### An Chomhairle Oidhreachta The Heritage Council



Planning Ref: PT8LD225 12 May 2025

Housing Department Longford County Council

Dear Sir/Madam

Re: PT8LD225 - Proposed construction of a new housing development of 22 houses with associated services, access roads and car parking at the proposed greenfield site, including boundary walls/fences, car parking, pedestrian entrances, landscaping, connection to existing services and associated site works AT Radharc Na Muileann, Knock, Lanesborough, Co. Longford

#### **Comment**

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

The Heritage Council support multi-house development in settlements, particularly schemes that provide a mix of homes including family homes. This is necessary to support the vibrancy of historic towns and villages and serve as an alternative to dispersed settlement patterns.

Concurrently, the Heritage Council believe that there is often needless removal of vegetation, trees, and hedgerows as part of site clearance works to 'the tidy' the site before construction work commences. This results in schemes that are overly harsh and dominated by hard surfaces. Furthermore, the presence of existing mature trees and hedgerows, which are important for local biodiversity, are a much better existing solution to landscaping then replanting with immature trees, which often take several decades to mature to any notable character or biodiversity value.

Whilst the site is not designated for its ecological qualities, the aerial photograph suggests that there are important natural features on site, include mature treelines, hedgerows, scrub and grasslands. Whilst it is expected that the removal of vegetation is required to accommodate the development footprint, we believe that the existing natural features could be integrated more into the boundary treatments and open space areas as part of the overall landscaping of the development site.

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson), John Burgess, Damian Downes, Michael Farrell, Fionnuala May, Deirdre McDermott, Dr. Patricia O Hare, John G. Pierce, Sheila Pratschke, Prof. Mark Scott, Dr. Mary Tubridy

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The existing site layout [Drawing No 6763-JOD-XX-ZZ-DR-T-100-007] details the existing levels, with little information on the vegetation structure, location of mature trees and hedgerows. The Proposed Layout drawing [Drawing No 6763-JOD-XX-ZZ-DR-A-7002] annotates occasionally that mature hedgerows to be retained "where possible", and notes that the public area adjacent to NIAH listed Windmill [RPS no 369], will be "upgraded".

There are two particular policies from the Longford County Development Plan 2021-2027 that the Heritage Council would cite in terms of this development.

CPO 12.23, "seeks to protect and enhance important landscape features and their setting including rivers, streams, canals, lakes and associated wetlands such as reedbeds and swamps; ponds; springs; bogs; fens; trees; woodlands and scrub; hedgerows and other field boundary types such as stone walls and ditches", believing in their importance because they "form part of a network of habitats, corridors and 'stepping stones' essential for wildlife to flourish, thus providing a high-quality natural environment for all".

CPO 11.22 "seeks to protect the setting of Protected Structures and refuse permission for development within the curtilage or adjacent to a Protected Structure which would adversely impact on the character and special interest of the structure, where appropriate".

With these two policies in mind, we make the following recommendations:

- Retention of hedgerows, and treelines along the western, northern and southern section of the site.
- Retain the existing mature scrub/tree vegetation in the southeast corner of the site (open space area) as to achieve:
  - A soft landscaping solution that retains natural features as part of the open green space requirements for the development
  - A landscape design that offers views and glimpses to the windmill [RPS 369], in a manner that enhances it setting based on the existing soft landscaping that surrounds it. This can be achieved by mowing regimes/subtle paths and trails, and a maintenance plan for the vegetation surrounding the structure.

The Heritage Council do note the setting back distance surrounding the protected structure identified in the site layout plans. However, we believe in general terms that the scheme could amplify and enhance the existing heritage of the site better, in a manner that would not compromise the development footprint/quantum.

In addition, these heritage-based recommendations would contribute to better placemaking, which would be of benefit to the future occupiers of the houses, in a way that engages citizens better with heritage. It would also ensure that the proposal demonstrates greater compliance with the local authority's county development plan policies.

We trust these recommendations will be considered as the local authority pursues this much needed residential development.

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Yours sincerely

Virginia Teehan Chief Executive Officer

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