



**GER FAHY
PLANNING**

Administrative Officer,
Review of County Development Plan,
Forward Planning Department,
Áras An Chontae,
Great Water Street.
Longford,
N39 NH56

18/11/2019

**Re: Review of County Development Plan
Lands at Farraneyhoogan, Longford County Longford**

Dear Sir/Madam,

We have been requested by our clients John, Suzanne and Bernadette Murray of Farraneyhoogan, Longford, Co. Longford to prepare the following submission in respect of the review of the Longford County Development Plan.

For the purposes of this submission we have inspected the site, consulted with our clients, reviewed the development potential of the subject lands in the context of the National Planning Framework, the RSES and the current Longford County Development Plan.

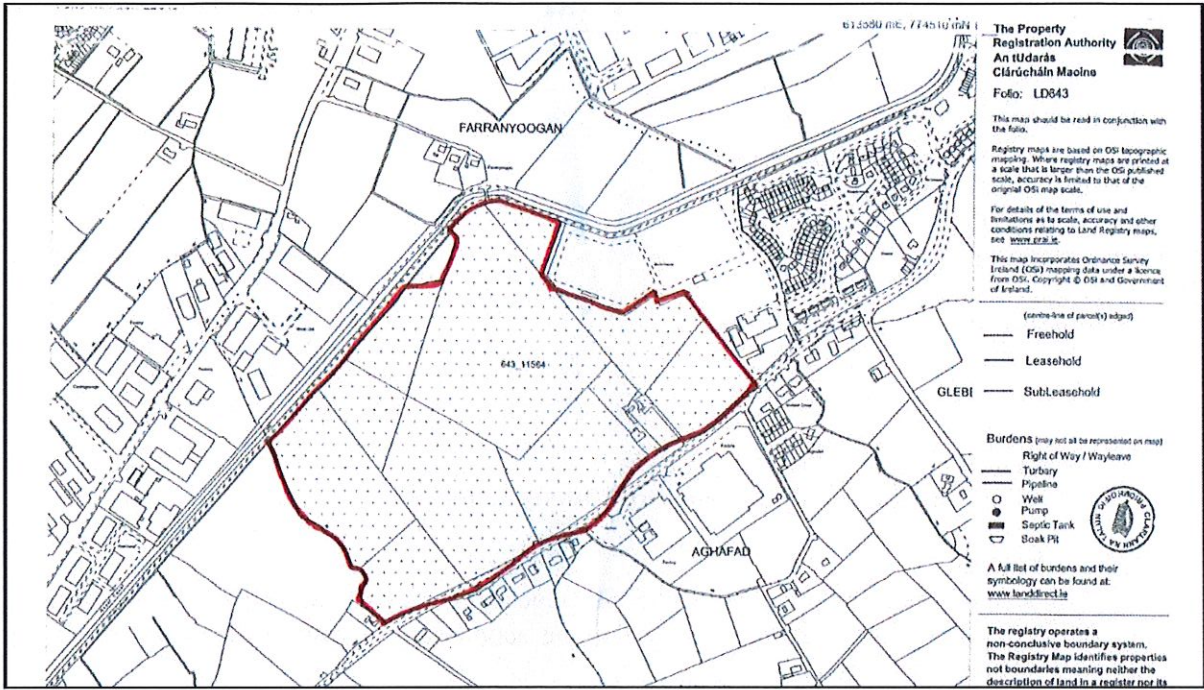
Site Description/Location

The subject lands which comprise 31.5 Hectares/78.00 acres are located to the south of Longford Town adjacent to the Longford Slashers GAA Club and are shown outlined in red on the aerial photograph below.

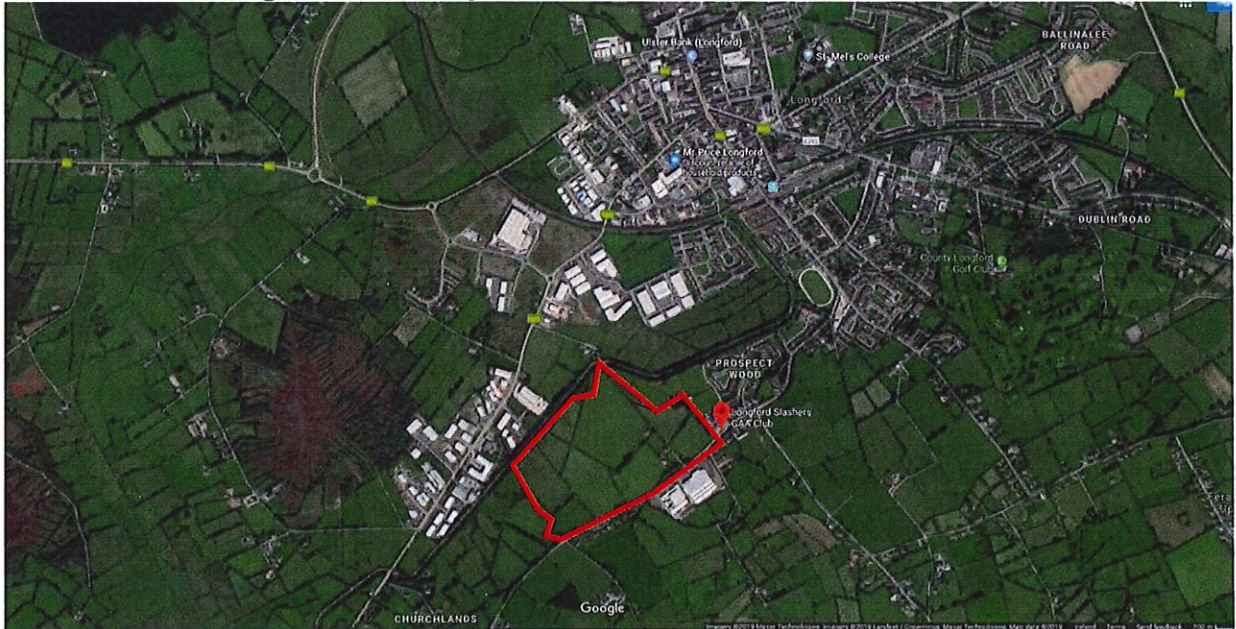
The lands are currently used for agricultural purposes. There are a number of agricultural sheds located in the centre of the landholding. The lands are bounded to the north by the Canal, to the south by the public road with an existing business premises opposite, to the east by the Longford Slashers GAA, Backstage Theatre and Gaelscoil Longfoirt and to the west by agricultural land. There is a high-quality residential development to the east and north of the Longford Slashers GAA.

Across the canal there is an extensive business park with an abundance of industrial and warehouse units. The fields closest to the public road are relatively flat and then the lands fall towards the canal.

OS Map showing location of subject lands outlined in red.



Aerial Photo showing location of subject lands.



Purpose for this submission

The purpose of this submission is to request that the Planning Authority explore the potential for the future use of the subject lands for the development of a neighbourhood quarter at the southern part of Longford Town. It is envisaged that the type of neighbourhood quarter would provide for a mixture of uses including a live-work arrangement with affordable housing to support employment generating uses in a positive homely environment which is supported by a high quality recreational and community infrastructure. There is potential for a portion of the subject lands to be used for a hotel. We understand that there is also a need for another secondary school and athletics track for the town. These types of community uses could be in the form of a shared education and amenity campus for the town.

The subject site is ideally located close to existing social infrastructure including the GAA, Backstage Theatre and the Gaelscoil which is housed in temporary accommodation at present. The proximity of the subject lands to the canal offers further advantages for the development of appropriately scaled tourism and recreational infrastructure such as the Blueways Bike Scheme and ancillary services.

Planning Policy

This section sets out the relevant policies in the National Planning Framework, RSES and the current Longford County Development Plan.

National Planning Framework

This section examines the relevant policies of the National Planning Framework:

Section 2.5 states as follows:

2.5 Building Stronger Regions: Accessible Centres of Scale

“The first, which is a concerted effort to focus on building internationally, nationally and regionally strong cities and towns could deliver a lot of positive impacts and enhance overall national growth so that:

future population and jobs growth would be geographically more aligned;

future jobs growth would be geographically more distributed, but to a limited number of larger

and regionally distributed centres, to include the North and West and Midlands;

Ireland’s regions, and in particular the north and west and midlands, would be turned around to better harness their potential for focused investment.

“National Policy Objective 2a

A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.

National Policy Objective 2b

The regional roles of Athlone in the Midlands, Sligo and Letterkenny in the North-West and the Letterkenny-Derry and Drogheda-Dundalk-Newry cross-border networks will be identified and supported in the relevant Regional Spatial and Economic Strategy”.

Table 2.1 | The NPF at a Glance: Targeted Pattern of Growth, 2040

National Policy Objective	Eastern and Midland	Southern	Northern and Western
1. Growing Our Regions	+ 490,000 - 540,000 people (2.85m total) +320,000 in employment (1.34m total)	+ 340,000 - 380,000 people (2m total) +225,000 in employment (880,000 total)	+160,000 - 180,000 people (1m total) +115,000 in employment (450,000 total)
2. Building Stronger Regions: Accessible Centres of Scale²³	Dublin City and Suburbs: +235,000 - 290,000 people (at least 1.41 million total) Regional Spatial and Economic Strategy to set out a strategic development framework for the Region, leading with the key role of Athlone in the Midlands and the Drogheda-Dundalk-Newry cross-border network	Cork City and Suburbs: +105,000 - 125,000 people (at least 315,000 total) Limerick City and Suburbs: +50,000 - 55,000 people (at least 145,000 total) Waterford City and Suburbs: +30,000 - 35,000 people (at least 85,000 total) Regional Spatial and Economic Strategy to set out a strategic development framework for the Region	Galway City and Suburbs: +40,000 - 45,000 people (at least 120,000 total) RSES to set out a strategic development framework for the Region, leading with the key role of Sligo in the North-West, Athlone in the Midlands and the Letterkenny-Derry cross-border network
3. Compact, Smart, Sustainable Growth	50% of new city housing within existing Dublin City and suburbs footprint 30% all new housing elsewhere, within existing urban footprints	50% new city housing on within existing Cork, Limerick and Waterford Cities and Suburbs footprints 30% all new housing elsewhere, within existing urban footprints	50% of new city housing within existing Galway City and suburbs footprint 30% all new housing elsewhere, within existing urban footprints

Whilst it is recognised that Athlone is identified as the regional centre of the Midlands region. The above Targeted Growth policy set out in the NPF provides for 30% of all new housing elsewhere within urban footprints which would include Longford a designated Key Town in the Midlands Region.

Having regard to the proximity of the subject lands to employment uses across the canal and existing educational and amenity facilities at Longford Slashers, Backstage Theatre and the Gaelscoil Longfoirt, the subject lands would be ideally suited to the delivery of growth in the population of Longford and growth in employment. The key locational advantage of this site is the potential to deliver a more sustainable high quality live-work arrangement with a strong emphasis on social amenities nearby.

Section 3.2 states as follows:

“3.2 Eastern and Midland Region

The Eastern and Midland part of Ireland will, by 2040, be a Region of around 2.85 million people, at least half a million more than today. The Region's most significant place-making challenge will be to plan and deliver future development in a way that enhances and reinforces its urban and rural structure and moves more towards self-sustaining, rather than commuter driven activity, therefore allowing its various city, metropolitan, town, village and rural components to play to their strengths, while above all, moving away from a sprawl-led development model.

This Region is one of significant contrasts, encompassing Dublin and its wider commuting catchment into surrounding and nearby counties and towns, some of which have grown very rapidly in recent decades to significant scale, particularly where located along motorway and railway corridors. Beyond Dublin and the principal transport corridors, the Region is more rural in character, with variation both within the counties adjoining Dublin and between the Mid-Eastern counties and the Midlands. All counties within this Region together with their main towns are strategically placed in a national context.

In the wider Mid-East Region, the rapid growth experienced by many towns in recent decades was mainly driven by housing, rather than jobs centred development. An integrated approach to the development of these and similar towns is a priority, but playing to local strengths and securing employment opportunities to drive self-sustaining, rather than mainly housing-led development.

Midlands

The Midlands Regional area comprises counties Laois, Longford, Offaly and Westmeath. These counties are not located immediately adjacent to Dublin, but the wider influence of the Metropolitan area has resulted in some settlements in this regional area experiencing substantial population growth at an unsustainable rate, while others have experienced decline.

The location of the Midlands is strategically important, bordering both the Northern and Western, and Southern Regions. Its central location in Ireland can be leveraged to enable significant strategic investment to a greater extent than at present, supported by a sustainable pattern of population growth, with a focus on strategic national employment and infrastructure development, quality of life and a strengthening of the urban cores of the county towns and other principal settlements.

The development of the subject lands for a mixture of residential and employment uses aligned with the existing amenity/community zoning would be in accordance with the above policies of the National Planning Framework.

Key future planning and development and place-making policy priorities for the Eastern and Midland Region include:

- Enabling the complementary development of large and county towns in the wider Greater Dublin Area and Midland areas on the key strategic and public transport routes in a regionally co-ordinated manner, with an enhanced emphasis on measures to promote self-sustaining economic and employment based development opportunities to match and catch-up on rapid phases of housing delivery in recent years.
- More effective strategic planning and co-ordination of the future development of nationally and regionally strategic locations at points that straddle boundaries between this and neighbouring regions as in the example of Athlone, which is a focal point for an area reaching into much of this and neighbouring regions in economic and employment, transport, education and public service delivery and retailing terms.
- A focused approach to compact, sequential and sustainable development of the larger urban areas along the Dublin – Belfast economic and transport corridor, along which there are settlements with significant populations such as Dundalk and Drogheda.
- More emphasis on consolidating the development of places that grew rapidly in the past decade or so with large scale commuter driven housing development with a particular focus on addressing local community and amenity facility provision in many of the larger commuter towns through targeted investment under relevant NPF National Strategic Outcomes.
- Preparing and implementing a regional priorities programme, to shape and inform delivery of the Regeneration and Development Initiative. Part of this programme should identify significant ready-to-go city, rural town and village and rural rejuvenation priorities which could harness publicly owned land and other assets that are not being used actively at present such as former healthcare, military, transport and other complexes and combining the potential of such assets with community and wider private and public sector support and investment to bring about the transformation of both urban and rural areas and places in an integrated manner.
- Tourism development and promotional branding to ensure that areas like the Midlands and Lakelands areas are developed and promoted in such a way as to play their full part in tapping the economic potential of regional and rural areas in the region.
- Harnessing the potential of the region in renewable energy terms across the technological spectrum from wind and solar to biomass and, where applicable, wave energy, focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to enable a managed transition of the local economies of such areas in gaining the economic benefits of greener energy.
- Building on the progress made in developing an integrated network of greenways, blueways and peatways, that will support the diversification of rural and regional economies and promote more sustainable forms of travel and activity based recreation utilising canal and former rail and other routes.

Having regard to the location of the subject lands we would consider the development of same for a mixture of residential and employment uses in a live-work arrangement supported by the utilisation of community/amenity space would represent positive development in a sequential approach having regard to the pattern of development in the surrounding area.

“The Role of Employment

While there are few large towns in the Northern and Western Region north of Galway City, towns in the North-West and in other areas outside the larger city regions, such as the Midlands, tend to have more significant employment and service functions relative to their regional and local catchment.

National Policy Objective 7

*Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on: Dublin;
The four Cities of Cork, Limerick, Galway and Waterford;*

*Strengthening Ireland’s overall urban structure, particularly in the Northern and Western **and Midland Regions**, to include the regional centres of Sligo and Letterkenny in the North-West, Athlone in the Midlands and cross-border networks focused on the Letterkenny-Derry North-West Gateway Initiative and Drogheda-Dundalk-Newry on the Dublin-Belfast corridor;*

Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth;

*Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities; Addressing the legacy of rapid unplanned growth, **by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to the cities**, together with a slower rate of population growth in recently expanded commuter settlements of all sizes; **In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.***

Ireland’s Towns

There is scope for potential growth in all towns in Ireland. In the context of the National Planning Framework, this will largely be determined by the relevant Regional Spatial and Economic Strategy for each Regional Assembly area, also taking into consideration the potential of smaller settlements and rural areas.

While targeted growth in the regional centres and network towns will take the lead in a regional and in the case of Athlone, inter-regional context, this must also be balanced with that targeted elsewhere. In all cases, regional and local planning authorities must consider the varied growth potential of different types of settlement in accordance with National Policy Objective 7, as well as rural areas, and tailor a strategy to balance this accordingly. It is not expected that all towns, large or small, will each target the same level of growth to 2040 and targets set in accordance

with the Framework and the Regional Spatial and Economic Strategies will be reviewed based on performance, by 2027. But all towns can and must grow over this period and some will be identified as having capacity for higher than average levels of growth.

The proposed use of the site for a mixture of employment generating uses supported by residential development in a live-work arrangement in close proximity to neighbourhood amenity uses including the permanent location of the Gaelscoil would accord with the above policies of the National Planning Framework.

“National Policy Objective 9

In each Regional Assembly area, settlements not identified in Policy 2a or 2b of this Framework, may be identified for significant (i.e. 30% or more above 2016 population levels) rates of population growth at regional and local planning stages, provided this is subject to:

*Agreement (regional assembly, metropolitan area and/or local authority as appropriate);
Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and
A co-ordinated strategy that ensures alignment with investment in infrastructure and the provision of employment, together with supporting amenities and services”.*

Having regard to the designation of Longford as a Key Town in the Regional Strategy and having regard to the locational advantage of the subject site relative to existing employment generating uses and to existing established social and community infrastructure as well as the proximity to the canal and the potential for further recreational amenities in association with same, the subject site would be ideally suited to the development of a neighbourhood comprising a mixture of residential, employment generating uses and recreational and community facilities.

Eastern & Midland Regional Assembly, Regional Spatial & Economic Strategy (RSES) 2019-2031

This section examines the role of Longford in the Eastern & Midland Regional Assembly.

Section 1.2 states as follows:

“1.2 Eastern and Midland Regional Assembly

The Eastern and Midland Regional Assembly was established on 1st January 2015. The Region covers nine counties containing twelve local authorities namely – Longford, Westmeath, Offaly, Laois, Louth, Meath, Kildare, Wicklow, Fingal, South Dublin and Dún Laoghaire-Rathdown County Councils and Dublin City Council. The Region includes 3 subregions or Strategic Planning Areas (SPAs), namely the Midland, Eastern and Dublin SPAs (see Figure 1.1)”.

Deprivation;

The Trutz Haase deprivation index identifies areas of affluence and deprivation in the Region. Dún Laoghaire-Rathdown is the most affluent local authority in the State and the Region, while Longford is the most disadvantaged in the Region and is the third most disadvantaged local authority in the State, see Figure 9.2 (Chapter 9 Quality of Life). However, there are pockets of disadvantage across the Region, with 15% of the population living in disadvantaged areas, sometimes in close proximity to areas of relative affluence. Education and skills are closely related to employment opportunities, with rates of third level education highest in Dublin and lowest in the Midlands, while rates of technical/apprenticeships were higher in the Eastern and Midland counties.

Longford has been identified as a Key Town in the RSES

Key Towns

*Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres. Bray Maynooth Swords Navan Naas Wicklow Rathnew Graiguecullen (Carlow) **Longford** Mullingar Tullamore Portlaoise.*

*The RSES identifies a third tier of Key Towns which are Swords, Maynooth, Bray, Navan, Naas, Wicklow-Rathnew, **Longford**, Mullingar, Tullamore, Portlaoise and Graiguecullen (Carlow). They are large economically active service and/or county towns, with high quality transport links that play an important service role for their catchments and that have the capacity to act as growth drivers to complement Dublin and the Regional Growth Centres.*

Longford

The County Town of Longford, is strategically located on the N4/M4 motorway and the Dublin to Sligo rail line, acting as a portal to the Northern and Western Region and providing a supporting role to the Regional Growth Centre of Athlone. Longford acts as a key employment centre with strong retail, administrative and service functions that serve a wide catchment. The town has a young, diverse and growing population of 10,000 people and a growth rate of 13% in the ten years to 2016. Key priorities are to promote compact growth, the regeneration of the town centre and to expand Longford's role as a hub for enterprise, employment and tourism.

GATEWAY REGION KEY TOWNS

Longford Town, Mullingar, Tullamore, Portlaoise and Graiguecullen (Carlow), are large economically active towns located within the Gateway Region. These towns provide important connections with adjoining regions and have the capacity and future growth potential to accommodate above average growth in tandem with the requisite investment in employment creation, services, amenities and sustainable transport.

Regeneration:

Longford Town has a number of strategic areas that can act as regenerative catalysts increasing the residential, economic and leisure potential of the town centre, whilst also addressing vacancy, derelict buildings and enhancing the vibrancy of the town. Key areas

include the Camlin Quarter and Ballyminion Areas with further strategic sites throughout, including possibilities within the southern quarter of the town. The Longford Flood Relief Scheme will address flood considerations and support appropriate use of riverside locations. There are opportunities for improved links between both ends of the town and enhanced rejuvenation of, and connections between, the Royal Canal Greenway and the former location of the canal harbour around the Market Square.

Residential Development:

The delivery of housing in Longford Town is essential to support the overall role and success of the settlement. A key focus for the settlement is to encourage the provision of high quality housing development at the right locations over the coming years in order to ensure wider societal benefits and the sustainability and enhancement of facilities such as schools, shops, recreation facilities and open spaces. Central to this is the requirement to provide high quality housing products that meet a variety of housing needs, including those required by employees of existing and potential industry and enterprises within the town.

Economic Development:

The town has a particularly high ratio of jobs to resident workers with significant in commuting and employment in sectors such as advanced manufacturing, pharma and agrifood. The planned development of a creative and innovation hub and co-working space on the Main Street offers a further opportunity to drive enterprise development and entrepreneurship in the town. There is also potential to build in significant investment in the nearby flagship Centre Parc's holiday village and the investment by the local authority in tourism and recreational infrastructure. The Upper Shannon Erne Future Economic Project, which is a collaboration between the Cavan, Leitrim, Longford and Roscommon local authorities with ESB and Bord na Móna, provides the opportunity to deliver cross regional economic projects.

The above policies support the delivery of increased population, employment generating uses supported by recreational facilities and open spaces. The proposed use of the site in a neighbourhood style live-work arrangement with ancillary recreational, community and educational uses would accord with the above principles of the RSES.

Having regard to the location of the site on the canal our clients would be supportive of the development of appropriately scaled tourism/recreational infrastructure.

“REGIONAL POLICY OBJECTIVES:

Longford Key Town

RPO 4.59: To enhance accessibility and sustainable mobility within the town centre by improving links between the core and surrounding areas through the further integration of public transport, walking and cycling facilities.

RPO 4.60: 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, recreational opportunities and the town's location on the Rebel Longford Trail.

RPO 4.61: Support social inclusion measures including the revitalisation of areas by physical regeneration, planning, **investment and community development and measures to improve educational attainment levels, up skilling in key competencies and skills acquisition.**

RPO 4.62: Support the **plan-led development** and regeneration of publicly owned land banks in the town for **residential, employment, education, community, cultural and recreational opportunities** and the consolidation of the town centre and the enhancement and linking of brownfield and outlying sites to the town centre, with a focus on the regeneration of underused buildings and strategic sites.

RPO 4.63: Support Longford Town as a strategic portal to the northwest and south in recognition of its location at the junction of the N55; M4/N4 Dublin/Sligo and N5; due to its proximity to the regional growth centre of Athlone; and support its role as a strategic employment centre”.

Having regard to the designation of Longford as a Key Town and having regard to locational advantage of the subject site in close proximity to the town's social infrastructure namely beside Gaelscoil Longfoirt, Longford Slasher's GAA Club, Backstage Theatre and a high quality residential estate at Prospect Wood, the subject lands would be ideally suited for the development of a neighbourhood scheme of residential development, with a mixture of additional amenities, potential employment site. This type of neighbourhood approach would accord with the above policies of supporting a plan-led development for residential, employment, education, community, cultural and recreational.

Current Zoning Longford County Development Plan 2015-2021

There are currently three different zonings on the subject lands which are shown on the map below. Some of the lands are located in what was formerly identified as the Southern Environs Local Area Plan.

A small portion of the site where the existing dwelling is located is zoned “Existing Residential”.

“Established Residential

This zoning is intended primarily for established housing development but may include a range of other uses particularly those that have the potential to improve the residential amenity of residential communities such as schools, crèches, small shops, doctor’s surgeries, small scale residential, playing fields, etc.

Potential sites may range from small gap infill, unused or derelict land and backland areas, side gardens of existing houses, up to larger undeveloped sites within an established residential area. A balance must be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide infill development. Proposals for development involving the intensification of residential uses within existing residential areas will need to clearly demonstrate that the proposal respects the existing character of the area and would not harm the amenity value of adjacent properties.

Within this zoning category the improved quality of existing residential areas will be the Council’s priority”.

Some of the landholding is zoned “Social and Community”

“Social/Community

To primarily provide for social and community facilities in addition to sporting and recreational facilities.

This zoning provides for facilities that serve the community as a whole such as schools, community centres, creches, nursing homes etc. and also allows for the extension of existing sporting, recreational and cultural facilities”.

The portion of the site zoned Social and Community is located immediately adjacent to the Longford Slashers GAA Club, the Backstage Theatre and the School.

Another part of the site is zoned “High Technology, Industrial, Employment Generating”.

“Hi-Tech/Light Industrial/Employment Generating

To primarily provide for Hi-Tech/Light Industrial and employment generating uses.

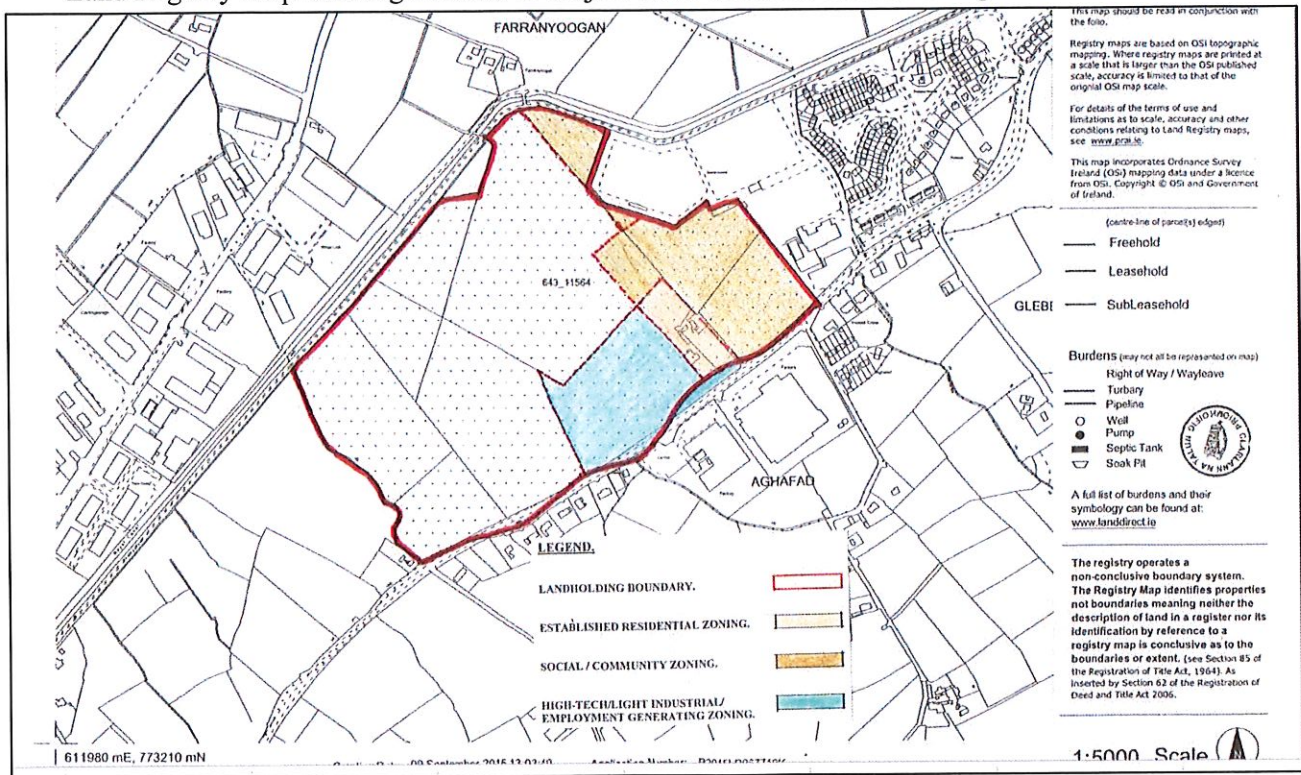
Zonings of this nature are indicative and are adaptable to the nature, size and requirement of future employment/hi-tech industrial development. The creation of local employment and generation of economic development is the primary aim of this zoning. Hi-tech business/office will be considered within this zoning.

The provision of developments within this zoning shall be designed to the highest architectural standards and will be flagship in terms of quality, employment and status.

The provision of any development within this zoning is subject to the protection of the N4 Mullingar to Roosky corridor and potential developers are advised to consult with the Planning Authority regarding any proposed developments at the preplanning stage”.

The remainder of the lands is unzoned.

Land Registry Map showing location of subject lands and their current zoning:



Conclusion

Having regard to the foregoing and to the following:

1. The designation of Longford as a Key Town,
2. The locational advantages of the subject site adjacent to Longford Slasher, Gaelscoil Longfoirt, the Backstage Theatre and the canal,
The existing zonings applicable to the site for Social/Community, High Technology Industrial/Employment generating uses,
3. The subject lands would be ideally suited for a mixture of uses in line with the National Planning Framework and RSES policies of delivering further employment supported by residential to ensure population growth and regeneration.
4. Having regard to the size of the landholding and the existing zonings applicable to the site it may be more suitable to the preparation of a future masterplan for the development of a neighbourhood which would include residential, employment generating uses, community infrastructure such as a secondary school and social and recreational facilities including a hotel and athletics track.

We would be obliged for the Planning Authority to look favourably on the foregoing submission and consider the above potential uses as being suitable for the future development of the landholding.

Yours sincerely,

