



Proposed Material Alterations to Draft Longford Town Local Area Plan 2025-2031

CHIEF EXECUTIVE REPORT ON
SUBMISSIONS RECEIVED

April 2025

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1.0 Introduction and Context

1.1 Background

The Draft Longford Local Area Plan 2025-2031 was placed on public display from Friday, 6 September 2024 until 4pm on Friday, 18th October 2024 (both dates inclusive). The Chief Executive's Report on submissions and observations received in respect of the Draft Plan was submitted to the Elected Members of Longford County Council on Friday 29th November 2024 for their consideration.

Having considered the Draft Longford Local Area Plan and the Chief Executive's Report, it was resolved by the Elected Members at a meeting of the Longford County Council on Wednesday 16th January 2025 to alter the Draft Longford Local Area Plan 2025-2031 in accordance with the recommendations of the Chief Executive Report. These alterations constitute a material alteration to the Draft Plan.

In accordance with Section 20(3)(j)(i) of the Planning and Development Act 2000 (as amended), the Proposed Material Alterations (75 no.) were published for public consultation for a minimum period of 4 weeks.

1.2 Proposed Material Amendments and Associated Reports

Longford County Council prepared Proposed Material Alterations to the Draft Longford Town Local Area Plan 2025-2031. It was determined that a Strategic Environmental Assessment (SEA) was required for some proposed material alterations and an Appropriate Assessment (AA) is not required for the proposed material alterations. The following documents were published for inspection and public consultation:

- Proposed Material Alterations to the Draft Longford Town Local Area Plan 2025-2031.
- Addendum Report to the Strategic Environmental Assessment (SEA) Environmental Report pursuant to the SEA Directive and Planning and Development (Strategic Environmental Assessment) Regulations 2004-2011 containing an assessment of the Proposed Material Alterations.
- Addendum Report to the Appropriate Assessment (AA) Screening and Natural Impact Report for the purposes of Appropriate Assessment pursuant to the EU Habitats Directive (92/43/EEC) and Planning and Development Act 2000 (as amended) containing an assessment of the Proposed Material Alterations.
- Addendum Report to the Strategic Flood Risk Assessment (SFRA) containing an assessment of the Proposed Material Alterations.

1.3 Public Consultation

The public consultation stage on the Proposed Material Alterations to the Draft Longford Town Local Area Plan (LAP) took place from 5 February 2025 to 5 March

2025 (inclusive). Public consultation was facilitated as follows:

- The statutory public notice was advertised in the locally circulating newspaper 'The Longford Leader', a copy of which is provided in Appendix A.
- Notification of the Proposed Material Alterations and a link to the website with the relevant documentation was issued to:
 - The statutory bodies listed in Appendix C (required under section 20(3)(a) of the Planning & Development Act 2000 as amended, and article 14 of the Planning and Development Regulations 2001 as amended).
 - Longford County Council elected members.
- Notification of the Proposed Material Alterations to the Draft Plan was advertised on the Council's Twitter, Facebook and Instagram accounts.
- The Proposed Material Alterations to the Draft LAP was uploaded onto a dedicated webpage:
<https://www.longfordcoco.ie/services/planning/longford-town-local-area-plan-2025-2031/>
- Hard copies of the draft plan were available for inspection at the following locations:
 - Longford County Council, Áras an Chontae, Great Water Street, Longford.
 - All branch libraries in County Longford.

1.4 Submissions

A total of 9 no. submissions were received within the statutory timeframe for public consultation (see Appendix B: List of Submissions Received). Only observations or submissions related to a proposed Material Alteration either via the online public consultation portal:

<https://consult.longfordcoco.ie/en/consultation/proposed-material-alterations-draft-longford-town-local-area-plan-2025-2031>

or by post, received within the above period, could be considered.

1.5 Requirement for Chief Executive Report

This Chief Executive's Report on the submissions made to the Proposed Material Alterations to the Draft Longford Town Local Area Plan is part of the statutory process of preparing a Local Area Plan and has been prepared in accordance with Section 20 (3) (k) of the Planning and Development Act 2000 (as amended). It relates to submissions and observations received from prescribed bodies and members of the public, following the publication of the Proposed Material Alterations to the Draft Longford Town Local Area Plan 2025-2031.

1.6 Content and Format of Chief Executive Report

In accordance with the requirements of Section 20 (i) of the Planning and Development Act 2000 (as amended) this report lists the persons who made submissions and observations, summarises the issues, gives the opinion of the Chief

Executive (CE) in relation to the issues raised and makes recommendations in relation to the Proposed Material Alterations to the Draft Longford Town Local Area Plan. The recommendations consider the proper planning and sustainable development of the area, the statutory obligations of the local authority and relevant policies or objectives of the Government or of any Minister of the Government.

In this document, proposed changes to the text are denoted as follows:

Green – to the insertion of any new text as proposed in this Chief Executive's Report.

Green ~~striketrough~~ - to any new text to be deleted as proposed in this Chief Executive's Report.

Red – where there is additional text to be inserted as per the Material Alterations published in February 2025

Blue ~~striketrough~~ – text to be deleted as per the Material Alterations published in February 2025.

1.7 Next Steps - Members Consideration of Chief Executive Report

This Chief Executive's Report has been prepared, as required under Section 20(3)(k) of the Planning and Development Act 2000 (as amended). The report is submitted to the Elected Members for their consideration. Members shall consider the Proposed Material Alterations and the Chief Executive's Report and shall, no later than a period of six weeks after the Chief Executive's Report has been furnished to them, make the Plan with or without the Proposed Material Alterations.

The Members may also decide to change a material alteration, which is known as a 'further modification' to a material alteration. In accordance with Section 20(q) of the Act, a 'further modification' may be made only where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European Site, and shall not be made where it relates to an increase in the area of land zoned for any purpose or an addition to or deletion from the Record of Protected Structures.

In making the Plan, the Elected Members must consider Proposed Material Alterations to the draft Local Area Plan, the environmental reports and the Chief Executive's Report on any submissions received and decide whether to make the Local Area Plan with or without the Proposed Material Alterations.

Section 20(3)(r) of the Planning and Development Act 2000 (as amended) states that the Members of the Council are restricted to:

- Considering the proper planning and sustainable development of the area,
- The statutory obligations of the local authority in the area; and

- Any relevant policies or objectives for the time being of the Government or any Minister of the Government.

In addition, the Elected Members, acting in the interests of the common good and the proper planning and sustainable development of the area, must, in accordance with the 'Code of Conduct for Councillors' (July 2019) prepared under the Local Government Act 2001 (as amended), carry out their duties in a transparent manner, follow due process and make their decisions based on relevant considerations.

It is important to note that under section 19(2) *'a local area plan shall be consistent with the objectives of the development plan, its core strategy, and any regional spatial and economic strategy that apply to the area of the plan...'* Members must ensure, that the future growth strategy for Longford Town as set out in the LAP demonstrates consistency with the Core Strategy of the County Longford Development Plan 2021-2027.

1.8 When the Adopted Plan comes into Effect.

In accordance with Section 20 (4a) of the Act the Local Area Plan shall come into effect 6 weeks from the day that it is made.

2.0 Summary of Submissions Received, CE Response and Recommendations

2.1 Introduction

This section contains a summary of the 9 no. written submissions received as part of the draft LAP consultation process (see Appendix B: List of Submissions Received) and the CE Response and Recommendation to same. The CE's response on the issues raised take account of the following:

- the proper planning and sustainable development of the area,
- the statutory obligations of any local authority in the area, and
- any relevant policies or objectives of the Government or of any Minister of the Government.

2.2 Office of the Planning Regulator

Submission no.	LD-C5-10
Name	Office of the Planning Regulator
Subject	PMA 17, 23, 45, 51, 66, 73

Summary of Issues Raised:

The submission sets out 1 recommendation and 3 observations. Recommendations relate to clear breaches of relevant legislative provisions, of the national or regional policy framework and/or Ministerial guidelines under section 28. The Planning Authority is requested to implement or address OPR recommendations in order to ensure consistency with relevant policy and legislative provisions. Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The Planning Authority is advised to action an observation. A submission can include advice on matters the OPR considers would contribute positively to the proper planning and sustainable development of the area. The Planning Authority is advised to give full consideration to advice contained in a submission. With the exception of 1 recommendation relating to access arrangements to Abbeycartron lands, the OPR generally considers the approach taken is evidence-based and consistent with proper planning and sustainable development.

Abbeycartron Access Arrangements

Recommendation 4 (ii) of the OPR's submission on the draft LAP required clarity on the access arrangements for the Abbeycartron lands. The OPR welcomes the proposed material alterations to address this recommendation, specifically the removal of the access arrangements previously provided for the Abbeycartron lands in the Longford Northern Environs Local Area Plan 2008-2014 so that the lands will be accessed via the 'alternative sustainable proposal' also proposed in the draft LAP (with amendments). However, the material alterations include a new objective ST 27 (MA 66) and supporting text at section 14.4.9.2 Abbeycartron Sustainable Transport Proposal (MA 51) which reiterates Objective ST 27, which facilitate a reversal of this position.

Objective ST 27: *Ensure implementation of the Abbeycartron Sustainable Transport Proposal is dependent on prior 'traffic and transport' and permeability assessment, to the satisfactory standard and detail of Longford County Council and in consultation with TII, and it's determined alignment with Section 2.4 'Design Standards and Guidelines' of the current LTP. In the absence of said prerequisites, all development within the defined site of LTP's Fig. 5.8 shall revert to its Northern Environs Local Area Plan 2008-2014 infrastructural arrangement.* Inclusion of the last line is in conflict with proposed MA 63 (Sustainable Transport Objective ST 26) which requires developers to provide elements of the road network as per the Abbeycartron Sustainable Transport Proposal. Having regard

to Recommendation 4 (ii) of the OPR submission on the draft LAP, and to avoid conflict between material alterations, it is recommended to omit the last line of MA 51 and MA 66.

The OPR has concerns regarding the new map proposed under MA 51 for the Abbeycartron Sustainable Transport Proposal (section 14.4.9.2) which is proposing a 'road with designated footway and cycleway' over the Camlin River into the Templemichael Industrial zoned lands. At draft LAP stage this was a 'ped/cycle only route'. This alteration will create a full east-west orbital road through the lands and a parallel route to the N4 immediately to the north, increasing capacity for the private car in Longford and facilitating car-dependency and car movements for the Abbeycartron and adjoining Templemichael lands. This proposal will undermine Ireland's commitment to achieving its mandatory climate action targets under the Climate Action and Low Carbon Development Act 2015, as amended.

The Local Transport Plan did not consider this route/crossing and its proposed inclusion will undermine RPO 8.6 of the RSES and Policy Objective CPO 5.9 of the County Development Plan requiring preparation of a LTP for Longford Town. It also conflicts with objective ST 30 which supports the 'priority schemes' of the LTP: *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.* It is recommended to remove the new map proposed under MA 51 and replace it with the previous map from the draft LAP, entitled Alternative Sustainable Proposal (Figure 5.9 of LTP).

MA Recommendation 1 – Abbeycartron Access Arrangements

Having regard to integration of land use & sustainable transportation, and in particular to:

- section 8.3 and RPO 4.59 and RPO 8.1 of the RSES for the EMRA;
- RPO 8.6 of the RSES and Policy Objective CPO 5.9 of the Longford County Development Plan requiring preparation of a local transport plan;
- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, and the Climate Action Plan 2024, and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021); and
- Policy Objectives CPO 5.1, CPO 5.3, CPO 5.5, CPO 5.8, CPO 5.45, CPO 5.46, CPO 5.47 and CPO 5.71 for sustainable transport and mobility of the CDP,

the Planning Authority is recommended to:

- (i) omit the last line of MA 51 and MA 66; and
- (ii) remove the new map under MA 51 and replace it with the previous map from the draft LAP 'Alternative Sustainable Proposal (Figure 5.9 of LTP)'.

Chief Executive Response:

(i) The OPR has requested the omission of the last line of MA 51 and MA 66. Excerpts from the relevant sections of the Proposed Material Alterations have been extracted and the relevant text has been highlighted in yellow which relates. The text which the OPR requests to be removed for both Proposed Material Alteration 55 and 66 is identical and indicates that '*In the absence of said prerequisites, all development within the defined site of LTP's Fig. 5.8 shall revert to its Northern Environs Local Area Plan 2008-2014 infrastructural arrangement.*' As the new map contained with Proposed Material Alteration 51 and titled '*Abbeycartron Sustainable Transport Proposal*' is to be retained, Longford County Council is agreeable to the omission of this text. The *Abbeycartron Sustainable Transport Proposal Map* is to be updated to include minor modifications to the drawing and legend.

(ii) The OPR has requested the removal of the new map proposed under MA 51 and its replacement with the previous map from the draft Local Area Plan, entitled Alternative Sustainable Proposal (Figure 5.9 of LTP). However, Longford County Council is of the opinion that in order to promote the future development of Longford town, by opening up land locked lands thereby ensuring accessibility, the new map contained within Proposed Alteration no. 51 and titled '*Abbeycartron Sustainable Transport Proposal*' is to be retained. This is considered essential strategic infrastructure for the future development of the town.

It should also be noted that existing references to the '*LTP Abbeycartron Access Strategy*' will be updated in the document to '*Abbeycartron Sustainable Transport Proposal*' e.g. ST 28 and ST 29.

Chief Executive Recommendation:

(i) Amend Proposed Material Alteration 51 and 66 as follows:

- **Proposed Material Alteration 51** – Further amend as follows:

Section '14.4.9.2 Alternative Sustainable Proposal Option', to be amended to be renamed in the heading as follows:

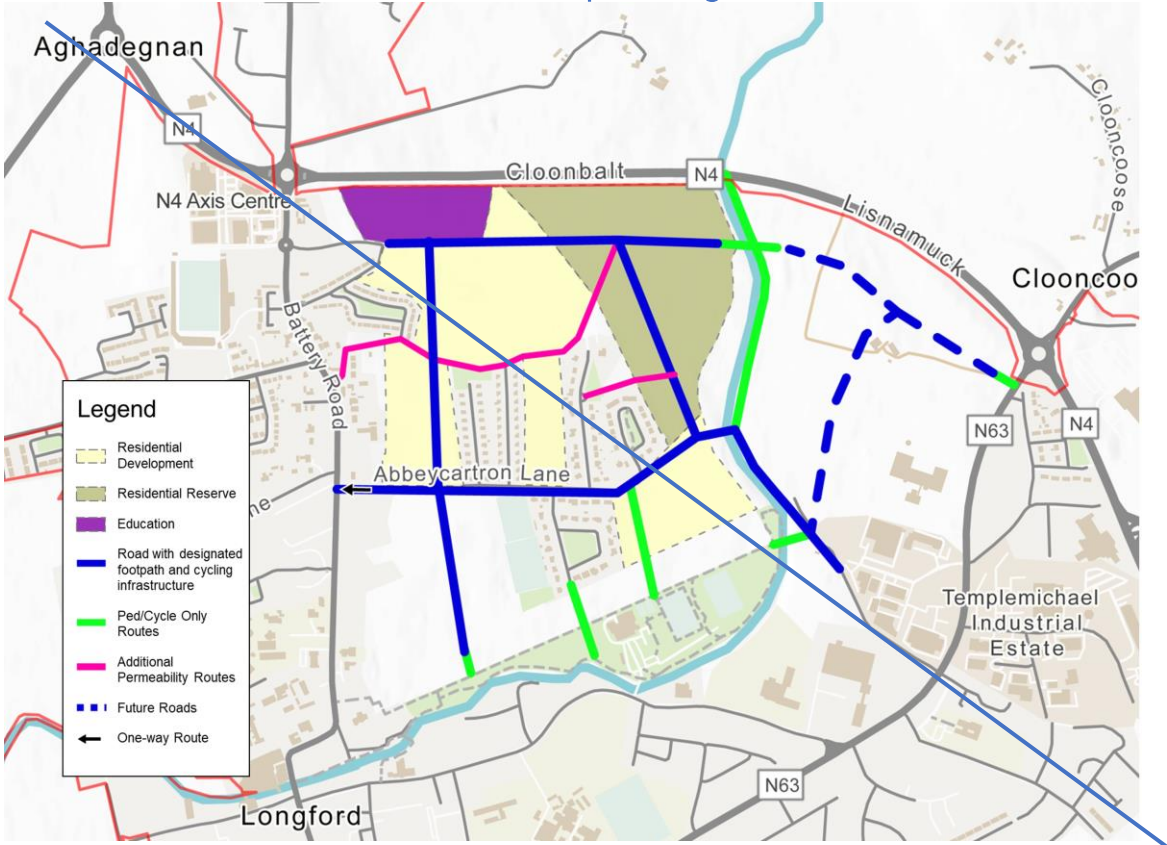
Alternative Abbeycartron Sustainable Transport Proposal

Include the following additional text after paragraph 3:

Implementation of the Abbeycartron Sustainable Transport Proposal is dependent on prior 'traffic and transport' and permeability assessment, to the satisfactory standard and detail of Longford County Council and in consultation with TII and NTA, and it's determined alignment with Section 2.4 'Design Standards and Guidelines' of the current LTP. ~~In the absence of said prerequisites, all development within the defined site of LTP's Fig. 5.8 shall revert to its Northern Environs Local Area Plan 2008-2014 infrastructural arrangement.~~

On page 215 of the Draft Local Area Plan the following figure is to be deleted:

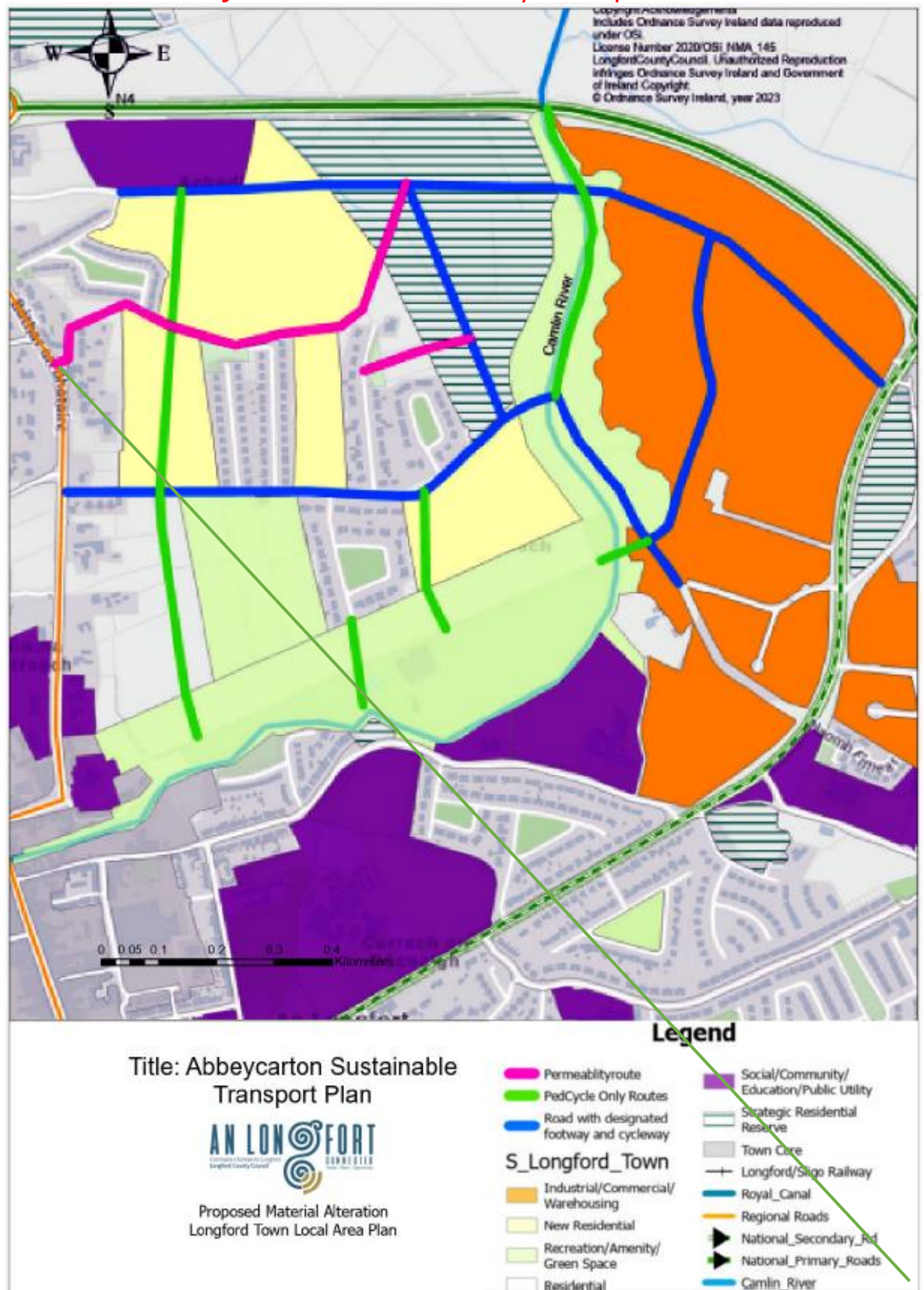
Alternative Sustainable Proposal (Figure 5.9 of LTP)

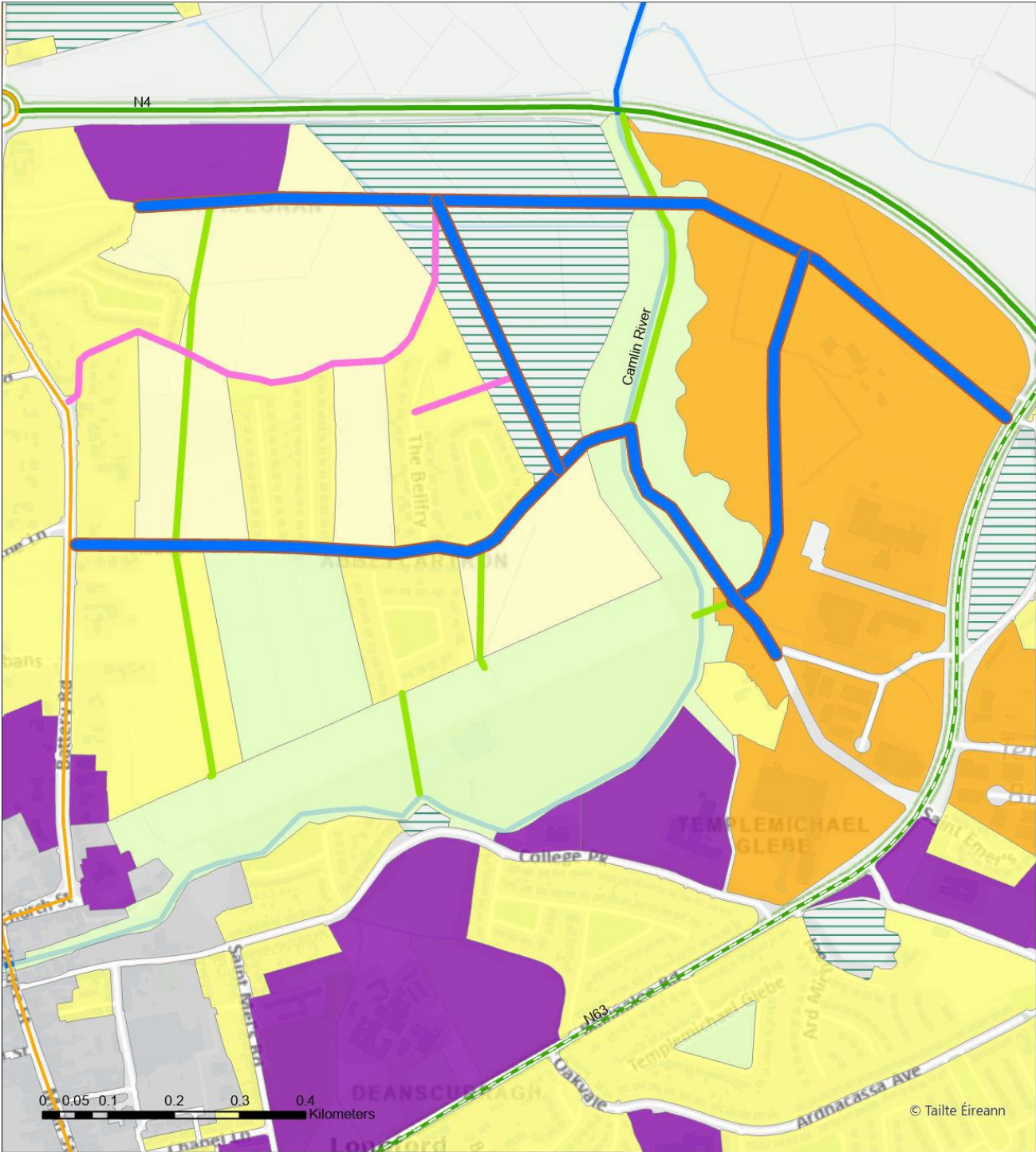


AND

the following heading and map to be included in its place: (the later map is an editorial update of below)

Abbeycartron Sustainable Transport Proposal





Title: Abbeycarton Sustainable
Transport Proposal



Proposed Material Alteration
Longford Town Local Area Plan

Legend

- Road with designated footway and cycleway
- Permeability Route
- Ped/Cycle only Route
- Industrial/Commercial/Warehousing
- New Residential
- Recreation/Amenity/Green Space
- Residential
- Social/Community/Education/Public Utility
- Strategic Residential Reserve
- Town Core
- Longford/Sligo Railway
- Regional Roads
- National_Secondary_Rd
- National_Primary_Rd
- Camlin_River
- GreenAreas_Longford
- Strategic Residential Reserve

In terms of an editorial correction as a result of the above name change to 'Abbeycartron Sustainable Transport Proposal' the following objectives from the Draft Plan will also be amended:

- *ST 28 Links bridging the Camlin River and facilitating east-west movements as alternatives to the existing N4/N5 bypass would be provided as developer-led interconnectors providing access to and within the site. These will be provided as part of a legible and permeable road network to make connections across the northern portion of the town and protect the national road network (See ~~LTP Abbeycartron Access Strategy Sustainable Transport Proposal~~).*
- *ST 29 A vehicular bridge will be provided to link proposed new development on the east and west side of the Camlin River network (See ~~LTP Abbeycartron Access Strategy Sustainable Transport Proposal~~).*

- **Proposed Material Alteration 66** – Further amend as follows:

In '14.6 Sustainable Transport Objectives' include the following additional objective:

ST 27: Ensure Implementation of the Abbeycartron Sustainable Transport Proposal is dependent on prior 'traffic and transport' and permeability assessment, to the satisfactory standard and detail of Longford County Council and in consultation with TII and NTA, and it's determined alignment with Section 2.4 'Design Standards and Guidelines' of the current LTP. ~~In the absence of said prerequisites, all development within the defined site of LTP's Fig. 5.8 shall revert to its Northern Environs Local Area Plan 2008-2014 infrastructural arrangement.~~

(ii) No change.

Development Strategy

Recommendation 1 of the OPR's submission to the draft LAP required the Planning Authority to set out a clear development strategy for the residential sites. As part of the response, the Planning Authority amended the phasing scheme for both New Residential and Industrial/Commercial/Warehousing lands. The revised phasing maps and tables provided for both land uses under MA 73 are welcomed. However, the infrastructural servicing information provided in the tables is quite limited for both land uses and the LAP could benefit from setting out the infrastructural requirements in more detail. Additionally, the Planning Authority is advised to update the analysis carried out during the LAP preparation with submissions from prescribed bodies to consultations during the plan preparation (e.g. the submission from Uisce Éireann (UÉ) on the draft LAP highlights deficiencies in the sewer network for

these lands and network extensions will need to be developer driver). This information is not included in the new table provided under MA 73.

MA Observation 1 – Development Strategy: Phasing Tables

Arising from the response to Recommendation 1 of the OPR's submission to the draft LAP, and to ensure the co-ordination of development and infrastructure capacity, the Planning Authority is advised to make the LAP with minor modifications to MA 73 to ensure any infrastructural deficiencies are highlighted (e.g. the Athlone Road lands) and to provide more detail on the infrastructural requirements for both the New Residential and Industrial/Commercial/Warehousing lands in the new phasing table. The draft Maynooth and Environs Joint LAP 2025-2031 provides a good example of this, see table 11.5 of the draft Joint LAP.

Chief Executive Response:

Minor modifications can be made to MA 73 to ensure infrastructural deficiencies are highlighted. More detail can be provided on the infrastructural requirements for both the New Residential and Industrial/Commercial/Warehousing land in the new phasing table. Additionally, the table has been updated to incorporate the analysis carried out during the LAP preparation with submissions from prescribed bodies to consultations during the plan preparation (e.g. the submission from Uisce Éireann (UÉ) on the draft LAP highlights deficiencies in the sewer network for these lands and network extensions will need to be developer driver). Cognisance has been given to the Draft Maynooth and Environs Local Area Plan 2025-2031 and associated table 11.5 in the format of the updated table and associated information.

Chief Executive Recommendation:

- **Proposed Material Alteration 73** – further amend to include the following additional tables after the respective 'New Residential' and 'Industrial/Commercial/Warehousing Phasing tables:

'New Residential' Phasing Table

New Residential Planning Table				
Phase 1				
Site no.	Site Area (ha.)	Density	Potential no. of housing units to be delivered	Infrastructural—Servicing Requirements
1	2.64	35dph	92	None
2	4.42		155	None
3	13.00		455	None
4	4.96		173	None
5	3.96		139	None
6	3.77		132	None
Total	32.75			1,146
Phase 2				
7	2.37	35 dph	83	Some
Overall Total	35.12		1229	

*Infrastructural Servicing Requirements – ‘New Residential’ Lands**

**Site 1: Demesne Lane; Site 2: Abbeycartron; Site 3: Abbeycartron; Site 4: Dempsey’s Field Abbeycartron; Site 5: Oaklands; Site 6: Oaklands (Phase 1: Short to Medium Term); Site 7: Demesne Lane (Phase 2: Medium Term).*

<i>Infrastructural Servicing Requirements – ‘New Residential’ Lands*</i>		
<i>Infrastructure</i>	<i>Delivery Schedule</i>	<i>Funding Sources</i>
<i>Movement and Active Travel</i>		
<i>Upgrades to existing infrastructure</i>	<i>In tandem with new development.</i>	<i>Developer, LCC, Statutory Bodies, Government Departments, Other.</i>
<i>Education</i>		
<i>Childcare facility</i>	<i>Provision of 1 facility providing for a minimum of 20 childcare places per 75 dwellings to be completed in the 1st phase of development.</i>	<i>Developer</i>
<i>Open Space Provision</i>		
<i>Provision of open space and recreational areas, including the provision of a playground.</i>	<i>In tandem with new development and completed prior to the occupation of 1st unit.</i>	<i>Developer</i>
<i>Water and Wastewater</i>		
<i>Water Supply/Wastewater Provision.</i>	<i>In tandem with new development.</i>	<i>Developer</i>
<i>Surface Water Drainage</i>		
<i>Infiltration at source to remove pollutants and minimal runoff.</i>	<i>In tandem with new development.</i>	<i>Developer</i>

‘Industrial/Commercial/Warehousing’ Phasing Table

<i>Site no.</i>	<i>Site Area (ha.)</i>	<i>Infrastructural Servicing Requirements</i>
<i>Phase 1</i>		
<i>1</i>	<i>20.66</i>	<i>None</i>
<i>2</i>	<i>8.26</i>	<i>None</i>
<i>3</i>	<i>2.97</i>	<i>None</i>
<i>4</i>	<i>4.11</i>	<i>None</i>
<i>5</i>	<i>5.38</i>	<i>None</i>
<i>Total</i>	<i>41.38</i>	
<i>Phase 2</i>		
<i>6</i>	<i>4.25</i>	<i>Some</i>
<i>Overall Total</i>	<i>45.63</i>	

*Infrastructural Servicing Requirements - 'Industrial/Commercial/Warehousing' Lands**

**Site 1: Ballinalee Rd; Site 2: N4; Site 3: Ballyminion; Site 4: Ballyminion; Site 5 Ballyminion (Phase 1: Short to Medium Term); Site 6: Pearse Park. (Phase 2: Medium Term).*

<i>Infrastructural Servicing Requirements -Industrial/Commerical/Warehousing Lands*</i>		
<i>Infrastructure</i>	<i>Delivery Schedule</i>	<i>Funding Sources</i>
<i>Movement and Active Travel</i>		
<i>Implementation of measures identified in the Longford Transport Plan (LTP) and Local Area Plan (LAP).</i>	<i>In tandem with new development.</i>	<i>Developer, LCC.</i>
<i>Water and Wastewater</i>		
<i>Water Supply/Wastewater Provision.</i>	<i>In tandem with new development.</i>	<i>Developer.</i>
<i>Surface Water Drainage</i>		
<i>Ensure connection to existing surface water network and site limited to appropriate greenfield/brownfield run-off rates. Any additional surface water should be contained within the site.</i>	<i>In tandem with new development.</i>	<i>Developer.</i>

Regeneration Strategy

Recommendation 3 of the OPR submission to the draft LAP required the Planning Authority to review and prioritise the regeneration strategy which originally identified 18 strategic sites to target investment more appropriately. The detailed response in the CE's Report to tackling vacancy is appreciated. These measures, such as the Vacant Homes tracker and the functions of the Vacant Homes Office, reflect the positive work of the Council and should be incorporated into the LAP, including in the Implementation and Monitoring Chapter.

The consolidation of the Camlin Quarter sites and rationalisation of the Strategic Sites from 18 to 12 is welcomed, along with the new map and table (MA 24). The amendment of Objective MP 02 to develop the strategic sites in line with the Longford 2040: A Town Centre First Strategy (TCFS) is welcomed (MA 17), together with omitting the requirement to prepare masterplans for the strategic sites (MAs 16, 17, 18, 19, 20, 21).

The LAP could benefit from providing additional detail regarding the TCFS, highlighting its publication and aims, especially given the valuable work and details it contains. New objective MP 05 (MA 23) should be further strengthened by linking it to the LTP and/or transport measures set out in the Transport Chapter of the draft LAP.

MA Observation 2 – Regeneration Strategy

Arising from the response to Recommendation 3 of the OPR submission to the draft LAP and in the interests of consistency and clarity and to ensure implementation of the LAP, the Planning Authority is advised to make the LAP with minor modifications to:

- (i) include the measures set out in the CE's Report to address vacancy, such as the Vacant Homes tracker and the functions of the Vacant Homes Office, in the LAP, including in the Implementation and Monitoring Chapter;
- (ii) MA 17, to include additional background detail on Longford 2040: A Town Centre First Strategy regarding its publication and aims;
- (iii) MA 23, to strengthen this objective further by linking it to the LTP and/or transport measures set down in the Transport Chapter of the LAP.

Chief Executive Response:

(i) The OPR has advised that the measures set out in the Chief Executive's Report to address vacancy, such as the Vacant Homes tracker and the functions of the Vacant Homes Office, in the Local Area Plan, including in the Implementation and Monitoring Chapter are to be included. However, it is noted that the relevant sections have not been subject to a Proposed Material Alteration and therefore cannot be further amended. Furthermore, to add additional text in another section could be confusing to the reader. It is considered that there is adequate detail within the document to address the observation from the OPR.

(ii) **Proposed material MA 17** – the OPR has requested that additional background detail on Longford 2040: A Town Centre First Strategy, is included. It is noted that Proposed Material Alteration 17 relates to amending section '9.5.3 Master Planning - Strategic Sites Objectives' and relates to the following objective which includes reference to the Town Centre First Strategy.

***MP 02** Promote the development and regeneration of the 'Strategic Sites' identified in the Longford Local Area Plan ~~in accordance with the Town Centre First Strategy, to include on a Master Plan basis.~~*

The OPR has suggested that additional background detail on Longford 2040: a Town Centre First Strategy be provided. However Proposed Material Alteration 17 which has been referenced by the OPR, relates to an objective MP02 which already references the Town Centre First Strategy. Additional information is contextual and is not considered appropriate for inclusion in Proposed Material alteration 17 which relates to a specific objective, and which is already referencing the Town Centre First Strategy which is considered sufficient. Furthermore, it is noted that there is already a section contained within the Draft LAP which contains detail on Town Centre First. This is considered adequate and also it is noted that this has been not subject to a Proposed Material Alteration and therefore cannot be further amended. Furthermore, to add additional text in another section could be confusing to the reader.

(iii) **Proposed Material Alteration 23** – this relates to the amendment of section '9.5.3 Master Planning - Strategic Sites Objectives' to include the following objective:

MP 05 Ensure the development of strategic sites shall include the provision of improved transport infrastructure links to support the economic development of Longford Town.

The observation by the OPR that this objective could be strengthened further by linking it to the Local Transport Plan and / or transport measures set down in the Transport Chapter of the Local Area Plan is accepted.

Chief Executive Recommendation:

(i) No change.

(ii) No change.

(iii) **Proposed Material Alteration 23** – Further amend as follows:

Amend section '9.5.3 Master Planning - Strategic Sites Objectives' to include the following objective:

MP 05 Ensure the development of strategic sites shall include the provision of improved transport infrastructure links to support the economic development of Longford Town in accordance with the provisions of the Local Transport Plan and the transport measures contained in the Sustainable Transport section of this Plan.

Sustainable Urban Drainage Systems

Recommendation 7 of the OPR's submission to the draft LAP required the Planning Authority to review and amend the sustainable infrastructure policy framework. MA 45 addresses this recommendation appropriately. It is suggested the wording of this new objective (WS 22) is expanded to refer to both existing and new developments. UÉ's submission makes a similar request.

MA Observation 3 – Sustainable Urban Drainage Systems

Arising from the response to Recommendation 7 of the OPR's submission to the draft LAP and in the interests of consistency and clarity and to ensure the implementation of the LAP, the Planning Authority is advised to make the LAP with a minor modification to MA 45 to strengthen this objective further by referring to both existing and new developments.

Chief Executive Response:

This should be read in conjunction with the following submission - Uisce Éireann (UÉ) - LD-C5-3

Proposed Material Alteration MA 45 an additional objective in section 13.3.3 'Water Supply and Wastewater Services Objectives' include the following additional objective:

WS 22: Promote the introduction of Nature Based SuDS in areas contributing to combined sewers, in particular, where streetscape enhancement programmes or resurfacing programmes are planned.

It is accepted that this objective could be strengthened further by referring to both existing and new developments.

Chief Executive Recommendation:

- **Proposed Material Alteration 45** – Further amend as follows:

In section 13.3.3 'Water Supply and Wastewater Services Objectives' include the following additional objective:

WS 22: Promote the introduction of Nature Based SuDS in areas contributing to combined sewers, in particular, where streetscape enhancement programmes or resurfacing programmes are planned for both existing and new developments. Changing the urban landscape to a more sustainable one that seeks to mimic the natural water balance is important for both new and existing developments.

Other Issue Raised: Map Clarity

The Planning Authority should improve the clarity of the map provided under MA 10, specifically the numbering and boundary of sites.

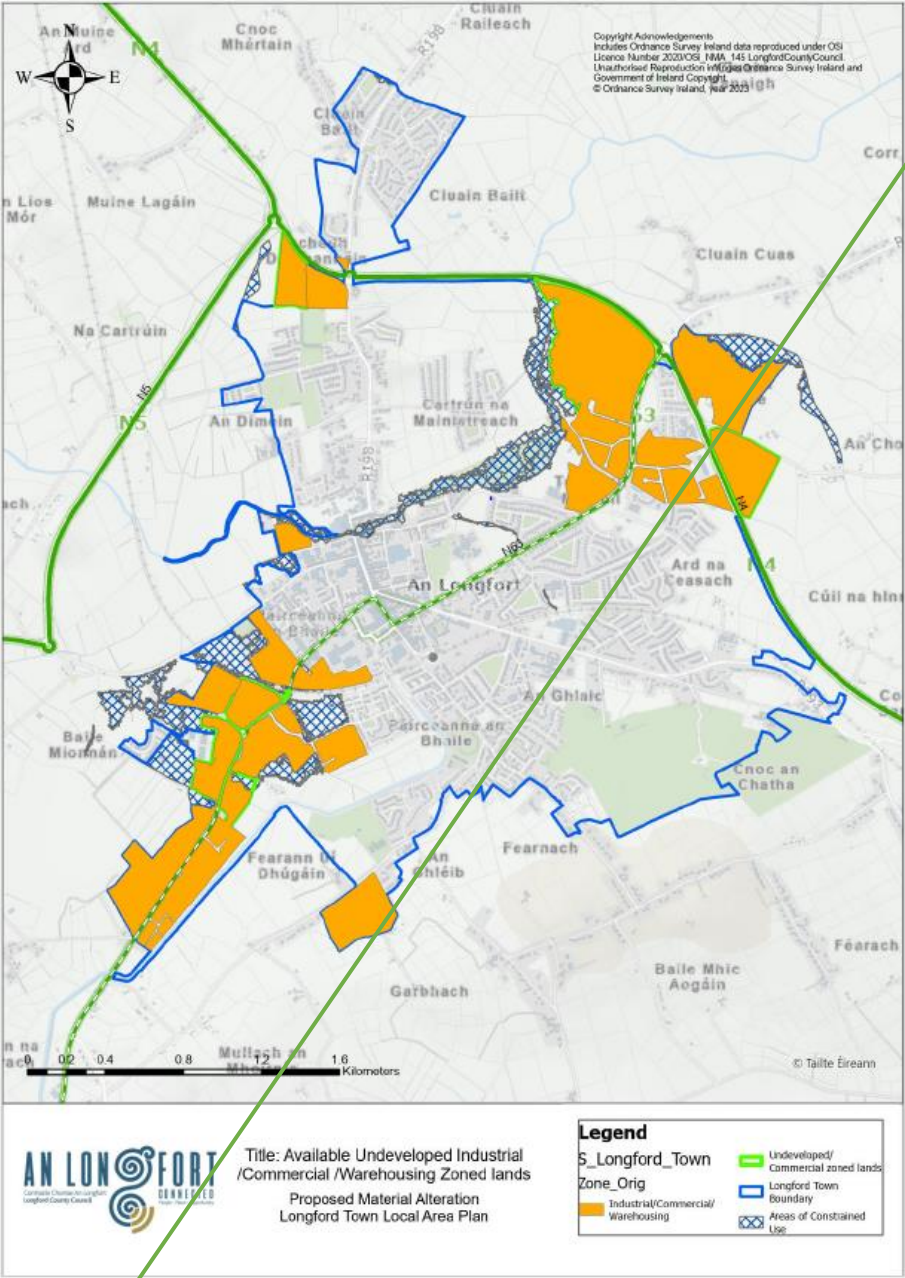
Chief Executive Response:

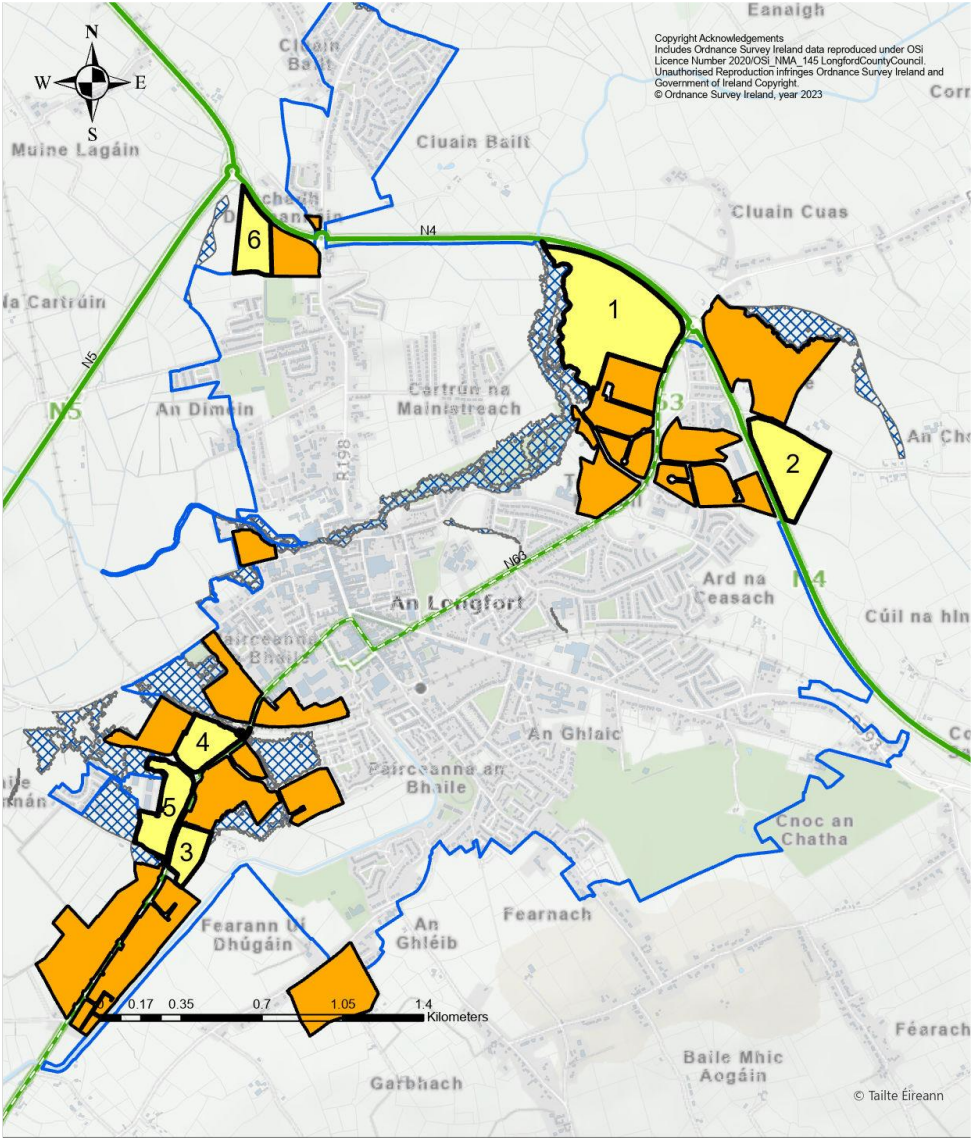
Improvements to the clarity of the mapping and specifically the numbering and boundary of the sites will be undertaken and an improved map included.

Chief Executive Recommendation:

- **Proposed Material Alteration 10** – Further amend with the removal of the following map and replacement with a clearer map as follows:

Section '7.3.1 Primary Growth Town' include the following map and table:





Title: Available Undeveloped Industrial
Commercial/Warehousing Zoned lands.
Proposed Material Alteration
Longford Town Local Area Plan

S_Longford_Town
Zone_Orig

- Industrial/Commercial/
Warehousing
- Undeveloped/
Commercial zoned lands

Industrial / Commercial / Warehousing Lands Availability Analysis Table

<i>Industrial / Commercial/Warehousing Lands</i>	
<i>Available Undeveloped Lands</i>	
<i>Site Number</i>	<i>Area in Ha.</i>
<i>1</i>	<i>20.66</i>
<i>2</i>	<i>8.26</i>
<i>3</i>	<i>2.97</i>
<i>4</i>	<i>4.11</i>
<i>5</i>	<i>5.38</i>
<i>6</i>	<i>4.25</i>
<i>Total</i>	<i>45.63</i>

**'Available Undeveloped' includes lands for which there is no planning permission.*

Other Issue Raised: Flooding

In terms of flooding matters under Recommendation 8, the CE Report states that these issues will be addressed in the next iteration of the Strategic Flood Risk Assessment. The OPR assumes this refers to the process of adopting the LAP. These matters should have been addressed at the material alterations stage.

Chief Executive Response:

See OPW Chief Executive Response (Submission LD-C5-9).

Chief Executive Recommendation:

See OPW Chief Executive Recommendation (Submission LD-C5-9).

2.3 National Transport Authority (NTA)

Submission no.	LD-C5-5
Name	National Transport Authority (NTA)
Subject	PMA 51, 66, 54, 68

Summary of Issues Raised:

Proposed Material Alteration 51 and 66

The NTA welcome the inclusion of an objective for implementation of the Abbeycarton Sustainable Transport Proposal. However, provision is still made for the infrastructure option put forward as part of the Northern Environs Local Area Plan 2008-2014. The revised map shows a full east-west orbital road through the lands, in contrast to the previous map which showed a ped/cycle only section across the river, and as the route approached the N63. The NTA is concerned such an approach would significantly increase capacity for the private car and facilitate car-dependency in Abbeycarton.

To ensure development of Abbeycarton lands can be progressed consistent with current planning and transport policy, only the Sustainable Transport Proposal, as amended according to the recommendation below, should be included, in line with a consistent, sustainable approach to transport provision as set out in the LTP. The further development and implementation of this option can be undertaken in collaboration with the NTA and TII and it is requested that this is reflected in the LAP. The NTA recommend the following:

- Remove reference to the Northern Environs Local Area Plan 2008-2014 infrastructural arrangement;
- Replace the new map with the previous Sustainable Transport Proposal map; -see OPR submission
- Include reference to the Abbeycarton Sustainable Transport Proposal being progressed through consultation with the NTA and TII.

Proposed Material Alteration 54

This objective is welcomed and recommend alteration to include reference to the Cycle Design Manual (2023) which replaced the National Cycle Manual.

Proposed Material Alteration 68

Inclusion of ST 33 is welcomed and the NTA encourage that the modal share targets detailed in the LTP are specifically referenced in the LAP.

Chief Executive Response:

- **Proposed Material Alteration 51 and 66** – to be read in conjunction with OPR submission and associated CE Response and Recommendation.

Longford County Council is accepting of the NTA comments with the exception of the omission of the LTP map which does not reflect Longford County Council's position. It is imperative that the new map is retained in order to ensure that lands are not landlocked and in order to ensure the future development and growth of Longford Town as a Key Town in line with the RSES. This is considered essential strategic infrastructure for the future development of the town and is facilitated in the respective Proposed Material Alterations 50 and 51. The *Abbeycarton Sustainable Transport Proposal Map* is to be updated to include minor modifications to the drawing and legend. In terms of the NTA's request to Include reference to the Abbeycarton Sustainable Transport Proposal being progressed through consultation with the NTA in addition to the TII this can be addressed by minor modifications to Proposed Material Alteration 51 and 66.

- **Proposed Material Alteration 54**

This proposed Material Alteration relates to the amendment of section '14.6 Sustainable Transport Objectives' and associated objective ST05 which relates to enhanced pedestrian and cycling permeability and networks in the urban environment of Longford Town in accordance with the provisions of the LTP and relevant best practice documents, relevant national policy and TII publications. It is accepted that as the National Cycle Manual (NTA, 2011) has been replaced by the Cycle Design Manual (2023), the objective should be updated accordingly to reflect this.

- **Proposed Material Alteration 68**

This proposed Material Alteration relates to the inclusion of an additional objective in the '14.6 Sustainable Transport Objectives' as per ST 33 which aims to 'Encourage modal share targets in accordance with LTP and relevant recommended standards and guidelines'. While the NTA have welcomed the inclusion of ST 33 and would encourage that the modal share targets detailed in the LTP are specifically referenced in the LAP. In this regard it is noted that section '4.4 Future Mode Share Targets' of the Longford Town Local Transport Plan (October 2023) relates and can be included by way of reference in this objective. The modal share targets from the LTP relate to work commuting to decrease from 70% (2016) to 46% (2042), similar for cycling and school trips.

Chief Executive Recommendation:

- **Proposed Material Alteration 51** – see OPR Recommendation
- **Proposed Material Alteration 66** – See OPR Recommendation.

- **Proposed Material Alteration 54** – Further amend as follows:

Amend section '14.6 Sustainable Transport Objectives' as follows:

ST05: 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)~~ Cycle Design Manual (2023), and relevant national policy and TII Publications.

- **Proposed Material Alteration 68** – Further amend as follows:

In '14.6 Sustainable Transport Objectives' include the following additional objective:

ST 33: Encourage modal share targets in accordance with '4.4 Future Mode Share Targets' (work commuting to decrease from 70% (2016) to 46% (2042), similar for cycling and school trips) of the Longford Town Local Transport Plan (October 2023) and relevant recommended standards and guidelines.

2.4 Transport Infrastructure Ireland (TII)

Submission no.	LD-C5-7
Name	Transport Infrastructure Ireland (TII)
Subject	PMA 50, 51, 52, 59, 61, 63-68

Summary of Issues Raised:

Proposed Material Alterations 50 and 51

These Proposed Material Alterations propose significant amendment of Section '14.4.9 Abbeycarton Access Strategy' and consist of text and map/figure deletions, additional text and a proposed new map entitled Abbeycarton Sustainable Transport Proposal. The material alterations are confusing and require revision to a single 'sustainable transport proposal' that maintains existing commitment to further detailed traffic analysis for the maintenance of the protection of the strategic transport function of the national road network in accordance with higher order Plans and Policies. TII suggests the following revision of proposed material alteration 51 for clarity:

Implementation of the Abbeycarton Sustainable Transport Proposal is dependent on prior 'traffic and transport' and permeability assessment, to the satisfactory standard and detail of Longford County Council and in consultation with TII ~~and it's determined alignment with Section 2.4 'Design Standards and Guidelines' of the current LTP. In the absence of said prerequisites, all development within the defined site of LTP's Fig. 5.8 shall revert to its Northern Environs Local Area Plan 2008-2014 infrastructural arrangement.~~

The above text refers to 'LTP's Fig. 5.8' yet presented (for deletion a part of material alteration no. 51) Figure 5.9 of the LTP. An editorial review is recommended of the proposed Figure entitled 'Abbeycarton Sustainable Transport Proposal' proposed as part of Proposed Material Alteration 50 is recommended to ensure consistency with the legend.

Proposed Material Alteration 52

The proposed replacement map/figure does not include a legend and is difficult to interpret. In addition, it is suggested the proposed material alteration be revised to remove any map /figure where the reader is directed to the LTP.

Proposed Material Alteration 59

TII advises traffic and transport assessments are primarily for Longford County Council as planning and roads authority and recommends the following revision:

ST22: Longford County Council ~~in conjunction~~ consultation with TII, will carry out detailed traffic and transport assessments for development proposed to the north of the N4 Longford By-Pass and the sequential provision of a local roads network

~~provisions as an alternative to the N4/N5 bypass to service the effective and sustainable development of these lands.~~

Proposed Material Alteration 61

TII recommends the following revision in the interests of clarity:

ST24: Ensure any proposed development shall have regard to National policy concerning the preservation of the N4 national primary road for National/Regional traffic and demonstrates compliance with TII Publications, DMURS and other appropriate applicable standards/guidance.

Proposed Material Alteration 63 to 68

There are contradictions and confusion in section 14.4.9 re. Abbeycarton and material Sustainable Transport Objectives ST26, ST28 and ST29 which relate to either or both Abbeycarton Access Strategies, need to be reviewed for consistency with Material Alterations 50 and 51.

TII recommends the following revisions:

Proposed Material alteration 66

ST 27: Ensure Implementation of the Abbeycarton Sustainable Transport Proposal is dependent on prior 'traffic and transport 'and permeability assessment, to the satisfactory standard and detail of Longford County Council and in consultation with TII. ~~and it's determined alignment with Section 2.4 'Design Standards and Guidelines' of the current LTP. In the absence of said prerequisites, all development within the defined site of LTP's Fig. 5.8 shall revert to its Northern Environs Local Area Plan 2008-2014 infrastructural arrangement.~~

Proposed Material alteration 67:

This proposes a new objective ST31 that partly accords with the TII recommendation to the draft LAP in relation to the maintenance of the protection of the safe and efficient operation of the national road network. TII recommends revision in the interests of clarity and observance of established planning and development management statutory consultee protocol:

ST 31: Require that any transport measures which interact with the national road network must observe relevant national policy contained in the 'Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012); ~~require undertake~~ prior consultation with TII via Longford County Council and demonstrate compliance with the County Development Plan and all relevant TII Publications standards.

Chief Executive Response:

- **Proposed Material Alteration 50 and 51** – to be read in conjunction with OPR submission and associated CE Response and Recommendation.

Longford County Council notes the TII comments. This has been discussed with the Roads Department and in relation to proposed material alteration 51, the Council is agreeable to the omission of the last line of the text to be included after paragraph 3. The inclusion of the reference to relevant standards is considered beneficial in terms of best practice and is to be retained. This is in accordance with the OPR recommendation. This is similarly addressed in relation to Proposed Material Alteration 66 of this submission which provides more detail.

Aside from this the remaining changes to the text and maps as presented in Proposed Material Alteration 50 and 51 shall be retained as indicated, subject to minor modification to take account of transposing and clerical errors. It is imperative that the new map entitled 'Abbeycartron Sustainable Transport Proposal' is retained in order to ensure that lands are not landlocked and in order to ensure the future development and growth of Longford Town as a Key Town in line with the RSES. This is considered essential strategic infrastructure for the future development of the town.

It is submitted that the text in Proposed Material Alteration 51 refers to Figure 5.8 yet presented for deletion is Figure 5.9 of the LTP. In terms of clarity Proposed Material Alteration 50 relates to the deletion of Figure 5.8 of the LTP '*Longford Northern Environs Local Area Plan 2008-2014 Map*'. Proposed Material Alteration 51 relates to the deletion of Figure 5.9 of the LTP '*Alternative Sustainable Proposal*'. Both are to be deleted as part of the respective Proposed Material Alterations 50 and 51, and this is considered satisfactory. The *Abbeycartron Sustainable Transport Proposal Map* is to be updated to include minor modifications to the drawing and legend.

Proposed Material Alteration 51 – An editorial review has been undertaken of the proposed Figure entitled 'Abbeycartron Sustainable Transport Proposal' proposed as part of Material Alteration 51 in order to ensure its accuracy and consistency with the legend and a revised map is to be included in the Final Plan.

In relation to ST 28 and ST 29 it is noted that the last line of both of these objectives states the following: "*see LTP Abbeycartron Access Strategy*". As an editorial edit this should be amended to "*see Abbeycartron Sustainable Transport Proposal*".

- **Proposed Material Alteration 52**

It is proposed to replace the existing map with a different map. The relevant map is Figure 5.6 from the LTP and is titled 'Overlap and potential conflicts between Networks Map'. However, the map has been incorrectly transposed from the LTP as the legend was omitted. This error is to be corrected. The inclusion of the text 'Figure

5.6 of the LTP' is not considered necessary and can be omitted. As there is a section (14.4.10) in the draft LAP in relation to Overlapping Infrastructure networks, the map is considered a positive addition as it certainly helps to make sense of the text.

- **Proposed Material Alteration 59**

TII advise a revision to the text of objective ST22 as the required traffic and transport assessments are primarily for Longford County Council as planning and roads authority. This has been discussed with the Roads Department and it is considered that the objective should be revised in this regard.

- **Proposed Material Alteration 61**

TII recommends a revision to the text of ST 24 which relates to the omission of the reference to Regional Traffic and DMURS. As this policy relates to the N4 National Primary Road this is considered acceptable and the policy should be revised appropriately.

- **Proposed Material Alteration 63 to 68**

There are contradictions and confusion in section 14.4.9 re. Abbeycarton and material Sustainable Transport Objective nos. ST26, ST28 and ST29 which relate to either or both Abbeycarton Access Strategies, need to be reviewed for consistency with material alterations 50 and 51. The majority of this issue has already been addressed. As per Proposed Material Alteration 63, ST 26 has been amended to refer to '*Abbeycarton Sustainable Transport Proposal*'. In relation to ST 28 and ST 29 it is noted that the last line of both of these objectives states the following: "*see LTP Abbeycarton Access Strategy*". While it is noted that neither ST 28 or ST 29 are subject to a Proposed Material Alteration, it is considered that as a consequence of Material Alterations 50, 51 and 63 and in terms of consistency in the document that these should be amended to "*Abbeycarton Sustainable Transport Proposal*".

- **Proposed Material alteration 66**

This proposes a new ST27 that repeats the proposed text of material alteration 51. TII recommends the following revision of material alteration no. 66. The TII recommendation is similar to the OPR recommendation on this proposed Material Alteration 66 which looked for the last line of ST27 to be omitted and to which it is considered is a satisfactory further amendment. However, TII have looked for additional wording which relates to 'alignment with Section 2.4 'Design Standards and Guidelines' of the current LTP'. This has been discussed with the Roads Department who have no objection to this text remaining as all they say is we will comply with the appropriate standards, which are what is required in any case. Therefore, the text should be amended to reflect the OPR submission which omits the last line of ST27 only, but retains the reference to Design Standards and Guidelines as a good practice reference.

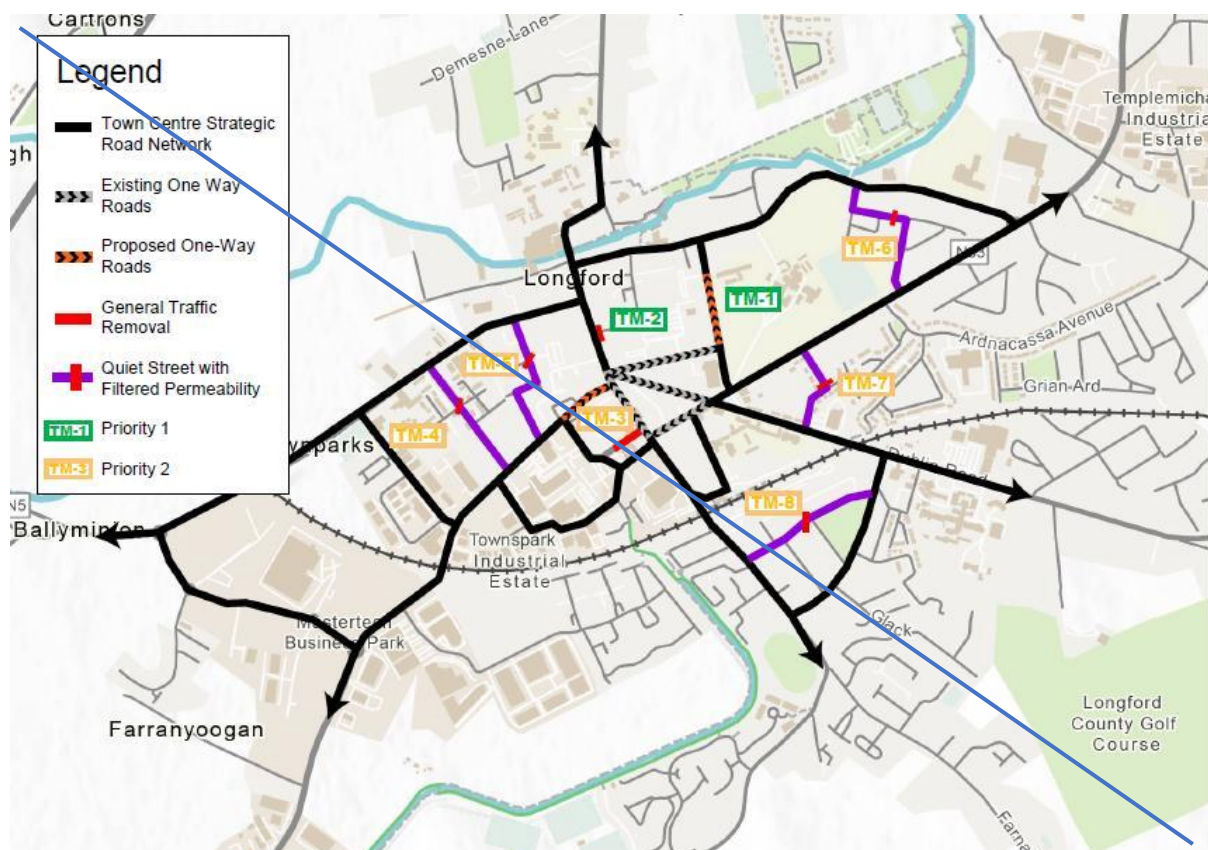
- **Proposed Material alteration 67**

This proposes a new objective ST31 which relates to the maintenance of the protection of the safe and efficient operation of the national road network. Revision of the material alteration in the interests of clarity and the observance of established planning and development management statutory consultee protocol is considered acceptable and the proposed Material Alteration should be amended to reflect this.

Chief Executive Recommendation:

- Proposed Material Alteration 50 – no change.
- Proposed Material Alteration 51 – see OPR Recommendation.
- Proposed Material Alteration 52 – Further amend as follows:

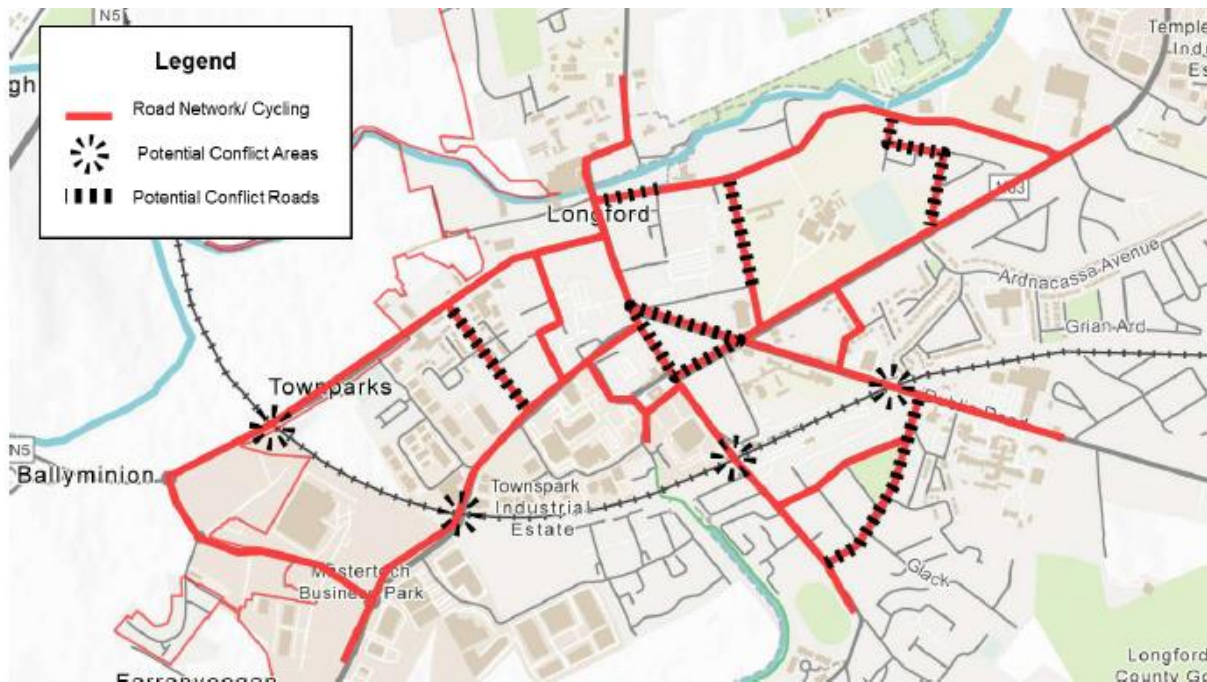
In Section 14.4.10 Overlapping Infrastructure Networks', delete the following map 'Overlap and potential conflicts between Networks Map (Figure 5.6 of the LTP)'.



AND

The following 'Overlap and potential conflicts between Networks Map' (Figure 5.6 of the LTP) — Map to be included:

Overlap and Potential Conflicts Between Networks Map



- **Proposed Material Alteration 59** – Further amend as follows:

Amend section '14.6 Sustainable Transport Objectives' as follows:

ST22: Longford County Council in conjunction consultation with TII, will carry out detailed traffic and transport assessments for development proposed to the north of the N4 Longford By-Pass and the sequential provision of a local roads network provisions as an alternative to the N4/N5 bypass to service the effective and sustainable development of these lands.

- **Proposed Material Alteration 61** – Further amend as follows:

ST24: Ensure any proposed development shall have regard to National policy concerning the preservation of the N4 national primary road for National/Regional traffic and demonstrates compliance with TII Publications, DMURS and other appropriate applicable standards/guidance.

- **Proposed Material Alteration 66** – See OPR Recommendation.
- **Proposed Material Alteration 67** – Further amend as follows:

In '14.6 Sustainable Transport Objectives' include the following additional objective:

ST 31: Require that any transport measures which interact with the national road network must observe relevant national policy contained in the 'Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012); require undertake prior consultation with TII via Longford County Council and demonstrate compliance with the County Development Plan and all relevant TII Publications. standards.

2.5 Department of Education

Submission no.	LD-C5-6
Name	Department of Education
Subject	PMA 25, 26

Summary of Issues Raised:

Proposed Material Alteration 25

The Department has indicated that the Longford Town School Places Assessment Table does not identify the levels of enrolment at these schools. This extra data impacts on the following statement within the table. *'This would suggest that the town is sufficient in terms of post-primary schools. However, there is a deficiency in terms of primary school provision.'* In terms of primary school provision, the statement is accurate. The Department have identified a small potential increase in primary school place demand, which most likely could be dealt through extra capacity in current schools or the expansion thereof.

In terms of post-primary provision, the statement is inaccurate. The catchment areas for post-primary schools are far wider than for primary schools. The school planning area (SPA) for Longford Town covers an area that includes Longford Town, Newtownforbes, Ardagh, Ballinalee and Edgeworthstown. As all the post-primary schools for this SPA are in Longford Town, the 2023/24 post-primary enrolment figure of 1,546 is comprised of pupils that reside in all the settlements above and their rural environs. The majority of these areas sit outside the LAP boundary. For this reason, there is little spare capacity currently at post-primary level. Taking this into account and future population growth, the department stated in its Draft Plan submission that:

Post-primary school place demand could have a small yet significant increase. It is currently expected that this extra requirement could be accommodated by the planned expansion of St. Mel's College which will create additional future capacity. It is also noted that Section 10.3.2 and the Education Facilities map within (page 117) references an area in Abbeycartron, Longford as being a potential site for future post-primary provision. As there will be a need to review post-primary school requirements in the future, the department considers that it would be prudent to maintain this reservation at this time.

As written proposed Amendment 25 suggests a spare capacity of 533 places at post-primary level. A surplus of post-primary places does not exist and the department requests that the School Places Assessment table be further adjusted to reflect a more accurate school place requirement position.

Proposed Material Alteration 26

The department notes the proposed amendment to all references in the Draft Local Area Plan from the Department of Education & Skills to the Department of Education.

Chief Executive Response:

Proposed Material Alteration 25

This relates to amendment to Section '10.3.2 Education and Training' paragraphs 2 and 3 and 'Longford Town School Places Assessment Table'. The contents of this Proposed Material Alteration and the contents of the Department submission are noted. Further amendments to address this are to be included. Levels of enrolment are to be included in the table and additional text is to be included to reflect the Department view in relation to primary school and post primary school place demand.

Section 10.3.2 and the Educational Facilities map references an area in Abbeycartron as being a potential site for future post primary provision. The Department consider that as there will be a need to review post-primary school requirements in the future, that it would be prudent to maintain this reservation at this time. The relevant area (Dempsey's Field) site has a site area of 4.96 ha. and is currently zoned 'New Residential' (see map).



As such a school is '*Permitted in Principle*' at this location and it is not considered necessary to change the zoning at this time. The Council is also cognisant that alternative sites may become more apparent in the future.

Also, it is noted that it is not currently envisaged that a post primary school will be required, as the Department have indicated that while post-primary school place demand could have a small yet significant increase, they have also indicated that it is currently expected that this extra requirement could be accommodated by the planned expansion of St. Mel's College which will create additional future capacity.

Proposed Material Alteration 26

This relates to the requested name change of the Department which is acknowledged by the Department and requires no further amendment.

Chief Executive Recommendation:

- **Proposed Material Alteration 25** – Further amend as follows:

Amend Section '10.3.2 Education and Training' paragraphs 2 and 3 and 'Longford Town School Places Assessment Table' as follows:

Primary and Secondary Schools:

There is no guiding population benchmark for the provision of primary or secondary school facilities in Ireland. Instead, these are determined on an area specific basis by the Department of Education ~~and Skills (DES)~~ having regard to available school capacity, demographic projections, an analysis of child benefit records, and local GIS travel pattern modelling. The ~~DES approach includes a general standard that for every 1,000 dwellings in an area, circa 12% of the population will require primary school places and 8.5% will require post primary school place.~~ Department currently uses an average of 10.25% which applies to projected population growth figures to determine primary school place needs, and an average of 7.5% of the same figures to determine post-primary school place needs. It is noted that these percentage figures are also subject to review. Applying this to the core strategy growth figures form Longford Town is set out in the subsequent table.

Longford Town School Places Assessment Table

<i>Primary School</i>	<i>DES Requirement</i>	<i>Existing Local Provision</i>	<i>Enrolment Figures 2023-2024</i>	<i>Differential</i>
For every 1,000 dwellings, c.12% of the population will require primary school places Based on 10.25% projected population growth (to 12,510 persons)	1,200 1282 places	1,147 places	1,150 places	-53 135 spaces
Post Primary				
For every 1,000 dwellings, c. 8.5% will require post primary school places Based on 7.5% projected population growth (to 12,510 persons)	850 938 places	1,471 places	1,546 places	+621 533 spaces

This would suggest that the town is sufficient in terms of post primary schools. However, there is a deficiency in terms of primary school provision (- 53 135 spaces).

The Department of Education has identified a small potential increase in primary school place demand, which most likely could be dealt through extra capacity in current schools or the expansion thereof. However the catchment areas for post-primary schools are far wider than for primary schools. The school planning area (SPA) for Longford Town covers an area that includes Longford Town, Newtownforbes, Ardagh, Ballinalee and Edgeworthstown. As all the post-primary schools for this SPA are in Longford Town, the 2023/24 post-primary enrolment figure of 1,546 is comprised of pupils that reside in all the settlements above and their rural environs. The majority of these areas sit outside the LAP boundary. For this reason, there is little spare capacity currently at post-primary level. Allowing for this and taking into account future population growth, the department consider that Post-primary school place demand could have a small yet significant increase. It is currently expected that this extra requirement could be accommodated by the planned expansion of St. Mel's College which will create additional future capacity.

- **Proposed Material Alteration 26**

No change.

2.6 Uisce Éireann (UE)

Submission no.	LD-C5-3
Name	Uisce Éireann (UE)
Subject	PMA 36-48

Summary of Issues Raised:

UÉ welcomes the inclusion of their previous comments and recommendations in proposed material alterations no. 36-48. While UÉ welcome Material Alterations 45, 47 and 48 relating to Nature Based Solutions and SUDs, the wording could be strengthened to demonstrate the importance of changing the urban landscape to a more sustainable one that seeks to mimic the natural water balance. This would apply to both existing and new developments.

Chief Executive Response:

The comments by Uisce Éireann are welcomed and noted. While Uisce Éireann welcome Mas 45, 47& 48 relating to Nature Based Solutions & SUDs, the comments in relation to the wording being strengthened to demonstrate the importance of changing the urban landscape to a more sustainable one that seeks to mimic the natural water balance can be incorporated through further amendments to the wording.

Chief Executive Recommendation:

- **Proposed Material Alteration MA 45** – Further amend as follows:

In section 13.3.3 'Water Supply and Wastewater Services Objectives' include the following additional objective:

WS 22: Promote the introduction of Nature Based SuDS in areas contributing to combined sewers, in particular, where streetscape enhancement programmes or resurfacing programmes are planned for both existing and new developments. Changing the urban landscape to a more sustainable one that seeks to mimic the natural water balance is important for both new and existing developments.

- **Proposed Material Alteration 47** – Further amend as follows:

In '13.4 Surface Water Drainage' include the following additional text after the last paragraph:

This Local Area Plan has been prepared taking account of the 'Guiding Principles for SuDs' Section 10.2 (Sustainable Management of Water) of the RSES and the 'Nature Based Management of Urban Rainwater and Urban Surface Water Discharges – A National Strategy' (DHLGH, 2024). Changing the urban landscape to a more sustainable one

that seeks to mimic the natural water balance is important for both new and existing developments.

- **Proposed Material Alteration 48** – Further amend as follows:
In Section '13.4. 1 Surface Water Objectives' amend SW02 as follows:
~~Pursue the resolution of surface water drainage issues as required throughout the town, in conjunction with Uisce Éireann as appropriate. In areas of the town where there are issues with the combined sewer network, pursue the reduction (or elimination if feasible) of surface water entering the network in conjunction with UE as appropriate.~~ *Changing the urban landscape to a more sustainable one that seeks to mimic the natural water balance is important for both new and existing developments.*

2.7 Electricity Supply Board (ESB)

LD-C5-4	
Name	Electricity Supply Board (ESB)
Subject	PMA 35, 57

Summary of Issues Raised:

Proposed Material Alteration 35

ESB welcomes Proposed Material Alteration No. 35 for Section 13.2.1 Electricity, that recognises the importance of electricity transmission and distribution infrastructure. Provision of a secure and reliable electricity transmission and distribution infrastructure is essential to meet growth in demand and ensure a reliable electricity supply is available.

Proposed Material Alteration 57

ESB notes the inclusion of amended wording to Section '14.6 Sustainable Transport Objectives' to include reference to the standards set out in the EU Energy Performance of Buildings Directive for Electric Vehicle Parking space provision. It is very important that the final Plan promotes, encourages and facilitates the use of sustainable modes and patterns of transport, including electric vehicles, with the appropriate Parking Standards that will set minimum levels of parking provision for Electric Vehicles in new developments. ESB, is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. ESB is implementing energy strategies that support the transition of Ireland to a low-carbon and ultimately post-carbon economy to become a competitive, resilient, and sustainable region.

Chief Executive Response:

Noted.

Chief Executive Recommendation:

No change.

2.8 Office of Public Works (OPW)

Submission no.	LD-C5-9
Name	Office of Public Works (OPW)
Subject	Flood Risk Management

Summary of Issues Raised:

Flood Zone Map

The previous CE Report response noted *'The mapping included within the SFRA will be updated to overlay the Flood Zones over the land use zoning map'*. No document has been included for the Material Alteration consultation to show this addressed.

Longford Town Flood Relief Scheme

The previous CE Report response stated that *"The next iteration of the SFRA will provide a strict measure for the progression of the Flood Relief Scheme, which is in line with the OPW policy. A policy will be added to the next iteration of the SFRA regarding the Longford Flood Relief Scheme."* Proposed Material Alteration 49 does add objective FR05 which ensures the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned, however no additional measures or policies have been included.

Policy Objectives

The previous CE Report response stated *'the next iteration of the SFRA will be updated with most up-to-date LAP policies. This will include any re-wording of some existing policies and the addition of any new policies'*. No document has been included for the Material Alteration consultation to show this has been addressed.

Construction, Replacement or Alteration of Bridges and Culverts over Watercourses

The OPW at draft plan stage highlighted that there are restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse, and that appropriate consent from the Commissioners is required under Section 50 of the Arterial Drainage Act 1945. This has not been referenced in the previous CE Report and has not been addressed at Material Alteration stage.

Errata

The previous CE Report response noted all website links would be checked to ensure they were still in operation, and updated links would replace superseded. No document included for the Material Alteration consultation to show this addressed.

Flood Risk Infrastructure

The previous CE Report response stated the next iteration of the SFRA would include a map showing where minor works have been undertaken in the town for the last 5 years and would provide technical details, where available. No document has been included for the Material Alteration consultation to show this has been addressed.

Preliminary Flood Risk Assessment (PFRA)

The previous CE Report response noted any '*mention and discussion of the PFRA in Table 2-2 will be removed from the next iteration of the SFRA report, as will the appendix map with PFRA extents. PFRA Pluvial mapping will be removed from the next iteration of the SFRA report. Furthermore, all mapping produced in Section 4.2 Justification Test will be updated to remove the pluvial mapping in the next iteration of the SFRA*'. No document has been included for the Material Alteration consultation to show this has been addressed.

Sustainable Drainage Systems (SuDS)

The previous CE Report response stated that "*a new chapter will be added to the next iteration of the SFRA, specifying a generic approach to SuDS for all new developments. Furthermore, additional measures will be added to the table under each of the OP sites detailing potential areas for SuDS*". No document has been included for the Material Alteration consultation to show this has been addressed.

Consideration of Climate Change Impacts

The OPW at draft plan stage noted consideration of the impacts of climate change primarily related to development management, highlighting that while Flood Zones are defined on the basis of current flood risk, planning authorities need to consider such impacts in the preparation of plans, such as avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives. This has not been addressed in the previous CE Report or Material Alterations consultation.

Drainage Districts

The OPW at draft plan stage highlighted text in the SFRA regarding council policy to consult with the OPW in relation to proposed developments in the vicinity of drainage channels and rivers for which the OPW are responsible, noting that the statutory maintenance of the drainage district channels within the plan area lies with the local authority, not the OPW. This has not been addressed in the previous CE Report or in the Material Alterations consultation.

Justification Tests

The OPW at draft plan stage noted that for each site where vulnerable development in flood risk areas had been deemed to be justified, conclusions had included general discussion regarding the possibility of managing flood risk through site layout or finished floor levels, the only specific requirement set out was that they be subject to a detailed flood risk assessment at development management stage that assesses residual risk. It was clarified that part 3 of the Plan Making Justification Test as set out in the Guidelines is that *"A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed, and the use or development of the lands will not cause unacceptable adverse impacts elsewhere"*. In order to satisfy the Justification Test, it must be demonstrated that it is feasible to develop the lands in question safely, with any requirements, mitigations or limitations required to ensure the lands can be safely developed included and transposed into the draft plan as policy objectives, and **not** be passed on to development management. This has not been addressed in the previous CE Report or the Material Alterations consultation.

Justification Tests had been included for residential lands OP7 and OP8, however these are zoned for water compatible open space. The previous CE Report response stated that *'Justification tests for OP7 and OP8 will be removed in the next iteration of the SFRA'*. No document has been included for the Material Alteration consultation to show this addressed.

Other

The OPW welcomes Material Alteration numbers 45-47 regarding promotion of SuDS and water efficiency and acknowledgement of the National Strategy for Nature Based Management of Urban Rainwater and Urban Surface Water Discharges.

Chief Executive Response:

The submission specifically concerns flood risk management and the SFRA. The OPW note that that no document has been included for the Material Alteration consultation to reflect the following Chief Executive Report responses to their submission at draft plan stage. This submission also indicates that in relation to the OPW submission to the Draft Plan that a number of areas commentary have not been addressed either in the CE Report on submissions to the draft plan, or the documents included for the Material Alterations consultation.

It is noted that the previous CE Report on submissions to the Draft LAP states that these issues will be addressed in the next iteration of the Strategic Flood Risk Assessment. It is acknowledged that these matters should have been addressed at the material alterations stage, rather than in the process of adopting the LAP. The comments of the OPR in relation to Flood Risk Assessment are noted and the

relevant amendments will be included in the final Local Area Plan and associated Strategic Flood Risk Assessment.

Chief Executive Recommendation:

The relevant amendments to be included in the final Local Area Plan and associated Strategic Flood Risk Assessment. Specifically, the following is identified:

- **Flood Zone Map:**

Mapping will be updated to overlay the Flood Zones over the land use zoning map - to be noted that the PFRA pluvial extents will be excluded.

- **Policy Objectives:**

The next iteration of the SFRA will be updated with the most up to date LAP policies.

- **Flood Risk Infrastructure:**

Mapping showing where minor works were undertaken in the last 5 years and associated text will be included in the SFRA.

- **Preliminary Flood Risk Assessment (PFRA):**

The SFRA will be updated so that mention and discussion of the PFRA in Table 2-2 will be removed. Appendix map with PFRA extents will be removed. PFRA Pluvial mapping will be removed from the report, all mapping produced in Section 4.2 Justification Test will be updated to remove the Pluvial mapping.

- **Sustainable Drainage Systems (SuDS):**

A new chapter will be added to the SFRA specify a generic approach to SuDS for all new developments. Additional measures will be added to the table under each of the OP sites detailing potential areas for SuDS. This will be shown in next iteration of the report.

- **Errata:**

All website links in the SEA, AA and SFRA will be updated to the most recent versions.

- **Longford Town Flood Relief Scheme:**

Additional Section will be added to the SFRA regarding the Longford flood relief scheme. New measures or policies will be added to the SFRA where required.

- **Construction, Replacement or Alteration of Bridges and Culverts over Watercourses:**

There are restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse, and that appropriate consent from the Commissioners is required under Section 50 of the Arterial Drainage Act 1945. This information will be included in the SFRA and will not impact the findings.

- **Consideration of Climate Change Impacts:**

Mapping showing the MRFS and HEFS flooding will be presented as part of the SFRA report.

- **Drainage Districts:**

The following text will be added to the SFRA:

It should be noted that the statutory maintenance of the drainage district channels within the plan area lies with the local authority, not the OPW.

- **Justification Test:**

Commentary will be included in the SFRA to ensure that future flood risk assessments must assess the impacts on flood risk elsewhere. This is mentioned in the SFRA in section 1.3.1, 1.6 and 1.8.

2.9 Department of Environment, Climate and Communications (DECC)

Submission no.	LD-C5-8
Name	Department of Environment, Climate and Communications (DECC)
Subject	PMA 70, 71, 72

Summary of Issues Raised:

The Department welcomes Proposed Material Alteration 70, which states the draft LAP supports the implementation the Climate Action Plan 2024 and the National Adaptation Framework 2024.

The Department welcomes the material alterations to Section 15. Climate Change, in particular:

- Proposed Material Alteration 71 which includes an objective to examine the potential of district heating including district heating derived from waste heat, where available, and commit to carrying out a feasibility using heat mapping in support of same when opportunities arise.
- Proposed Material Alteration 72 which includes an objective for all proposed developments to support the circular economy principles by taking account of the EPA's Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects (2021).

Chief Executive Response:

The Departments comments are noted. It is the intention to adopt these in finalising the Longford Town Local Area Plan.

Chief Executive Recommendation:

No change.

2.10 Michael Keenan

Submission no.	LD-C5-2
Name	Michael Keenan
Subject	PMA 30, 45

Summary of Issues Raised:

Proposed Material Alteration 30

The hedge between the Mall grounds and Abbeycartron is probably in place over 100 years and is a rich source of biodiversity which should be protected to the maximum extent possible. I recommend this be included in the alteration.

Proposed Material Alteration 45

Regarding nature-based water solutions seems lukewarm in commitment when it just states "promote the introduction of nature-based water solutions". It is recommended that this alteration and/or relevant sections of the Local Area Plan are amended to state a commitment by LCC in all aspects of its work in Longford Town, not just in relation to new drainage works. Examples include planning, planning conditions, regeneration work, town footpaths development/repairs, carparks, public realm areas around town retrofitting, redevelopment. Suds contribute to climate change mitigation and can also result in cost reductions and a better environment for all. The NTA Advice Note Greening NBS SuDS for AT Schemes has been included as part of this submission.

Chief Executive Response:

Proposed Material Alteration 30

This proposed material alteration relates to '11.13 Natural Heritage and Biodiversity Objectives' and amendment of the following objective:

NHB03: 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.

The submission specifically refers to the hedge between the Mall grounds and Abbeycartron being in place over 100 years and a rich source of biodiversity which should be protected to the maximum extent possible, and as such should be included in the alteration. While this submission makes specific reference to NHB03 which relates to particularly along the Royal Canal and pNHA and Camlin River, it is noted that upon examination of the Draft Longford Town Local Area Plan it is noted that section '11.13 Natural Heritage and Biodiversity Objectives' contains a significant

number of objectives. In particular NNB 12 is noted which would provide adequate protection and as such a further amendment to NHB is not required, as it is considered that adequate protection is given by other objectives within '11.13 Natural Heritage and Biodiversity Objectives'.

Proposed Material Alteration no. 45: see also Uisce Éireann LD-C5-3 and OPR Submissions LD-C5-10

Proposed Material Alteration 45 relates to section 13.3.3 'Water Supply and Wastewater Services Objectives' and the inclusion of the following additional objective:

WS 22: Promote the introduction of Nature Based SuDS in areas contributing to combined sewers, in particular, where streetscape enhancement programmes or resurfacing programmes are planned.

In relation to this submission similar issues have been raised by Uisce Éireann and the OPR submission. As indicated in these submissions it is considered that proposed objective WS22 can be further strengthened and should be amended.

Chief Executive Recommendation:

- **Proposed Alteration no. 30:**

No change.

- **Proposed Material Alteration MA 45 – Further amend as follows:**

In section 13.3.3 'Water Supply and Wastewater Services Objectives' include the following additional objective:

WS 22: Promote the introduction of Nature Based SuDS in areas contributing to combined sewers, in particular, where streetscape enhancement programmes or resurfacing programmes are planned for both existing and new developments. Changing the urban landscape to a more sustainable one that seeks to mimic the natural water balance is important for both new and existing developments.

Appendix A: Copy of Public Notice



Proposed Material Alterations to the Draft Longford Town Local Area Plan 2025 - 2031

Notice is hereby given, pursuant to Section 20(3)(e) of the Planning and Development Act 2000 (as amended), that Longford County Council has prepared Proposed Material Alterations to the Draft Longford Town Local Area Plan 2025-2031.

In accordance with Section 20(3)(f) of the Planning and Development Act 2000 (as amended), it has been determined that a Strategic Environmental Assessment (SEA) is required for some proposed material alterations and an Appropriate Assessment (AA) is not required for the proposed material alterations.

In this regard, the following documents are published for inspection and public consultation:

- Proposed Material Alterations to the Draft Longford Town Local Area Plan 2025-2031.
- Addendum Report to the Strategic Environmental Assessment (SEA) Environmental Report pursuant to the SEA Directive and Planning and Development (Strategic Environmental Assessment) Regulations 2004-2011 containing an assessment of the Proposed Material Alterations.
- Addendum Report to the Appropriate Assessment (AA) Screening and Natural Impact Report for the purposes of Appropriate Assessment pursuant to the EU Habitats Directive (92/43/EEC) and Planning and Development Act 2000 (as amended) containing an assessment of the Proposed Material Alterations.
- Addendum Report to the Strategic Flood Risk Assessment (SFRA) containing an assessment of the Proposed Material Alterations.

A copy of the Proposed Material Alterations and associated SEA, AA, and SFRA documents may be inspected **from 5th February until 4pm on 5th March 2025 (both dates inclusive)** at the following locations:

- The Planning Office, Longford County Council, Áras an Chontae, Great Water Street, Longford Town, County Longford, N39 NH5 (during normal office hours).
- All County Longford Branch Libraries – Longford, Ballymahon, Drumlish, Edgeworthstown, Granard and Lanesborough Libraries (during branch hours).
- <https://consult.Longfordcoco.ie/>

Written submissions/observations with respect to the Proposed Material Alterations to the Draft Longford Town Local Area Plan and associated documents

can be made **from 5th February until 4pm on 5th March 2025 (both dates inclusive).** Submissions/observations received during this period will be taken into consideration before the making of any material alteration and the Plan is adopted. **Late submissions will not be accepted.**

Written submissions or observations should be clearly marked '*Proposed Material Alterations to the Draft Longford Town Local Area Plan 2025-2031*' and must be submitted via **one** of the following methods:

- By post to: Senior Staff Officer, Planning Department, Longford County Council, Áras an Chontae, Great Water Street, Longford Town, County Longford, N39 NH5.
OR
- Online, through the submission form facility available on Longford County Council's Consult portal: <https://consult.Longfordcoco.ie/>

Only submissions or observations made in respect of the Proposed Material Alterations and accompanying documents (including submissions relating to the likely significant effects on the environment of implementing the Proposed Material Alterations) will be taken into consideration before the making of any material alteration to the Draft Local Area Plan. Submissions or observations in relation to any other aspect of the Draft Local Area Plan cannot be considered at this stage in the process.

Children, or groups or associations representing the interests of children, are entitled to make submissions or observations.

Submissions and observations **must** include the full name and address of the person(s) making the submission and where relevant, the body or organisation represented. Please do not include personal, confidential or other sensitive information in submissions.

Written submissions or observations received shall be published on the website of Longford County Council within 10 working days of its receipt and will also form part of the Chief Executive Report to the Elected Members to be published on the Council website.

In order to assist us with complying with Data Protection and GDPR, please include your name and contact details on a separate sheet to the content of your submission/observation. This processing of your personal data is lawful under Article 6(1)(e) of the GDPR regulations. The Council's Data Protection Policy is available on the Council website longfordcoco.ie **Please note that by giving your contact details you are agreeing to the Council GDPR policy.**

Barbara Heslin
Director of Services

Appendix B: List of Submissions Received

The list sets out the submissions received within the statutory timeframe for public consultation under Section 20(3)(b) of the Planning & Development Act 2000 as amended. (9 no. submissions)

LD-C5-2	Michael Keenan
LD-C5-3	Uisce Eireann
LD-C5-4	Electricity Supply Board
LD-C5-5	National Transport Authority
LD-C5-6	Department of Education
LD-C5-7	Transport Infrastructure Ireland
LD-C5-8	Department of the Environment, Climate & Communications
LD-C5-9	Office of Public Works
LD-C5-10	Office of Planning Regulator

Appendix C: Statutory Bodies Notified

Notifications were made under Section 20(3)(a) of the Planning & Development Act 2000, as amended, Article 14 of the Planning and Development Regulations 2001, as amended, and Article 14E of the Planning & Development (Strategic Environmental Assessment) Regulations 2004, as amended to the following:

Minister for Housing, Local Government and Heritage
Minister for Media, Tourism, Arts, Culture, Sports and the Gaeltacht
Department of Environment, Climate and Communications
Department of Agriculture, Food and Marine
Development Applications Unit of Department of Housing, Local Government and Heritage
Office of the Planning Regulator
An Bord Pleanála
Uisce Eireann
Environmental Protection Agency
Cavan County Council
Leitrim County Council
Roscommon County Council
Westmeath County Council