cars,

- All replacements for bus and commuter rail vehicles and carriages to be low or zero carbon by 2030,
- Increased rollout of rural public transport through Connecting Ireland.

2.5. **Climate Action Plan (CAP) 2023 - Changing Ireland for the Better**

This update includes:

Outlining the actions required to 2035 and beyond, which will guide our joint efforts over the coming years. It will be updated annually and will be improved and strengthened when required, allowing us to learn from our experiences in what is a very significant and complex undertaking. While we have yet to see the large emissions reductions that will be required to achieve our goals, we will continue to put in place the policies and measures that will allow these reductions to be achieved over the remainder of the decade and beyond. We will also continue to deal with the climate change that is already upon us and strengthen our resilience to the adverse impacts of extreme weather events that are becoming increasingly frequent.

On transport - the plan calls for a significant cut in transport emissions by 2030 in order to meet the sectoral emission ceiling. Meeting our 2030 transport abatement targets will require transformational change and accelerated action across all key decarbonisation channels. Climate Action Plan 2021 targets have been revised to meet this higher level of ambition, including a 20% reduction in total vehicle kilometres, a reduction in fuel usage, and significant increases to sustainable transport trips and modal share. Fleet electrification and use of biofuels will continue to provide the greatest share of emissions abatement in the medium term, and vehicle targets, while unchanged, have been reframed as a percentage share of total fleet and new registrations, to better embed our vehicle strategy within our wider Sustainable Mobility Policy.

In recognition of the OECD report's findings that the Irish transport system embeds car-dependency and increased emissions by design, the Avoid-Shift-Improve framework for transport sustainability has been applied to categorise all actions, emphasising the crucial role of spatial and land-use planning in designing transport systems that can support our net-zero ambition.

2.6. **Climate Action and Low Carbon Development (Amendment) Act, 2021**

This establishes a framework to develop the transition towards a low carbon economy.

2.7. **Climate Action and Low Carbon Development Act 2015**

Section 15 requires a relevant body to have regard to the approved national mitigation plan, adaptation framework and sectoral adaptation plans, national transition objectives, and the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.

2.8. **National Sustainable Mobility Policy, Department of Transport, Project Ireland 2040**

A statement of policy by the Department of Transport to support modal shift to more sustainable modes: walking, cycling and public transport, through infrastructure and service improvements, as well as demand management and behavioural change measures. The statement includes:

It is based on three principles: safe and green mobility; people focused mobility; and better integrated mobility; to guide the delivery of sustainable mobility policy over the coming decade.

In urban areas the focus will be on the sustainable movement of people rather than the movement of the private car. The need to improve sustainable mobility options in rural areas is recognised: a 'one-size fits all' approach won't work.

The avoid-shift-improve principle is set out: to avoid or reduce the need for travel: land use planning; shift to more environmentally friendly modes: public transport, active travel; and improve the energy efficiency of vehicle technology: vehicle efficiency and clean fuels.

2.9. **Regional Policy**

The Regional Economic & Spatial Strategy (RSES) for the Eastern, & Midlands Region 2019-2031 applies.

The document has three key themes, one of which is specifically targeted at Climate Action and includes six connected outcomes including: and includes six connected outcomes including: '6. Integrated Transport & Land Use' - Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning.

Tourism - The Department of Transport, Tourism and Sport Policy Document People, Place and Policy Growing Tourism to 2025 makes a number of policy proposals that are relevant to the planning of tourism, namely; protecting heritage assets through sustainable tourism; targeting high growth potential areas; incorporate cultural and sports-based offerings; respecting brand architecture and the environment; need to optimise air and sea connections; need to facilitate inter-modal transport transfers; and support for cross-border tourism.

RPO 6.8: To support the sustainable development of tourism in the Region in line with the strategic objectives of both Ireland's Ancient East and Ireland's Hidden Heartlands experience brand propositions.

2.9.1. Referenced by the applicant are the following provisions:

RPO 4.60 0: Support the development of Longford as a tourism hub having regard to its accessibility to key tourist destinations in the Region including Center Parcs.

RPO 4.79 Local authorities shall identify and provide policies that recognise the contribution that small towns, villages and rural areas contribute to social and economic wellbeing.

RPO 4.84 Support the rural economy and initiatives in relation to diversification, agri business, rural tourism and renewable energy so as to sustain the employment opportunities in rural areas.

2.10. **Development Plan**

Longford County Development Plan 2021-2027 is the operative plan. Relevant provisions include:

Rural Regeneration – County Policy Objectives – to support the development of Longford as a tourism hub having regard to its accessibility to key tourist destinations

in the Region, including Center Parcs, and proximity to natural amenities and recreational opportunities.

Economic Development Strategy - facilitate and support sustainable growth of the economy (County Policy Objective) CPO 8.1.

Tourism - Tourism Economic Development - it is the County Policy Objective to promote tourism as an integral part of County Longford's overall economic profile (CPO 8.85)

General Tourism Development Policy - objectives are set out in section 10.5.3 and include ensure the potential environmental effects of a likely increase in tourists/tourism-related traffic volumes in particular locations / along particular routes shall be considered and mitigated as appropriate. Such a consideration should include potential impacts on existing infrastructure (including drinking water, wastewater, waste and transport) resulting from tourism proposals, (CPO 10.16).

Support the development and expansion of tourism/recreation facilities including forest-based tourism accommodation at appropriate locations while ensuring minimum impact on the natural environment, biodiversity and public recreation, (CPO 10.56).

Chapter 5.11 dealing with Transport, Infrastructure, Energy and Communications - Climate Context and Associated Actions

Transport - travel is a source of unwanted noise, emissions, and energy use, accounting for 42.2% of Ireland's Total Final Energy Consumption in 2018, the largest take up of any sector, when compared to Energy, Industry, Residential and Agriculture. Transport has also been the only sector that has not reduced its CO2 emissions since 1990, continuing to account for nearly 30% of Ireland's total emissions – 72% of which come from road transportation alone; with passenger cars accounting for 61% of same.

The Eastern & Midlands Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES) 2019 – 2031 has prioritised reducing the 'need' for travel over economically 'efficient' travel, reinforced by the Climate Action Plan 2019 (CAP) in its ambition to make growth less transport intensive through better planning, remote and home-working and modal shift to public transport.

2.10.1. Referenced by the applicant are the following provisions:

Section 2.6 where Centre Parcs is referred to.

CPO 3.17 Seek the integration of positive climate change mitigation and adaptation measures in all planning applications.

CPO 5.36 Seek to ensure that all new private car parking facilities are provided to an appropriate standard, proximate to the development which it serves and in accordance with the Design Manual for Urban Roads and Streets (2020).

CPO 5.37 Allow for the reduction in car parking standards in suitable town centre locations in order to encourage a modal shift away from the private car to more sustainable forms of transport.

CPO 5.39 Require proposed car parks to include the provision of necessary wiring and ducting to be capable of accommodating future Electric Vehicle charging points, at a rate of 10% of total space numbers.

CPO 5.64 Support the provision of electrical charging infrastructure both on street and in new developments in accordance with car parking standards prescribed in Chapter 16: Development Management Standards of this plan.

CPO 5.83 Work in conjunction with Irish Water to protect existing water infrastructure, to maximise the potential of existing capacity and to facilitate the timely delivery of new water services infrastructure to facilitate future growth.

CPO 5.88 Work in conjunction with Irish Water to protect existing water infrastructure, to maximise the potential of existing capacity and to facilitate the timely delivery of new water services infrastructure to facilitate future growth.

CPO 5.110 Site-specific Flood Risk Assessment (FRA) is required for all planning applications in areas at risk of flooding (fluvial, pluvial or groundwater), even for developments appropriate to the particular Flood Zone. The detail of these site-specific FRAs will depend on the level of risk and scale of development. A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations. The Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (OPW, 2009), (or any superseding document) and available information from the CFRAM Studies shall be consulted with to this effect.

CPO 5.111 Require all applications in areas prone to flooding to be subject to the Justification Test set out in the Planning System and Flood Risk Management Guidelines for Planning Authorities. Compensatory flood storage provision or the

provision of flood defences will not override the need for completion of the justification test.

CPO 5.112 Consult with the OPW in relation to proposed developments in the vicinity of drainage channels and rivers for which the OPW are responsible, and to retain a strip on either side of such channels where required, to facilitate maintenance access thereto.

CPO 5.145 Promote and support the use of renewable forms of energy as a contribution to the energy demand of all new buildings, where consistent with the proper planning and sustainable development of an area.

CPO 5.146 Support and facilitate the development of secure, appropriately-scaled energy storage facilities at suitable locations throughout the county.

CPO 5.157 Promote the development of solar energy infrastructure in the county, in particular for on-site energy use, including solar PV, solar thermal and seasonal storage technologies. Such projects will be considered subject to environmental safeguards and the protection of natural or built heritage features, biodiversity, views and prospects, and other relevant planning considerations.

CPO 5.159 Support and encourage the installation of solar collectors and panels for the production of heat or electricity in residential and commercial buildings, in line with relevant design criteria.

3.0 Assessment

- 3.1.1. The potential increase in private car journeys, which is referred to in my earlier report of the 28th March 2023, in section 9.10, under the heading (EIA) 'Climate', is, in my opinion, contrary to policy in relation to climate action.
- 3.1.2. Measures to avoid an increase in private car journeys, by encouraging the use of public transport, are referred to in condition no. 6 of that report. Measures to mitigate the impact of an increase in private car journeys, by facilitating electric vehicle use, are referred to in condition no. 7 of that report.
- 3.1.3. It is also pointed out in that report that the proposed development offers an alternative to even less sustainable forms of tourism, such as overseas travel by domestic tourists.

- 3.1.4. With the exception of the increase in private car journeys I am satisfied that the proposed development accords with national, regional and local policy.
- 3.1.5. Subject to the inclusion of conditions 6 & 7 as set out in my previous report, I am satisfied that the proposed development would be acceptable in principle.

Planning Inspector

3rd October 2023

Appendices

Appendix 1 National Planning Framework (NPF), 2018-2040, extracts.

Appendix 2 National Sustainable Mobility Policy, Department of Transport, Project Ireland 2040, extracts.

Appendix 3 Regional Economic & Spatial Strategy for the Eastern, & Midlands Region 2019-2031, extracts.

Appendix 4 Longford County Development Plan 2021-2027, extracts.