



AA Conclusion Statement

In support of the Appropriate Assessment of the Longford Town Local Area Plan 2025-2031

Longford County Council

Final

Prepared by LUC

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Chapter 1

Introduction

1.1 This is the Appropriate Assessment (AA) Conclusion Statement for the Longford Town Local Area Plan 2025-2031. The obligation to undertake AA derives from Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC as transposed into Irish legislation by, inter alia, the Planning and Development Act 2000, as amended. AA is a focused and detailed impact assessment of the implications of a strategic action (such as a plan or programme) or project, alone and in combination with other strategic actions and projects, on the integrity of any European Site in view of its conservation objectives. This AA Conclusion Statement should be read in conjunction with the Plan and associated documents including the AA Natura Impact Report (NIR).

Legislative Requirements in relation to AA

1.2 In carrying out the AA for the Plan, the Planning and Development Act 2000, as amended, requires, inter alia, that the Council considers the matters set out below, and describes how these issues have been addressed.

1.3 Matters taken into account by the AA. Matter specified by the Regulations and

(a) the Natura Impact Report

- How (a) addressed by AA: An AA NIR accompanies this AA Conclusion Statement and the Plan

(b) any supplemental information furnished in relation to any such report

(c) if appropriate, any additional information sought by the authority and furnished by the applicant in relation to a Natura Impact Report

(d) any information or advice obtained by the public authority

(e) if appropriate, any written submissions or observations made to the public authority in relation to the application for consent for proposed plan or project

(f) any other relevant information

- How (b-f) addressed by AA: This AA Conclusion Statement accompanies the NIR that provides additional detail on European Sites. Submissions made during the Plan preparation/AA process that were relevant to the AA resulted in updates being made to the AA NIR. Proposed Material Alterations were screened for the need to undertake Stage 2 AA (Stage 2 AA was not required for the Alterations).

1.4 In addition to the above, the Regulations require that the Council makes available for inspection a determination regarding the outcome of the assessment with respect to whether or not the Plan would adversely affect the integrity of a European site (a copy of this determination is provided at Section 4).

AA Conclusion Statement

1.5 Non-Statutory AA guidance (Department of Environment, Heritage and Local Government, 2009) states that (Section 4.14) it "is recommended that planning authorities include a clear and discrete AA Conclusion Statement as a distinct section in the written statement of the plan separate to the SEA statement." This guidance recommends that the following issues are addressed by the AA Conclusion Statement:

- Summary of how the findings of the AA were factored into the Plan (see Section 2);

- Reasons for choosing the Plan as adopted, in the light of other reasonable alternatives considered as part of the AA process (see Section 3);
- A declaration that the Plan as adopted will not have an adverse effect on the integrity of European Sites (provided at Section 4); and
- The NIR (the AA NIR is accompanied by this AA Conclusion Statement and has informed the AA Determination – see Section 4).

1.6 Furthermore, as stated in the “Development Plans Guidelines for Planning Authorities” (Department of Housing, Local Government and Heritage, 2022):

“....There is a similar requirement to publish a determination relating to the AA that may have been undertaken. Under Article 6.3 of the Habitats Directive the determination (often termed an ‘AA Conclusion Statement’) must state as to whether or not the Draft Plan would adversely affect the integrity of a European site. However as stated in Section 3.5, this determination must have been made prior to the adoption of the Draft Plan.”

1.7 As recommended, this AA Conclusion Statement addresses the above issues, including the signed AA Determination included at Section 4.

Chapter 2

How the findings of the AA were factored into the Plan

2.1 Outlined below are the Likely Significant Effects identified, the AA recommended mitigation actions and how it was addressed in the LAP.

Loss of functionally linked habitat:

- “Require an ecological appraisal, in addition to an Appropriate Assessment, for development not directly connected with or necessary to the management of European Sites, or a proposed European Site and which are likely to have significant effects on that site either individually or cumulatively”.
- A new objective, NHB 05, was included in the LAP as recommended in the AA, with alternative wording.
- Objective NHB 04 could be strengthened to encompass any plan or project that is likely to have a significant impact on the Royal Canal pNHA as well as the River Camlin as this links to the Lough Forbes Complex SAC / Ballykenny Bog SPA: NHB 04 Require screening for Appropriate Assessment (AA), in accordance with Article 6(3) and Article 6(4) of the Habitats Directive, to be carried out with respect to any plan or project which may have a likely significant impact on the River Camlin and Royal Canal pNHA.
- Objective NHB 04 was updated to incorporate the AA recommended mitigation.

2.2 Additional objectives in the Longford Town LAP provide safeguards and mitigation measures from the loss of functionally linked habitat, specifically:

- **NHB 01** Comply with the Natural Heritage Objectives contained in Chapter 12: Natural Heritage & Environment of the Longford County Development Plan 2021-2027.
- **NHB 02** Implement where relevant the County Longford Heritage Plan and Longford Biodiversity Action Plan 2019-2024.
- **NHB 03** Protect, conserve and enhance Longford's biodiversity and natural heritage that includes wildlife (flora and fauna), habitats and landscapes of importance to wildlife, particularly along the Royal Canal pNHA and Camlin River. Any developments that may potentially impact on the pNHA should be accompanied by an Ecological Assessment.
- **NHB 09** Ensure the provision of appropriate Riparian strips of not less than 10 meters from the top of the bank of all watercourses to enhance biodiversity and preserve the natural flood regime of the area. The full extent of the biodiversity protection zone should be determined on a case-by-case basis by the Council, based on site specific characteristics and sensitivities.
- **NHB 10** Support restoration and conservation works to protect and enhance water quality of the Camlin River and the (pNHA) Royal Canal and the associated biodiversity value of riverbanks.
- **NHB 16** Require mitigating measures in certain cases where it is evident that biodiversity is likely to be affected. These measures may, in association with other specified requirements, include establishment of wildlife areas/corridors/parks, tree planting, wildflower meadows/marshes and other areas.

2.3 Additional safeguards and mitigation measures are provided within the Longford County Development Plan 2021-2027, specifically:

- **CPO12.1** Protect, conserve and enhance to the County's natural heritage and biodiversity. This includes wildlife (flora and fauna), habitats, landscapes and/or landscape features of importance to wildlife, or which play a key role in the conservation and management of natural resources.
- **CPO12.5** Protect and conserve the conservation value of Special Areas of Conservation, candidate Special Areas of Conservation, Special

Protection Areas, Natural Heritage Areas and proposed Natural Heritage Areas and any other sites that may be proposed for designation during the lifetime of this Plan.

- **CPO12.6** Ensure that no plans, programmes, etc. or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European Sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects). Except as provided for in Article 6(4) of the Habitats Directive; in so far as there must be – (a) no alternative solution available, (b) imperative reasons of an overriding public interest for the project to proceed; and (c) Adequate compensatory measures in place.
- **CPO12.7** Ensure that any plan or project that could have a significant adverse impact (either by themselves or in combination with other plans and projects) upon the conservation objectives of any Natura 2000 Site or would result in the deterioration of any habitat or any species reliant on that habitat will not be permitted. Except as provided for in Article 6(4) of the Habitats Directive; in so far as there must be – (a) no alternative solution available (b) imperative reasons of an overriding public interest for the project to proceed; and (c) Adequate compensatory measures in place.
- **CPO12.8** Ensure that all development proposals relating to European Sites will comply with the DoECLG publication ‘Appropriate Assessment of Plans and Projects in Ireland- Guidance for Planning Authorities’.
- **CPO12.9** Ensure an Appropriate Assessment is carried out in respect of any plan or project not directly connected with or necessary for the management of the site but likely to have a significant effect on the integrity of a European Site(s), either individually or in-combination with other plans or projects, in view of the site’s conservation objectives to comply with the Habitats Directive.
- **CPO12.10** Permit development on or adjacent to designated Special Areas of Conservation, Special Protection Areas, Natural Heritage Areas,

Statutory Nature Reserves or those proposed to be designated over the period of the Plan, only where an appropriate level of assessment can clearly demonstrate that it will have no significant adverse effect on the integrity of the site.

- **CPO12.11** Consult and have regard to the views and guidance of the National Parks and Wildlife Service in respect of proposed development where there is a possibility that such development may have an impact on a designated European or National site, or a site proposed for such designation.
- **CPO12.13** Undertake appropriate surveys and collect data to provide an evidence-base to assist the Council in meeting its obligations under Article 6 of the Habitats Directives (92/43/EEC) subject to available resources.
- **CPO12.14** Prepare Strategic Habitat Management Plans for European Sites in the County in consultation with the National Parks and Wildlife Service and relevant stakeholders.
- **CPO12.15** Require an ecological appraisal, in addition to an Appropriate Assessment, for development not directly connected with or necessary to the management of European Sites, or a proposed European Site and which are likely to have significant effects on that site either individually or cumulatively.
- **CPO12.16** Ensure that no plan, programme, or project giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan, either individually or in combination with other plans, programmes, etc. or projects.
- **CPO12.17** Require an Ecological Impact Assessment (EclA) for any proposed development which may have a significant impact on rare, threatened and or protected species and non-designated habitats of biodiversity value.

Non-physical disturbance (offsite only)

- “Require an ecological appraisal, in addition to an Appropriate Assessment, for development not directly connected with or necessary to the management of European Sites, or a proposed European Site and which are likely to have significant effects on that site either individually or cumulatively”.
- A new objective, NHB 05, was included in the LAP as recommended in the AA, with alternative wording.
- It is recommended that this objective is strengthened as follows: “Ensure that proposals for the lighting/flood lighting of waterways infrastructure, buildings or pedestrian/cycling routes along waterways minimise adverse impacts on protected species (e.g. bats, birds, otters, etc.) and incorporate lighting schemes as set out in ‘Bats and Lighting, Guidance Notes for: Planners, engineers, architects, and developers’.
- Objective updated to incorporate AA recommended mitigation.

2.4 Additional safeguards and mitigation measures are provided within the Longford County Development Plan 2021-2027, specifically:

- **CPO12.6** Ensure that no plans, programmes, etc. or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European Sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects). Except as provided for in Article 6(4) of the Habitats Directive; in so far as there must be – (a) no alternative solution available, (b) imperative reasons of an overriding public interest for the project to proceed; and (c) Adequate compensatory measures in place.
- **CPO12.7** Ensure that any plan or project that could have a significant adverse impact (either by themselves or in combination with other plans and projects) upon the conservation objectives of any Natura 2000 Site or would result in the deterioration of any habitat or any species reliant on

that habitat will not be permitted. Except as provided for in Article 6(4) of the Habitats Directive; in so far as there must be – (a) no alternative solution available (b) imperative reasons of an overriding public interest for the project to proceed; and (c) Adequate compensatory measures in place.

- **CPO12.12** Identify and provide appropriate buffer zones between Designated Sites and local biodiversity features and areas zoned for development.
- **CPO12.111** Require all developments to be designed and operated in a manner that will minimise and contain noise levels, including the use of noise / vibration attenuation measures as appropriate.
- **CPO12.112** Require the submission of a Noise Impact Assessment for all developments likely to introduce noise generating uses in proximity to noise sensitive uses.
- **CPO12.113** Control lighting in urban and rural areas and in particular in sensitive locations, in order to minimise impacts on residential amenity, habitats and species of importance.

Air Pollution

- Minimising air quality impacts was not explicitly covered within the Draft Longford Town LAP. Therefore, the internal draft of the AA recommended that the following objective is included in the LAP:

‘Promote the preservation of best ambient air quality compatible with sustainable development in accordance with the EU Ambient Air Quality and Cleaner Air for Europe (CAFE) Directive (2008/5/0/EC) and ensure that all air emissions associated with new developments are within Environmental Quality Standards as out in the Air Quality Standards Regulations 2011 (SI No. 180 of 201) (or any updated/superseding documents)’.

- A new objective, CC 17, was subsequently included in the LAP which reflects the aforementioned recommended mitigation.

The Longford Town LAP has been informed by the Longford Town Local Transport Plan. The Longford Town LTP contains strategies which include a number of proposed schemes: pedestrian schemes; cycle schemes; quiet streets; bicycle parking schemes; permeability schemes; public transport schemes; traffic management schemes; and, car parking schemes within Longford Town, which are reflected in the LAP. The Longford Town LAP strongly supports compact development in the town centre and the enhancement of the sustainable and active travel networks. This will reduce the need to travel by private car and provide more sustainable travel options for people within Longford Town:

- **CS 03** Support and facilitate compact growth through the sustainable intensification and consolidation of the town centre and established residential areas.
- **CS 04** Encourage the compact growth of Longford Town and undertake a town centre first approach to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the County Core Strategy Table.
- **ST 04** Management of space in town centres to deliver a high level of priority and permeability for walking, cycling and public transport modes to create accessible, attractive, vibrant and safe, places to work, live, shop and engage in community life.
- **ST 05** Seek to implement enhanced pedestrian and cycling permeability and networks in the urban environment of Longford Town in accordance with the provisions of the LTP, the Design Manual of Urban Roads and Streets, (DMURS) (DTTS and DECLG, 2020), the Permeability Best Practice Guidelines, (NTA, 2013) and the National Cycle Manual (NTA, 2011).
- **ST 06** Seek to implement pedestrian and cycling improvements with the assistance of the NTA through the Green Schools Programme and Sustainable Transport Measures Grants Scheme.
- **ST 08** Encourage larger employers within the town and applications for planning permission to establish employment generating premises to develop mobility management plans to promote sustainable travel choices.

This will include measures to support smarter travel such as the provision of cycle facilities and bicycle storage and shower facilities for employees.

- **ST 09** Ensure new development areas and employment land-uses are permeable for walking and cycling and are laid out in such a way as to facilitate the operation of and access to public transport by residents and employees.
- **ST 10** Ensure that the layout and design of new developments provide for bus stops, passenger waiting facilities, and bus turning and service regulatory layover facilities, as required.
- **ST 11** Support and develop public transport routes throughout the town through collaboration with the National Transport Authority.
- **ST 12** Retrospectively provide public transport, walking and cycling infrastructure and facilities in existing development areas to achieve growth in sustainable mobility.
- **ST 13** Provide suitable infrastructure on public transport corridors to improve safety and efficiency for public transport users.
- **ST 14** Engage and cooperate with the Department of Transport, National Transport Authority, Transport Infrastructure Ireland, Irish Rail, Local Link and other stakeholders to improve the provision of public transport and public transport facilities in Longford.
- **ST 15** Support the NTA in the provision of new and upgraded bus stops in Longford Town).
- **ST 16** Support the development of an integrated transport hub within the town, which serves the county and for the promotion of public transport connectivity between Longford 'Key' town and other towns and villages.
- **ST 17** Seek the development of effective cycling infrastructure along the key urban arterial routes to and from Longford Town:
 - (R198 – Battery Road/Church Street/Bridge Street;
 - R393 – Dublin Road; and
 - the N63 – Ballinalee Road);

in order to coincide with key employment areas, public transport hubs and schools within Longford Town.

- **ST 18** 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 the Longford County Development Plan 2021-2027*.
- **ST 19** Liaise and collaborate with relevant agencies to support the growth of EVs with support facilities and infrastructure through a roll-out of additional electrical charging infrastructure at appropriate locations in the town.
- **ST 20** Support the prioritisation of parking for Electric Vehicles (EVs) in town centre locations.
- **SST 32** Support and facilitate the implementation of the pedestrian, cycle, public transport, car parking, traffic management, and permeability 'Priority Schemes' set out in the Local Transport Plan. Proposals for new development will be required to demonstrate how they will integrate with the provisions of the Local Transport Plan.

2.5 Additional safeguards and mitigation measures are provided within the Longford County Development Plan 2021-2027, specifically:

- **CPO12.6** Ensure that no plans, programmes, etc. or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European Sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects). Except as provided for in Article 6(4) of the Habitats Directive; in so far as there must be – (a) no alternative solution available, (b) imperative reasons of an overriding public interest for the project to proceed; and (c) Adequate compensatory measures in place.
- **CPO12.7** Ensure that any plan or project that could have a significant adverse impact (either by themselves or in combination with other plans

and projects) upon the conservation objectives of any Natura 2000 Site or would result in the deterioration of any habitat or any species reliant on that habitat will not be permitted. Except as provided for in Article 6(4) of the Habitats Directive; in so far as there must be – (a) no alternative solution available (b) imperative reasons of an overriding public interest for the project to proceed; and (c) Adequate compensatory measures in place.

- **CPO5.45** Ensure new development areas and employment land-uses are permeable for walking and cycling and are laid out in such a way as to facilitate the operation of and access to public transport by residents and employees.
- **CPO5.46** Ensure that the layout and design of new developments provide for bus stops, passenger waiting facilities, and bus turning and service regulatory layover facilities, as required.
- **CPO5.47** Support and develop public transport routes throughout the County through collaboration with the National Transport Authority.
- **CPO5.48** Retrospectively provide public transport, walking and cycling infrastructure and facilities in existing development areas to achieve growth in sustainable mobility.
- **CPO5.51** Support the continued integration of national, regional and local bus and rail services to ensure the delivery of a fully integrated public transport service.
- **CPO5.52** Improve access to public transport as part of road improvement projects, where possible.
- **CPO 5.53** Seek to address urban congestion, with particular emphasis on facilitating improved bus transport movement and reliability, and improved links to bus and railway stations.
- **CPO5.55** Support the operation of existing bus services and facilitate the provision of improved facilities for bus users in towns and villages including the provision, in collaboration with the relevant agencies, of set down areas for coaches and bus shelters for passengers.

- **CPO5.56** Support bus priority measures on existing and planned road infrastructure, where appropriate, in collaboration with the National Transport Authority, Bus Éireann and the Transport Infrastructure Ireland.
- **CPO5.57** Facilitate the provision of park and ride facilities in appropriate locations within convenient reach of transport nodes and along strategic transport corridors.
- **CPO5.59** Facilitate the expansion and development of existing and any future proposed rail facilities and supporting infrastructure within the county.
- **CPO12.104** Promote the preservation of best ambient air quality compatible with sustainable development in accordance with the EU Ambient Air Quality and Cleaner Air for Europe (CAFE) Directive (2008/50/EC) and ensure that all air emissions associated with new developments are within Environmental Quality Standards as out in the Air Quality Standards Regulations 2011 (SI No. 180 of 201) (or any updated/superseding documents).
- **CPO12.105** Support the collation of air quality and greenhouse gas monitoring data in support of a regional air quality and greenhouse gas emission inventory.
- **CPO12.106** Seek to ensure in tandem with the EPA, that all developments are operated in a manner that does not contribute to deterioration in air quality.
- **CPO12.107** Promote alternative and sustainable transport methods in order to maintain good air quality and support the introduction of charging points for electric vehicles (EVs) throughout the county and will seek to replace its fleet with EVs where feasible.
- **CPO12.108** Promote the retention of trees, in-particular broad leaf-species, hedgerows and other vegetation where possible, and encourage afforestation and tree planting as a means of air purification and filtering.

Recreational Impacts

2.6 It is recognised that the waterways within and around Longford Town including the Camlin River and the River Shannon offer potential in relation to tourism development and recreational activities. Therefore, it is recommended that the Longford Town LAP coordinates proposals proposed along the waterways, helping to avoid the most sensitive areas the qualifying features of the European sites may rely on. It was also recommended in the internal draft of the AA that a new objective is included in the Natural Heritage and Biodiversity section:

- “Ensure the provision of appropriate Riparian strips of not less than 10 meters from the top of the bank of all watercourses to enhance biodiversity and preserve the natural flood regime of the area. The full extent of the biodiversity protection zone should be determined on a case-by-case basis by the Council, based on site specific characteristics and sensitivities”.
- A new objective, NHB 09, was subsequently included in the LAP which reflects the aforementioned recommended mitigation.

2.7 The Longford Town LAP contains a number of objectives under the ‘Green Infrastructure’ section which support the creation of new green infrastructure and areas for recreation. This has the potential to reduce recreational pressure on European sites. Some of these objectives also aim to protect the waterways within Longford Town. These include:

- **GI 01** Protect, enhance and further develop the Green Infrastructure network in Longford town to provide a shared space for amenity, recreation and biodiversity to thrive and to strengthen links to the wider regional network. This should be informed by appropriate ecological surveys and assessment, which will inform the existing Green Infrastructure Strategy, the identification of further potential Green Infrastructure and associated measures over the lifetime of the Local Area Plan.
- **GI 02** Reduce fragmentation of the existing green infrastructure network while protecting and enhancing its biodiversity by strengthening ecological links including stepping-stone habitats (according to their value).

- **GI 03** Integrate new and existing green infrastructure as an essential component of all new developments and to restrict development that would fragment, damage or prejudice the integrity of the green infrastructure network. Site specific ecology surveys should be carried out to inform proposed developments.
- **GI 04** Seek to provide open space and recreation facilities in the Plan area by creating a network of open spaces and creating connectivity between these to form a nature wildlife corridor.
- **GI 05** Ensure the key green infrastructure and habitat features identified in Potential Green Infrastructure Projects Map, and the linkages they provide to larger areas of green infrastructure and the wider countryside are retained and integrated into the design of new developments as far as practicable.
- **GI 06** Protect, enhance, create and connect natural heritage, high-quality amenity areas and other green spaces throughout Longford Town for both biodiversity and recreational use. Promote links with any further designated walking, cycling and wildlife routes existing or proposed throughout the County.
- **GI 07** Preserve, protect and enhance the Royal Canal and Camlin River as important amenity and recreational resources. Walkway development will be promoted, particularly in the vicinity of the Canal and the Camlin River. Require retention or creation of public access to the waterways in order to facilitate the creation or expansion of walking/cycling routes.
- **GI 08** Protect, enhance and improve existing public rights of way where appropriate and investigate the provision of additional rights of way, parking and lay-be facilities where appropriate through agreement with existing landowners and through the development management process.
- **GI 09** Seek that development proposals also include an outline of measures to protect the retained green infrastructure of a site during the period of construction.
- **GI 10** Provide for wildlife bridges (eco links) as part of any new pedestrian and cycle links across the River Camlin, the Royal Canal and railway,

thereby facilitating the free movement of people and species throughout the Plan area.

- **GI 11** Promote a network of pedestrian and cycle paths to enhance accessibility to the green infrastructure network, while ensuring that the design and operation of the routes responds to ecological protection needs.
- **GI 12** Incorporate items of historical or heritage importance within the Green Infrastructure network as amenity features, where practical.

2.8 Objectives in the Longford County Development Plan 2021-2027 also provide safeguards and mitigation measures from recreational pressure, specifically:

- **CPO12.69** Maintain a biodiversity zone of not less than 10 metres from the top of the bank of all watercourses in the county, with the full extent of the protection zone to be determined on a case by case basis by the Council, based on site specific characteristics and sensitivities. (Agriculture, native tree forestry, appropriate public amenity and recreational projects (Including the provision of slipways and angling infrastructure) and strategic Green Routes / Blueways / Trails will be open for consideration within the biodiversity protection zone, subject to appropriate safeguards and assessments).
- **CPO7.42** Support the development of recreation and open space in accordance with the EMRA RSES Recreation and Open Space Guiding Principles and Guiding Principles for Healthy Placemaking.
- **CPO7.43** Promote the development of a wide variety of high quality accessible open space areas, for both active and passive use, and formal and informal activities in accordance with the Core Strategy and Settlement Strategy.
- **CPO13.1** Develop the green infrastructure network to ensure the conservation and enhancement of biodiversity, including:
 - the protection of European Sites;

- the provision of accessible parks, open spaces and recreational facilities (including allotments and community gardens);
- the sustainable management of water;
- the maintenance of landscape character including historic landscape character;
- the protection and enhancement of the architectural and archaeological heritage.
- Any new greenway, blueway and peatway projects shall comply with CPO 5.15 in relation to Infrastructure corridor and route selection processes.
- **CPO13.2** Seek a net gain in green infrastructure through:
 - the protection and enhancement of existing assets;
 - the provision of new green infrastructure as an integral part of the planning process;
 - taking forward priority projects including preparing green infrastructure maps during the lifetime of the Development Plan.
- **CPO13.5** Facilitate the conservation and enhancement of significant non-designated areas containing ecological importance and located in green corridors.
- **CPO13.10** Facilitate the ongoing development and improvement of green infrastructure, including green networks, green amenities and linked green corridors which ensure the provision of natural areas for the growth of wildlife and biodiversity.
- **CPO13.11** Develop a green infrastructure network for urban areas, connecting both natural and seminatural corridors including green spaces, open spaces, rivers and canals. Enhancements along natural features may include the provision of riparian buffers and wild areas for pollination.
- **CPO13.15** Support the delivery of sustainable strategic Greenways, Blueways and Peatways projects in the County in accordance with the Strategy for the Future Development of National and Regional Greenways.

- **CPO13.16** Develop an integrated network of Blueways both within County Longford and to adjoining counties.
- **CPO13.19** Support the development of an integrated Strategic Greenway Network of national and regional routes and maximise connectivity to existing greenways through linkages of cycling and walking infrastructure.
- **CPO13.20** Protect, enhance and preserve the built and natural heritage of the Royal Canal and its associated structures including the maintenance of the broadzone at 100m either side of the Canal. This shall include the natural setting of the canal and its views and prospects.
- **CPO13.21** Proposals for greenway/blueway development should contribute towards the protection or enhancement of existing green infrastructure and have regard to the “Connecting with nature for health and wellbeing” EPA Research Report 2020.

Changes to hydrology including water quality and quantity

- “Require that all developments relating to water supply and wastewater treatment are subject to screening for Appropriate Assessment to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any European sites and that the requirements of Article 6 of the EU Habitats Directive are met”.
 - A new objective, WS 15, was included in the LAP as recommended in the AA
- “Promote the sustainable use of water and water conservation in existing and new developments within the town by encouraging demand management measures among all water users and requiring new developments to incorporate water conservation measures”.
 - A new objective, WS 13, was included in the LAP as recommended in the AA.
- “Maintain, improve and enhance the environmental and ecological quality of surface waters and groundwater in Longford Town in conjunction with the EPA and in accordance with the River Basin Management Plan for Ireland 2022-2027 and future cycles of this Plan”.

- Objective WS 11 was updated to incorporate the AA recommended mitigation.

2.9 The following objectives in the Longford Town LAP also provide safeguards and mitigation measures from changes to hydrology that may have a significant effect on European sites, specifically:

- **WS 11** Protect valuable groundwater sources and important surface water bodies from pollution through infiltration by domestic, agricultural or other sources of effluent/pollutant material.
- **NHB 10** Support restoration and conservation works to protect and enhance water quality of the Camlin River and the (pNHA) Royal Canal and the associated biodiversity value of riverbanks.
- **WS 04** Seek to ensure the provision of an appropriate level of headroom in water services to facilitate the economic, social and environmental development of the town in the longer term.
- **WS 05** Investigate the feasibility of establishing additional projects in terms of improving existing water supply, establishing new supplies, sewerage mains provision and improvement of existing treatment plants in the medium and long-term in conjunction with Uisce Éireann.
- **WS 12** Support the separation of foul and storm water network at the remaining locations within the town. Developments in locations where there are combined foul and surface water sewerage systems shall be required to provide separate systems.
- **WS 17** Discourage the over concentration/proliferation of individual septic tanks and treatment plants to minimise the risk of groundwater pollution.
- **WS 18** Ensure that all new development proposals include a Drainage Impact Assessment.
- **WS 19** Work alongside Uisce Éireann to minimise the number and frequency of storm overflows of sewage to watercourses.

Additional safeguards and mitigation measures are provided within the Longford County Development Plan 2021-2027, specifically:

- **CPO12.6** Ensure that no plans, programmes, etc. or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European Sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects). Except as provided for in Article 6(4) of the Habitats Directive; in so far as there must be – (a) no alternative solution available, (b) imperative reasons of an overriding public interest for the project to proceed; and (c) Adequate compensatory measures in place.
- **CPO12.7** Ensure that any plan or project that could have a significant adverse impact (either by themselves or in combination with other plans and projects) upon the conservation objectives of any Natura 2000 Site or would result in the deterioration of any habitat or any species reliant on that habitat will not be permitted. Except as provided for in Article 6(4) of the Habitats Directive; in so far as there must be – (a) no alternative solution available (b) imperative reasons of an overriding public interest for the project to proceed; and (c) Adequate compensatory measures in place.
- **CPO5.83** 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.
- **CPO5.84** Protect both ground and surface water resources and to work with Irish Water to develop and implement Water Safety Plans to protect sources of public water supply and their contributing catchment.
- **CPO5.88** Ensure that adequate water services are available to service development prior to the granting of planning permission and to require developers to consult Irish Water regarding available capacity, prior to applying for planning permission.
- **CPO5.89** Promote the sustainable use of water and water conservation in existing and new development within the County by encouraging demand

management measures among all water users and requiring new developments to incorporate water conservation measures.

- **CPO5.92** Ensure that development will only be permitted in instances where there is sufficient capacity for appropriate collection, treatment and disposal (in compliance with the Water Framework Directive and River Basin Management Plan) of wastewater.
- **CPO5.94** Support strategic wastewater treatment infrastructure investment and provide for the separation of foul and surface water networks to accommodate future growth in the County.
- **CPO12.34** Preserve, protect and enhance the Counties inland lakes and waterways for their amenity and recreational resource amenity, including the Royal Canal, the Rivers Shannon, Inny and Camlin and Lough Ree, Lough Gowna as well as the County's other rivers and lakes.
- **CPO12.36** Protect Lough Ree from unsustainable, large-scale and high volume abstraction of water resources for use in areas external to County Longford.
- **CPO12.37** Ensure all abstractions of water from Lough Ree will be subject to assessment for compliance with the requirements of Article 6 of the Habitats Directive.
- **CPO12.67** Ensure that the County's watercourses are retained for their biodiversity and flood protection values.
- **CPO12.58** Conserve and enhance where possible, the wildlife habitats of the County's rivers and riparian zones, lakes, canals and streams which occur outside of designated areas to provide a network of habitats and biodiversity corridors throughout the county.
- **CPO12.59** Maintain a biodiversity zone of not less than 10 metres from the top of the bank of all watercourses in the county, with the full extent of the protection zone to be determined on a case by case basis by the Council, based on site specific characteristics and sensitivities.

Chapter 3

Consideration of Alternatives

3.1 This section summarises the alternatives considered for the Plan during the preparation process. These alternatives have been incorporated into the Plan having regard to both:

- The environmental effects (including those related to ecology and European sites) which are identified by the SEA (informed by the AA) and are detailed above; and
- Planning - including social and economic - effects that also were considered by the Council.

Limitations in Available Alternatives:

3.2 The Plan is required to be prepared by the existing, Longford County Development Plan 2021-2027 and the Planning and Development Act 2000 (as amended), which specifies various types of objectives that must be provided for by the Plan. The alternatives available for the Plan are guided by the provisions of higher-level planning objectives, including those of the National Planning Framework, the Regional Spatial and Economic Strategy for the Southern Region and the Development Plan. These documents set out various requirements for the content of the Plan including on topics such as land use zoning and the sustainable development of settlements.

3.3 The following reasonable alternatives considered in the Environmental Report were:

- Alternative 1: Town Centre First Approach – Develop Longford Town in line with the Draft Town Centre First Approach Strategy and the key priorities for growth of a ‘Key Town’ in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (i.e. more consolidated and compact growth).

- Alternative 2 - Dispersed growth (less consolidated and compact).

Reasonable Alternative 1 – Town Centre First Approach

- Reasonable Alternative 1 seeks to develop Longford Town in line with the Draft Longford Town Centre First Approach Strategy and the priorities for growth of a 'Key Town' in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities. The main aim of this approach therefore is to promote more consolidated and compact growth.
- This approach would regenerate brownfield land; reuse existing buildings; and be more efficient in terms of infrastructure provision and resource use. It would focus development in more urban areas, meaning greater reuse of buildings and less development of greenfield land. Although brownfield land has some biodiversity value, encouraging development on these sites over greenfield sites which often contain more habitats will have a positive effect on biodiversity.
- The Town Centre First Strategy promotes Longford as a town of cultural and heritage significance which may increase the appreciation of and accessibility to heritage assets. It promotes the reuse of existing buildings and brownfield land which would prevent soil sealing of greenfield land. This would aid in minimising and mitigating runoff from new developments and would reduce flood risk. Directing new development to the town centre will enable connections to the public water and waste water infrastructure, avoiding the need for individual septic tanks to be installed which can increase the risk of pollution. In addition, the Town Centre First Strategy promotes prioritising climate change adaptation
- It would promote higher density development in the town which would result in people living closer to services and facilities and boost the vitality of the area. Higher density living also promotes more active travel and greater levels of social inclusion as well as providing natural surveillance, which all enhance health, wellbeing and safety of Longford's residents. In addition, the town centre first approach supports the development of a

socially connected town with inclusive spaces and places which are accessible, age friendly, safe and welcoming, as well as the development of walkways and river access.

- This alternative would reduce the need to travel by private vehicle to access services and facilities and would increase access to sustainable modes of travel such as walking and cycling. This would result in decreased transport-related emissions and subsequently improve air quality.

Reasonable Alternative 2 – Dispersed Growth

- Reasonable Alternative 2 supports dispersed growth in Longford. This approach supports development which is less consolidated and compact.
- Dispersed growth will likely result in the development of significant areas of greenfield land. This could sterilise mineral resources as well as resulting in the inefficient use of land by focusing development on undeveloped areas. Dispersed development will not optimise the use of existing infrastructure and will likely require the development of new infrastructure.
- It would likely result in the development and loss of significant areas of greenfield land, which would harm the natural environment through habitat loss and subsequent fragmentation of the ecological network. The loss of greenfield land would adversely affect soil quality resulting in soil sealing which reduces the extent of permeable surfaces, increasing surface water runoff into nearby watercourses, and flood risk. Unlike compact growth of the town which has existing infrastructure, the dispersal of growth will require new developments to install individual waste water infrastructure which increases the risk of water pollution.
- Access to services and facilities would be more difficult, especially via active travel and public transport due to distance and a relative lack of provision of public transport outside the town centre. This would likely result in a higher dependence on and use of cars and less active travel, resulting in an increase in transport emissions.

- Development would be more dispersed and take place away from urban centres where there are already employment and education facilities. This would have negative impacts on social inclusion and access to these facilities would therefore be more difficult, especially via active travel and public transport due to distance and a relative lack of provision of public transport outside of the town centre. This would reduce active travel and increase vehicle-derived air pollution which will impact the physical and mental health of Longford's population.
- Dispersed development could adversely impact landscape character, visual amenity, and tranquillity and lead to settlement coalescence. Development of greenfield land could disturb buried archaeology and impact the setting of heritage assets.

Conclusion on why the preferred approach was chosen in light of other reasonable alternatives

3.4 The 'Dispersed Growth' scenario is likely to result in the most adverse effects across all SEA topic areas. The most positive effects are likely to be experienced by the scenario which proposes a more consolidated and compact growth, although adverse effects are also likely to occur for this option as it will be necessary to develop greenfield land closest to the town centre to meet the demand for housing and employment.

3.5 The proposed approach for the LAP is to develop the town in line with the Town Centre First Strategy and the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities. This approach minimises urban sprawl; reduces the need to travel by private vehicle; improves access to services and facilities, including sustainable and active travel infrastructure; enhances the townscape character, visual amenity and setting of heritage assets; and is the most efficient use of resources.

Chapter 4

AA Determination

Appropriate Assessment Determination

Under Section 177V of the Planning and Development Act 2000, as amended, for the Longford Town Local Area Plan 2025-2031

In order to comply with the requirements of Section 177V of the Planning and Development Act 2000, as amended, and pursuant to Article 6(3) of the Habitats Directive as to whether or not a plan or project would affect the integrity of any European site(s), this Appropriate Assessment determination is being made by Longford County Council relating to the potential for the Longford Town Local Area Plan 2025 - 2031 that is being adopted [See [reference 1](#)] to have effects on the integrity of European sites.

In carrying out this Appropriate Assessment (AA), the Council is taking into account the matters specified under Part XAB of the Planning and Development Act 2000 (as amended), including the following:

- The Natura Impact Report for the Proposed Material Alterations;
- The Natura Impact Report prepared for the Draft Plan;
- Written submissions made during the Plan preparation process; and
- Ongoing advice on AA from the Council's agents.

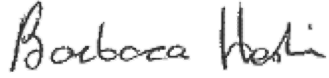
As part of the AA, it was identified that the Plan may, if unmitigated, have likely significant effects on 7 (no.) European sites. Plan elements that could potentially have a likely significant effect, if unmitigated, to European sites

include: the Plan's Core Strategy Objectives, residential development, economic development, tourism, regeneration and placemaking, social and green infrastructure, energy, communications and waste infrastructure, climate change and implementation and monitoring.

The identified effects arise from loss of functionally linked habitat, non physical disturbance, air pollution, recreational pressure and changes in hydrology, including water quality and quantity.

The undersigned, having carefully considered the information referred to above agrees with and adopts the reasoning and conclusions presented and determines that:

- The risks to the safeguarding and integrity of the Qualifying Interests, Special Conservation Interests and Conservation Objectives of the European sites identified have been addressed by the inclusion of mitigation measures into the Plan that will, in addition to the measures already in force through the Longford County Development Plan 2021-2027, prioritise the avoidance of effects in the first place and mitigate against the identified potential significant effects where these cannot be avoided. In addition, all lower-level plans and projects arising through the implementation of the Plan will themselves be subject to AA/screening for AA when further details of design and location are known.
- In-combination effects from interactions with other plans and projects are considered and the mitigation measures incorporated into the Plan are seen to be robust to ensure that there will be no significant effects as a result of implementation of the Plan either alone or in-combination with other plans/projects.
- Having incorporated mitigation measures into the Plan, it has been demonstrated that the Plan is not foreseen to give rise to any significant adverse effect on the integrity of any European site, either alone or in combination with other plans and projects **[See reference 2]** . This demonstration has been made in view of the Conservation Objectives of the habitats and/or species, for which these sites have been designated.



**Barbara Heslin,
Director of Service – Physical Development.**

3 June 2025

References

- 1 Incorporating the Draft Plan; all and any alterations; and all and any further modifications considered by the AA process.
- 2 Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the plan to proceed; and c) Adequate compensatory measures in place.

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