



# **DRAFT      LONGFORD TOWN   LOCAL   AREA PLAN 2025-2031**

## **CHIEF EXECUTIVE REPORT ON SUBMISSIONS RECEIVED**

**November 2024**

**Forward Planning Section**

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## 1.0 Requirement for Chief Executive's Report

This report is a requirement of section 20(3)(c) of the Planning and Development Act 2000 (as amended) whereby the Planning Authority is obliged to '*prepare a report on any submissions or observations received*' within a specified submission/observation period. Not later than 12 weeks after publishing notice of the preparation of the draft development plan, the planning authority shall prepare the Chief Executive (CE) report, which is required to be circulated to the elected members of Longford County Council for their consideration. The CE's Report is required to:

- List the persons or bodies who made submissions or observations.
- Summarise the recommendations, submissions and observations made by the Office of the Planning Regulator (OPR).
- Summarise the submissions and observations made by any other person.
- Contain the opinion of the CE in relation to the issues raised, and the CE's recommendations in relation to the proposed LAP taking account of:
  - the proper planning and sustainable development of the area;
  - the statutory obligations of any local authority in the area;
  - any relevant policies or objectives of the Government or of any Minister of the Government.

The CE report is required to be published on the website of the planning authority as soon as practicable following its submission to the elected members.

## 2.0 Local Area Plan Process and Consultation Undertaken

### 2.1 Local Area Plan Making Process

The LAP preparation process involves public consultation at a maximum of three stages, which subsequently leads to and informs the preparation of the final LAP as shown below. The local authority is currently at step 5 in the process below.

#### Key Stages in the Local Area Plan Making Process

<b>1. Pre-Draft Stage</b>
Forming the issues to be addressed in the Plan and gathering information from consultation with relevant stakeholders and interested parties.
<b>2. Draft Plan Stage</b>
Following a review of collated information, a Draft Plan will be prepared by the Planning Authority. The Draft will afford the public the first opportunity to gauge the direction that the final Plan is heading.
<b>3. Notice of Draft Plan</b>
The Draft Plan will be available for inspection for at least 6 weeks. We will publish a notice in local papers letting you know that the Draft is available for inspection and inviting your submissions.
<b>4. Chief Executive's Report</b>
A Chief Executive's Report will be prepared based on the submissions received and containing the opinion of the Chief Executive and his recommendations in relation to the Plan.
<b>5. Consideration by Elected Members ** CURRENT STAGE **</b>
The Elected Members will consider the Chief Executive's Report and then make, amend or revoke the Plan as appropriate in accordance with the recommendations of the Chief Executive.
<b>6. Material Alterations</b>
In the event of material alterations or amendments, we will publish notice of this and invite further submissions. A similar process to that outlined at stages 4 and 5 is then repeated.
<b>7. Final Plan</b>
Following consultation on Material Alterations, a further Chief Executive's Report will be prepared, to be considered by the Elected Members. The Elected Members will consider the report and then adopt the Plan.

### 2.2 Methods of Consultation

The public consultation stage of the draft Longford Town Local Area Plan (LAP) took place from 6 September 2024 to 18 October 2024 (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 draft Plan and a link to the website showing the draft Plan 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 draft Plan was advertised on the Council's Twitter, Facebook and Instagram accounts.
- 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.

## 2.3 Submissions

Submissions could be made by email or by hard copy. 34 no. submissions were received within the statutory timeframe for public consultation (see Appendix B: List of Submissions Received).

## 3.0 Summary of Submissions Received, CE Response and Recommendations

### 3.1 Introduction

This section contains a summary of the 34 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.

The CE's recommendation indicates proposed new text as an amendment to the draft LAP is coloured in red, whilst recommended text to be removed from is indicated by blue strikethrough.

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.

### 3.2.1 Office of Planning Regulator (OPR)

Submission no.	LLAP 31
Name	Office of the Planning Regulator
Subject	Residential Development Strategy; Consistency with RSES, Consistency with Development Plan and Core Strategy; Density, Regeneration: Estate Regeneration, Dereliction and Vacancy; Transport and Accessibility, Economy and Employment, Retail, Education, Utilities and Infrastructure Capacity, Infrastructure (Green and Blue, SUDS), Flood Risk Management, Implementation and Monitoring

#### Summary of Issues Raised:

The OPR acknowledges the considerable work put into the preparation of the draft LAP. The OPR evaluation has had regard to the Longford County Development Plan 2021-2027, the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly, and section 28 guidelines.

Longford is identified as a Key Town under the RSES and the LAP will play an important role in providing employment for the surrounding area and acting as a regional driver to complement the Regional Growth Centre of Athlone. In this regard the OPR welcomes the phasing strategy for the economic lands to attract additional investment into the town.

The Planning Authority is commended for the work carried out on the Camlin Quarter and securing Urban Regeneration and Development Fund (URDF) funding. The Camlin Quarter will act as a catalyst for investment and regeneration in the town and identification of strategic sites for regeneration provides a clear development strategy for the town. The proposed use of masterplans for 18 strategic sites, however, raises concerns in terms of time to prepare such plans, which may defer investment. The LAP land activation measures are critical to Longford Town in achieving its population targets from the County Development Plan core strategy. In this regard, the regeneration aims and principles of the strategic sites would be better contained within the LAP, placing their objectives on statutory footing and avoiding the need to prepare masterplans.

The OPR commends the preparation of the Local Transport Plan (LTP) and integrating of its policy objectives into the draft LAP. However, it would be preferable if the access strategy for the Abbeycartron lands prioritises one transport arrangement which focuses on sustainable travel modes and promotes active travel. Other recommendations focus on the need to provide a clearer and more detailed strategy to assist in assessing specific proposals at development management stage.

The OPR make 8 recommendations<sup>1</sup> and 2 observations<sup>2</sup> under the following themes:

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### **Residential Development Strategy:**

#### **Consistency with the Regional, Spatial and Economic Strategy**

Section 19(2) of the Act requires that a Local Area Plan is consistent with any RSES that applies to the area of the plan. Longford Town is designated as a Key Town in the RSES. Key regional priorities for Longford Town are to promote compact growth, the regeneration of the town centre and to expand Longford's role as a hub for enterprise, employment and tourism. In this regard, the OPR welcomes the preparation of the LTP consistent with Regional Policy Objective (RPO) 8.6 of the RSES. Further, the draft Local Area Plan identifies 18 strategic sites which include the regeneration of two existing housing estates (Ardnacassa and St. Michael's Road) which is in line with RPO 4.61 of the RSES. The draft LAP is deemed broadly consistent with the RSES and in general compliance with section 19(2) of the Act, except as otherwise identified.

#### **Consistency with Development Plan and Core Strategy**

Sections 19(2) and 20(5) of the Act requires a LAP be consistent with objectives of the development plan and its core strategy. The core strategy of the County Development Plan provides for a housing target of 1,304 homes in Longford Town and a population increase of 2,502 persons over the 2021 – 2027 plan period (i.e. 471 persons per year), growing the town's population to 12,510 persons by 2027. The land use zonings for the town were carried out as part of the preparation of the County Development Plan. Concern is expressed in relation to the draft LAP that achieving these targets will be difficult based on the growth rate over the first 2 years of the County Development Plan. A key issue for the LAP to address will be in terms of ensuring robust land activation measures to ensure the town meets its population targets set down in the core strategy. Regular and effective monitoring of planning applications and commencement notices are important for the implementation of the LAP.

#### **Residential Development Strategy**

A phasing map is provided in the draft LAP which identifies 4 residential sites as Phase 1 and 1 site for Phase 2 and Phase 3. The OPR welcomes this prioritisation but considers the LAP would benefit from providing a breakdown of site areas, quantum of housing units, servicing requirements and phasing arrangements (if required) for the selected residential sites. The OPR considers this important in terms of achieving compact growth, regeneration and investment in infrastructure.

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<sup>1</sup> Recommendations relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. The planning authority is required to address recommendations to ensure consistency with the relevant policy and legislative provisions.

<sup>2</sup> 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 requested to action an observation.



The draft LAP should also have greater regard to section 4.2 of Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines) and section 5 of the Local Area Plans, Guidelines for Planning Authorities (2013) on the level of detail for these development areas e.g. setting out, in text and graphic form, the overall design and layout of the area, including heights, densities, access and connectivity, active travel routes, and open space (including Sustainable Urban Drainage Systems (SuDS))<sup>1</sup>.<sup>(1)</sup> Graphics and maps could be similar to the Strategic Development and Regeneration Area maps in the Dublin City Council Development Plan 2022-2028).

### Recommendation 1 – Residential Development Strategy

Having regard to the compact and sustainable growth of Longford, the co-ordination of the housing and infrastructure delivery and the regeneration of the town, and in particular to:

- RPO 3.2 and RPO 4.26 of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly for compact growth, and RPO 4.61 and RPO 4.62 of the RSES for the regeneration of Longford Town;
- Policy Objectives CPO 4.2, CPO 4.4 and CPO 4.6 of the Longford County Development Plan 2021-2027 (the County Development Plan) or compact growth and regeneration;
- Key principle 4 of the County Development Plan for the co-ordination of housing and infrastructure; and
- section 4.2 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) and section 5 of the Local Area Plans, Guidelines for Planning Authorities (2013),

the Planning Authority is required to set out a clear development strategy for the Phase 1-3 residential sites, providing details such as the site areas, number of housing units to be delivered, infrastructure servicing requirements and phasing arrangements (if required), indicative building heights, densities, access and connectivity, active travel routes, and open space (including Sustainable Urban Drainage Systems).

### Chief Executive Response:

In relation to the OPR concerns that compliance with Development Plan core strategy targets will be difficult based on the growth rate over the first two years of the County Development Plan, attention is drawn to the following chapter: '5.0 Core Strategy Compliance'. In particular '5.1.4 LAP Compliance with County Development Plan Core Strategy' states: *'To ensure continued compliance with the Core Strategy and its housing allocation for Longford it will be necessary to monitor the number of residential units permitted and developed on an annual basis. ...Monitoring the number of units permitted and constructed enables a closer alignment between the Core Strategy, the population projection, development activity and all the associated necessary physical social and community infrastructure'*. This chapter also contains supporting objectives in relation to implementation of the core strategy. Furthermore in '16.0 Implementation and

Monitoring', section '16.2 Compliance with Core Strategy' the following is stated *'to ensure continued compliance with the ore Strategy and its housing allocation for Longford it will be necessary to monitor the number of residential units permitted and developed on an annual basis'*. A number of land activation measures are also included in this chapter in order to best place the town to meet its population targets set down in the core strategy.

Key Principle 4 of the Longford County Development Plan 2021-2027 is to *'align future development with existing and planned investment in infrastructure with settlements'*. As such in terms of achieving compact growth, regeneration and investment in infrastructure, the phasing map in section '16.0 Implementation and Monitoring' provides a prioritisation for development in terms of both economic and residential lands.

The OPR have also cited a number of Policy Objectives CPO 4.2, CPO 4.4 and CPO 4.6 of the Longford County Development Plan 2021-2027 (the County Development Plan) or compact growth and regeneration. These are as follows:

- *CPO 4.2: Require at least 30% of all new homes that are targeted in settlements to be located within the existing built-up footprint of the settlements<sup>3</sup>, in an effort to make settlements more compact and reduce unsustainable urban sprawl and ribbon development.*
- *CPO 4.4: Arrest the decline and stagnation in areas that have experienced low population growth or decline in recent decades.*
- *CPO 4.6: Support the regeneration of underused town centre and brownfield/infill lands, promote measures to reduce vacancy and the underuse of existing building stock and support initiatives that promote the reuse, refurbishment and retrofitting of existing buildings within urban centres and targeted settlements in the County in order to achieve sustainable compact growth targets of 30% of all new housing to be built within the existing urban footprint of targeted settlements in the County.*

The OPR have referenced section 4.2 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024). Upon examination section 4.2 (ii) of these guidelines relate to Local Area Plans and state the following:

*'...In areas that will be subject to large-scale development or change, the local area plan will generally include a masterplan that indicates the manner in which the area will be developed. This will usually include detail of the types of development, the extent of any such development envisaged, proposals in relation to the overall design and layout of the area and a phasing strategy for the delivery of the cross cutting infrastructure, amenities and services needed to support the development'.*

Taking the aforementioned into consideration, in terms of providing greater clarity

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<sup>3</sup> This means within the existing built-up footprint of all sizes of urban settlement, as defined by the CSO in line with UN criteria i.e., having a minimum of 50 occupied dwellings, with a maximum distance between any dwelling and the building closest to it of 100 metres, and where there is evidence of an urban centre (shop, school etc.).

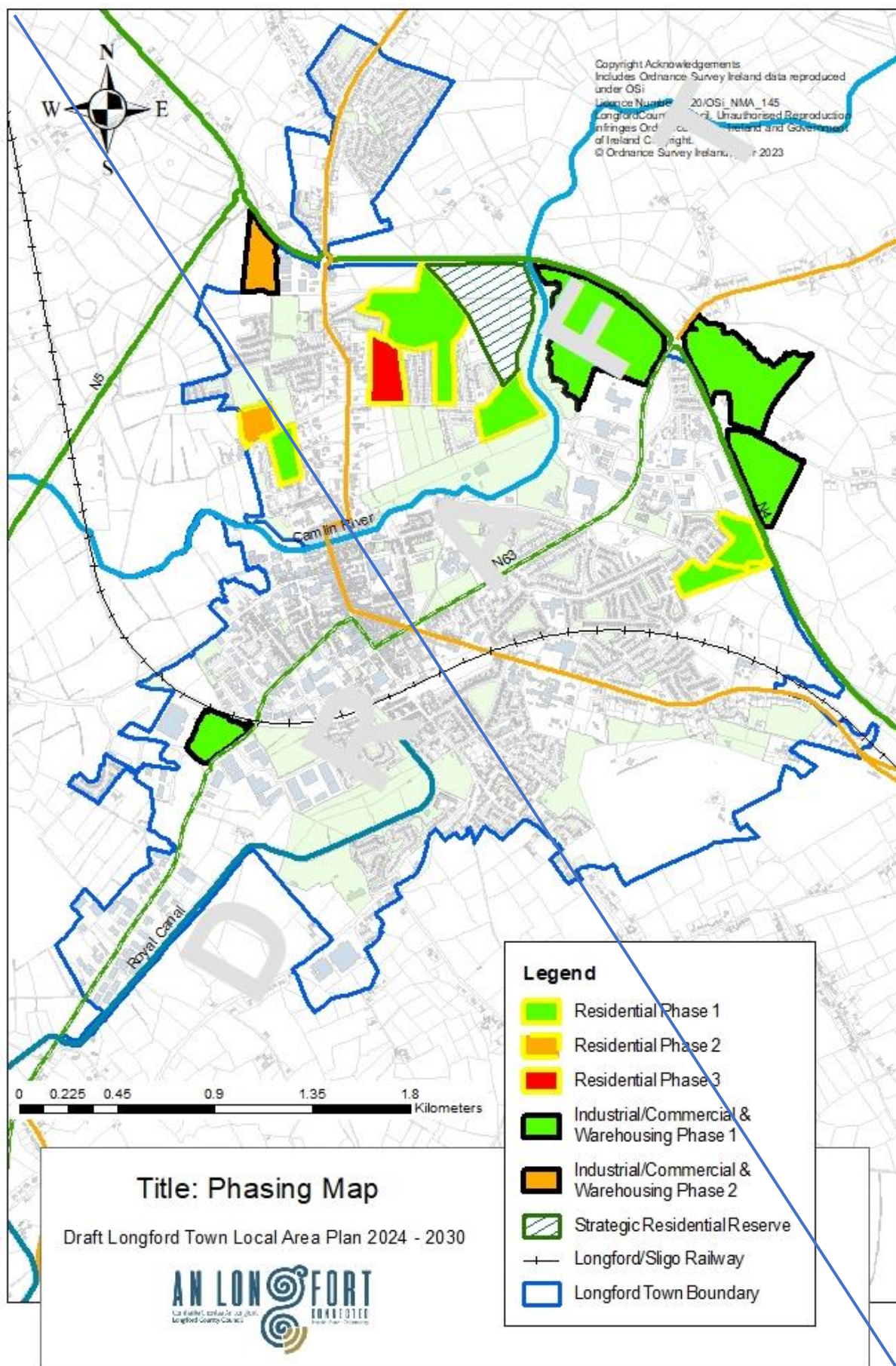
a breakdown of the site areas, quantum of housing units, servicing requirements can be provided as requested by the OPR.

In relation to the development strategy and level of detail for development areas, phasing arrangements are set in accordance with the text in section '16.0 Implementation and Monitoring' and associated Phasing Map. Infrastructure servicing requirements and phasing arrangements are included in this. The phasing is based on servicing and based on the Infrastructural Assessment Report (IAR) carried out as part of the County Development Plan, as subsequently reviewed.

However as required by the OPR, greater detail is to be provided in relation to the Phasing Development Strategy for residential development. As such a revised phasing map is to be included and an accompanying table included in the LAP to provide details of site areas and the potential number of housing units to be delivered taking account of the 'Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities' (2024). Specific detail in relation to active travel is contained in '14.0 Sustainable Transport' and also in the Longford Local Transport Plan which will be consulted as part of the development management process. Further specific site specific details in relation to indicative building heights, access and connectivity and open space (including Sustainable Urban Drainage Systems) are issues which are beyond the resources of the Forward Planning team to deliver at this time, and will be addressed by way of the Development Management process which will as required take account of section 28 Guidelines as part of the this process, and the 'Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities' (2024).

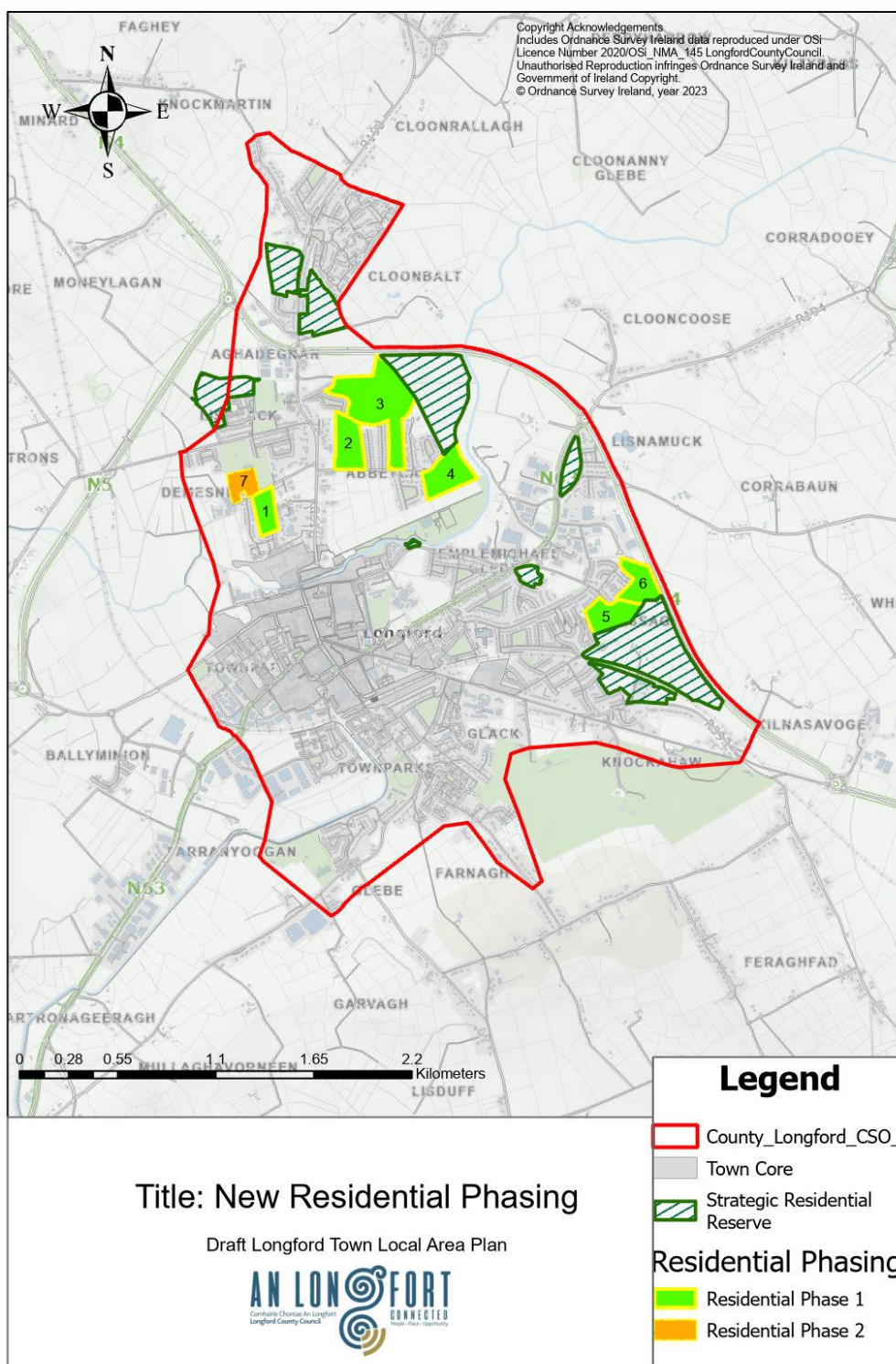
#### **Chief Executive Recommendation:**

- In Section '16.0 Implementation and Monitoring', in '16.3 Phasing Scheme – Residential and Employment Lands' amend the text as follows:  
*As such 'New Residential' and 'Industrial/Commercial/Warehousing' lands have been included in a phasing scheme based on the Infrastructural Assessment Report (IAR) carried out as part of the Longford County Development Plan 2021-2027 and taking account of subsequent information garnered during the Local Area Plan preparation process. The subsequent phasing maps and tables are presented for both land uses. The numbering associated with the maps and tables relates to site identification purposes only and does not define the order of development within each individual phase.*
- Delete the following 'Phasing Map' and replace with the following 2 no. maps and accompanying 2 no. tables:



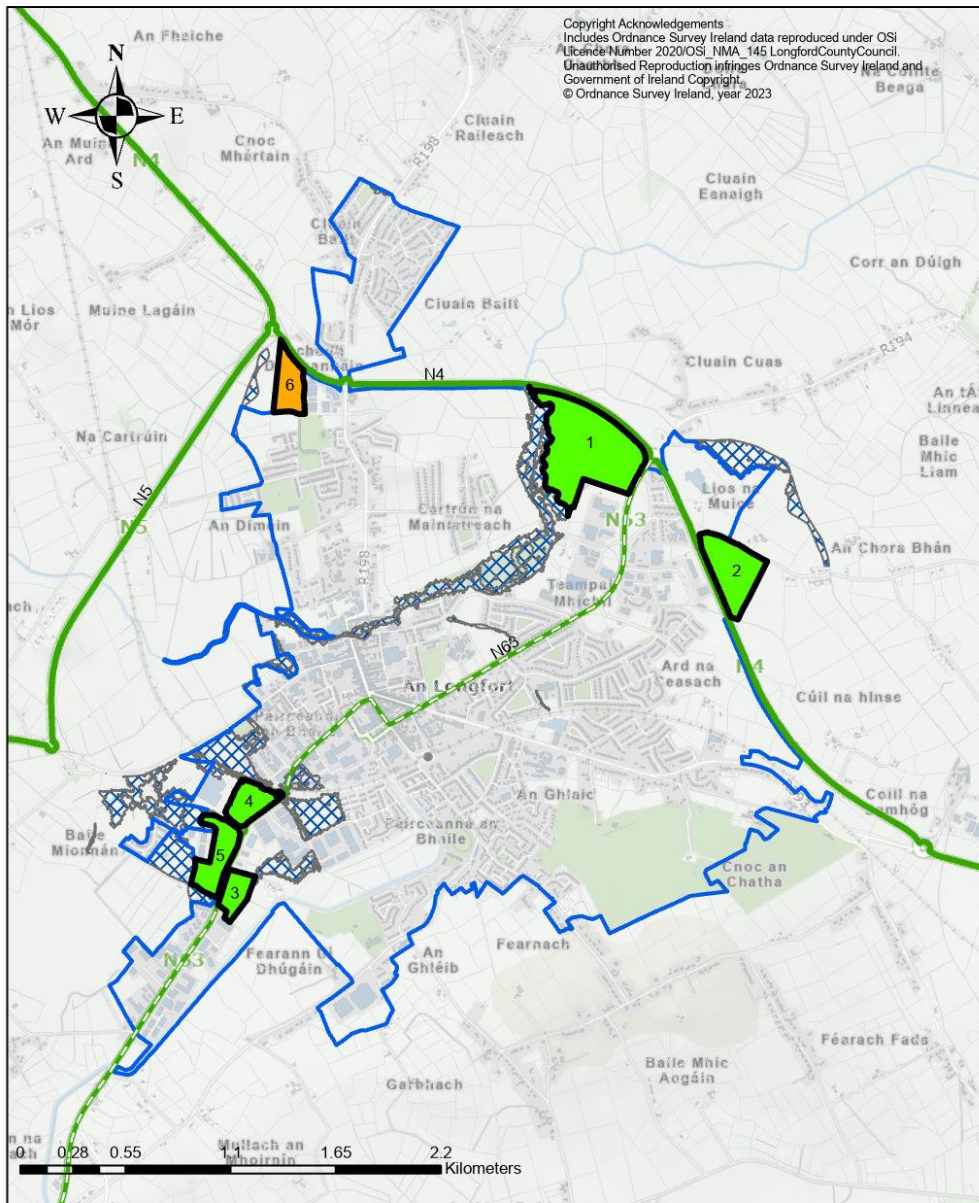


- Include the following 2 no. maps and 2 no. tables:



*'New Residential' Phasing 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	



Title: Industrial/ Commercial/  
Warehousing Phasing map.

Draft Longford Town Local Area Plan



#### Legend

##### Ind\_com\_phased\_Lap

Industrial/Commercial & Warehousing Phase 1

Industrial/Commercial & Warehousing Phase 2

National\_Secondary\_Roads

National\_Primary\_Roads

Longford Town Boundary

Areas of Constrained Use

### *Industrial/Commercial/Warehousing' Phasing Table*

<i>Phase 1</i>		
<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>	

#### **Density**

Longford Town is classified as a 'Key Town and Large Town (5,000+ population)' in the Compact Settlement Guidelines. The draft LAP includes density ranges from the Compact Settlement Guidelines for both the 'centre and urban neighbourhood' and the 'suburban/urban extension' areas. The draft LAP would benefit from including a map identifying these two distinct areas of the town. Policy Objective 3.1 of the Compact Settlement Guidelines recommends density ranges are applied and refined based on consideration of centrality and accessibility to services and public transport and considerations of character, amenity, and natural environment. On some of strategic sites zoned Town Core, it is not clear if there is any intention to seek higher densities and/taller elements where appropriate and where site context and conditions allow. This relates to the earlier point regarding the need for additional detail on the build out of the development sites. A recommendation to therefore refine densities for this Key Town is included.



## Recommendation 2 – Height and Density Strategy

Having regard to:

- RPO 3.3 of the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly to ensure density standards consistent with section 28 Guidelines;
- Policy Objective 3.1 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines) to achieve appropriate densities that respond to place contexts; and
- SPPR 1 of the Urban Development and Building Heights, Guidelines for Planning Authorities (2018) (Building Heights Guidelines),

the Planning Authority is required to:

- (i) include a map identifying the centre and urban neighbourhood and the suburban / urban extension areas;
- (ii) review the density ranges and refine the densities as per Policy Objective 3.1 of the Compact Settlements Guidelines; and
- (iii) illustrate locations in the strategic sites that are suitable for buildings of height as per SPPR 1 of the Building Heights Guidelines.

### Chief Executive Response:

As per the NPF and NSO 1: Compact Growth as supported by National Policy Objective 3c compact growth is to be achieved by concentrating on delivering growth within the existing built-up footprint of settlements by focusing on the re-use of previously developed 'brownfield' land, the development of infill sites, and the re-use and redevelopment of existing sites and buildings with an objective that at least 30% of all new homes in settlements outside the 5 cities and suburbs will be within the existing built up footprint<sup>9</sup>. Accordingly in terms of the County Longford Development Plan 2021-2027 the following County Policy Objectives are noted:

*- CPO 4.2 Require at least 30% of all new homes that are targeted in settlements to be located within the existing built-up footprint of the settlements\*, in an effort to make settlements more compact and reduce unsustainable urban sprawl and ribbon development.*

*\* This means within the existing built-up footprint of all sizes of urban settlement, as defined by the CSO in line with UN criteria i.e. having a minimum of 50 occupied dwellings, with a maximum distance between any dwelling and the building closest to it of 100 metres, and where there is evidence of an urban centre (shop, school etc.).*

*- CPO 4.6 Support the regeneration of underused town centre and brownfield/infill lands, promote measures to reduce vacancy and the underuse of existing building stock and support initiatives that promote the reuse, refurbishment and retrofitting of existing buildings within urban centres and targeted settlements in the County in order to achieve sustainable compact growth targets of 30% of all new housing to be built*

*within the existing urban footprint of targeted settlements in the County.*

However, it is noted however that no supporting maps were contained in the County Longford Development Plan 2021-2027 in relation to the aforementioned CPOs. It is accepted that the LAP would benefit from a Density Map which incorporates the areas referred to in these policies.

The OPR have also drawn particular attention to Policy Objective 3.1 of the Compact Settlement Guidelines which recommends that density ranges are applied and refined based on consideration of centrality and accessibility to services and public transport and considerations of character, amenity and the natural environment. The CSG '3.3 Settlements, Area Types and Density Ranges' is noted. '3.3.3 Key Towns and Large Towns (5,000+ population)' relates to Longford Town and in particular Table 3.5 - Areas and Density Ranges Key Towns and Large Towns (5,000+ population):

#### ***Key Town / Large Town - Centre and Urban Neighbourhood***

*The centre comprises the town centre and the surrounding streets, while urban neighbourhoods consist of the early phases of residential development around the centre that have evolved over time to include a greater range of land uses. It is a policy and objective of these Guidelines that residential densities in the range 40 dph-100 dph (net) shall generally be applied in the centres and urban neighbourhoods.*

#### ***Key Town / Large Town - Suburban/Urban Extension***

*Suburban areas are the low-density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).*

The Local Area Plan must be consistent with the County Development Plan and associated core strategy. As per the County Development Plan core strategy the density range for Longford Town is specified as 35-40ha. This range has been carried into the Draft Local Area Plan, however the Local Area has not specifically delineated where the specific density levels apply. In order to comply with the CSG it is recommended that a map delineating the higher density 'Centre and Urban Neighbourhood' and the lower density 'Suburban/ Urban Extension' is included. This would include any 'Strategic Sites located within the existing settlement footprint where the higher density level of 40 dph. would apply. Furthermore, additional text to support this map to specify the relevant density levels in these locations should also be included. Applying a density of 40 dph in the 'centre and urban neighbourhood' and 35 dph in the 'suburban/urban extension' adheres to the density ranges of the Compact Settlement Guidelines. Such density levels are

considered adequate taking account the nature of Longford town. It is not considered necessary to review and refine the density levels further as they are within the ranges indicated in the Compact Settlement Guidelines, and are considered adequate for Longford Town, in addition to being in compliance with the Core Strategy of the County Development Plan, as is a statutory requirement of the LAP.

In relation to SPPR 1 it is noted that this states the following:

*'In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height'.*

As such within the 'Town Centre' zoning increased building height will be considered on a sit specific bases, subject to protection of residential and visual amenities and the proper planning and sustainable development of the area. An additional policy should be included in this regard.

It should also be noted that there is a specific policy within the Draft Local Area Plan which relates to compliance with the Compact Settlements Guidelines and SPPR's:

*RSE11: Comply with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, published in January 2024, constitute Ministerial Guidelines, and other relevant Guidelines and Specific Policy Requirements (SPPRs) issued under Section 28(1) of the Planning and Development Act 2000 (as amended).*

As such an additional policy is not considered necessary.

#### **Chief Executive Recommendation:**

- In Section 6.2.1 include the following additional text and map:

*In accordance with the Compact Settlement Guidelines (2024), the following density levels are identified in Longford Town (see Density Map):*

#### ***Area 1: Centre and Urban Neighbourhood: (40 dph):***

*Town Core*

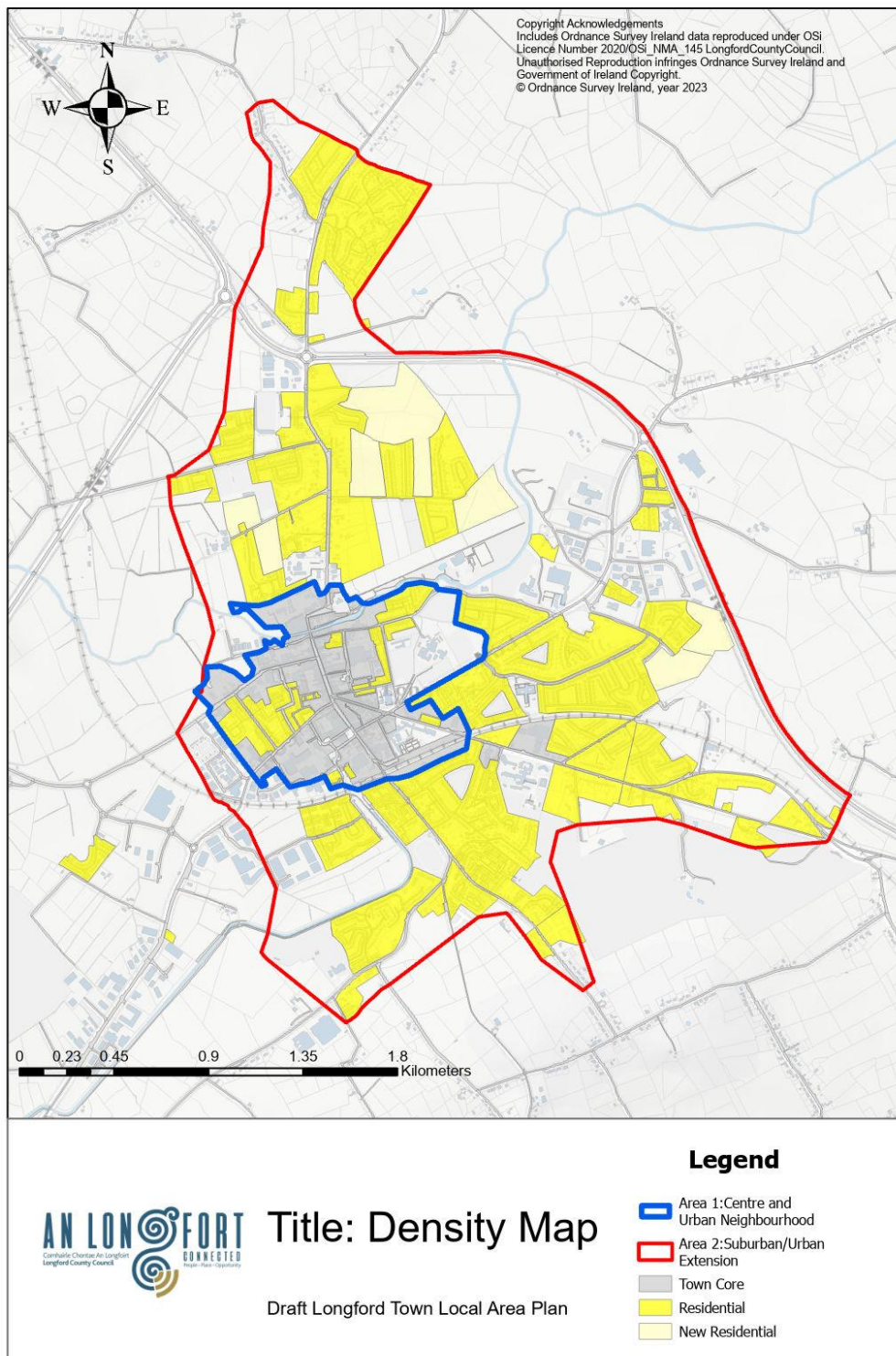
*Residential*

#### ***Area 2: Suburban/Urban Extension: (35dph)***

*Residential*

*New Residential*

*'Within the 'Centre and Urban Neighbourhood' Area increased building height will be considered subject to protection of residential and visual amenities and the proper planning and sustainable development of the area'.*



## Regeneration

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

draft LAP identifies 18 strategic sites for regeneration, all of which are subject to preparation of individual masterplans. The OPR is concerned that preparation of individual masterplans for 18 sites will take time and delay investment. Improved focus should be provided by setting out the overall regeneration strategy for each of the sites and carrying out a prioritisation exercise to target investment. Additionally, the LAP would benefit from greater detail in respect of these development and renewal areas, having regard to section 4.2 of the Compact Settlements Guidelines and section 5 of the LAP Guidelines e.g. in text and graphic form, provide guidance on design, layout, massing, materials, permeability and a phasing strategy for the delivery of infrastructure (if required).

With respect to the Camlin Quarter, a Framework Plan was prepared in 2019 and URDF was secured in 2021. The County Development Plan promotes the Framework Plan (section 6.5.3.1) and the draft LAP includes objectives to support this project citing the Camlin Quarter Plan (REG 14, 15 and TOU 07). The draft LAP however, rationalises the Framework Plan and breaks the overall regeneration quarter down into individual sites which will be subject to new masterplans. Given the significant work to date on the Camlin Quarter, the URDF funding and the need to attract development and investment, this LAP should provide greater detail on the regeneration aims and principles of these individual projects for the Camlin Quarter, in lieu of preparing individual masterplans. Further, the OPR welcomes the recent publication of the Longford 2024: A Town Centre First Strategy (2024) and encourages consideration of this document in addressing this matter.

The Ballyminion area is identified in the RSES as a regeneration area. This area is largely located outside of the CSO Settlement boundary<sup>42</sup> to the southwest of the town and includes an existing housing estate and lands zoned industrial/commercial/warehousing and areas of constrained land use. MP 07 of the draft LAP includes an objective to *'finalise and agree a masterplan for the appropriate regeneration and renaturing of the floodplain areas' of the Ballyminion area*. The draft LAP would benefit from more appropriately setting out the regeneration aims and design intent for these lands to provide a clearer direction for investment decisions and greater co-ordination for development and infrastructure delivery.

### **Estate Regeneration**

The OPR welcomes the identification of Ardncassa and St. Michael's Road regeneration areas which are in line with RPO 4.61 of the RSES. Improved focus should be provided on the regeneration principles to provide clarity for the local community and developers, particularly in terms of prioritising investment (e.g. community facilities, recreation improvements and surface water drainage upgrades) and assisting in implementing and monitoring.

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<sup>4</sup> This means within the existing built-up footprint of all sizes of urban settlement, as defined by the CSO in line with UN criteria i.e. having a minimum of 50 occupied dwellings, with a maximum distance between any dwelling and the building closest to it of 100 metres, and where there is evidence of an urban centre (shop, school etc.).



### **Dereliction and Vacancy**

There are high concentrations of vacant properties in Longford town. While the development of strategic sites would provide a catalyst for regeneration of the town core, it is important that the Planning Authority sets out actions and policies to proactively address this issue and includes measurable targets for the LAP period.

#### **Recommendation 3 – Regeneration Strategy**

Having regard to the regeneration of Longford Town, and in particular to:

- RPO 4.61 and RPO 4.62 of the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly for the regeneration of Longford Town;
- section 4.2 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) and section 5 of the Local Area Plans, Guidelines for Planning Authorities (2013); and
- Policy Objectives CPO 4.6, CPO 6.52 and CPO 6.53 of the Longford County Development Plan 2021-2027 for regeneration,

the Planning Authority is required to:

- (i) set out an overall regeneration strategy for the 18 strategic sites, identifying the development principles, infrastructure requirements and prioritising the development of these sites;
- (ii) set out the regeneration aims and principles of Ballyminion, Ardnacassa and St. Michael's Road;
- (iii) provide greater detail on the urban structure and form, massing, materials, permeability, open space and Sustainable urban Drainage Systems strategy;
- (iv) include measurable targets for the reduction of vacancy for the plan period and a strategy for the monitoring of same.

### **Chief Executive Response:**

It is considered that the 18 sites could be consolidated into a smaller number, for example the sites within the Camlin Quarter could be brought into one site, including no. 1, 5, 11, 13, 16 and 17. The overall regeneration strategy for the town core, taking in the strategic sites located within the town centre is set out in the Longford Town Centre First Strategy. There are no specific regeneration aims and objectives outlined for individual sites such as the Old Garda Barracks, MacGuinness Shop, No. 72 Main Street. The Town Centre First (TCF) Strategy outlines aims to address vacancy and dereliction, addressing a number of these buildings. Specific masterplans for each building, which are generally in private ownership, are not considered at this stage and there are no resources in TCF to prepare such masterplans. The regeneration aims and principles for Ballyminion, Ardnacassa and St. Michael's Road would be in line with the housing departments requirements. Density and building height have already been addressed under Recommendation 2 of this submission.

The Derelict Sites Register is currently under review with the Derelict Sites Levy to come into effect in Longford in January 2025 for properties on the Derelict Sites

Register. The Vacant Sites Register is also currently under review which along with the work of the Vacant Homes Officer to promote schemes such as the Croí Cónaithe scheme, aims to promote land activation and reduce vacancy and dereliction in the town centre. Compulsory Purchase Order targets are set each year for the Local Authority to address vacancy and dereliction in our towns and villages. CPOs will be used where necessary to assist in bringing property back into active use. The Vacant Homes Office tracks the number of properties that are entered into the various land activation schemes and how they exit the scheme. This tracker will assist in the monitoring of addressing vacancy in Longford Town.

#### Chief Executive Recommendation:

- Amend section '9.5.2 Master Planning – Strategic Sites' as follows:

##### **9.5.2 ~~Master Planning~~—Strategic Sites**

*This Local Area Plan sets a framework to identify and secure the redevelopment and regeneration of such areas in need of renewal and supports the active land management of vacant sites to address incidents of urban decay and vacancy. The primary objective is to facilitate long-term economic development in the town and the delivery of sustainable housing and the generation of economic activity. **Where necessary the development of strategic sites shall include the provision of improved transport infrastructure links to support the economic development of Longford Town.***

~~Master Planning consists of a holistic approach to development through social, economic and environmental initiatives. Masterplans can be used as useful tools to act as a driver for regeneration, in terms of providing a clear strategy for future development which also provides an opportunity to tap into various funding streams. Longford County Council will continue to prepare masterplans for areas in need of regeneration throughout the town, as these provide a clear vision for the area in terms of rejuvenation and aid in securing much needed funding streams in order to carry out such projects.~~

~~Further Regeneration areas are identified which correspond with those areas identified as 'Strategic Sites'. 'Strategic Sites' are considered regenerative catalysts within the town. During the lifetime of the Local Area Plan a Masterplan will where appropriate be prepared for each of the sites identified as 'Strategic Sites' (see **Strategic Sites Map**). Other areas not identified may also be focussed on for regeneration purposes as this initiative develops over the years. The development of masterplans will be determined by resources and priorities which may change over time.~~

*These areas contain lands that detract from the overall area in which they are situate, either by way of heightened levels of vacancy (commercial, industrial, residential) or through poor maintenance and/or dereliction, or a mix of these attributes. These areas are prominently located and have a significant visual impact that affects the overall image and investment potential of the town and environs.*

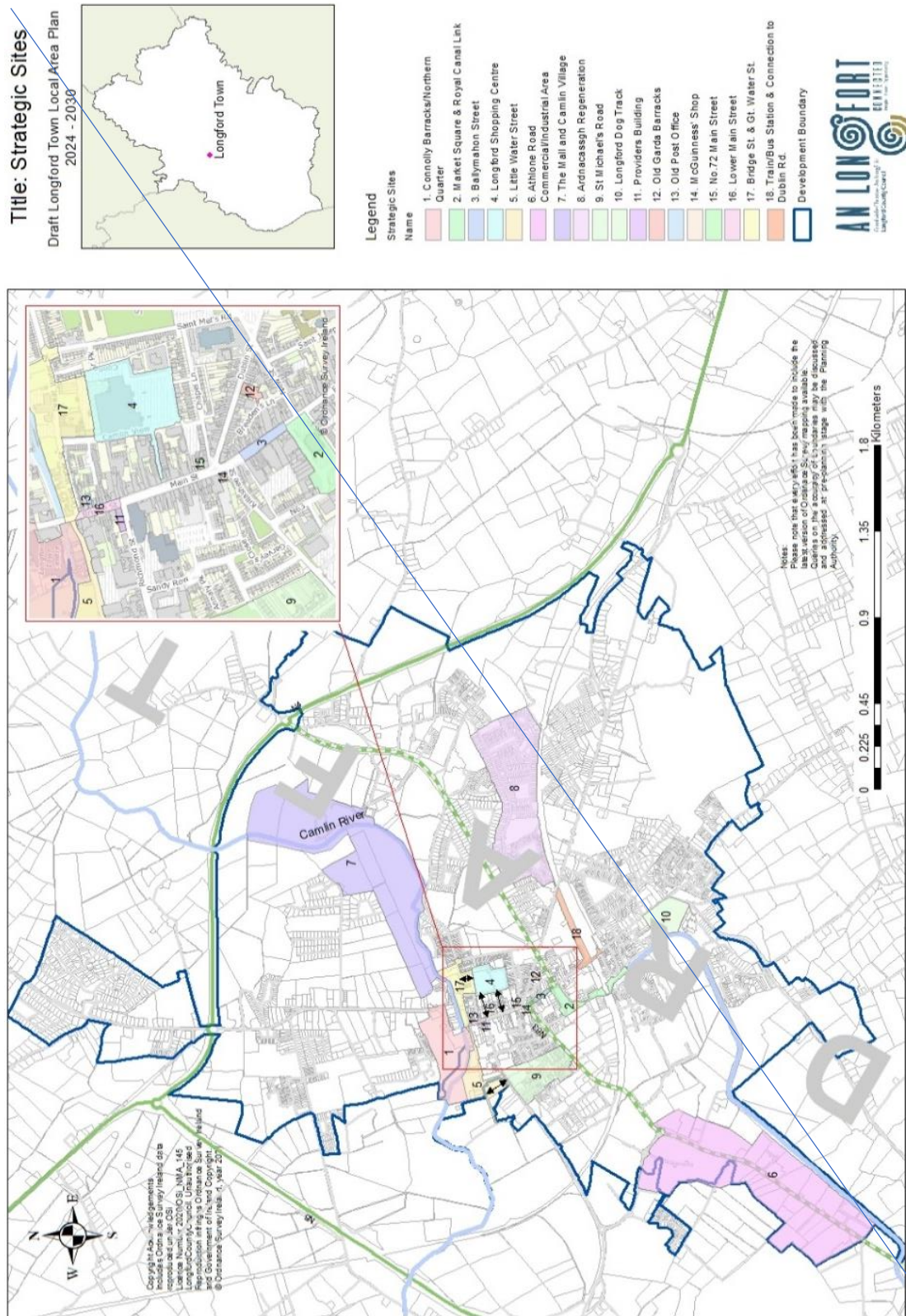
The Ardnacassa and Saint Michael's Road areas of Longford Town and other areas which are suffering from social and economic deprivation will also be subject to designation as 'Strategic Sites'. Strategic Site no. 9 6 (Athlone Road Commercial Industrial Area) is substantially within the floodplain, and as such has to be very sensitively dealt with, and its use for flood attenuation and urban forestry may be more appropriate.

Additional regeneration areas may also be identified in Longford town during the lifetime of the Local Area Plan as the need arises. Areas suffering from social and economic deprivation will be prioritised. ~~The masterplans to be prepared in the lifetime of this plan shall promote an appropriate mix of development to facilitate the implementation of identified objectives in each instance. Developments in these areas should adhere to the principles contained within the DMURS and other guidance issued on Sustainable Urban Development and the accompanying Urban Design Manual and shall be prepared in consultation with infrastructure providers including Transport Infrastructure Ireland and Uisce Eireann.~~

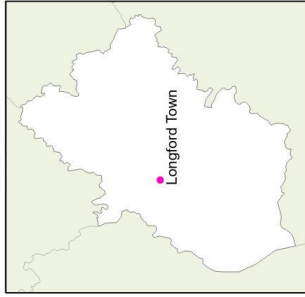
- Amend section '9.5.3 Master Planning - Strategic Sites Objectives' as follows:
- MP 02** Promote the development and regeneration of the 'Strategic Sites' identified in the Longford Local Area Plan **in accordance with the Town Centre First Strategy**, ~~to include on a Master Plan basis.~~
- MP 03** Identify additional 'Regeneration Areas' as required, to include areas suffering from social and economic deprivation within Longford town.
- MP 04** Promote innovative solutions to ensure social, economic and environmental gain for communities.
- ~~**MP 05** Masterplans shall be prepared for the identified 'Strategic Sites' in consultation with the community and also with relevant statutory bodies during the lifetime of this Plan. Additional areas suffering from social and economic deprivation will also be prioritised.~~
- ~~**MP 06** Carry out master planning to ensure that large areas of land are appropriately planned and developed in a sustainable manner, which include provision for phasing, infrastructure provision, community facilities, density, layout, open spaces, landscaping and development design briefs and statements.~~
- ~~**MP 07** Finalise and agree a masterplan for the appropriate regeneration and renaturing of the floodplain areas of the Ballyminion area of Longford Town.~~
- ~~**MP 08** Prepare masterplans for additional areas as required, such as the Ardnacassa and St Michael's Road areas of Longford Town and other areas suffering from social and economic deprivation within Longford town.~~
- ~~**MP 09** Encourage private development in accordance with a detailed and agreed masterplan that fully addresses the potential of the site in its wider context.~~
- 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.**



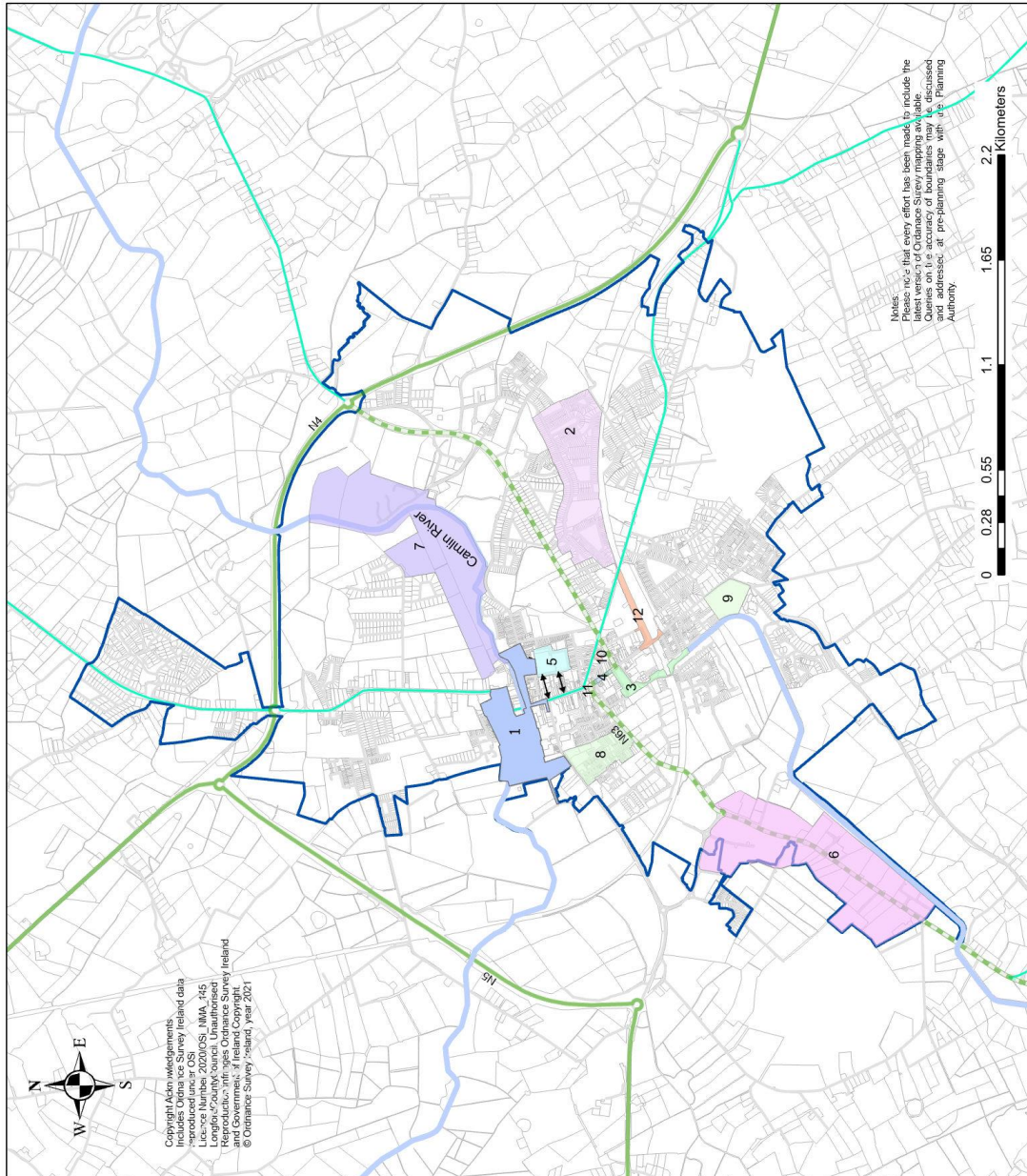
- Section '9.5.2' delete the 'Strategic Sites Map' below and replace it with the subsequent updated map:



**Title: Strategic Sites**  
**Draft Longford Town Local Area Plan**  
**2024 - 2030**



- Legend**
- 1 Camlin Quater Area
  - 2 Ardnacassagh Regeneration Area
  - 3 Market Square & Royal Canal Link
  - 4 Ballymahon Street
  - 5 Longford Shopping Centre
  - 6 Athlone Road Commercial/Industrial Area
  - 7 The Mall and Camlin Village
  - 8 St Michael's Road
  - 9 Longford Dog Track
  - 10 Old Garda Barracks
  - 11 McGuinness' Shop
  - 12 Train/Bus Station & Connection to Dublin Rd.





- Section '9.5.2 Master Planning – Strategic Sites', include the following table after the above new 'Strategic Sites Map':

***Strategic Sites Regeneration Strategy Table:***

<b><i>Strategic Sites</i></b>			
<b><i>Site no.</i></b>	<b><i>Area in ha</i></b>	<b><i>Infrastructure Requirements</i></b>	<b><i>Development Priority</i></b>
<b><i>1</i></b>	<b><i>13.99</i></b>	<b><i>None - Serviced</i></b>	<b><i>High</i></b>
<b><i>2</i></b>	<b><i>21.87</i></b>	<b><i>None - Serviced</i></b>	<b><i>Low</i></b>
<b><i>3</i></b>	<b><i>1.96</i></b>	<b><i>None – Serviced</i></b>	<b><i>High</i></b>
<b><i>4</i></b>	<b><i>0.22</i></b>	<b><i>None - Serviced</i></b>	<b><i>Medium</i></b>
<b><i>5</i></b>	<b><i>2.50</i></b>	<b><i>None – Serviced</i></b>	<b><i>Medium</i></b>
<b><i>6</i></b>	<b><i>40.5</i></b>	<b><i>This area is not currently serviced with a sewer network and there is no current UE project to support this. Network extensions will therefore be developer driven.</i></b>	<b><i>Low</i></b>
<b><i>7</i></b>	<b><i>36.74</i></b>	<b><i>None - Serviced</i></b>	<b><i>High</i></b>
<b><i>8</i></b>	<b><i>5.57</i></b>	<b><i>None – Serviced</i></b>	<b><i>Low</i></b>
<b><i>9</i></b>	<b><i>3.11</i></b>	<b><i>None – Serviced</i></b>	<b><i>Medium</i></b>
<b><i>10</i></b>	<b><i>0.10</i></b>	<b><i>None – Serviced</i></b>	<b><i>Low</i></b>
<b><i>11</i></b>	<b><i>40.55</i></b>	<b><i>None – Serviced</i></b>	<b><i>Low</i></b>
<b><i>12</i></b>	<b><i>1.68</i></b>	<b><i>None - Serviced</i></b>	<b><i>High</i></b>
<b><i>Total area</i></b>	<b><i>168.84</i></b>		

### **Transport and Accessibility**

The OPR welcomes the preparation of the LTP, as required by the RSES (RPO 8.6) and Policy Objective CPO 5.9 of the County Development Plan ensuring the integration of land use and transport planning and setting out transport priorities. In particular, the draft LAP includes Policy Objective ST 32 ensuring the priority schemes of the LTP are placed on a statutory footing within the LAP which is supported.

A significant shift to active and sustainable modes will be necessary to enable Ireland to achieve mandatory climate action targets under the Climate Action and Low Carbon Development Act 2015 i.e. to reduce greenhouse gas emissions by 51% by 2040, with a commitment to achieving carbon neutrality by 2050. As such, it is important to set ambitious but realistic modal shift targets for Longford Town in consultation with relevant stakeholders, and to include these within the LAP to achieve these national targets and to assist in appropriate implementation and monitoring of the LAP.

Objective ST 16 of the LAP supports the development of an integrated transport hub which is supported by the OPR as a measure to promote sustainable travel modes.

However, the LTP did not examine this provision and it is unclear from the draft LAP where this hub will be located. The LAP provides an opportunity to identify a location for the hub within the town centre, enhancing accessibility and sustainable mobility as per RPO 4.59 of the RSES. Site selection should be carried out in consultation with the National Transport Authority (NTA).

Potential conflicts between networks are mapped in the LTP. This is a useful forward planning exercise which facilitates mitigation measures being developed at a local planning level. Section 14.4.10 of draft LAP includes the incorrect map and should insert figure 5.6 from the LTP into this section of the LAP.

Some incorrect maps and projects are transposed from the LTP into the draft LAP. To ensure full alignment with this policy objective, the OPR requests the Planning Authority to review the draft LAP to confirm the priority projects and maps are contained therein (e.g. draft LAP includes all the bike schemes, public transport projects and car parking strategy but does not include the prioritised routes/projects).

### **Abbeycartron Access Strategy**

The Abbeycartron lands are located to the north of the town, east of Battery Road and south of the N4. There are some existing housing estates already developed, with a significant portion of the remaining lands identified in the draft LAP as Phase 1 and Phase 3 residential. The Longford Northern Environs LAP 2008-2014 provided a zoning and traffic assessed infrastructure strategy for the lands, identifying a number of new roads with 4 new access points. Given the time since the publication of this LAP and the changes to transport and land use planning, including land use zoning, the LTP examined a more sustainable proposal to access these lands; entitled 'alternative sustainable proposal'.

The OPR welcomes the re-examination of the access arrangement for these lands having regard to the significant changes in transport and land-use planning and notes the car dependent nature of the original access strategy. However, the draft LAP and its associated policy objectives include the two access arrangements, making it unclear for members of the public, developers and service providers which is the preferred access strategy for the lands. In addition, the priority cycle and permeability measures identified in the LTP are not fully aligned with the active travel routes of the new access strategy.

Given that the development of a bus route scheme for the town and frequency study is a medium-term priority, there is a need to ensure the access arrangements for Abbeycartron prioritise sustainable travel modes, highlighting active travel as per RPO 8.1 of the RSES and the modal hierarchy promoted in the National Investment Framework for Transport in Ireland (2021). The OPR, therefore, recommends that the LAP includes the alternative sustainable option and removes references to the 2008-2014 transport strategy.

## Recommendation 4 – Transport and Accessibility

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

- section 8.3 and RPO 4.59 and 8.1 of the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly;
  - 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 5.7, CPO 5.8, CPO 5.45, CPO 5.46, CPO 5.47 and CPO 5.71 of the Longford County Development Plan 2021-2027,
- the Planning Authority is required to:
- (i) provide a specific objective for modal share targets for Longford Town;
  - (ii) include the alternative sustainable proposal access arrangement for the Abbeycarton lands and remove references to the traffic arrangements from the Longford Northern Environs Local Area Plan 2008-2014; and
  - (iii) provide greater detail on the proposed integrated transport hub, noting a preference for a town centre location and to consult with the National Transport Authority on this proposal.

## Observation 1 – Local Area Plan and Local Transport Plan Integration

Having regard to the maps, figures and tables in the Local Transport Plan and Policy Objective CPO 5.9 of the Longford County Development Plan 2021-2027, the Planning Authority is requested to review and ensure the correct graphics are transposed into the draft Longford Town Local Area Plan 2025-2031 ensuring the integration of land use and transport planning and setting out the transport priorities for the plan area.

### Chief Executive Response:

It is the aim of the Council to encourage modal shift and advance towards this during the lifespan of the LTP and LAP. A Specific Objective should be included in this regard.

In relation to the Abbeycarton Access Strategy within the Draft LAP, having considered the OPR submission, in conjunction with the NTA and TII submissions, and the Council's own internal positions, it is considered that Fig. 5.8 (Longford Northern Environs Local Area Plan 2008 – 2014) would not be adopted into the LAP. Furthermore, the Alternative Sustainable Proposal (Fig 5.9 of the LTP) is amended in order to support the development of the area. The amended Alternative Sustainable Proposal figure will be included in section 14.4.9.2. As such the relevant amendments in terms of text and graphics should be made.

It is noted by the OPR that objective ST16 relates to the development of an integrated transport hub within the town and states the following:

*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.*

The inclusion of an objective is considered sufficient at this stage, as the specific town centre location is considered premature pending further design studies and impact assessments. As options are investigated during the duration of the plan, necessary policy and land use requirements will be considered and the plan will be modified as required. However, it is considered that objective ST16 could be modified to include reference to collaboration with the NTA as requested in their submission.

In relation to the OPR Observation, the mapping in section 14.4.10 of the draft LAP has been reviewed. As it contains the incorrect map transposed from the LTP, the existing map should be deleted and the correct map in relation to figure 5.6 from the LTP should be included in this section of the LAP. In relation to the remaining LTP maps incorporated into the LAP, these are considered satisfactory and appropriate.

#### Chief Executive Recommendation:

- In section '146 Sustainable Transport Objectives' include the following additional objective:

*Encourage modal share targets in accordance with LTP and relevant recommended standards and guidelines.*

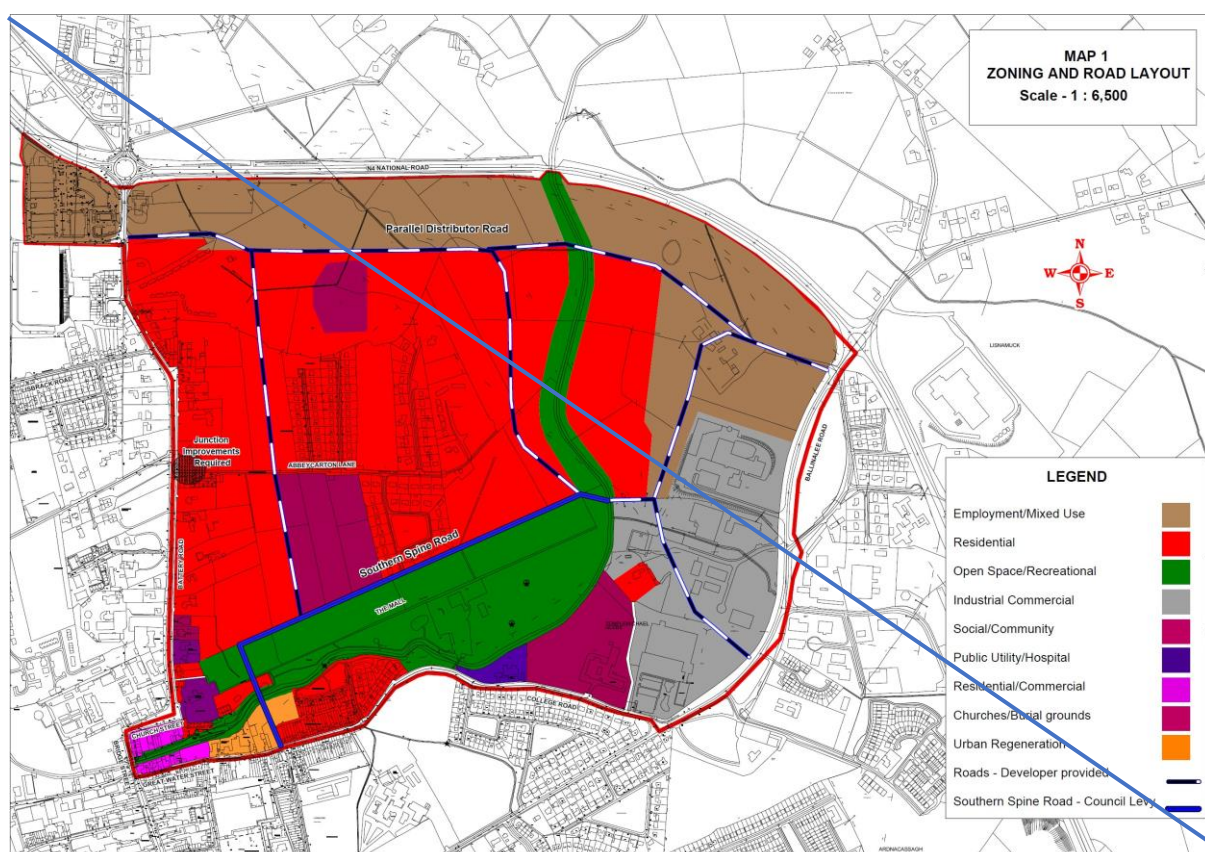
- Amend '14.4.9 Abbeycartron Access Strategy' as follows:

~~‘...The Abbeycartron Access Strategy consists of the following 2 options which are outlined accordingly:~~

#### ~~14.4.9.1 — Longford Northern Environs Local Area Plan 2008-2014 Option~~

~~The Longford Northern Environs Local Area Plan exists to provide a zoning and traffic assessed infrastructure strategy for the Abbeycartron Lands in the north of the town. As part of this, a number of new roads are identified within the area, with four new access points provided, making it extremely permeable for vehicles.~~

*Longford Northern Environs Local Area Plan 2008-2014 Map (Figure 5.8 of LTP)*



*In the 15 years since this plan was published, transport policy and thinking has changed to favour sustainable modes of transport, and to reduce car dependency. Under this direction, a more sustainable schematic (Alternative Sustainable Proposal section) has therefore been developed with this plan as the alternative delivery option.*

- Section '14.4.9.2 Alternative Sustainable Proposal Option', to be renamed as follows:  
*'Alternative Abbeycartron Sustainable Transport Proposal'*
- Section '14.4.9.2 Alternative Sustainable Proposal Option' (renamed as above) to 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 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.*

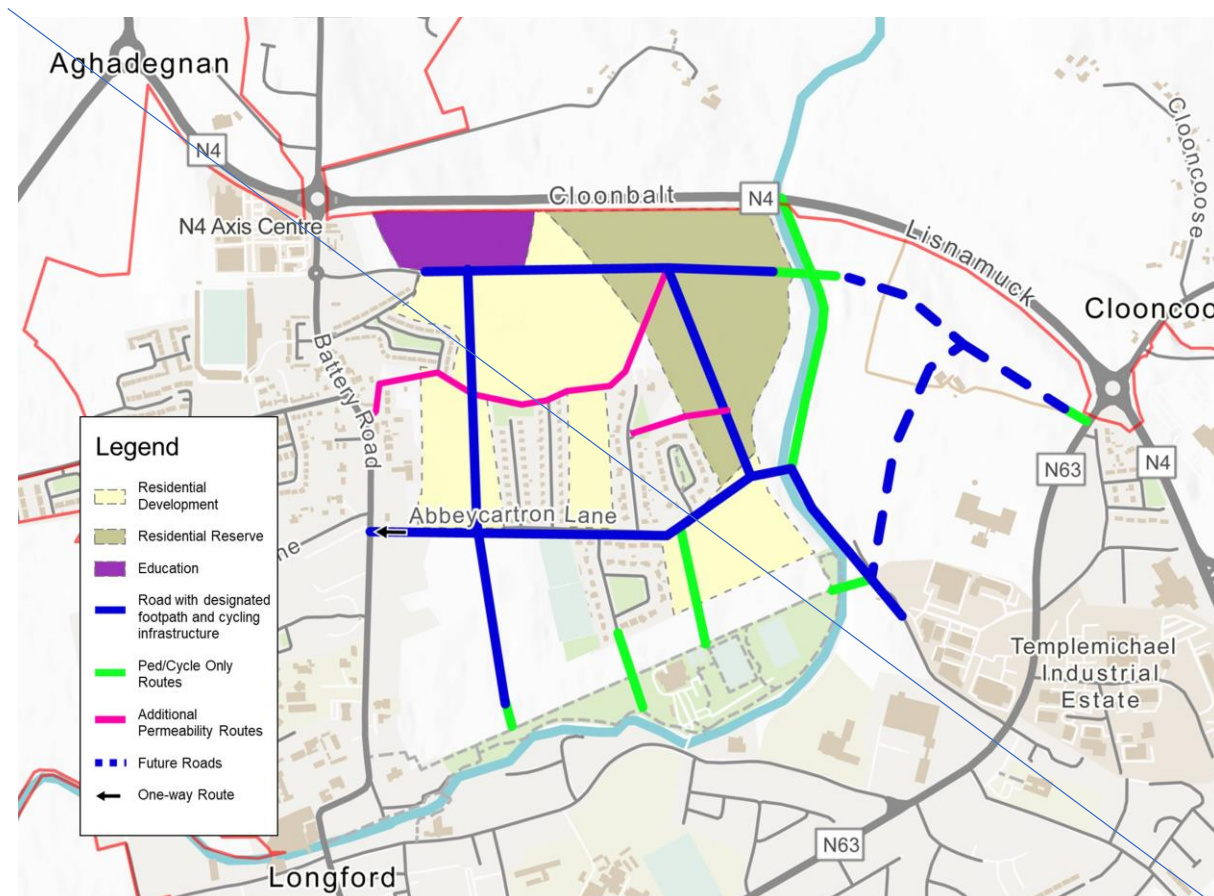
'14.6 Sustainable Transport Objectives' include the following additional objectives:  
*Ensure Implementation of the Abbeycartron Sustainable Transport Proposal is dependent on prior 'traffic and transport' and permeability assessment, to the satisfactory standard and detail of Longford County Council 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.*

- On page 215 the following is to be deleted:

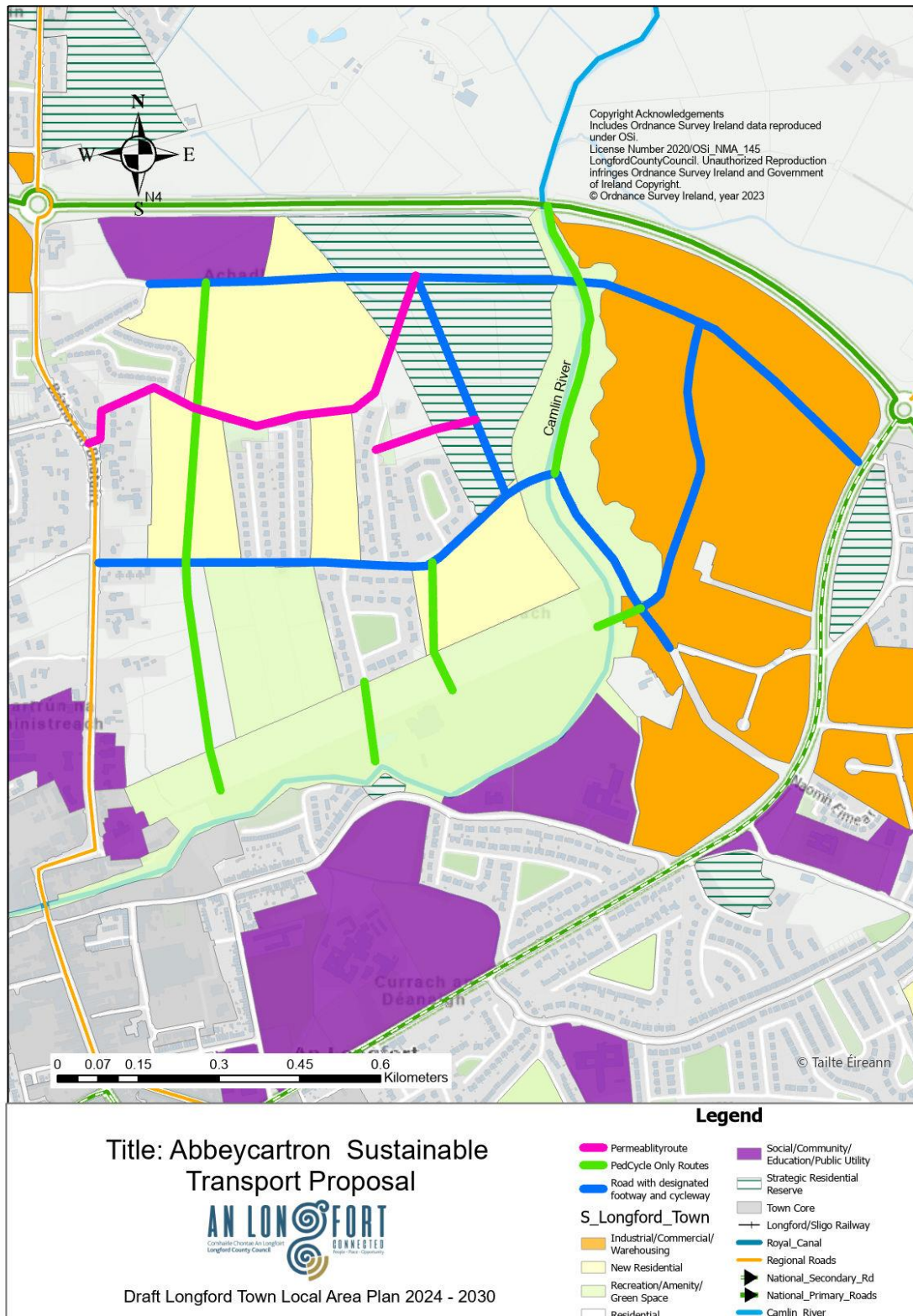
**Alternative Sustainable Proposal (Figure 5.9 of LTP)**





- The following heading and map to be included in its place:

### *Abbeycartron Sustainable Transport Proposal*



- Section '14.6 Sustainable Transport Options' delete the following objectives:

~~ST 27 With reference to the LTP Abbeycartron Access Strategy – Longford Northern Environs Local Area Plan 2008-2014 option only, vehicular access to be provided linking Longford town centre and the lands zoned to the north of the Camlin River in the vicinity of Great Water Street, to include a spine road parallel to the Mall Amenity Area. This would be provided by the Local Authority and involve the installation of a new river crossing from the Mall to Great Water Street. This is to be funded through the application of specific levies on development that would benefit from such a link (in accordance with a specific scheme under S. 49 of the Act).~~

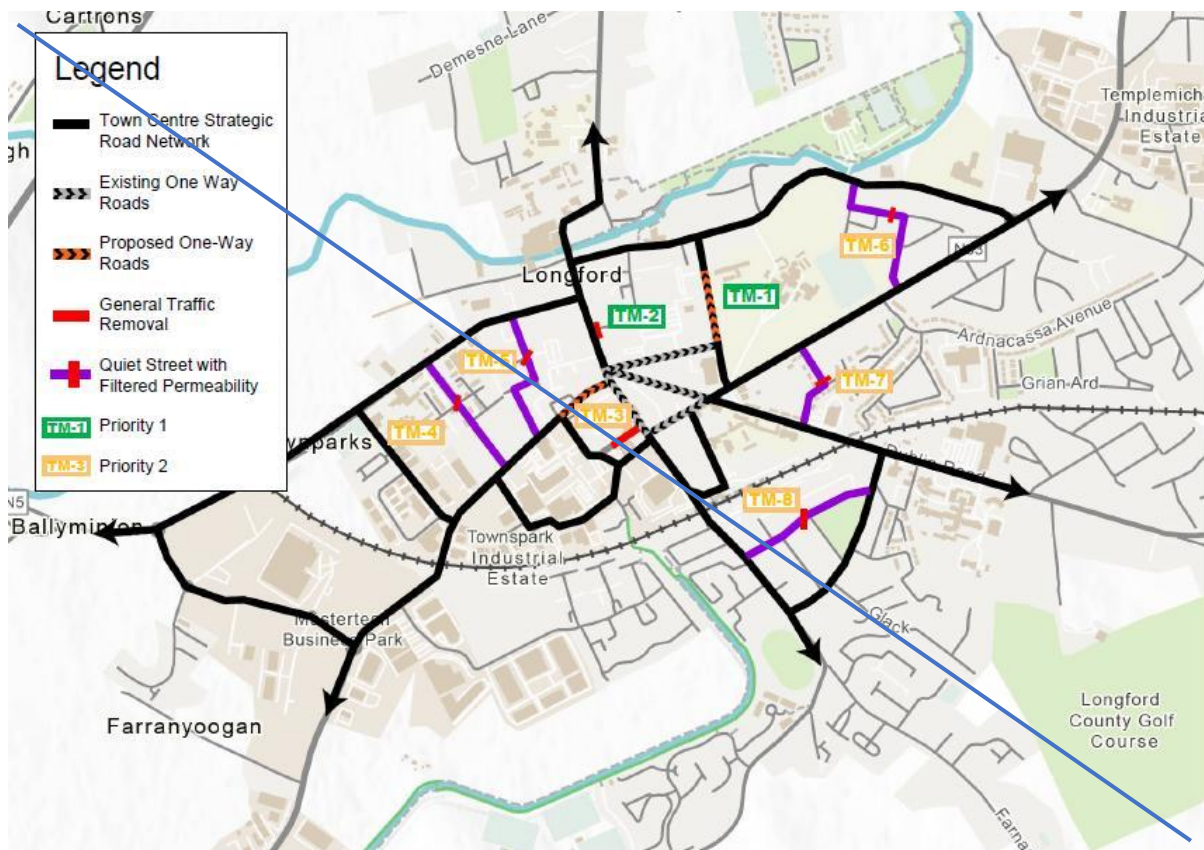
~~ST 31 With reference to the LTP Abbeycartron Access Strategy – Longford Northern Environs Local Area Plan 2008-2014 option only, the southern spine route will be developed as indicated to facilitate the development of lands zoned to the north. All developments permitted that will benefit from the development of this route will be levied in accordance with a special scheme under s. 49 of the PDA to facilitate the construction of this route.~~

- Section '14.6 Sustainable Transport Options' amend ST 26 as follows:  
*Require developers in specific areas to provide elements of the road network as indicated in the ~~LTP Abbeycartron Access Strategy~~ **Abbeycartron Sustainable Transport Proposal** and associated cycle and pedestrian facilities in accordance with the provisions of the DMURS. This will be required and details agreed in association with permission for such development, where this will facilitate the appropriate access to and movement within the development concerned and to strengthen its relationship with the town centre. Where appropriate, infrastructural funding will be addressed through the provisions of contribution schemes prepared under s.48 & 49 of the Act.*

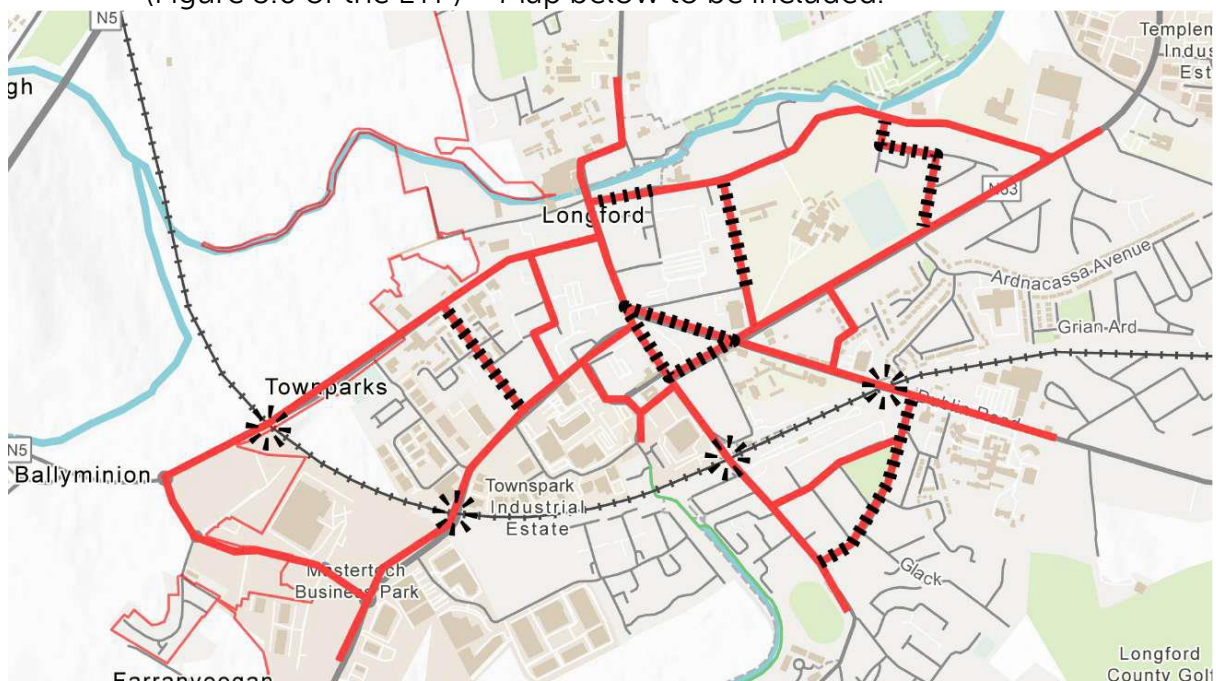
- '14.6 Sustainable Transport Objectives' amend ST16 as follows:  
*In collaboration with the NTA, ~~Support~~ the development of an integrated transport hub within the town, which serves the county and for the promotion of public transport connectivity between Longford 'Key' town and other towns and villages.*

- 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 replace with the following map:





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



## Economy and Employment

Longford is a key town which provides a long-established employment base in the county. Key regional priorities for Longford Town are to promote compact growth, the regeneration of the town centre and to expand Longford's role as a hub for enterprise, employment and tourism. RPO 4.63 of the RSES seeks to support Longford Town's role as a strategic employment centre. To support and grow economic activity in the town, 197 ha of land is zoned and available for employment purposes. The LAP would benefit from providing more detailed information including a breakdown of developed and available undeveloped employment zoned lands in the town and their locations.

The LTP maps the employment density of Longford Town which highlights a greater employment density in the town centre, with areas further out having fewer jobs. This employment pattern is positive as it aligns with public transport provision. Policy Objective ECON 06 supports the continuation of this sustainable pattern of development and is welcomed.

With the exception of the town centre, the other employment generating lands are all located on the outskirts of the town, adjoining the strategic road network and are not in close proximity to residential zones or public transport services. The economic lands would benefit from greater integration of transport and land-use planning by identifying the types of employment uses for the different locations based on their accessibility, as per section 1.4 of appendix A of the Development Plans Guidelines: *accessibility is a central consideration in selecting employment zones and the transport provision of potential locations for development needs to be strategically considered:*

- *Low intensity employment uses such as distribution, warehouse, storage and logistics facilities will require good access to the major road network;*
- *High intensity employment uses such as offices will require the highest level of accessibility by public transport, walking and cycling. The sequential approach to land-use zoning will also apply, with lands contiguous to existing development within a settlement being prioritised for high-intensity employment zoning ahead of lands located further on the periphery of the settlement.*

The transport measures and strategies of the LTP should be better integrated into this assessment to ensure establishment of sustainable travel patterns and avoid creation of car dependent employment zones.

A phasing map sets out the priority locations for employment generating lands, with Phase 1 and 2 lands identified. Phase 1 lands are frontloaded with 4 sites identified and 1 site for Phase 2. The draft LAP does not provide site areas. Given the potential timelines involved in developing all of these sites, the LAP would benefit from further consideration of anticipated land activation measures required to facilitate the development of these lands and associated infrastructure in order to support Longford Town's role as a strategic employment centre.

With respect to the Phase 1 lands, two of the sites are located on the western side of the N4, outside the CSO Settlement boundary. They are not serviced by public transport and there are no cycle or pedestrian provisions identified in the LTP. Given their periphery location, the NTA recommends that the LAP includes a requirement for any development on these lands to promote and facilitate sustainable transport trips to work such as measures as car parking provision and management, provision for cyclists, shuttle bus services and general workplace travel plan activities. The OPR encourages the Planning Authority to engage and collaborate with the NTA on best practices.

The carrying capacity of the national road network should be considered when evaluating sites adjoining the N4, as per the Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

### Recommendation 5 - Economic development and employment

Having regard to the overall economic strategy for Longford as a Key Town, and in particular to:

- RPO 4.2 and RPO 4.63 of the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly;
- section 1.4 of appendix A of the Development Plans, Guidelines for Planning Authorities (2022);
- Policy Objectives CPO 6.15, CPO 8.26, CPO 8.27, CPO 8.28 and CPO 8.33 of the Longford County Development Plan 2021-2027; and
- sections 2.5 and 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012),

the Planning Authority is required to:

- (i) provide a breakdown of the developed and available and undeveloped employment zoned lands and their locations;
- (ii) identify the types of employment uses for the employment generating sites based on their accessibility. The transport measures and strategies of the Local Transport Plan should be integrated into this assessment;
- (iii) identify the key land activation measures required to facilitate the development of the employment lands identified in the phasing map, to support their delivery within the life of the Longford Town Local Area Plan 2025-2031 and supported by timely infrastructure delivery; and
- (iv) include a specific policy objective for the employment lands on the western side of the N4 to facilitate sustainable transport trips to work.

### Chief Executive Response:

In terms of the recommendation to provide a breakdown of the developed and available and undeveloped employment zoned lands and their locations, it is considered that this would be a positive addition to the Plan, and accordingly a map and table to this extent should be prepared and included in the LAP.

The types of employment uses for the employment generating sites are as identified

in the land use zoning matrix which is contained in Appendix 1 of the Local Area Plan. Any planning applications will be considered in accordance with the zoning matrix, relevant policy and guidelines.

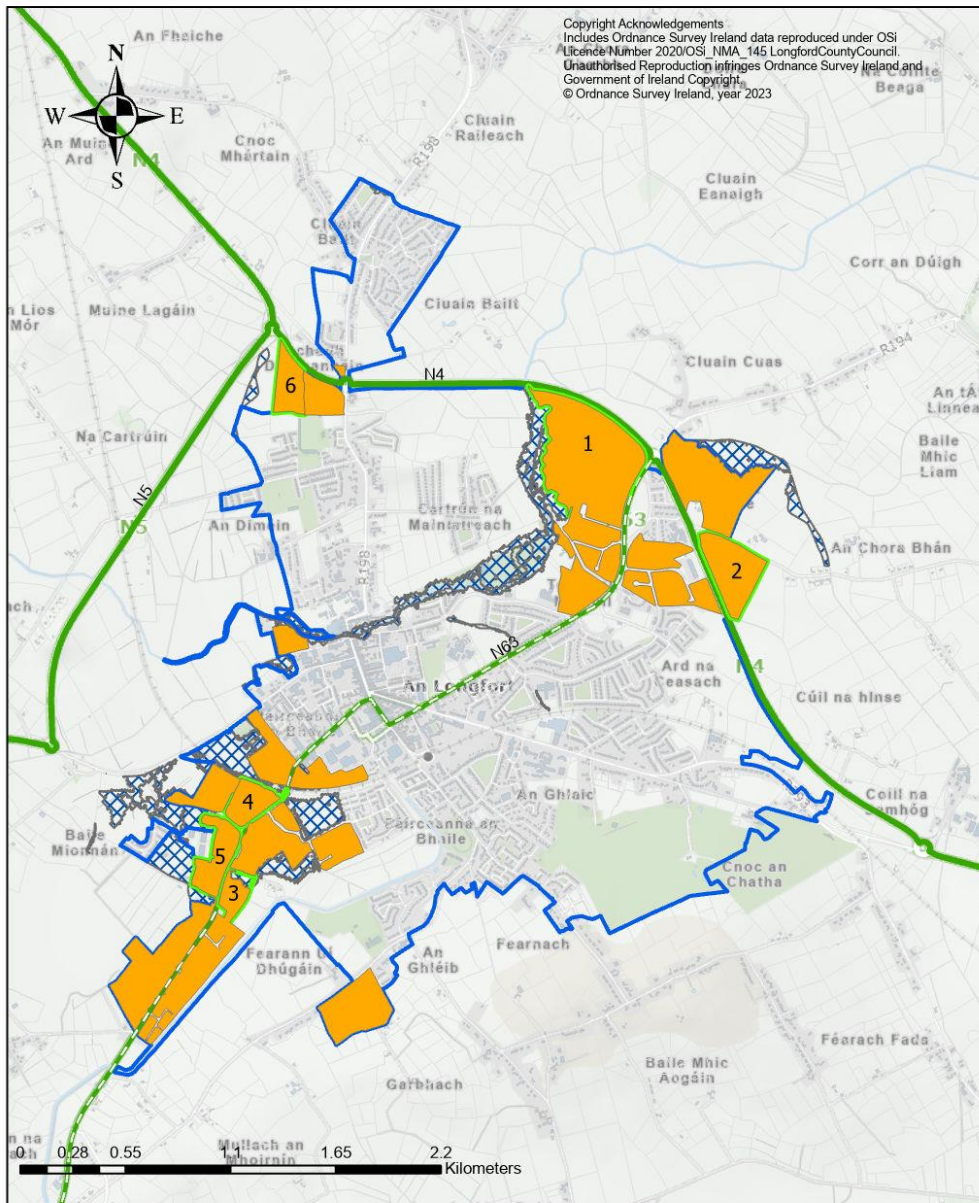
Key land activation measures to facilitate the development of lands are as identified in a specific chapter entitled '16.0 Implementation and Monitoring'. These include employment lands. These include Active Land Management measures, Compliance with the Core Strategy, a phasing scheme, collaboration with the National Land Development Agency, Application of Vacant Site Levy, Residential Zoned Land Tax. Active Land Management Objectives are contained within this chapter.

As per '14.6 Sustainable Transport Objectives' a number of relevant objectives are noted which relate to the development of employment lands and as such would include the lands on the western side of the N4. However, it is considered that in terms of better integration that the Plan would benefit from an additional specific policy in the Economic Development section of the Plan also in order to ensure that the employment lands on the western side of the N4 are developed in accordance with sustainable transport principles and the relevant Sustainable Transport Objectives of this Plan. Specifically in terms of the NTA submission (LLAP10), it is also considered that Appendix 1; Land Use Zoning and Land Zoning Matrix, in the section '*Industrial/Commercial/Warehousing*' could include additional text to promote sustainable transport.

**Chief Executive Recommendation:**

- (i) Section '7.3.1 Primary Growth Town' include the following map and table:





Title: Available Undeveloped Industrial  
/ Commercial / Warehousing Zoned lands.

Draft Longford Town Local Area Plan



#### Legend

- Undeveloped/Commercial zoned lands
- Areas of Constrained Use
- ▶ National\_Secondary\_Roads
- ▶ National\_Primary\_Roads
- Longford Town Boundary
- S\_Longford\_Town  
Zone\_Orig  
Industrial/Commercial/Warehousing

*Table XX: Industrial / Commercial / Warehousing Lands Availability Analysis*

<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.*

- In section '7.5 Economic Development Objectives' include the following additional objective:

*ECON XX: Ensure that the employment lands on the western side of the N4 are developed in accordance with sustainable transport principles and the relevant Sustainable Transport Objectives of this Plan.*

- In Appendix 1; Land Use Zoning and Land Zoning Matrix, in the section 'Industrial/Commercial and Warehousing' include the following additional text:

*Under this land use zoning there is a requirement that proposals for development will promote and facilitate sustainable transport for trips to work via such measures as car parking provision and management, provision for cyclists, shuttle bus services and general workplace travel plan activities.*

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## Retail

In the Retail Planning Guidelines for Planning Authorities (2012), Longford Town is defined as a Level 3 Settlement, assigning it the role of providing retail support at a sub-regional level. The importance of Longford Town has also been recognised in the RSES for EMRA, which has classified the town as a Level 2 centre (Major Town Centres and County (Principal) Town Centres). Longford Town's Core Retail Area is to be the focus and preferred location for retail development during the plan period. This is supported by Policy Objective RET 06 of the LAP and welcomed by the OPR. Section 7.6.3.4.1 of the draft LAP states that in order to maintain the role of Longford Town as a driver of development in the north midlands area and to maintain its position within the Regional Retailing Hierarchy, the potential for regional shopping facilities will be considered subject to relevant planning criteria. Longford Town has two existing shopping centres, one in the centre of the town and the second to the north, with a portion of the latter repurposed, with the rest vacant. The LAP should



clearly identify either the location or the criteria for the location of any such future development, focusing on protecting the vitality and viability of the existing town centre.

#### Observation 2 – Retail

Having regard to the Longford Town's designation as a Level 3 Settlement in the Retail Planning Guidelines for Planning Authorities (2012) and a Level 2 Centre in the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly, the Planning Authority is advised to review and amend section 7.6.3.4.1 regarding the provision for regional shopping facilities to support and promote the vitality and viability of the existing town centre.

#### Chief Executive Response:

The section referred to by the OPR is as follows:

##### **7.6.3.4.1 Regional Shopping Centres**

*Due to Longford town's location at strategic point on national infrastructure, Longford has traditionally acted as an inter-regional centre for the surrounding counties. In order to maintain the role of Longford Town as a driver of development in the north midlands area and to maintain its position within the Regional Retailing Hierarchy, the potential for regional shopping facilities will be considered subject to relevant planning criteria.*

The OPR have indicated that the LAP should clearly identify either the location or the criteria for the location of any such future development, focusing on protecting the vitality and viability of the existing town centre. The OPR has incorrectly indicated that Longford has two existing shopping centres, one in the centre of the town and the second to the north, with a portion of the latter repurposed, with the rest vacant. Longford Town has only 1 existing shopping centre (Tesco Shopping Centre). The other referred to by the OPR is not an existing shopping centre, but the vacant shopping centre which was never occupied and is vacant. It should be noted that the vacant site is the identified as strategic site and that relevant regeneration policy objectives in addition to Town Centre First objectives apply.

Furthermore, the Local Area Plan must be compliant with higher level policy and plans. In this regard the County Longford Development Plan 2021-2027 relates. Section 7.6.3.4.1 of the LAP is a direct extract from the County Longford Development Plan 2021-2027. This was referred to the OPR and no issue was raised. As such this is considered satisfactory, and no changes is recommended in this regard. It is also noted that Observations by the OPR are not statutory requirements.

#### Chief Executive Recommendation:

No change.

## Education

The OPR welcomes the preparation of the Social Infrastructure Audit. Access to quality childcare, education and health services is a National Strategic Outcome of the National Planning Framework (NPF). In this regard the new development area of Abbeycartron should be appropriately planned to include sufficient social infrastructure and supports. The draft LAP states that a site has been identified by the Department of Education as a potential Post Primary School site; Dempsey's Field in Abbeycartron. This site is zoned New Residential. While education is a permitted use under this land use zoning, this site is prioritised as a Phase 1 residential site in the draft LAP. While the need for a school in the Abbeycartron area is fully acknowledged, this site is located at the most easterly point of the overall development area, requiring a significant number of active travel arrangements to access the site. The LTP does not include any school provision for this site. The OPR therefore advises the Planning Authority engage with the Department of Education and NTA in relation to school provision and site selection.

### Recommendation 6 - Abbeycartron school site

Having regard to:

- National Strategic Outcome 10 – Access to Quality Childcare, Education and Health Services and NPO 31 of the National Planning Framework; and
- Policy Objective CPO 7.37, CPO 7.38, and CPO 7.39 of the Longford County Development Plan 2021-2027,

the Planning Authority is required to review the location of school site in the Abbeycartron lands based on accessibility and connectivity. The transport measures and strategies of the Local Transport Plan should be integrated into this assessment. The Planning Authority should consult with the Department of Educational and Skills and the National Transport Authority in addressing this recommendation

### Chief Executive Response:

#### To be read in conjunction with (Department of Education – LLAP15)

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 in their submission 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).



These are serviced lands in relative proximity to the town centre and with a substantial number of residential properties in terms of a 20-minute walking catchment. In terms of the zoning provisions, a school is 'Permitted in Principle' at this location, and it is not considered necessary to change the zoning at this time. While the site has not been zoned specifically for Education use, it is considered at this stage premature to change the zoning of the site as alternative more favourable sites may become available in the future.

Also, it is considered that the need for a post primary school is a potential longer-term possibility. 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. Also based on the revised calculations completed as part of this report on the 'Longford Town School Assessment Table' a surplus of post primary spaces exists based on the core strategy population projections for the town exists. Were a more favourable location to become available for the school it would give flexibility and perhaps allow for a better location. It would also allow the lands at Dempsey's Field, which are fully serviced lands and as such within Phase 1, to possibly be developed for other uses allowed within its zoning class in a more timely fashion. It is therefore considered that as the current zoning allows for this level of flexibility, while also allowing for a school to be 'Permitted in Principle', and as such it is considered not necessary to change the zoning at this location.

**Chief Executive Recommendation:**  
No change.

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#### **Utilities and Infrastructure Capacity**

Following a review of the Uisce Éireann (UÉ) submission, there are matters that need clarification or revision. With respect to wastewater, UÉ states that there is sufficient capacity at the Longford Town Wastewater Treatment Plant to support the delivery of the housing and population targets in the core strategy of the County Development Plan. With respect to water supply, UÉ notes that the Lough Forbes Water Treatment Plant (WTP) has limited headroom but a more significant upgrade to the WTP will be required to facilitate long term growth in Longford. The OPR

advises the Planning Authority to consult with UÉ in relation to these matters. Additional text should also be included on the forthcoming Integrated Urban Wastewater Management Plan which will soon commence for Longford Town as per the requirements of the recast Urban Wastewater Treatment Directive.

#### **Chief Executive Response:**

Uisce Éireann's submission has been considered and addressed accordingly – see submission LLAP17 of this report. In terms of the request by the OPR for the inclusion of additional text on the forthcoming Integrated Urban Wastewater Management Plan which will soon commence for Longford Town as per the requirements of the recast Urban Wastewater Treatment Directive, this should be included.

#### **Chief Executive Recommendation:**

- In section '13.3.2 Wastewater Services' at the end of paragraph 1, include the following additional text:

*In general, Uisce Éireann will have regard for the capacity of the water and sewerage network for the existing and future population in considering any development proposals in Longford Town. In order to accommodate proposed connections to the municipal WWTP it may require an upgrade to be completed. This upgrade is not on the current Capital Investment Plan (CIP) and is currently proposed for the 2026 to 2030 CIP where works will not commence prior to 2030 (subject to change). **The Integrated Urban Wastewater Management Plan will soon commence for Longford Town as per the requirements of the recast Urban Wastewater Treatment Directive.***

- In section 13.3.3 Water Supply and Wastewater Services Objectives, include the following additional objective (WS 21):

***Support the Integrated Urban Wastewater Management Plan for Longford Town as per the requirements of the recast Urban Wastewater Treatment Directive.***

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#### **Infrastructure (Sustainable urban Drainage Systems, Green & Blue)**

The draft LAP supports the use of SuDS and nature-based solutions through Policy Objectives SW 04 and SW 05. The OPR is concerned that there is not sufficient consideration of green and blue infrastructure in the draft LAP, consistent with RPO 7.22 and RPO 7.23 of the RSES and NPO 57 of the NPF. Integrating these strategies into the plan making process produces better outcomes by informing the other plan elements, such as the design of open spaces, parks, public realm etc. This contributes to creation of healthy, low carbon, resilient and connected settlements and places (section 4.4 of the Compact Settlement Guidelines). This is especially for larger development sites i.e. Abbeycarton Lane, extension to the existing Ardnacassa residential estate and the new industrial zoned lands on the eastern outskirts of the town and in the southwest. Additionally, greater use of SuDS will assist in addressing surface water issues raised in the LAP.

## Recommendation 7 - Green and Blue Infrastructure

Having regard to the provision of sustainable infrastructure and nature based water management solutions, and in particular to:

- RPO 7.22 and RPO 7.23 of the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly; and
- section 4.4 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024),

the Planning Authority is required to:

- (i) review and amend the sustainable infrastructure policy framework, to include both green and blue infrastructure; and
- (ii) identify key measures to ensure that Sustainable Urban Drainage Systems will be integrated into the future development of the strategic sites and employment generating zones.

### Chief Executive Response:

This submission should also take note of the Uisce Éireann submission (LLAP17) and associated response and recommendation.

The OPR is concerned that there is not sufficient consideration of green and blue infrastructure in the draft LAP, consistent with RPO 7.22 and RPO 7.23 of the RSES and NPO 57 of the NPF. In this regard the content of the following is noted:

- *RPO 7.22 Local authority development plan and local plans, shall identify, protect, enhance, provide and manage Green Infrastructure in an integrated and coherent manner and should also have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species.*
- *RPO 7.23: Support the further development of Green Infrastructure policies and coordinate the mapping of strategic Green Infrastructure in the Region.*

Blue and Green Strategies have been integrated into the plan. It should be noted that the Draft Local Area Plan contains a specific chapter in relation to Natural Heritage and Green Infrastructure with associated policies (see '11.0 Natural Heritage and Green Infrastructure'). These have also been augmented following consideration of the EMRA submission.

Furthermore, it is noted that Uisce Éireann have indicated that there 'there are many areas within the sewer network that experience significant capacity challenges; in particular, capacity exceedance will occur more frequently where rainwater from roof or paved surfaces is connected to the wastewater system, most notably in areas served by a single combined sewer network. UÉ strongly encourages the removal (or significant reduction, if full removal is not feasible), of surface water inflows to the wastewater system (including the removal of other misconnections). To support this, UÉ encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green Infrastructure in existing and new development



areas.

Specifically in terms of 'Green-Blue Infrastructure and SuDs' as per their submission, UÉ encourages Planning Authority objectives and initiatives supporting the implementation of Sustainable Drainage Systems (SuDS) and the enhancement of green and blue infrastructure, which is provided for in the National Planning Framework. To support sustainable use of the available hydraulic capacity in Combined Sewers, UÉ welcomes the proposal to promote SuDS and in particular promotion of Nature based SuDS (NbSuDS). UÉ recommend the introduction of further objectives in the LAP to promote the introduction of NbSuDS in areas contributing to combined drainage systems (if applicable) where streetscape enhancement programmes or resurfacing programmes are planned. UÉ is happy to engage with the planning authority in progressing nature-based rainwater management initiatives in line with the Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance document. In this regard an additional objective is recommended in relation to '13.3.3 Water Supply and Wastewater Services Objectives' in order to *promote the introduction of Nature Based SuDS in areas contributing to combined sewers, in particular, where streetscape enhancement programmes or resurfacing programmes are planned*.

The OPR highlights the importance of integrating green and blue infrastructure into the LAP consistent with NPO 58. Planning for green and blue infrastructure can contribute to climate change adaptation, in particular flood risk management through nature-based solutions (NPO 57 and NPO 63). It can also make a positive contribution to climate mitigation and have positive impacts on biodiversity and clean air (NPO 64). The LAP is consistent with objectives of the NPF and RSES concerning environmental protection. The draft LAP supports the use of SuDS and nature-based solutions through Policy Objectives SW 04 and SW 05. The planning authority has ensured that the LAP is consistent with NPO 57 by avoiding inappropriate development in areas at risk of flooding, in accordance with the detailed requirements and provisions of section 28 *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009). In accordance with NPO 57, the LAP is required to integrate sustainable water management solutions, such as SuDS. The OPR have highlighted the need to reference an interim best practice document from 2022, however EMRA have also referenced a document which is the final document. Accordingly, reference has been made to the relevant document in light of the relevant submissions.

#### **Chief Executive Recommendation:**

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- Amend '13.3.3 Water Supply and Wastewater Services Objectives' to include the following additional objective:  
*'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 '13.4 Surface Water Drainage' to 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).*

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### **Flood Risk Management**

The OPR welcomes the preparation of the Strategic Flood Risk Assessment (SFRA) and accompanying justification tests to inform the draft LAP. Flood risk areas are represented by a constrained land use designation in the land use zoning map and Policy Objectives FR 02 and FR03 provide additional support for the management and sustainable use of the flood risk areas. There are errors within the SFRA identified by the OPW submission which the OPR requests the Planning Authority to amend:

- Does not include most up to date versions of policy objectives of draft LAP;
- Justification Tests have been included for residential lands sites OP7 and OP8, however, these lands have been zoned for water compatible open space;
- Utilises superseded datasets and links to websites no longer operational.

Additional detail should be provided within the SFRA on where integrated and area based provision of SuDS and green infrastructure are appropriate to avoid reliance on individual site by site solutions – as per earlier comments and recommendation regarding the need for increased focus on SuDS measures to address surface water. The Longford Flood Relief Scheme is welcomed to address flood considerations and support appropriate use of riverside locations. A policy objective supporting and protecting the progression of the FRS should be included.

With respect to consideration of climate change impacts, it is acknowledged that the land use zonings for Longford Town were prepared as part of the County Development Plan, and the draft LAP must be in compliance with this. The Planning Authority is, however, advised to engage with the OPW when preparing its new County Development Plan. In particular, greater consideration of the precautionary approach for climate change impacts and future scenario mapping at plan making stage will be required.

## Recommendation 8 – Flood Risk Management

Having regard to flood risk management, and in particular to:

- (i) RPO 7.12 of the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly; and
- (ii) the Planning System and Flood Risk Management Guidelines (2009), the Planning Authority is required to:
- (iii) include a policy objective to support and protect the Longford Flood Relief Scheme;
- (iv) overlay the Flood Zone A and B on the land use zoning map;
- (v) provide greater consideration of climate change impacts and overlay these maps on the land use zoning maps; and
- (vi) review the Strategic Flood Risk Assessment as per the submission from the Office of Public Works (OPW).

The Planning Authority should consult the OPW in addressing this recommendation.

### Chief Executive Response:

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. The Justification tests for OP7 and OP8 will be removed in the next iteration of the SFRA. They are now either recreation, amenity, or greenspace, and will be updated accordingly as previously they were referred to as residential. All superseded PFRA datasets will be removed in the next iteration of the SFRA. All website links will be checked to ensure they are still under operation, and any updated links will replace superseded if required. 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. 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. Mapping within the next iteration of the SFRA will be updated to overlay the Flood Zones over the land use zoning map. It is to be noted that the PFRA pluvial extents will be excluded from this mapping. The next iteration of the SFRA will include a new map as the above with the CFRAM, and mid-range and high-end future scenarios extents overlayed on the land use zone map.

### Chief Executive Recommendation:

No change.

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### Implementation and Monitoring

Section 6.5 of the LAP Guidelines states that planning authorities are encouraged to periodically review the success or otherwise of the implementation of policies and

objectives of a LAP by effective monitoring systems such as reviewing the progress in securing the objectives of the county development plan in accordance with section 15 of the Act. Section 16 of the draft LAP sets out the implementation and monitoring strategies. The chapter states the Planning Authority will establish a database of strategic brownfield and infill sites so that brownfield sites reuse can be managed as part of the active land management process and it will monitor the number of residential units permitted and developed on an annual basis to ensure compliance with the core strategy and its housing allocation. It is considered that a more systematic approach to monitoring would better assist the Planning Authority in implementing the key objectives/actions of the draft LAP, and by identifying lead responsibility, suitable indicators for measuring policy objectives and a timeline for implementation of actions/projects e.g. earlier comments on tackling dereliction and vacancy rates. Guidance on monitoring and implementation is provided in chapter 10 of the Development Plans Guidelines. The Carlow-Graigucullen Joint Urban LAP 2024-2030 and Newcastle West LAP 2023-2029 provide examples of good practice.

### Observation 3 – Monitoring and Implementation

Having regard to section 15(1) and 15(2) of the Planning and Development Act 2000, as amended, the Planning Authority is requested to review the proposed provisions of the draft Local Area Plan concerning implementation and monitoring to provide a more detailed systematic approach to monitoring the implementation of key objectives and/or actions of the draft Local Area Plan.

#### Chief Executive Response:

Key land activation measures to facilitate the development of lands are as identified in a specific chapter entitled '16.0 Implementation and Monitoring'. These include Active Land Management measures, Compliance with the Core Strategy, phasing schemes for both '*New Residential*' and '*Industrial/Commercial/Warehousing*' lands, collaboration with the National Land Development Agency, Application of Vacant Site Levy, Residential Zoned Land Tax. Active Land Management Supporting objectives are contained within this chapter. Greater detail is to be provided in relation to the phasing arrangements as indicated earlier in this report. Taking this into account the specific chapter included in the Draft Local Area Plan on Implementation and Monitoring and associated content and objectives contained therein are considered adequate.

#### Chief Executive Recommendation:

No change recommended.

### 3.2.2 Eastern and Midland Regional Authority (EMRA)

Submission no.	LLAP 6
Name	Eastern and Midland Regional Authority (EMRA)
Subject	Core Strategy, Placemaking, Economic Development, Culture and Heritage, Sustainable Transport, Climate, Infrastructure, Strategic Environmental Assessment, Appropriate Assessment

#### Summary of Issues Raised:

The Regional Assembly acknowledge the extensive work the Council has carried out to prepare the draft Longford Town Local Area Plan 2025-2031. In particular, the overall approach and effort to coordinate and incorporate policies and objectives so that they are consistent with the RSES which is welcomed. It is considered that the draft LAP is generally consistent with the Regional Spatial and Economic Strategy (RSES) 2019-2031 and would be further enhanced by addressing the following recommendations:

#### Core Strategy

In recognition of Longford Town being identified as Key Town in the RSES settlement strategy, it is noted that the percentage population growth rate for Longford Town between 2016 and 2022 (+944 persons, 9.43%) is less than the average growth rate experienced for County Longford (+5,878 persons, 14.38%) during the same 6-year intercensal period. This is a trend that will require regular monitoring as part of the implementation of Longford County Development Plan 2021-2027 and the draft Longford Town LAP 2025 – 2031 core strategy and an effective monitoring mechanism should be included in Chapter 3 of the draft LAP.

#### Chief Executive Response

In terms of compliance with the Core Strategy of the Longford County Development Plan 2021-2027 Section 5.1.2 states the following:

*'Given its designation within the RSES Settlement Hierarchy, and as reflected in the County Longford Core Strategy (Chapter 4 Core Strategy, Settlement Strategy and Housing Strategy of the County Longford Development Plan), Longford Town is identified as the settlement targeted for the most growth over the Plan period. The core strategy sets out a significant level of growth in population within Longford. The population of Longford Town was 10,952 persons in the 2022 Census. The population growth target for the town is to grow by 2,502 persons, to a population of 12,510 people by 2027 in the Longford County Development Plan 2021-2027. This additional growth requires 1,304 residential units.'*

It is noted however that between 2016 and 2022 the percentage population growth rate for Longford Town (9.43%) was less than the average growth rate experienced for County Longford (14.38%). Furthermore, as indicated in section 5.1.2 of the Draft



LAP as informed by the Longford CDP 2021-2027 two-year review (October 2023), only 153 residential units have been granted planning permission in the town since the County Development Plan was adopted. As the core strategy allocation for Longford town is 1,304 residential units on 35.33 ha, there is therefore a significant reserve of undeveloped residential zoned land in the town to meet its housing and population allocations in the Longford CDP 2021-2027. A policy is included in this draft LAP that upon the replacement of the current core strategy or zoning provisions contained in the County Longford CDP 2021-2027 by that of a subsequent Development Plan that the Local Area Plan will recognise this.

As indicated by the Assembly and In recognition of Longford Town being identified as Key Town in the RSES settlement strategy, and as reflected in County Development Core Strategy as Longford Town is identified as the settlement target for the most growth, it is recognised that this is a trend that will require regular monitoring as part of the implementation of Longford County Development Plan 2021-2027 and the draft Longford Town LAP 2025 – 2031 core strategy. To this end the Assembly require that an effective monitoring mechanism should be included in Chapter 3 of the draft LAP. However, there are already a number of existing policies in the chapter which address this as indicated below:

***CS 01** Support the implementation of the relevant County Policy Objectives (CPO's) contained within Chapter 4: Core, Settlement and Housing Strategies and other relevant chapters of the County Longford Development Plan 2021-2027, including the Core Strategy and all zoning provisions of the County Longford Development Plan 2021-2027, or subsequent relevant Development Plan and in accordance with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).*

***CS 04** Monitor the scale, type, tenure and location of constructed and permitted developments in Longford during the lifetime of the Plan and apply appropriate development management standards to ensure compliance with the Core Strategy.*

***CS 05** 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.*

***CS 06** Remain within the allocated housing requirements set out in the County Development Plan 2021-2027 Core Strategy for Longford Town (or subsequent relevant Development Plan) when facilitating residential development. In this regard, development shall not be permitted where it conflicts with the County Core Strategy.*

Annual monitoring of objectives will be carried out both as part of the County Development Plan and also as detailed in Chapter 16 of this Plan. As such adequate monitoring mechanisms are considered already in the Plan.

### Chief Executive Recommendation:

No change.

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#### Placemaking

Chapter 6 of the draft LAP could be strengthened further by including reference to Section 9.4 of the RSES in relation to Healthy Placemaking and the 'Guiding Principles for the Creation of Healthy and Attractive Places'.

Chapter 6 of the Draft LAP should be enhanced by promoting an appropriate housing mix of suitable levels of private, social and affordable housing types in accordance with the Longford Key Town Requirements contained in the RSES, namely *"Central to this is the requirement to provide high quality housing products that meet a variety of housing needs, including those required by employees of existing and potential industry and enterprises within the town"*.

### Chief Executive Response:

Section 9.4 of the RSES in relation to Healthy Placemaking and the 'Guiding Principles for the Creation of Healthy and Attractive Places' are noted. It is considered that the LAP could benefit from referencing same. In the interest of demonstrating consistency with the RSES, the cited changes by EMRA are considered positive and should be incorporated. Additional text is recommended and a supporting objective.

In relation to the Assembly comments that the LAP should be enhanced by promoting an appropriate housing mix of suitable levels of private, social and affordable housing types in accordance with the Longford Key Town Requirements contained in the RSES is also considered a favourable addition to the Plan.

### Chief Executive Recommendation:

- The following additional text to be included under the heading '6.1 Overview':

#### ***Placemaking***

*Placemaking relates to the interrelationship and connection between people and the spaces they use. It requires a people-centred approach to the planning, design and management of our settlements and the built environment. Placemaking is underpinned by good urban design, which seeks to create public spaces that are vibrant, distinctive, safe and accessible and which promote and facilitate social interaction and economic growth.*

*Placemaking is an essential link between spatial planning and improving people's quality of life through the creation of attractive places to live, work, visit and invest. The availability of, and access to, services is key to creating healthier places. This includes access to adequate housing and employment choice, supported by good healthcare and education, quality public realm and access to nature, the arts and*

*cultural heritage. There are significant national and regional policy requirements, along with section 28 guidelines which relate to Placemaking.*

*In working towards establishing viable and sustainable communities, it is important to ensure that the Local Area Plan is underpinned by policies and proposals that are consistent with overarching national and regional guidance and policies. The importance of healthy placemaking are central components of same. The RSES and Section 9.4 Healthy Placemaking' and associated 'Guiding Principles for the Creation of Healthy and Attractive Places' are of particular note, in addition to Chapter 7 of the County Longford Development Plan 2021-2027.*

- Include the following additional objective as RES 01 and renumber subsequent objectives accordingly:

*Support the implementation of Section 9.4 Healthy Placemaking of the RSES, and the relevant County Policy Objectives (CPOs) contained within Chapter 7: Placemaking and other relevant chapters of the County Longford Development Plan 2021-2027.*

- Include the following additional text in '6.1 Overview':

### ***Residential Density, Mix and Design***

*The delivery of housing in Longford Town is essential to support the overall role and success of the settlement. A key focus for the settlement is to encourage the provision of high-quality housing development at the right locations over the coming years in order to ensure wider societal benefits and the sustainability and enhancement of facilities such as schools, shops, recreation facilities and open spaces. Central to this is the requirement to provide high quality housing products that meet a variety of housing needs, including those required by employees of existing and potential industry and enterprises within the town. As such the Plan promotes an appropriate housing mix of suitable levels of private, social and affordable housing types in accordance with the Longford Key Town requirements. New residential areas should be connected, attractive and well designed with a range of adaptable dwelling types and densities, creating a sense of place and a high-quality public realm.*

- Amend existing RES01 to include the following additional text:

*Promote an appropriate housing mix of suitable levels of private, social and affordable housing types in accordance with the Longford Key Town Requirements and ensure that all new residential development provides for a sustainable mix of housing types, sizes and tenures and that new development complements the existing residential mix.*

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### **Economic Development**

Chapter 7 of the draft LAP could be enhanced by providing more detailed information including a breakdown on developed and available undeveloped employment zoned lands in the settlement and the methodology used to identify the location and extent of same in accordance with 'Development Plans: Guidelines

*for Planning Authorities (2022) (Appendix A, Section 1.4 Enterprise and Employment Zoning)* published by the Department of Housing, Local Government and Heritage. Chapter 7 should make reference to Figure 6.3 Economic Strategy of the RSES which has the five key principles including Smart Specialisation, Clustering, Orderly Growth, Placemaking and Future Proof and Risk Management. Chapter 7 of the draft LAP would benefit by referencing the *'Guiding Principles to Identify Strategic Employment Development'* contained in Section 6.3 of the RSES (Economic Strategy) as to how strategic employment sites in the town have been identified. The OPR Practice Note PN04 on *'Planning for Employment Growth – The Development Plan and Employment Lands'* (August 2024) is also noteworthy.

#### **Chief Executive Response:**

##### **To be read in conjunction with LLAP31 OPR (Economy and Employment)**

Section 7.3 of the Draft Local Area Plan contains an Economic Development Strategy for Longford Town. As part of this strategy the role of Longford Town as the Primary Economic Growth Town in the County is recognised and supported. As per section **'7.3.1 Primary Economic Growth Town'** it is stated that *'As such it is important to ensure that there is an adequate supply of zoned land for employment purposes at appropriate locations to accommodate employment growth. A total of 197 hectares of land is zoned and available for employment purposes in Longford Town, across a range of employment land-use types. This offers significant potential for future economic development within the town.'*

The Draft LAP figure of up to c.197ha of land zoned for employment purposes across a range of employment land-use types, corresponds with the Longford Town Zoning Map contained in the Longford CDP 2021-2027. Detail on the breakdown of developed and available undeveloped employment land was not provided in the County Longford Development Plan 2021-2027, which was prepared prior to the cited guidelines and upon which the Local Area Plan is based. While not specified in the Plan the figure of 197 hectares consist of the following zonings and respective areas; 'Town Core' 49.14 ha. and 'Commercial / Industrial / Warehousing' 147.69 ha. This detail should be included. Based on the methodology contained in *'Development Plans: Guidelines for Planning Authorities (2022) (Appendix A, Section 1.4 Enterprise and Employment Zoning)'* the quantity identified is sufficient. However further detail in relation to available undeveloped employment zoned lands in the LAP would be beneficial and desirable. In this regard a map and accompanying showing available lands within the 'Commercial / Industrial / Warehousing' zoning should be included. This was also addressed by way of the OPR submission.

In terms of the methodology used to identify employment lands, this is in accordance with the County Longford Development Plan 2021-2027 upon which the Local Area Plan zonings are based. Further detail is also given in section **'7.4 Local Area Plan Approach'** which states the following:

*'A quantum of lands has been identified in the plan area for appropriate employment development. The employment lands comprise of industrial and enterprise ventures that are operated by both national and international companies and are primarily*

*located primarily on the outskirts of the town. Collectively these employment sites offer a strong employment base for the towns inhabitants and those living in surrounding areas. This plan seeks to advance these developments in tandem with the development of the plan's residential areas in the coming years. This approach will facilitate sustainable living whereby employment sites are accessible to residential areas by sustainable modes of travel without sole reliance on the private car.*

*This planned approach to future employment development in Longford town will comply with the provisions of both the EMRA RSES and County Longford Development Plan 2021-2027 which supports the important role of Longford Town in terms of service provision and employment for its catchment within the economic function of the county. This plan will support the development of Longford Town as a dynamic and cutting-edge location with immediate access to excellent infrastructure and local services. This in-turn will ensure the town's attractiveness as a place for people to reside and employment companies to locate.*

*This Local Area Plan will support critical employment growth in the coming years. This accords with the approach set out in Chapter 8: Economic Development of the County Longford Development Plan 2021-2027. A policy is included in this Local Area Plan that upon the replacement of the current Core Strategy or zoning provisions contained in the County Longford Development Plan 2021-2027 by that of a subsequent Development Plan that the Local Area Plan will recognise this'.*

The above text is considered sufficient and is also supported by the Infrastructural Assessment Report (IAR) contained in the County Longford Development Plan 2021-2027, as incorporated and amended into the Local Area Plan (see 16.0 Implementation and Monitoring' and associated phasing map).

Key land activation measures to facilitate the development of lands are as identified in a specific chapter entitled '16.0 Implementation and Monitoring'. These include employment lands. These include Active Land Management measures, Compliance with the Core Strategy, a phasing scheme, collaboration with the National Land Development Agency, Application of Vacant Site Levy, Residential Zoned Land Tax. Active Land Management Objectives are contained within this chapter. The specific chapter included in the Draft Local Area Plan on Implementation and Monitoring and associated content and objectives contained therein are considered adequate. However in terms of the phasing of the land, further detail could be provided.

The Assembly also considers that Chapter 7 could be enhanced further by referring to Figure 6.3 Economic Strategy of the RSES which has the five key principles including Smart Specialisation, Clustering, Orderly Growth, Placemaking and Future Proof and Risk Management. Figure 6.3 is the Economic Strategy of the RSES and in the interests of demonstrating consistency with the RSES it is recommended that reference to same is included in '7.4 Local Plan Led Approach' and that Figure 6.3 is also included as requested by EMRA.

In terms of how the strategic employment sites in the town were identified as



highlighted by EMRA it is agreed that Draft LAP would benefit by referencing both the 'Guiding Principles to Identify Strategic Employment Development' contained in Section 6.3 of the RSES (Economic Strategy) and also the OPR Practice Note PN04 on 'Planning for Employment Growth – The Development Plan and Employment Lands' (August 2024). Existing Objective ECON 04 aims to 'Support the provision of physical infrastructure and zoned lands to realise the delivery of strategic employment lands in central accessible locations' and should be amended to include reference to the aforementioned documents.

#### Chief Executive Recommendation:

- Amend '7.3.1 Primary Growth Town' as follows:

*A total of 197 hectares of land is zoned ~~and available~~ for employment purposes in Longford Town, across ~~a range of the following~~ employment land -use types: 'Town Core' and 'Industrial/Commercial/ Warehousing'. ~~This offers significant potential for future economic development within the town.~~*

- In terms of a breakdown of employment lands a map and table of undeveloped 'Commercial/Industrial/ Warehousing' zoned lands is to be provided. (see response and recommendation to OPR submission LLAP31 'Economy and Employment').

- Amend '7.4 Local Plan Led Approach' paragraph 2 to include the following additional text and Figure 6.3 from the RSES:

*This planned approach to future employment development in Longford town will comply with the provisions of both the EMRA RSES and County Longford Development Plan 2021-2027 which supports the important role of Longford Town in terms of service provision and employment for its catchment within the economic function of the county. **The Economic Strategy of the RSES (section 6.3) and associated vision and economic principles have been considered. As per Figure 6.3 Economic Strategy of the RSES and associated five key principles relate to the following: Smart Specialisation; Clustering; Orderly Growth; Placemaking; and Future Proof and Risk Management.***



Figure 6.3. The Economic Strategy

- Amend Objective ECON 04 to include the following additional text:  
*Support the provision of physical infrastructure and zoned lands to realise the delivery of strategic employment lands in central accessible locations in accordance with the 'Guiding Principles to Identify Strategic Employment Development' contained in Section 6.3 of the RSES (Economic Strategy); and OPR Practice Note PN04 on 'Planning for Employment Growth – The Development Plan and Employment Lands' (August 2024).*

#### Culture and Heritage (Natural Heritage and Green Infrastructure)

Chapter 11 of the draft LAP should include a specific objective for the preparation of a Green Infrastructure survey and strategy for the town during the lifetime of the plan.

Chapter 11 of the draft LAP could be further strengthened by referring to the 'Guiding Principles in the preparation of Green Infrastructure Strategies' in Section 7.7 of the RSES which mentions the need to identify and protect existing Green Infrastructure assets; the importance of connectivity; consideration of the ecological impacts of greenways; integrating an ecosystem services approach; carbon sequestration and integration with the natural and built environment.

**Chief Executive Response:**

The Assembly has expressed concern that there does not appear to be a specific objective included for the preparation of a Green Infrastructure survey and strategy for the town during the lifetime of the plan which should be included. In this regard attention is drawn to Section 11.5 of the Local Area Plan which contains a specific section on 'Green Infrastructure' and is supported by a Green Infrastructure Map and associated policy objectives relating to Green Infrastructure. This is considered the Green Infrastructure Strategy. There is a supporting Green Infrastructure Map which relates to existing known Green Infrastructure and not future potential projects.

However it is noted that as per section '11.7 Habitat Mapping' the following is stated: *Under Article 10 of the EU Habitats Directive, planning and development policies must endeavour to conserve and sustainably manage corridors and stepping-stone habitat features. During the timespan of the Local Area Plan, habitat mapping and green infrastructure survey for the town will be completed. This report will identify and map the various habitats and green infrastructure areas in the town. These maps will be a valuable tool in the future planning of the area and also provide information for the general public and community groups. The survey will employ the Heritage Council's habitat classification system and recorded habitats by features according to their ecological value. Green Infrastructure Mapping will provide detailed information of the location and distribution of the various habitat types. These biodiversity areas will form a critical component of the town's Green Infrastructure.*

This is supported by objective NHB 24 *'in consultation with the National Parks and Wildlife Service, pursue the preparation, establishment and implementation of Habitat Mapping and a Wetland Survey for the Town'*. Such survey will provide an opportunity to highlight other potential green infrastructure projects and to update the existing Green Infrastructure Strategy in the plan. As such it is considered that the wording of this objective should be expanded to convey same. Potential Green Infrastructure projects should be included as this will augment the existing green infrastructure map and Green Infrastructure Strategy already embodied in the LAP. This will also compliment a number of specific 'Green Infrastructure Objectives' in the Plan, namely GI01 *'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 ecological surveys and assessment'*. As such this objective should also be expanded to reference the identification of further potential Green Infrastructure over the lifetime of the Local Area Plan.

It is considered that in this section the additional text should be included to reference

Section 7.7 of the RSES and associated Guiding Principles as requested by EMRA. Chapter 11 of the draft LAP should include a specific objective for the preparation of a Green Infrastructure survey and strategy for the town during the lifetime of the plan.

#### Chief Executive Recommendation:

- Include the following text in heading *'11.5 Green Infrastructure **Strategy**'*.
- In '11.13 Natural Heritage and Biodiversity Objectives' amend the following objective:  
NHB 24: *'In consultation with the National Parks and Wildlife Service, pursue the preparation, establishment and implementation of Habitat Mapping and a Wetland Survey for the Town **and which will identify further potential green infrastructure projects and opportunities as an update to Green Infrastructure in the Plan.***
- In '11.0 Natural Heritage and Green Infrastructure', 'Green Infrastructure Objectives' amend the following objective:  
GI01 *'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 ecological surveys and assessment; **which will inform existing Green Infrastructure Strategy, the identification of further potential Green Infrastructure and associated measures over the lifetime of the Local Area Plan.***
- At the end of section '11.5 Green Infrastructure' to include the following additional text:  
*The preparation of the Green Infrastructure Strategy has had regard to the 'Guiding Principles in the preparation of Green Infrastructure Strategies' in Section 7.7 of the RSES and the need to identify and protect existing Green Infrastructure assets; the importance of connectivity; consideration of the ecological impacts of greenways; integrating an ecosystem services approach; carbon sequestration and integration with the natural and built environment.*

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#### Sustainable Transport

Section 14.6 of the draft LAP could be enhanced by making specific reference to the 'Guiding Principles for the Integration of Land Use and Transport' as set out in Section 8.3 of the RSES and how the draft LAP incorporates the relevant measures contained there.

Chapter 14 of the Draft LAP should refer to the importance of the M4 corridor to Longford town having regard to the RSES recognising the importance of maintaining, improving and protecting the strategic function of the key transport corridors in alignment with RPO 8.10 and Table 8.4 (Road Projects for the Region).

### Chief Executive Response:

Chapter 14 of the Draft LAP relates to Sustainable Transport. Section 14.6 lists a total of 32 no. sustainable transport objectives for the town, which in general are supported by the Assembly. However, the Assembly does consider that this section (14.6) of the draft LAP would be enhanced by making specific reference to the 'Guiding Principles for the Integration of Land Use and Transport' as set out in Section 8.3 of the RSES and how the draft LAP incorporates the relevant measures contained there. In this regard policy objective ST02 is to be augmented to include reference to same.

EMRA have also indicated that reference should be included to the importance of the M4 corridor to Longford town having regard to the RSES recognising the importance of maintaining, improving and protecting the strategic function of the key transport corridors in alignment with RPO 8.10 and Table 8.4 (Road Projects for the Region). In this regard it is noted that the RSES contains regional policy objectives relating to investment in improved strategic road connectivity. RPO 8.10 states that *'the RSES supports appraisal and or delivery of the road projects set out in Table 8.4 subject to the outcome of appropriate environmental assessment and the planning process'*. Table 8.4: Road Projects for the Region identified the M4 Mullingar to Longford (and Sligo).

The Draft Local Area Plan contains policy relevant to investment in improved strategic road connectivity and identified M4 improvements. In particular ST23 is noted which aims to *'continue to progress the development of the N4 Mullingar – Rooskey dual carriageway with the relevant government departments and transport agencies'*. However it is considered that this policy objective could be augmented to also include reference to the *'appraisal'* and *'delivery'* of the project, subject to the outcome of appropriate and environmental assessment and the planning process' as identified in RPO 8.10.

In the interest of demonstrating greater consistency with the RSES the cited changes by EMRA as outlined above are considered positive to the plan and should be incorporated.

### Chief Executive Recommendation:

- Section 14.6 to include the following additional text in Policy Objective ST 02: *Comply with the relevant sections of Chapter 5: Transport, Infrastructure, Energy & Communications of the Longford County Development Plan 2021-2027, including Sustainable Transport, Sustainable Public Transport, Cycling and Walking County Policy Objectives and the Design Manual for Urban Roads and Streets (2019). and the 'Guiding Principles for the Integration of Land Use and Transport' as set out in Section 8.3 of the EMRA RSES and the relevant measures contained.*
- Policy Objective ST23 to be amended to include the following additional text:  
*'Continue to progress appraisal, delivery and the development of the N4*



*Mullingar – Rooskey dual carriageway with the relevant government departments and transport agencies, subject to the outcome of appropriate and environmental assessment and the planning process’.*

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### Climate Action

Chapter 15 of the draft LAP should be amended to include reference to the Regional Spatial and Economic Strategy for the Region which includes Climate Action as one of the three key principles of the RSES, in addition to reference to Section 7.9 of the RSES regarding climate change. The Assembly considers that best practice should be applied in order to mitigate and reduce the effects of climate change, and in this respect the Assembly would like to draw attention to Figure 7.4 Climate Strategy of the RSES which should be referred to in the draft LAP. The draft LAP should align with RPOs 7.14 and 7.15 of the RSES regarding flood risk management.

### **Chief Executive Response:**

Chapter 15 of the Draft LAP relates to Climate. In the interest of demonstrating greater consistency with the RSES the cited changes by EMRA are considered positive to the plan and should be incorporated. Reference should be made to the EMRA RSES which includes climate action as one of its three key principles. As indicated in ‘7.9 Climate Change’ of the RSES *Climate change will have diverse and wide-ranging impacts on the Eastern and Midland Region’s environment, society and economic development, including managed and natural ecosystems, water resources, agriculture, food security and bioeconomy, human health and coastal zones’.* Best practice in order to mitigate and reduces the effects of climate change should be included. Figure 7.4 Climate Strategy of the RSES which indicates the regional climate strategy and best practice approach should be included.

In relation to the Regional Policy Objectives on Flooding cited from the RSES these are as follows:

*RPO 7.14 Local authorities shall take account of and incorporate into the development of local planning policy and decision making the recommendations of the Flood Risk Management Plans (FRMPs), including planned investment measures for managing and reducing flood risk.*

*RPO 7.15: Local authorities shall take opportunities to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management are planned.*

A section will be added to the next iteration of the SFRA with regards to the Longford Flood Relief Scheme. The Catchment Flood Risk Assessment and Management (CFRAM) preliminary options report will be analysed and a chapter prepared based on such, detailing the conclusion of the most cost-effective solution for the protection of the town. We will provide any additional technical information from the Jacobs report on the solutions.

In the Occupancy Permit (OP) Justification test tables the following is stated: *"the lands have not benefited from any flood relief schemes"*. This will be reworded to mention that it may potentially benefit from future flood relief schemes such as the Longford Flood Relief Scheme.

**Chief Executive Recommendation:**

- Section '15.2 Integrating Climate Considerations into the Longford Local Area Plan' should be amended to include the following additional text and Figure 7.4 from the EMRA RSES. Separately the references to the County Longford Climate Adaptation Strategy 2019 are to be omitted.

**15.2 Integrating Climate Considerations into the Longford Local Area Plan**

*In tackling global warming, a comprehensive legislative and policy framework relating to climate action has been developed in Ireland over the past number of years. These provisions seek to ensure that climate considerations are fully integrated into spatial plans such as the Longford Local Area Plan. As per the National Planning Framework and National Strategic Outcome (NSO 8) is the need to initiate a transition to a low carbon and resilient society. The Regional Spatial and Economic Strategy for the Region includes Climate Action as one of the three key principles of the RSES. As indicated in '7.9 Climate Change' of the RSES Climate change will have diverse and wide-ranging impacts on the Eastern and Midland Region's environment, society and economic development, including managed and natural ecosystems, water resources, agriculture, food security and bioeconomy, human health and coastal zones. Figure 7.4 Climate Strategy of the RSES indicates the regional climate strategy and best practice approach (see below).*

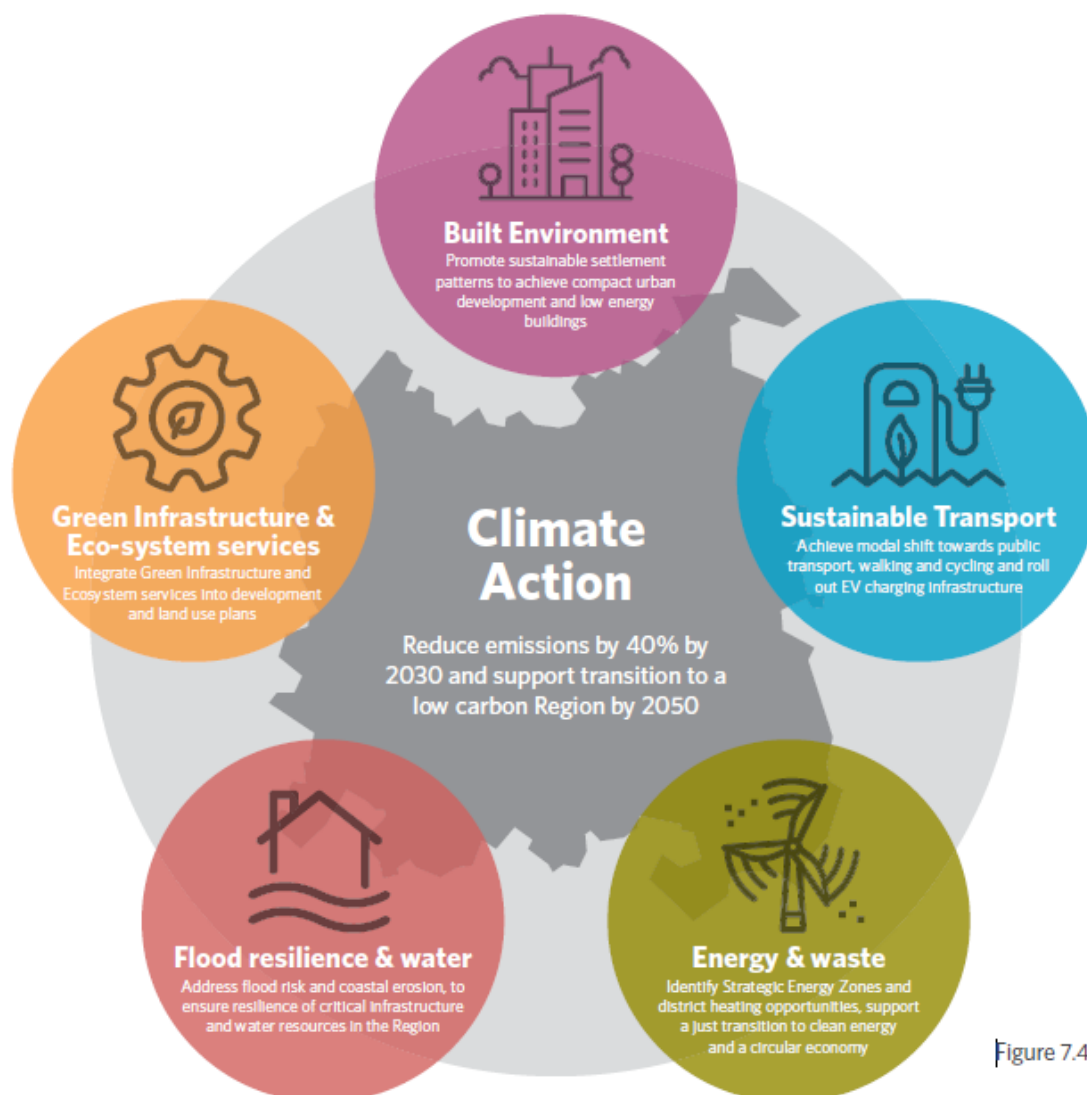


Figure 7.4 Climate Strategy

Whilst the primary long-term goal is to achieve net zero emissions by 2050 (*Climate Action Plan, 2019*), recent policy developments reflect a widespread acceptance that climate change is happening now, and the associated impacts of same giving added urgency to the increasing emphasis of plans integrating mitigation<sup>5</sup> and adaptation<sup>6</sup> measures. *In this regard, County Longford's Climate Adaptation Strategy 2019 has provided a critical point of reference in preparing this plan.* As such *climate this* is therefore one of the cross-cutting principles of this Plan.

### Infrastructure

The Assembly consider that Section '13.5 Flooding' of the draft LAP can be expanded and improved upon by including reference to the 'Guiding Principles for SuDS' contained in Section 10.2 (Sustainable Management of Water) of the RSES. In

<sup>5</sup> Climate mitigation refers to measures to reduce climate change by limiting greenhouse emissions. It includes strategies to reduce activities that give rise to greenhouse gases and to enhance carbon sinks.

<sup>6</sup> Adaptation refers to actions which seek to better manage and reduce the risks and effects associated with existing or anticipated climate change and exploit beneficial opportunities.

addition, Longford County Council should also note the recent publication of *'Nature Based Management of Urban Rainwater and Urban Surface Water Discharges – A National Strategy'* by the Department of Housing, Local Government and Heritage in May 2024 which is of relevance to the above.

It is also considered that this section of the draft LAP can be further expanded upon by including reference to RPO 7.15 in the RSES whereby local authorities shall take opportunities to enhance biodiversity and amenities and ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned.

#### **Chief Executive Response:**

The planning authority has ensured that the LAP is consistent with NPO 57 by avoiding inappropriate development in areas at risk of flooding, in accordance with the detailed requirements and provisions of section 28 *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009). In accordance with NPO 57, the LAP is required to integrate sustainable water management solutions, such as SuDS. The draft LAP supports the use of SuDS and nature-based solutions through Policy Objectives SW 04 and SW 05.

The Assembly consider that Section '13.5 Flooding' of the draft LAP can be expanded and improved upon by including reference to the 'Guiding Principles for SuDS' contained in Section 10.2 (Sustainable Management of Water) of the RSES. In addition, Longford County Council should also note the recent publication of *'Nature Based Management of Urban Rainwater and Urban Surface Water Discharges – A National Strategy'* by the Department of Housing, Local Government and Heritage in May 2024 which is of relevance to the above. This has been reviewed; however, it is considered that this addition is more relevant in relation to the 'Surface Water' section, and as such it is recommended that relevant amendments are made therein.

EMRA have cited RPO 7.15. This relates to flooding and states the following:

*Local authorities shall take opportunities to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned'.*

EMRA have requested that reference to this objective is included in this section of the Plan. As such an additional objective should be included to this extent.

It should also be noted that issues raised overlap with those raised in the OPR submission (LLAP31) and Uisce Éireann submission (LLAP17). This included inclusion of an additional objective in '13.3.3 Water Supply and Wastewater Services Objectives' to include the following additional objective:

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

**Chief Executive Recommendation:**

- In '13.4 Surface Water Drainage' to 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).*

- In Section '13.5.2 Flood Risk Management Objectives' include the following additional objective:

*FR05: Ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned.*

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**Strategic Environmental Assessment (SEA)**

It is considered that the SEA Environmental Report would be improved upon by including a clear conclusion statement on the outcome of the overall SEA process as part of this report. Reason: In the interest of clarity and best practice.

**Chief Executive Response:**

The Draft SEA Environmental Report has assessed the environmental effects arising from the draft LAP and sets out a series of recommendations within chapter 6. Any updates to the LAP in light of these recommendations will be assessed in the next iteration of the SEA Environmental Report. The next iteration of the SEA Environmental Report and its accompanying Non-Technical Summary will provide a summary as to how the SEA process has influenced the development of the LAP. The SEA Statement, to accompany the finalised SEA Environmental Report will report on how the findings of the SEA and the results of the associated consultation have been integrated into the LAP.

**Chief Executive Recommendation:**

No change.

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**Appropriate Assessment (AA)**

The final Appropriate Assessment report should be amended to reflect the requirements for the preparation of a Natura Impact Report for the draft Longford Town Local Area Plan 2025-2031 being a land use plan as per Section 177T (3)(d) of the Planning and Development Act 2000 (as amended). Reason: To ensure compliance with the Planning and Development Act 2000 (as amended).

**Chief Executive Response:**

The terminology of Natura Impact Statement was used but the requirements under Section 177T (1) (a) of the Planning and Development Act 2000 (as amended) have



been met through Chapter 4 of the Appropriate Assessment and Natura Impact Assessment. Section 177T (1) (a) of the Planning and Development Act 2000 (as amended) states that:

*'A Natura impact report means a statement for the purposes of Article 6 of the Habitats Directive, of the implications of a Land use plan, on its own or in combination with other plans or projects, for one or more than one F902[European site], in view of the conservation objectives of the site or sites'.* Therefore, the requirements under Section 177T (1) (a) requires only a statement, which the report has done. However, reference to statement will be replaced with report to minimise any potential concerns over compliance with the Planning and Development Act 2000 (as amended).

**Chief Executive Recommendation:**

No change.

### 3.2.3 Environmental Protection Agency (EPA)

Submission no.	LLAP1EPA
Name	Environmental Protection Agency (EPA)
Subject	Content of Environmental Report, future amendments to the Plan, SEA Statement, Environmental Authorities

#### Summary of Issues Raised:

The EPA focus on reviewing and commenting on key sector plans. For land use plans at county and local level, a 'self-service approach' is provided via the guidance '[SEA of Local Authority Land Use Plans – EPA Recommendations and Resources](#)'. This document sets out recommendations for integrating environmental considerations into Land Use Plans and should be taken into account and relevant recommendations incorporated in finalising and implementing the Plan. The Council should ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the NPF and the EMRA RSES.

#### Content of the Environmental Report

The SEA Regulations set out the information to be contained in an Environmental Report in terms of the following; *Assessment of Alternatives; Assessment of Environmental Effects; Mitigation Measures; Monitoring.*

#### *State of the Environment Report – Ireland's Environment 2024*

This report should be considered and integrated as appropriate, in implementing the plan or programme over its lifetime.

#### Future Amendments to the Plan

Screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the Plan.

#### SEA Statement – "Information on the Decision"

Once the Plan is adopted, an SEA Statement is to summarise:

How environmental considerations have been integrated into the Plan;

How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;

The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,

The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

Send the SEA Statement with the above information to any environmental authority consulted. Guidance on preparing SEA Statements is available on the EPA website.

#### Environmental Authorities

Under the SEA Regulations, consult with: Environmental Protection Agency; Minister

for Housing, Local Government and Heritage; Minister for Environment, Climate and Communications; and Minister for Agriculture, Food and the Marine. any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft local area plan.

### **Chief Executive Response**

The Draft SEA of the Longford Town LAP includes the content outlined by the EPA and will continue to follow the guidance in the next iteration of the SEA. The next iteration of the SEA will consider and include reference to the State of the Environment Report 2024. Any future amendments to the Longford Town LAP will be screened to determine their likely significant effects. If likely significant effects are identified, these will be assessed accordingly in the next iteration of the SEA Environmental Report. Once the Longford Town LAP is adopted and the Environmental Report has been finalised, an SEA Statement will be produced in line with EPA guidance.

### **Chief Executive Recommendation:**

No changes recommended.

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### 3.2.4 Office of Public Works (OPW)

Submission no.	LLAP23
Name	Office of Public Works (OPW)
Subject	SEA, SFRA, Flooding

#### Summary of Issues Raised:

##### SEA

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"*. This is a requirement that in order to satisfy the Justification Test, it must be demonstrated that it is feasible to develop the lands in question safely. Any requirements, mitigations or limitations required to ensure the lands can be safely developed should be included and transposed into the draft plan as policy objectives, and this should **not** be passed on to development management.

##### SFRA

##### Flood Zone Map

It would be beneficial if a Flood Zone map showing Flood Zones A and B overlaid on Land Use Zonings were included.

##### Longford Town Flood Relief Scheme

The Longford Town Flood Relief scheme currently being progressed by Longford County Council is referenced in section 9.3 of the written statement with respect to regeneration opportunities. Policy objectives included in the county development plan such as CPO 5.106, CPO 5.107, and CPO 5.114 will provide support to the development of this scheme. Longford County Council might consider the inclusion of a specific objective in this regard in the Draft Local Area Plan, to ensure that zoning or development proposals support and do not impede or prevent the progression of this scheme.

##### Flood Risk Infrastructure

It is noted that minor works, funded by the OPW have been completed in Longford Town. Longford County Council might consider including a register of key flood risk infrastructure in the Local Area Plan where it would not otherwise be readily identified or protected from interference or removal.

##### Preliminary Flood Risk Assessment (PFRA)

Section 2.3 of the SFRA regarding Flood Risk Indicators contains discussion on Preliminary Flood Risk Assessment (PFRA) mapping. This dataset has been included on Table 2-2: Modelled Flood Risk Indicator Mapping, and PFRA extent mapping has

been included in Appendix A of the SFRA. In addition, PFRA pluvial extents have been used in the assessment of risk to specific sites in section 4.3 of the SFRA.

PFRA indicative flood maps have been superseded by the national indicative fluvial, coastal and groundwater flood mapping, and therefore PFRA mapping provided to Local Authorities in 2012 should no longer be used for any purpose. Planning Authorities may need to carry out their own Flood Risk Assessments to inform the definition of Flood Zones for areas less than 5km<sup>2</sup> that were not included in the National CFRAM and NIFM Programmes. The OPW do not intend to update the PFRA indicative pluvial maps, as it is not appropriate to map flooding from this source through a national-scale assessment, and maps would be more robust if produced at the community / local scale. While this dataset has not been superseded like the fluvial, coastal and groundwater it should also no longer be used by local authorities.

### **Chief Executive Response**

Any updates or alterations to the policy objectives within the next iteration of the LAP will be screened to determine their likely significant effects. If likely significant effects are identified, these will be assessed accordingly in the next iteration of the SEA Environmental Report. The mapping included within the SFRA will be updated to overlay the Flood Zones over the land use zoning map. It is to be noted that the PFRA pluvial extents will be excluded. The next iteration of the SFRA will include a map showing where minor works have been undertaken in the town for the last 5 years and will provide technical details, where available. 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.

### **Chief Executive Recommendation:**

None.



### 3.2.5 Department of Education

Submission no.	LLAP15
Name	Department of Education
Subject	Population projections, Education requirements, Potential School site

#### Summary of Issues Raised:

Allowing for the Census 2022 average of 2.71 persons per household in Longford, a development of 1,304 units could result in an additional cc 3,534 people for Longford Town in the future. If this growth materialises, it could result in an additional requirement for school provision in Longford town. The department has used this particular scenario in making its assessment of future school place requirements within the LAP area.

The department's preference would be to expand existing facilities should there be a requirement as a result of planned population increases. The department requests the Planning Authority to examine the potential of protecting a land buffer around each of the primary schools to enable them to expand further if required to meet the future population growth in Longford Town. In this regard, the department notes and welcomes Childcare and Health Facilities Objective ECH 03 where the Council will support and facilitate improvements to existing primary schools and secondary schools to resolve current capacity issues and facilitate forecasted future growth. It is also noted in Objective ECH 04 that the Council will support the provision of adequate and suitable school accommodation, as needs require, including the development of new schools and the expansion or alteration of existing ones (within the 'built up' areas within Longford).

The projected growth figures based on residential unit development could see a small increase in primary school place demand, which most likely could be dealt with through extra capacity in current schools or expansion thereof. Post-primary school place demand could have a small yet significant increase. It is expected this could be accommodated by the planned expansion of St. Mel's College. It is also noted that Section 10.3.2 and the Education Facilities map references an area in Abbeycartron as 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.

In section 10.3.2 Education and Training it is stated that the Department of Education's 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. This is incorrect as the percentage does not apply to dwellings but to projected population growth figures and the department currently uses an average of 10.25% for such figures to determine primary school

place needs and an average of 7.5% of the same figures to determine post-primary school place needs. These percentage figures are subject to review.

The Department notes Sustainable Transport Objective ST06 that the Council will seek to implement pedestrian and cycling improvements with the assistance of the NTA through the Green Schools Programme and Sustainable Transport Measures Grants Scheme. The department supports the development of sustainable travel links between schools and residential areas.

In assessing current and future capacity, the Department of Education has to be mindful of potential unforeseen circumstances such as the Ukrainian crisis, which have the ability to put undue pressure on school place provision. The department will engage with the Council where the findings of an assessment require a review of existing or future school site provision within a specific location. The department also anticipates that additional special education needs provision at both primary and post-primary level will be required in the future throughout the country and this may result in schools requiring additional accommodation to meet this growing need. The Department will consult with the Council if and when additional special education needs accommodation is required within specific locations.

The department changed its name from "The Department of Education & Skills" to "The Department of Education" and requests this is amended.

The department welcomes continued engagement regarding development of new and existing schools and emphasises the critical importance of the Council in ensuring sufficient land is zoned for this purpose.

#### **Chief Executive Response:**

#### **To be read in conjunction with 3.2.1 Office of Planning Regulator (OPR) LLAP31 Education, Recommendation 6 – Abbeycartron School Site**

The contents of the submission from the Department of Education are noted and the reference to continued engagement with the Council is welcomed.

It is noted that the projected growth figures based on residential unit development could see a small increase in primary school place demand, which most likely could be dealt through extra capacity in current schools or the expansion thereof. While the Department have indicated that 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.

The Department's preference to expand existing school facilities should there be a requirement as a result of planned population increases is noted. The department requests the potential of protecting a land buffer around each of the primary schools to enable them to expand further if required to meet the future population growth in Longford Town. Existing policy objectives in the Draft Plan are supportive of this ;

Childcare and Health Facilities Objective ECH 03 where the Council will support and facilitate improvements to existing primary schools and secondary schools to resolve current capacity issues and facilitate forecasted future growth; Objective ECH 04 that the Council will support the provision of adequate and suitable school accommodation, as needs require, including the development of new schools and the expansion or alteration of existing ones (within the 'built up' areas within Longford).

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. Also based on the revised calculations completed as part of this report on the 'Longford Town School Assessment Table' a surplus of post primary spaces exists based on the core strategy population projections for the town exists.

The Council recognises that population growth and unforeseen global circumstances, such as the Ukrainian and indeed international refugee crisis, may require an expansion to and/or maximising use of existing educational infrastructure and delivery of new facilities also. In response to this, the Council will support the appropriate development of new schools and/or redevelopment of existing schools within Longford town. It is considered that the policies objectives contained within the Draft Plan support this.

In relation to section 10.3.2 Education and Training it is noted that the 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. In light of this the figures in the text should be amended to reflect accordingly.

The name change from the 'The Department of Education & Skills' to "The Department of Education" is noted and as such all references should be updated in the Plan accordingly.

### Chief Executive Recommendation:

- Amend the text in 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>Differential</i>
<i><del>For every 1,000 dwellings, c.12% of the population will require primary school places</del> Based on 10.25% projected population growth (to 12,510 persons)</i>	<del>1,200</del> places	1282	1,147 places
			-53 spaces
<i>135</i>			
<i>Post Primary</i>			
<i><del>For every 1,000 dwellings, c. 8.5% will require post primary school places</del> Based on 7.5% projected population growth (to 12,510 persons)</i>	<del>850</del> places	938	1,471 places
			+621 spaces
			533

*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).*

- Throughout the Draft Local Area Plan to change all references in the Draft Local Area Plan to 'the Department of Education & Skills'.



### 3.2.6 Department of the Environment, Climate and Communications

\* Includes supplementary submission from Geological Survey Ireland

Submission no.	LLAP19
Name	Department of the Environment, Climate and Communications
Subject	Climate and GSI datasets

#### Summary of Issues Raised:

The DECC notes the positive objectives of the LCDP 2021-2027, which integrates climate change adaptation considerations into all functions and activities of the Local Authority. Objectives at County level for climate action, renewable energy infrastructure, communications infrastructure inter alia should be reflected by objectives and actions of the LAP, as relevant for the plan area, to support implementation of national, regional and county level policy on these themes.

The Department asks that the material outlined in the following sections is taken into consideration when finalising the Longford town LAP. The Department also asks that consideration is taken of Agenda 2030, the Sustainable Development Goals (SDGs) and their respective targets, in the overall drafting of the Plan, and in relation to the specific areas outlined below. The following recommendations are an opportunity to strengthen objectives of the LAP.

1. An objective is included to support the implementation of CAP24 (and annual revisions).
2. An objective is included to support the implementation of the NAF.
3. Objectives are included to ensure the implementation of DZ priority areas and related actions, thereby ensuring consistency and alignment between both plans.
4. The Local Authority examine the potential of district heating including district heating derived from waste heat, where available, technically feasible and cost effective and commit to carrying out a feasibility exercise and the use of heat mapping in support of same in the draft policies. As such, policies in support of same are encouraged.
5. Objectives are included to support circular economy principles and includes reference to the EPA's *Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects* (2021).
6. Includes reference to and includes objectives and /or policies to support and facilitate the development telecommunications infrastructure in line with Government policy, including the rollout of 5G.

#### Chief Executive Response:

This submission was referred to the Climate team of the Council. It is recommended that there is acceptance of Recommendations 1, 2, 4 and 5. In terms of recommendation 3, the plan supports the Climate Action Plan in CC04 and also

supports the Decarbonisation Zone, which is a component of the Climate Action Plan, in CC16. Therefore it is recommended that there are no changes, as objectives to ensure implementation of DZ priority areas are contained within the Climate Action Plan. Objectives CC06 and CC16 explicitly express support for the CAP and the DZ. In terms of Recommendation 6, it is assumed that all developments will be assessed in light of government policy. Climate Action has no reason to express specific support for the rollout of 5G. It is recommended that there are no changes to the draft plan on the basis that all developments will be assessed in light of government policy. Finally, Climate Action agrees with the observation from GSI that their data sets should be used for flood risk assessments.

#### **Chief Executive Recommendation:**

Section '15.8 Climate Change Objectives', include the following additional text:

- Amend objective CC04 as follows:

*Support the implementation of Longford County Council's Climate Action Plan 2024-2029 any other subsequent Climate related documents deemed relevant by the Planning Authority **such as the National Climate Action Plan 2024 (and annual revisions) and the National Adaptation Framework 2024.***

- Include the following additional objective:

***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.***

- Include the following additional objective:

***All proposed developments should 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).***

#### **Supplementary Submission from Geological Survey Ireland (included in DECC submission)**

Geological Survey Ireland is the national earth science agency and a division of the Department of the Environment, Climate and Communications which provide independent geological information and interpretation and gather various data. It is recommended using their various data sets when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies. Use of our data or maps should be attributed correctly (please refer to each individual dataset's metadata for correct attribution). For specific data available for Environmental Assessment and Planning topics a link is provided. A spreadsheet has been completed highlighting some of their more relevant datasets. In relation to GSI's comments made to the SEA scoping report. GSI are pleased to see inclusion of their comments as Environmental Protection Observations (EPOs) in the SEA report and the Draft LAP. GSI flood risk maps may be useful for flood risk assessment, these include both historic and predictive maps. GSI encourage the Council to use any other data sets referenced above for use in Local area plan and associated environmental assessments.

**Chief Executive Response:**

Relevant data from the Department of the Environment, Climate and Communications had been used to inform the Draft Longford Town LAP and will inform the next iteration of the SEA and SFRA.

**Chief Executive Recommendation:**

None.

### 3.2.7 The Heritage Council

Submission no.	LLAP26
Name	The Heritage Council
Subject	Strategic Vision and Aims, Core Strategy Compliance, Residential Sustainability, Regeneration, Placemaking, Natural Heritage and Green Infrastructure, Cultural and Built Heritage, Climate Change, Strategic Environmental Assessment and Appropriate Assessment

#### Summary of Issues Raised:

##### General:

A summary of national and local policy context is given and the obligation on local authorities to ensure the inclusion of such objectives in statutory plans is indicated. The Heritage Council are concerned regarding the accessibility of the planning system to the public. Therefore, whilst there are many important objectives in the plan, it needs to be more concise, and the objectives more tangible for development management purposes. There is often unnecessary lengthy supporting information. It is recommended that a review of all objectives be carried out to ensure that they are tailored to a LAP as per the hierarchy of land use plans.

##### Chief Executive Response:

The Draft Local Area Plan has been prepared in the context of higher-level documents, plans and guidelines. The Draft LAP was the subject of extensive consultation with a range of stakeholders and the public. The text and policies included is the result of that consultation. Development management is not specifically for this Local Area Plan, and the Plan makes reference to the use of the Development Management Standards Chapter of the County Longford Development Plan 2021-2027 which relates.

##### Chief Executive Recommendation:

No change.

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#### Strategic Vision and Aims

The Heritage Council welcome the emphasis on the "natural and built environment" in the vision. The Heritage Council strongly believe in heritage led regeneration and development, which can build on existing unique character, and cannot be recreated. Heritage led regeneration and conservation through use, are the best approaches for tackling vacancy in the built environment. This should be reflected in the strategic aims. The natural environment, particularly in terms of the aquatic environment, is affected by developments not just in the immediate vicinity, but further away. Therefore, it is not practical to emphasise "local area plan boundary" in the natural

heritage strategic aim.

The following amendments to the following strategic aims are requested:

Strategic Aim - *"to tackle problems of population decline, lack of investment and physical dereliction in an integrated and cross cutting way, through several policy areas including integrated land use, **heritage led regeneration, re-use of designated and non designated buildings**, and **other** socio-economic measures to address the physical, economic, social and environmental problems associated with dereliction and decay".*

Natural Heritage and Green Infrastructure *"to contribute towards the protection and enhancement of ~~the~~ natural heritage and the biodiversity within the ~~Local Area Plan boundary~~, **within the town and its environs** and to provide a wide range of environmental, social and economic benefits"*

Built and Cultural Heritage - *"to conserve and manage Longford's unique heritage assets for the benefit of present and future generations and to promote such assets as generators of economic development and ~~urban~~ regeneration while adhering to **best practice conservation principles and** the relevant statutory obligations".*

#### **Chief Executive Response:**

Strategic aims are included in Chapter 4 of the Draft Local Area Plan and also are transcribed to the start of each relevant preceding chapter.

Strategic Aim no. 5 relates to Regeneration and Placemaking. This is a strategic aim and as such it is not considered to single out all specific elements. There are many other measures which contribute to regeneration and placemaking. While the inclusion of 'heritage led regeneration' is considered beneficial, the inclusion of reference to the 're-use of designated and non designated buildings' is not considered necessary and is already encompassed in the regeneration reference.

Strategic Aim no. 7 relates to Natural Heritage and Green Infrastructure. The Heritage Council suggestion that the reference to the Local Area Plan boundary is replaced with the town and its environs has been considered, however it is considered that it is not necessary to include this. This is a strategic aim and the protection of natural heritage further away will be protected by way of the Development Management process and under the auspices of the County Development Plan.

Strategic Aim no. 8 relates to the Built and Cultural Heritage. It is considered that the Heritage Council suggestions which result in the scope of the aim being widened from the scope of urban only regeneration and also the reference to 'best practice conservation principles' will be a positive enhancement and should be included.



## Chief Executive Recommendation:

- Amend '4.0 Strategic Vision and Aims', Strategic Aim no. 5 as follows:

### *5 Regeneration and Placemaking*

#### **Strategic Aim:**

*to tackle problems of population decline, lack of investment and physical dereliction in an integrated and cross cutting way, through several policy areas including integrated land use, **heritage led regeneration** and socio-economic measures to address the physical, economic, social and environmental problems associated with dereliction and decay. '*

- Amend '9.0 Regeneration and Placemaking' Strategic Aim at the start of the chapter as above.
- Amend '4.0 Strategic Vision and Aims', Strategic Aim no. 8 as follows:

### *8. Built and Cultural Heritage*

#### **Strategic Aim:**

*to conserve and manage Longford's unique heritage assets for the benefit of present and future generations and to promote such assets as generators of economic development and ~~urban~~ regeneration while adhering to **best practice conservation principles** and the relevant statutory obligations.*

- Amend '12 Built and Cultural Heritage' Strategic Aim at the start of the chapter as above.

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## Core Strategy Compliance

The Heritage Council support policies that ensure consolidated and compact growth. Negative impacts on natural and cultural heritage are the result of poor and inefficient land use planning. Achieving more consolidated growth will reduce greenhouse gas emissions from the built environment and ensure land take is restrained and not pose undue threats to cultural and natural heritage. It ensures greater integration between patterns of development and sustainable transport, which aid climate mitigation.

Policy Objective CS05 the following amendment is recommended:

*"Encourage the compact growth of Longford Town and undertake a town centre first approach to ensure that development **makes efficient use of land**, proceeds sustainably and at an appropriate scale, density and sequence and in line with the County Core Strategy Table".*

There is a need to identify land activation in Objective CS 07.

Recommend a policy on greenfield sites. It is essential to ensure that any greenfield release in strategic reserves and other areas, makes efficient use of land, whilst providing the mix of homes necessary, and having densities and facilities, that are conducive to public transport roll out, and cycling and walking.

### Chief Executive Response:

The Heritage Council recommend that objective CS05 should make reference to 'makes the efficient use of land'. However the inclusion of this text is not considered necessary.

The Heritage Council have indicated that there is a need to identify land activation in Objective CS 07. C07 is to '*encourage the appropriate redevelopment of brownfield and infill sites for residential and mixed uses within the existing built-up footprint of Longford Town*'. This is not considered necessary. Land Activation measures are contained within section '16.0 Implementation and Monitoring' as well as with Section '9.0 Regeneration and Placemaking'.

The Heritage Council have recommended a policy on greenfield sites in order to ensure that any greenfield release in strategic reserves and other areas, makes efficient use of land, whilst providing the mix of homes, and having densities and facilities, that are conducive to public transport roll out, and cycling and walking. As per '5.0 Core Strategy Compliance' and '6.0 Residential Sustainability and Placemaking', density levels have been indicated in the Plan and will be developed in accordance with same.

### Chief Executive Recommendation:

No change.

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### Residential Sustainability and Placemaking

The Heritage Council support Town Centre first approaches. Land activation in core areas and a sequential approach that favours brownfield development is needed. Inclusion of the *Sustainable Residential Development and Compact Settlements Guidelines* for Planning Authorities in the LAP is welcomed. However many objectives lack emphasis or are too general.

In terms of optimizing site potential the Heritage Council believe terraced houses have efficient high density land use form that accommodates family homes. The more sustainable aspects of this design can be combined with more modern development typologies to achieve efficient use of land in settlements such as Longford town. This LAP is encouraged to accommodate such development forms and encourage this typology in inner core development sites. It is recommended that policy be provided in this regard i.e. to encourage residential development to respond positively to the historic context, while making efficient use of sites.

The *Sustainable Residential Development and Compact Settlements Guidelines* note the importance of responsive placemaking for existing heritage as well as expectations for the application of density and development management standards, the flexible imposition of which is needed for inner core sites. As such it is important to provide a policy that encourages the reuse of heritage assets, both designated and non-designated. This often requires departures from overly rigid

development management standards, which should also be noted in the policy/objective.

**Chief Executive Response:**

The Heritage Council consider that terraced houses should be encouraged in the LAP. It should be noted that sites will be developed in accordance with the proper planning and sustainable development of the area.

In terms of encouraging the reuse of heritage assets, it is considered that there is adequate policy in this regard. In addition to the Regeneration and Placemaking Chapter as contained in Section 9 of the Plan, the LAP also contains a designated chapter '12 Built and Culture Heritage'. In terms of heritage assets having less development management standards, planning applications will be assessed in accordance with the Development Management Standards contained in the Development Plan.

**Chief Executive Recommendation:**

No change.

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**Regeneration and Placemaking**

Contains too many vague non-planning related objectives, detailed policies on the following are needed:

- How infill and brownfield developments will be pursued as good design placemaking.
- Specific design standards that respond positively to context.
- The importance of existing heritage and character, and how this will inform design proposals.
- Specific and detailed information on public realm ambitions, and how these will be designed in terms of material palette and soft landscaping.

There should be greater detail and development considerations for the strategic areas/regeneration areas identified. Whilst it is not reasonable to have masterplans developed for each site, there should be clear high-level guidance, in terms of expected uses, development types, and identification of environmental constraints for each of the areas. The proposed uses for the area and development considerations (i.e. heritage, and environmental assets to be considered) should be provided.

Objective MP03 - the intention to identify additional regeneration areas is one of the key rationales behind a LAP and should have been already advanced for this draft.

**Chief Executive Response:**

To be read in conjunction with 3.2.1 Office of Planning Regulator (OPR) LLAP31 – Regeneration (Recommendation 3 – Regeneration Strategy).

Section '9.5.2 Master Planning – Strategic Sites' sets out a framework to identify and secure the redevelopment and regeneration of such areas in need of renewal and supports the active land management of vacant sites to address incidents of urban decay and vacancy. The primary objective is to facilitate long-term economic development in the town and the delivery of sustainable housing and the generation of economic activity. It is considered that there is sufficient detail in this section and its supporting objectives. The 18 no. strategic sites have been reduced to 12 no. sites. Also additional detail in relation to site size etc. has been included. (See OPR submission response and associated recommendation to 3 Regeneration Strategy)

As per objective MP 03 it is an objective of the Council *to 'Identify additional 'Regeneration Areas' as required, to include areas suffering from social and economic deprivation within Longford Town'*. This is considered a beneficial objective and should be retained.

**Chief Executive Recommendation:**

- See OPR submission - 3.2.1 Office of Planning Regulator (OPR) LLAP31 – Regeneration (Recommendation 3 – Regeneration Strategy).

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**Natural Heritage and Green Infrastructure**

The zone of influence for developments for SACs and SPAs is 15km, with hydrological connectivity and ex situ conservation impacts often meaning a larger radius for assessment. Developments that occur within the LAP boundary may have impacts on SACs outside the town and need to undergo the required Appropriate Assessment. These sites should be mentioned and would include at a minimum Brown Bog SAC, Lough Forbes Complex SAC, and Ballykenny-Fisherstown Bog SPA.

It is recommended that a new objective is drafted to ensure compliance with the Birds and Habitats Directive, or amend NHB 05 i.e. a policy that fully provides for the need for appropriate assessment of projects that may have impacts on SACs/SPAs in the region.

NHB 04 seeks an Appropriate Assessment under the Habitats Directive. There is a misunderstanding of ecological designations as an ecological assessment is the means to assess impacts on the pNHA. NHB 05 also seems confused on this matter. Amend NHB 03 to state: *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.

Support NHB 06, however, by specifying buildings, bats and birds, it is excluding all other protected species and needs to be redrafted to avoid this.

NHB17 - there is a need to include "existing hedgerows". Other features such as long-established hedgerows should also be retained and may be more ecologically rich than existing single trees.

#### Chief Executive Response:

It is not considered necessary to list European designated sites outside the plan boundary within 15km as these will be automatically considered as part of the appropriate assessment considerations. NHB 03 relates to the protection of biodiversity and natural heritage, it is considered a positive addition that this objective should be augmented by a requirement that any developments that may potentially impact on the pNHA should be accompanied by an Ecological Assessment. In terms of NHB 04 it is considered that this should be expanded to include reference to Article 6(4) of the Habitats Directive. It is considered that NHB05 as written is unclear. Accordingly, this should be rewritten to ensure that it provides for the need for appropriate assessment of projects that may have impacts on SACs/SPAs in the region. In relation to NHB06 this relates to habitats and / or disturbance of protected species within Longford town. This is a broad category, and it is considered that no further revision is warranted. In relation to NHB 17 which relates to trees, it is considered excessive to expand this to include existing hedgerows. The protection of hedgerows is also covered under other existing objectives i.e. NHB 12.

#### Chief Executive Recommendation:

- Amend NHB03 with the addition of the following text:

*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.*

- Amend NHB04 with the additional text as follows:

*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.*

- Amend NHB 05 as follows:

~~*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.*~~ *Require appropriate*

## **Built and Cultural Heritage**

The Heritage Council supports and commends the introductory sections to this chapter. The Battery Road Architectural Conservation Area needs to be upheld. The area is car dominated however, although it is recognised that the R198 is one of the main arteries out of the town. Greater settlement-based design and traffic management is needed to ensure places like Longford Town are "*places to be, not places to pass through*". Work could be progressed on a new public realm design in the car parking area at the corner of Church Street, adjacent to Fee Court. Whilst the general policies for the ACA are welcomed, an objective that reflects our points could be drafted.

Support the objectives in this chapter, however, it is recommended that flexible implementation of development management standards be included in PS 05. Designated and non-designated historic assets should be treated flexibly. Given the issue of vacancy and dereliction, and challenging requirements for re-using heritage assets, there is a need to ensure car parking requirements, privacy distances etc. do not compromise more important strategic planning objectives.

### **Chief Executive Response:**

The Battery Area Architectural Conservation Area is included in this plan (Appendix 2). Specific objectives for its protection are contained in '12.8 Architectural Conservation Area Objectives' and are considered sufficient.

In terms of encouraging the reuse of heritage assets, it is considered that there is adequate policy in this regard. In addition to the Regeneration and Placemaking Chapter as contained in Section 9 of the Plan, the LAP also contains a designated chapter '12 Built and Culture Heritage'. In terms of heritage assets having less development management standards, planning applications will be assessed in accordance with the Development Management Standards contained in the Development Plan.

### **Chief Executive Recommendation:**

No change.

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## **Climate Change**

Climate Action is a thread that should run through an entire plan. Given the impacts of climate change on natural heritage, the Heritage Council strongly support policies in the planning system that both reduce emissions at source (mitigation) and ensure adaptation to the worst impacts of climate change. The Heritage Council believe that the reuse of the embedded carbon in existing buildings and ensuring land use



patterns and mobility are integrated, is the most important role the planning system has for addressing climate change. In overarching terms, we wish to:

- Ensure transport and land use are strongly integrated, as per national policy, and our settlement patterns are conducive to public transport roll out and walking and cycling.
- Ensure efficient use of land to reduce the built environment footprint.
- Avoid sites that have high ecological potential, informed by habitat mapping.
- Ensure brownfield sites and well-located sites within the urban boundary are preferred in a sequential approach to development including sites next to the train station.

Some of the policies from CC 01 to CC 25 caters to the above points, however it is recommended that some of the existing policies be redrafted to fully capture the above points e.g. CC13 and CC14 need to be redrafted to account for integration of transport with patterns of development.

#### **Chief Executive Response:**

Some changes have been made to the '15.8 Climate Change' objectives in light of the DECC submission. Additional objectives have also been included. It is not considered necessary to include further additional policies or make amendments to those already added.

#### **Chief Executive Recommendation:**

No change.

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#### **Strategic Environmental Assessment/ Appropriate Assessment**

The Appropriate Assessment and Natura Impact Statement to accompany the Longford Town Local Area Plan was prepared with regard to the Guidance on Appropriate Assessment Screening for Development Management (2021) produced by the Office of the Planning Regulator.

Chapter 5 of the Draft SEA of the Longford Town LAP presents a summary of the SEA findings for the appraisal of the LAP's Vision, 12 strategic aims and 316 objectives relating to core strategy compliance, residential development, economic development, tourism, regeneration and placemaking, social infrastructure, natural heritage and green infrastructure, built and cultural heritage, energy and communications, sustainable transport, climate change, and implementation and monitoring.

Any updates or alterations to the objectives within the next iteration of the LAP will be screened to determine their likely significant effects. If likely significant effects are

identified, these assessments will be updated in the next iteration of the SEA Environmental Report in accordance with the updated Longford Town LAP. Any new objectives will be assessed in the next SEA Environmental Report.

**Chief Executive Recommendation:**

No change.

### 3.2.8 National Transport Authority (NTA)

Submission no.	LLAP10
Name	National Transport Authority (NTA)
Subject	Specific Transport Objectives, Abbeycartron Access Strategy, Phasing and Sustainable Transport Accessibility, Mapping.

#### Summary of Issues Raised:

The NTA based on the *National Sustainable Mobility Policy* and *National Investment Framework for Transport in Ireland*, submits the following recommendations. The NTA notes a number of references to public transport in the LAP and is committed to work with the Council in developing services as per our Connecting Ireland programme and Local Link, including enhancements to supporting facilities in Longford. In relation to Active Travel, subject to the recommendations below, the comprehensive incorporation of the schemes from the Longford Local Transport Plan into the Local Area Plan provides a clear path forward for investment in walking and cycling. With the following recommendations the NTA would be satisfied Longford could develop consistent with the principles of land use and transport integration.

#### 1. Specific Transport Objectives

The NTA supports the overall thrust of the Sustainable Transport Chapter and incorporation of the LTP schemes into the LAP as specific schemes to be pursued during the lifetime of the LAP. The following objectives require clarification:

- ST 16 - recommended that this is amended to ensure that any transport hub could only be developed in central Longford in collaboration with the NTA, and would incorporate cycle facilities in addition to public transport;
- ST 17 - recommend the following additional text: "Seek the development of effective cycling *infrastructure in accordance with the Cycle Design Manual* along the key urban arterial routes to and from Longford Town;
- ST 20 - recommend re-wording as follows: "Support the redesignation of on-street parking spaces in central Longford to Electric Vehicles;
- ST 22 – The NTA would not support the provision of additional local road capacity as an alternative to the N4/N5 bypass. The main function of the National Road network is to provide for strategic traffic. Local traffic should be directed onto local roads and new roads within the plan area should be designed in such a manner as to provide access to new development areas rather than as additional strategic bypass routes (see section 3 of this submission). As such, the second part of this objective should be deleted;
- ST 24 – would benefit from clarifying that it refers only to the existing N4 up to the time that the N4 Mullingar to Longford scheme is in place;
- ST 25 – could be strengthened by including reference to the need for a Mobility Management Plan to accompany such planning applications.

- ST 26, 27, 28, 29, 30 and 31 – see section 2.

## 2. Abbeycartron Access Strategy

The *National Sustainable Mobility Policy* states that safe and green mobility will be supported by: *“Rebalancing transport movement in metropolitan areas and other urban centres away from the private car and towards active travel and public transport.”* The *National Investment Framework for Transport in Ireland* sets out investment hierarchies, including the Modal Hierarchy: *“Sustainable modes, starting with active travel (walking, wheeling and cycling) and then public transport, will be encouraged over less sustainable modes such as the private car.”*

The NTA welcomes inclusion of the Alternative Sustainable Proposal Option to serve Abbeycartron. This provides opportunity to develop Abbeycartron in a manner which facilitates access to all development areas by car, but which would limit potential for through movement, and is the preferred option for the NTA. Clear direction should be given as to the approach and the ambiguity of presenting 2 options. In doing so, consistency between the Abbeycartron Access Strategy and the Walking, Cycling and Permeability Schemes could also be achieved, bringing greater clarity to overall transport requirements for the town.

The NTA recommends Objectives ST 26, 27, 28, 29, 30 and 31 are revisited in their entirety and objectives adopted which reflect the Alternative Sustainable Proposal Option only, emphasising that the development of Abbeycartron will be undertaken in a manner which promotes and facilitates sustainable transport. Such objectives should state that the detailed planning and development of these lands will be undertaken in collaboration with the NTA and Transport Infrastructure Ireland.

## 3. Phasing and Sustainable Transport Accessibility

The NTA notes the intention to develop the peripheral industrial/commercial and warehousing zonings to the east of the N4 in Phase 1. Given their location adjacent to a national road junction, it is important these sites develop in a manner which promotes and facilitates access by sustainable transport modes, including active travel for potential employees from Longford Town itself, in a manner which minimises use of the private car.

The NTA recommends the description of the Land Use Zoning for Industrial/Commercial and Warehousing in Appendix 1 is updated to include a requirement that proposals for development will promote and facilitate sustainable transport for trips to work via such measures as car parking provision and management, provision for cyclists, shuttle bus services and general workplace travel plan activities.

The NTA recommends an Economic Development Objective is included which states that the development of land zoned for employment-generating uses will be undertaken in a manner which promotes and facilitates sustainable transport, and which manages car use in order to protect the strategic

function and carrying capacity of the national road network.

It is recommended that Cycle Route Schemes C-13 and/or C-22 are extended to include the N4 roundabout and indicative access junctions into these land parcels.

#### 4. Overlapping Infrastructure Networks

Drafting error whereby the wrong figure was imported from the Local Transport Plan (Figure 5.6 of the LTP)".

#### **Chief Executive Response:**

**(To be read in conjunction with OPR Submission LLAP31 - Recommendation 4 Transport and Accessibility and TII Submission LLAP14)**

With reference to the specific transport objectives these have been reviewed. Where necessary objectives have been removed in order to reflect the Sustainable Transport Option only and other enhancements to policy. In terms of ST 20 the redesignation of on-street parking spaces in central Longford to Electric Vehicles is not supported as this would be to the detriment of other vulnerable users. Mobility Plans are also already referenced in ST08. Amendments have also been made in light of the refinement to the Abbeycartron Access Strategy and the OPR submission and TII submissions.

In terms of the Abbeycartron Access Strategy it is accepted that there is ambiguity in presenting 2 options and therefore it has been recommended that the Longford Norther Environs Local Area Plan 2008-2014 is omitted. In relation to the Abbeycartron Access Strategy within the Draft LAP, having considered the OPR submission, in conjunction with the NTA and TII submissions, and the Council's own internal positions, it is considered that Fig. 5.8 (Longford Northern Environs Local Area Plan 2008 – 2014) would not be adopted into the LAP. Furthermore, the Alternative Sustainable Proposal (Fig 5.9 of the LTP) is amended in order to support the development of the area. The amended Alternative Sustainable Proposal figure will be included in section 14.4.9.2. As such the relevant amendments in terms of text and graphics should be made.

As per '14.6 Sustainable Transport Objectives' a number of relevant objectives are noted which relate to the development of employment lands and as such would include the lands on the western side of the N4. However it is considered that in terms of better integration that the Plan would benefit from an additional specific policy in the Economic Development section of the Plan also in order to ensure that the employment lands on the western side of the N4 are developed in accordance with sustainable transport principles and the relevant Sustainable Transport Objectives of this Plan. This is also addressed under the OPR submission Response (LLAP31. Specifically in terms of the NTA submission (LLAP10), it is considered that Appendix 1; Land Use Zoning and Land Zoning Matrix, in the section '*Industrial/Commercial/Warehousing*' could include additional text to promote sustainable transport.

The NTA have highlighted a drafting error in the importation of a drawing from the Local Transport Plan which relates to Figure 5.6 of the LTP "Overlap and potential conflicts between networks". This was also highlighted by the OPR and has been previously addressed in that submission response and recommendation which related to the correct of this transposition error. (See OPR Submission LLAP31 - Recommendation 4 Transport and Accessibility and TII Submission LLAP14)

#### Chief Executive Recommendation:

- '14.6 Sustainable Transport Objectives' amend the following objectives:
  - ST16: *In collaboration with the NTA, ~~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 in accordance with the Cycle Design Manual 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.*

- *ST22: in conjunction with TII, carry out detailed traffic and transport assessments for development proposed to the north of the N4 Longford Bypass 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.*
- *ST24: Ensure any proposed development shall ~~have regard to National policy concerning the preservation of the N4 national primary road for National / Regional traffic~~ demonstrate compliance with TII publications, DMURS and other applicable standards/guidance.*

- Amend '14.4.9 Abbeycartron Access Strategy' as follows:

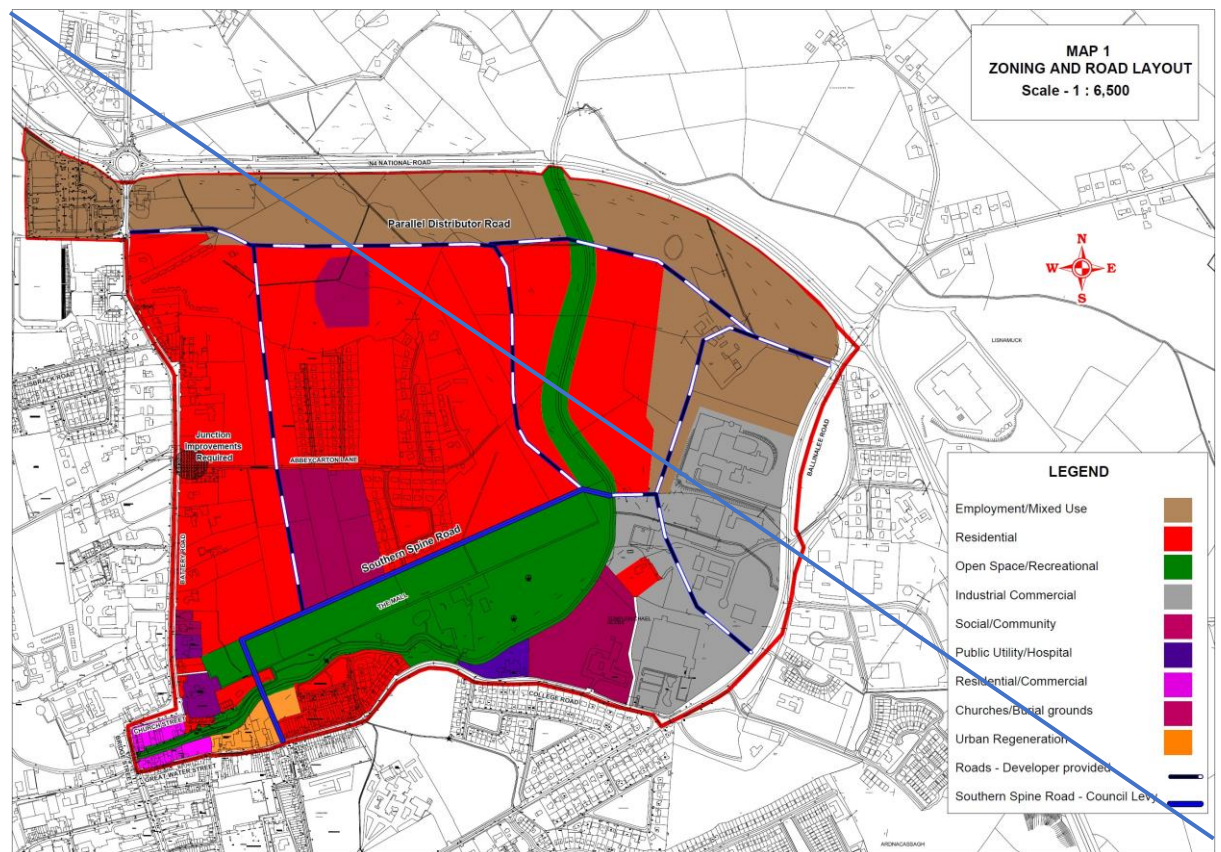
*~~...The Abbeycartron Access Strategy consists of the following 2 options which are outlined accordingly:~~*

#### *~~14.4.9.1 — Longford Northern Environs Local Area Plan 2008–2014 Option~~*

*~~The Longford Northern Environs Local Area Plan exists to provide a zoning and traffic assessed infrastructure strategy for the Abbeycartron Lands in the north of the town. As part of this, a number of new roads are identified within the area, with four new access points provided, making it extremely permeable for vehicles.~~*



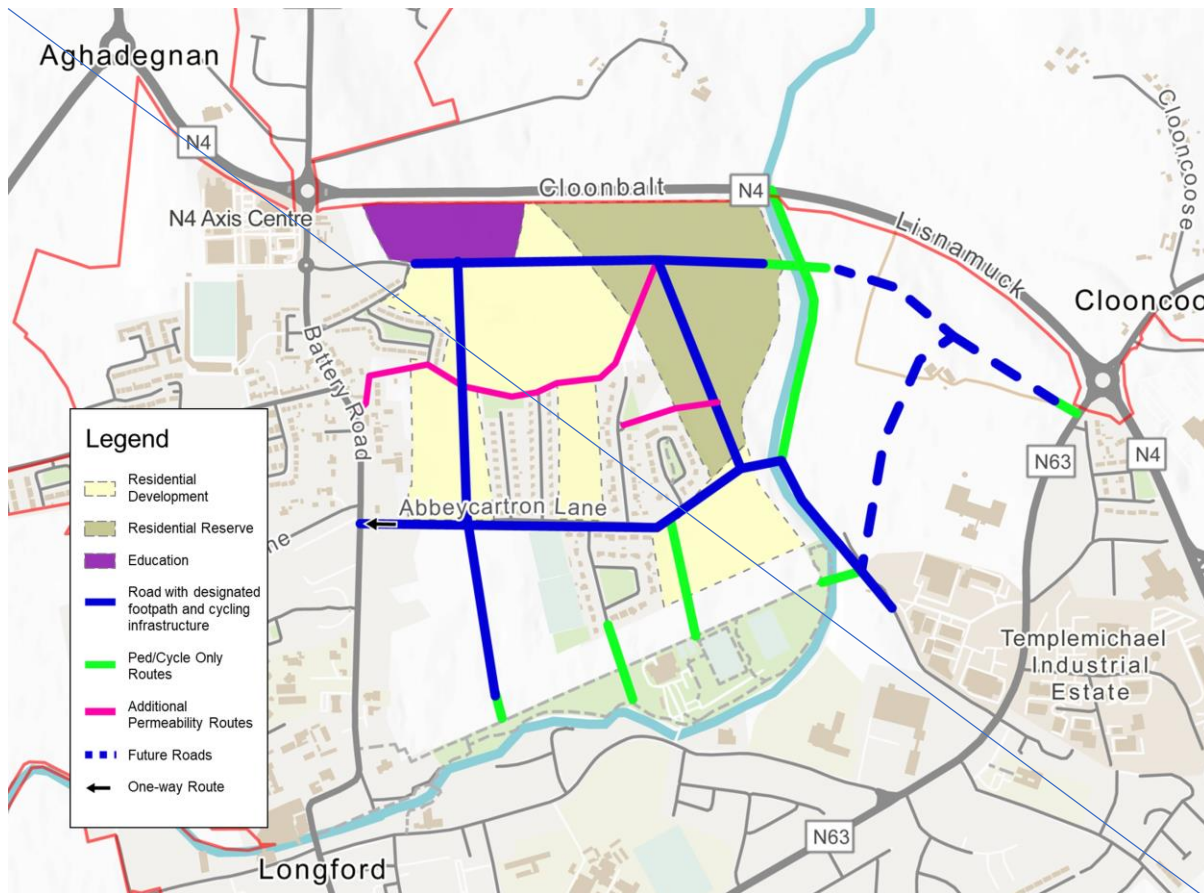
*Longford Northern Environs Local Area Plan 2008-2014 Map (Figure 5.8 of LTP)*



*In the 15 years since this plan was published, transport policy and thinking has changed to favour sustainable modes of transport, and to reduce car dependency. Under this direction, a more sustainable schematic (Alternative Sustainable Proposal section) has therefore been developed with this plan as the alternative delivery option.*

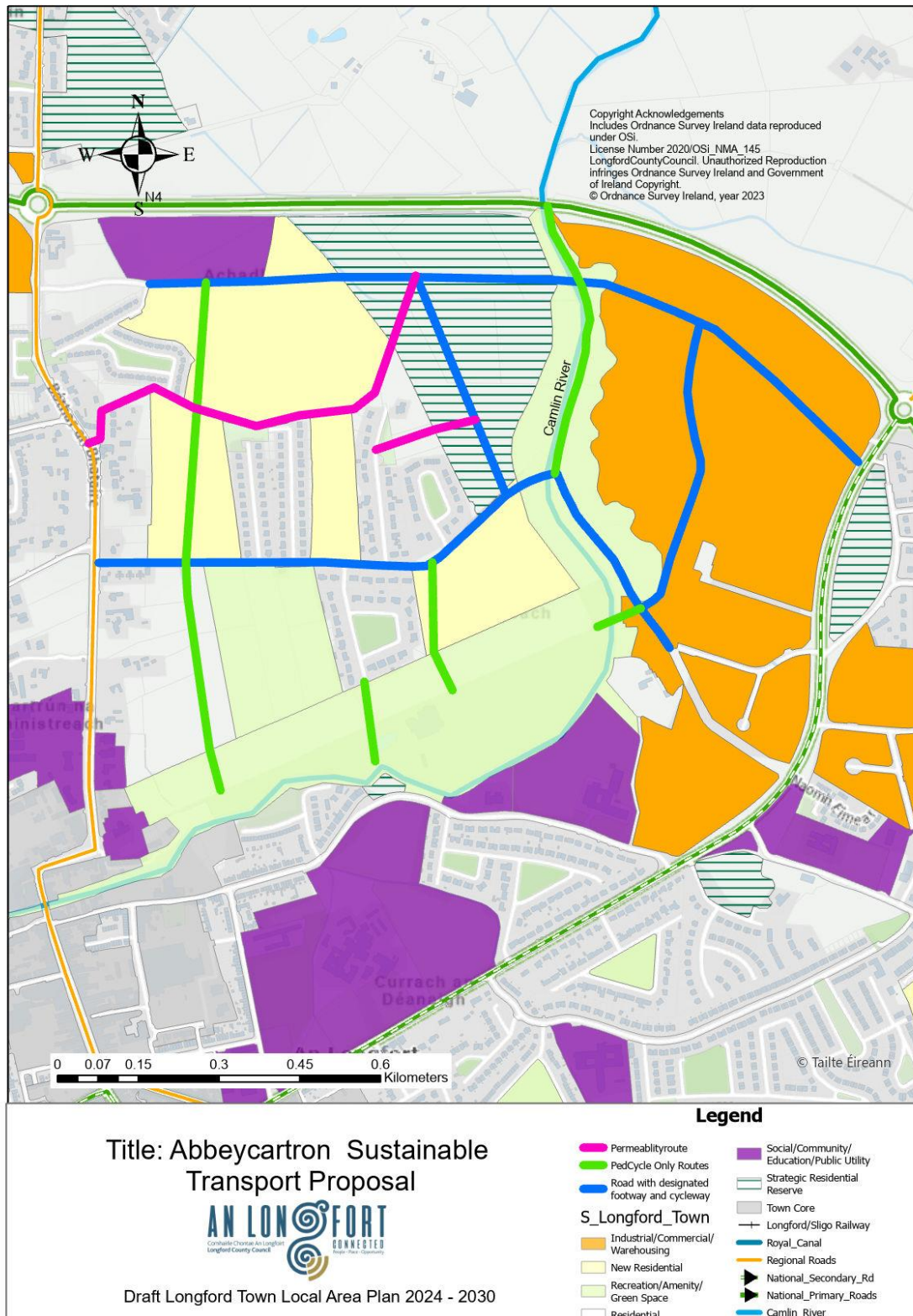
- On page 215 the following is to be deleted:

*Alternative Sustainable Proposal (Figure 5.9 of LTP)*



- The following heading and map is to be included in its place:

### *Abbeycartron Sustainable Transport Proposal*





- Section '14.4.9.2 Alternative Sustainable Proposal Option' 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 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.*

'14.6 Sustainable Transport Objectives' include the following additional objectives:

*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.*

- On page 215 the heading above Figure 5.9 of LTP to be renamed as follows:

*Alternative Abbeycartron Sustainable Transport Proposal (Figure 5.9 of LTP)*

- Section '14.6 Sustainable Transport Options' amend ST 26 as follows:

*Require developers in specific areas to provide elements of the road network as indicated in the ~~LTP Abbeycartron Access Strategy~~ Abbeycartron Sustainable Transport Proposal and associated cycle and pedestrian facilities in accordance with the provisions of the DMURS. This will be required and details agreed in association with permission for such development, where this will facilitate the appropriate access to and movement within the development concerned and to strengthen its relationship with the town centre. Where appropriate, infrastructural funding will be addressed through the provisions of contribution schemes prepared under s.48 & 49 of the Act.*

- Section '14.6 Sustainable Transport Options' delete the following objectives:

~~*ST 27 With reference to the LTP Abbeycartron Access Strategy – Longford Northern Environs Local Area Plan 2008-2014 option only, vehicular access to be provided linking Longford town centre and the lands zoned to the north of the Camlin River in the vicinity of Great Water Street, to include a spine road parallel to the Mall Amenity Area. This would be provided by the Local Authority and involve the installation of a new river crossing from the Mall to Great Water Street. This is to be funded through the application of specific levies on development that would benefit from such a link (in accordance with a specific scheme under S. 49 of the Act).*~~

~~ST 31 With reference to the LTP Abbeycartron Access Strategy—Longford Northern Environs Local Area Plan 2008–2014 option only, the southern spine route will be developed as indicated to facilitate the development of lands zoned to the north. All developments permitted that will benefit from the development of this route will be levied in accordance with a special scheme under s. 49 of the PDA to facilitate the construction of this route.~~

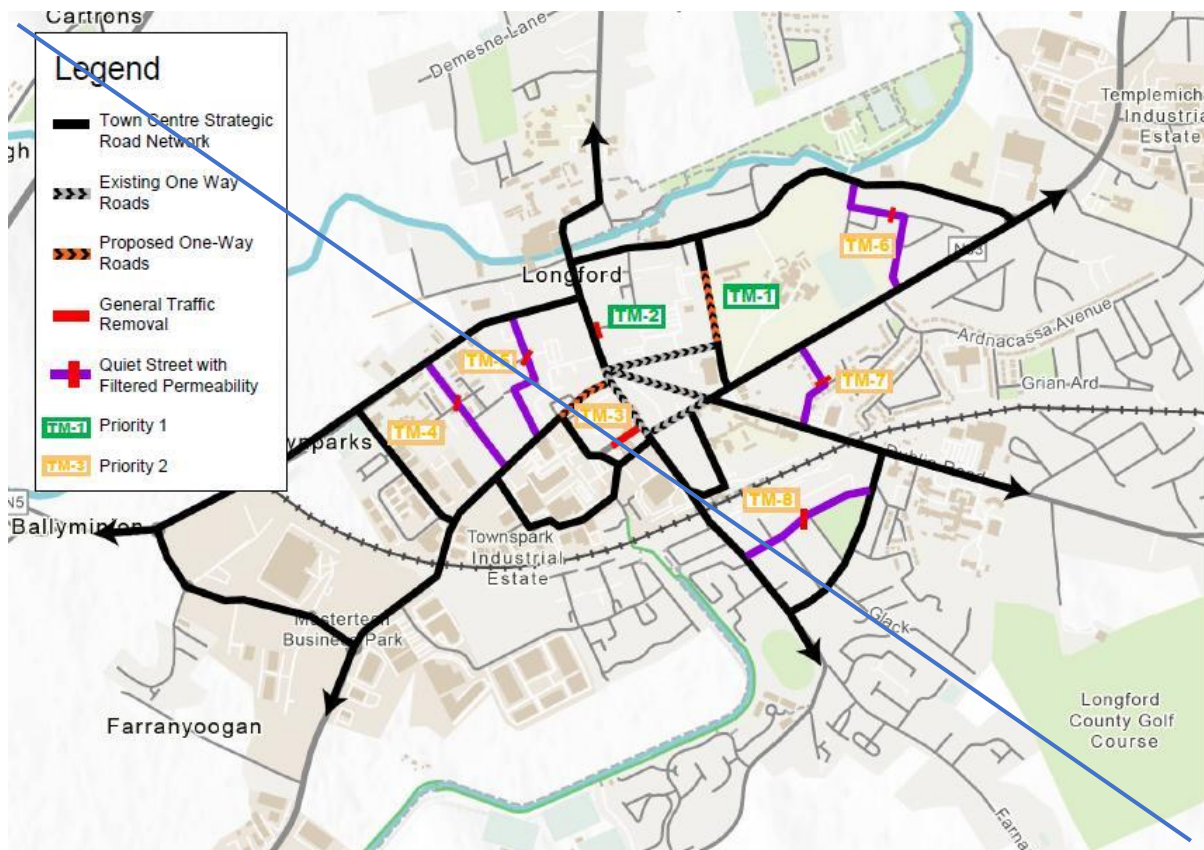
- In section '7.5 Economic Development Objectives' include the following additional objective:

*ECON XX: Ensure that the employment lands on the western side of the N4 are developed in accordance with sustainable transport principles and the relevant Sustainable Transport Objectives of this Plan.*

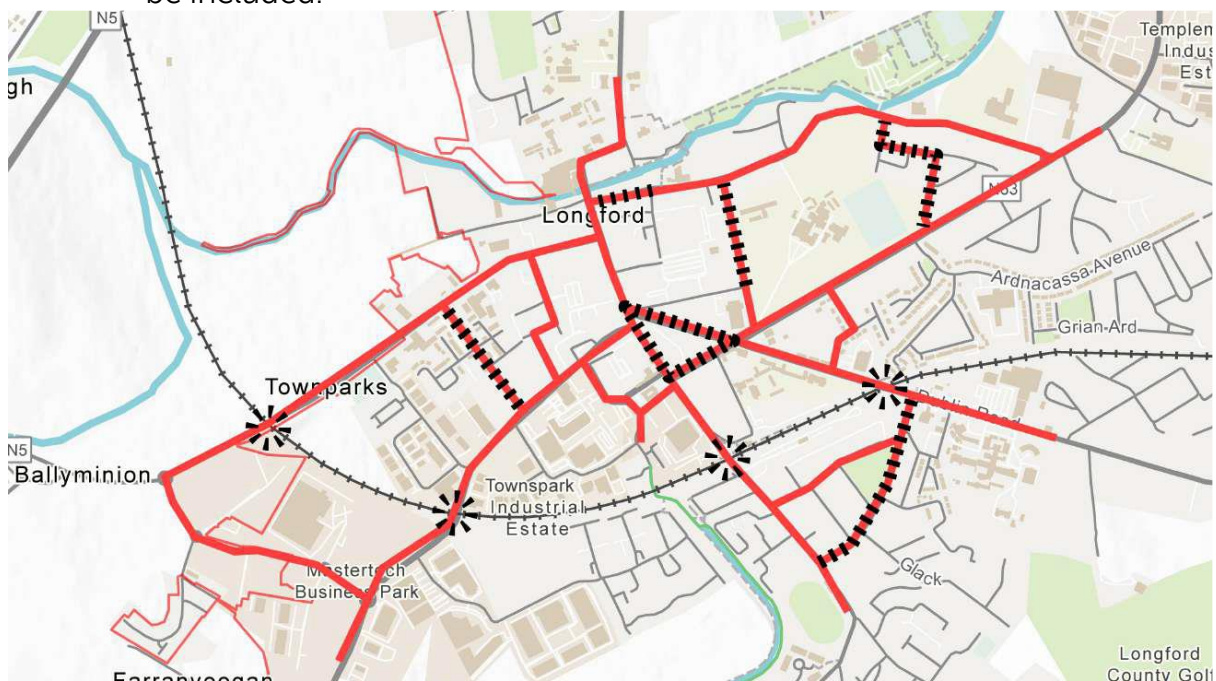
- In Appendix 1; Land Use Zoning and Land Zoning Matrix, in the section 'Industrial/Commercial and Warehousing' include the following additional text:

*Under this land use zoning there is a requirement that proposals for development will promote and facilitate sustainable transport for trips to work via such measures as car parking provision and management, provision for cyclists, shuttle bus services and general workplace travel plan activities.*

- 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 replace with the following map:



- In 'Overlap and potential conflicts between Networks Map' - Map below to be included:





### 3.2.9 Transport Infrastructure Ireland (TII)

Submission no.	LLAP14
Name	Transport Infrastructure Ireland (TII)
Subject	Transportation Issues, National Policy and Guidance, Abbeycartron Sustainable Transport Options, Policy Recommendations

#### Summary of Issues Raised:

This submission seeks to address the safety, capacity, and strategic function of the national road network in accordance with TII's statutory functions and the provisions of official policy. Having regard to the critical location of Longford on the national road network, 5 recommendations are made in accordance with higher order land use and transportation policy and in the interests of the sustainable planning and development.

#### Strategic Context

TII recommends requirements to address the N4 Mullingar to Longford (Roosky) scheme and clarity on measures for the maintenance and protection of investment made in national road assets need to be fully addressed.

#### Local Authority Plan Context

The Draft LAP is to replace the previous LAP which incorporated the Southern and Northern Environs LAPs. Collaborative agreement had been made with TII/NRA with regard to the integrated transport and planning of the Northern Environs. TII considers this work remains relevant and co-exist with the local transport plan. TII welcomes that the Draft LAP has regard to the Local Transport Plan.

The County Development Plan 2021 – 2027 seeks to protect and maintain the strategic traffic function of the national road network. TII highlight the need for detailed traffic impact assessments for development proposed to the north of the N4 Longford bypass and the sequential provision of local roads network provisions as an alternative to the N4/N5 bypass. TII is unable to ascertain if impacts on, and interactions with the national road network have been assessed and/or considered as required under the LAP appropriate to demonstrate the protection of the national road network that has efficiency sensitivities to development of the town and at Abbeycartron and north of the N4, but also on the N63.

In Chapter 14 *Sustainable Transport* which aims to promote increased delivery of sustainable transport within the Town to contribute to carbon emission reduction, TII advises that protection of the national road network for intended strategic traffic in accordance with *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) contributes to this Strategic Aim.

TII makes the following recommendations:

#### Inclusion of observance of national roads policy and TII Publications

TII recommends the *Sustainable Transport Objectives* commit that any transport measures which interact with the national road network must observe *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012), require prior consultation with TII and compliance with all relevant TII standards as detailed in TII Publications and *Core Strategy Strategic Aim No. 9* of the County Development Plan 2021 – 2027. TII is concerned that national road policy and TII Publications do not appear alongside other standards e.g. DMURS in ST05.

#### Review of transposing LTP

Review and revision of transposing the LTP into the LAP *Sustainable Transport Strategy* and *Objectives* to clarify which measures in the LTP are intended as development objectives of the Draft LAP.

#### Revision of Sustainable Transport Objectives

Revision of *Sustainable Transport Objectives* to ensure clarity directing the public and developer stakeholders. TII is unable to identify whether the protection of the safe and efficient operation of the national road network as part of the sustainable transport hierarchy will be observed in the Draft LAP *Sustainable Transport Objectives*. TII recommended text revisions to Draft *Sustainable Transport Objectives* as follows:

- "ST 21 ~~Address~~ **Protect** the safety, capacity and strategic function of the national road network in accordance with the provisions of official policy ~~and taking account of the requirements of as~~ in the Section 28 DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012). "
- "ST 22 ~~The Council in consultation with TII, c€~~arry out detailed traffic ~~impact~~ **and transport** assessments for development proposed to the north of the N4 Longford bypass and the sequential provision of local roads network provisions as an alternative to the N4/N5 bypass."
- "ST 24 Ensure that any proposed development shall **demonstrate compliance with TII Publications** ~~have regard to National policy concerning the preservation of the N4 national primary road for National/Regional Traffic.~~"
- "ST 25 Require that applications for planning permission on the industrially zoned lands to the north of the N4 Longford Bypass (see Appendix 1 Zoning map) shall be subject to a detailed traffic ~~impact~~ **and transport** assessment, **the terms of which shall be scoped by the Council in consultation with TII, in advance of their consideration for development.**"

#### Revision of Abbeycarton Access Strategy Approach

The Abbeycarton Access Strategy requires review as it is unclear which Strategy is preferred, why and how it is to be implemented. It is vital that recognising and

recording the requirements that for any Abbeycarton Access Strategy should be subject to the requirement for detailed traffic and transportation assessments by the Council scoped with the assistance of TII to inform future development applications in the area. In this way, the delivery of access arrangements for Abbeycarton will be formally identified for future individual applications and other development proposal mechanisms may be assured of being in accordance with an access strategy that has been appropriately evidenced and assessed.

*Sustainable Transport Objectives* ST26-29 require revision to ensure they reflect and promote the Abbeycarton Access Strategy whilst recognising higher order development policy and objectives taking cognisance of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012).

#### Chief Executive Response:

This should be read in conjunction with the CE response and Recommendation to the OPR submission (LLAP31) and NTA submission (LLAP10)

Further to consultation with the TII during the preparation of the LTP, Section 2.4 'Design Standards and Guidelines' makes specific reference to documentation for the benefit of TII concerns, including the 'Spatial Planning and National Roads Guidelines for Planning Authorities'. Of relevance to the Abbeycarton Access Strategy (Section 5.10 of the LTP), the current LTP commits to *"further detailed traffic impact assessment beyond the scope of this LTP, including an assessment of its impacts on the strategic function of the N4"*. Nonetheless in terms of national roads policy and TII publications an additional policy objective can be included to this extent. In relation to TII's specific concerns in relation to ST05, this objective can also be extended in scope.

A review of the material transposed from the LTP has been undertaken. It is noted that the 'Map on page 215 of the Draft LAP which relates to 'Alternative Sustainable Proposal (Figure 5.9 of LTP) was transposed in error. This should be corrected. This issue has also been previously addressed in the OPR and NTA submissions (LLAP31 and NTA10). Furthermore, it is noted that the Active Travel section considers all elements with the current LTP development objectives of merit and worthy of full inclusion. It is accepted that the proposed TII word edits will assist in alleviating concerns raised and ensure prior consultation with TII.

In relation to the Abbeycarton Access Strategy within the Draft LAP, having considered the OPR submission, in conjunction with the NTA and TII submissions, and the Council's own internal positions, it is considered that Fig. 5.8 (Longford Northern Environs Local Area Plan 2008 – 2014) would not be adopted into the LAP. Furthermore, the Alternative Sustainable Proposal (Fig 5.9 of the LTP) is amended in order to support the development of the area. The amended Alternative Sustainable Proposal figure will be included in section 14.4.9.2. As such the relevant amendments in terms of text and graphics should be made.

Proposed ST22 of the current LAP commits to the detailed traffic (and transport) assessment. Active Travel disagree of the necessity for the Local Authority to undertake such traffic and transport assessments and recommends retaining the flexibility for developers to undertake same to a standard to the satisfaction of the Local Authority. Active Travel contest that with the exception of the exclusion of the 'South Spine Road' in Fig 2.8 of LTP (found to be detrimental to the historical significance and integrity of the Old Mall), minimal differences of significance exist between the either proposal.

#### Chief Executive Recommendation:

- In Sustainable Transport Objectives, include the following additional objective:

*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 prior consultation with TII, and compliance with the County Development Plan and all relevant TII standards.*

- Amend ST05 as follows:

*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), ~~and relevant national policy and TII Publications.~~*

- Amend '14.6 Sustainable Transport Objectives' as follows:
  - *ST 21 ~~Address~~ ~~Protect~~ the safety, capacity and strategic function of the national road network in accordance with the provisions of official policy ~~and taking account of the requirements of as in~~ the Section 28 DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012). "*
  - *ST22: ~~in conjunction with TII,~~ carry out detailed traffic and transport assessments for development proposed to the north of the N4 Longford Bypass 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.~~*
  - *ST24: Ensure any proposed development shall ~~have regard to National policy concerning the preservation of the N4 national primary road for National / Regional traffic demonstrate compliance with TII publications, DMURS and other applicable standards/guidance.~~*
  - *ST 25 Require that applications for planning permission on the industrially zoned lands to the north of the N4 Longford Bypass (see Appendix 1 Zoning map) shall be subject to a detailed traffic ~~impact~~ ~~and transport~~ assessment, ~~the terms of which shall be scoped by the Council in consultation with TII, in advance of their consideration for development.~~*

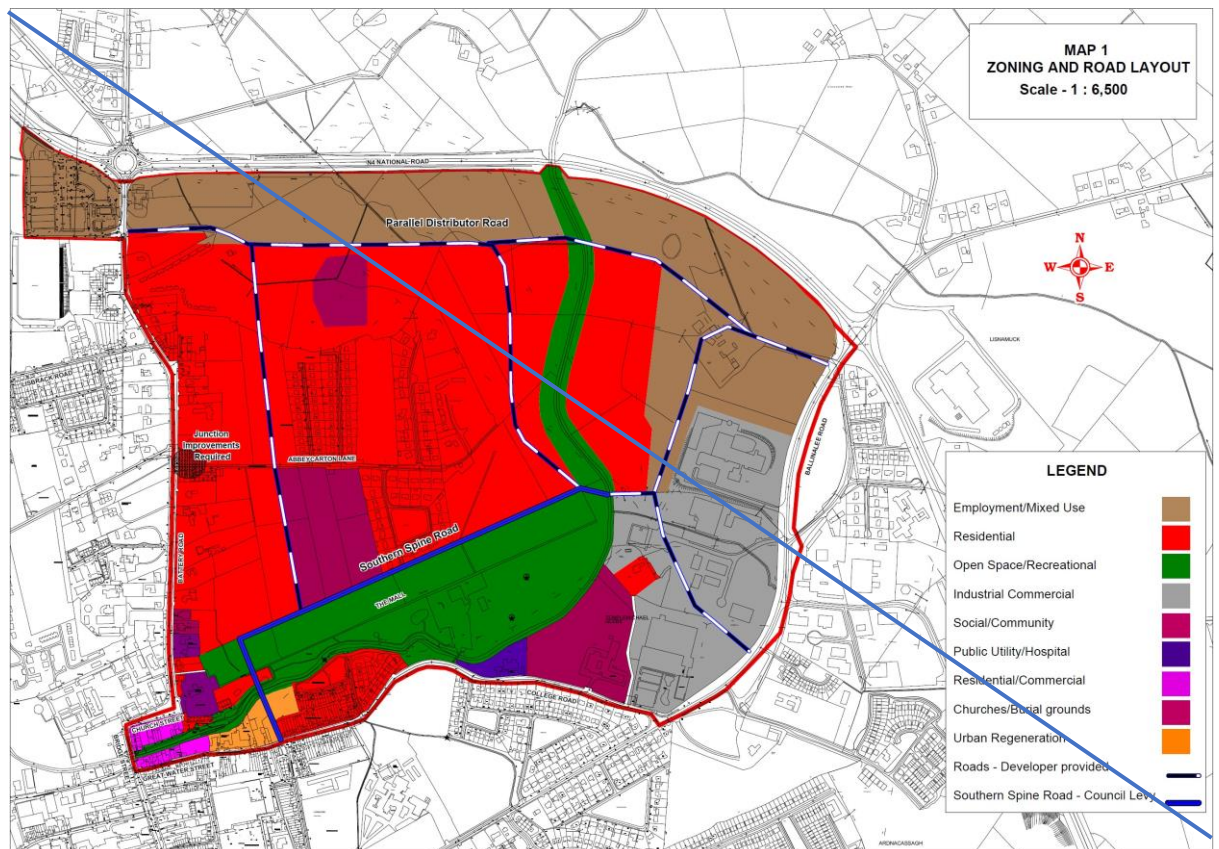
- Amend '14.4.9 Abbeycartron Access Strategy' as follows:

*~~‘...The Abbeycartron Access Strategy consists of the following 2 options which are outlined accordingly:~~*

*~~14.4.9.1 — Longford Northern Environs Local Area Plan 2008–2014 Option~~*

*~~The Longford Northern Environs Local Area Plan exists to provide a zoning and traffic assessed infrastructure strategy for the Abbeycartron Lands in the north of the town. As part of this, a number of new roads are identified within the area, with four new access points provided, making it extremely permeable for vehicles.~~*

*~~Longford Northern Environs Local Area Plan 2008–2014 Map (Figure 5.8 of LTP)~~*

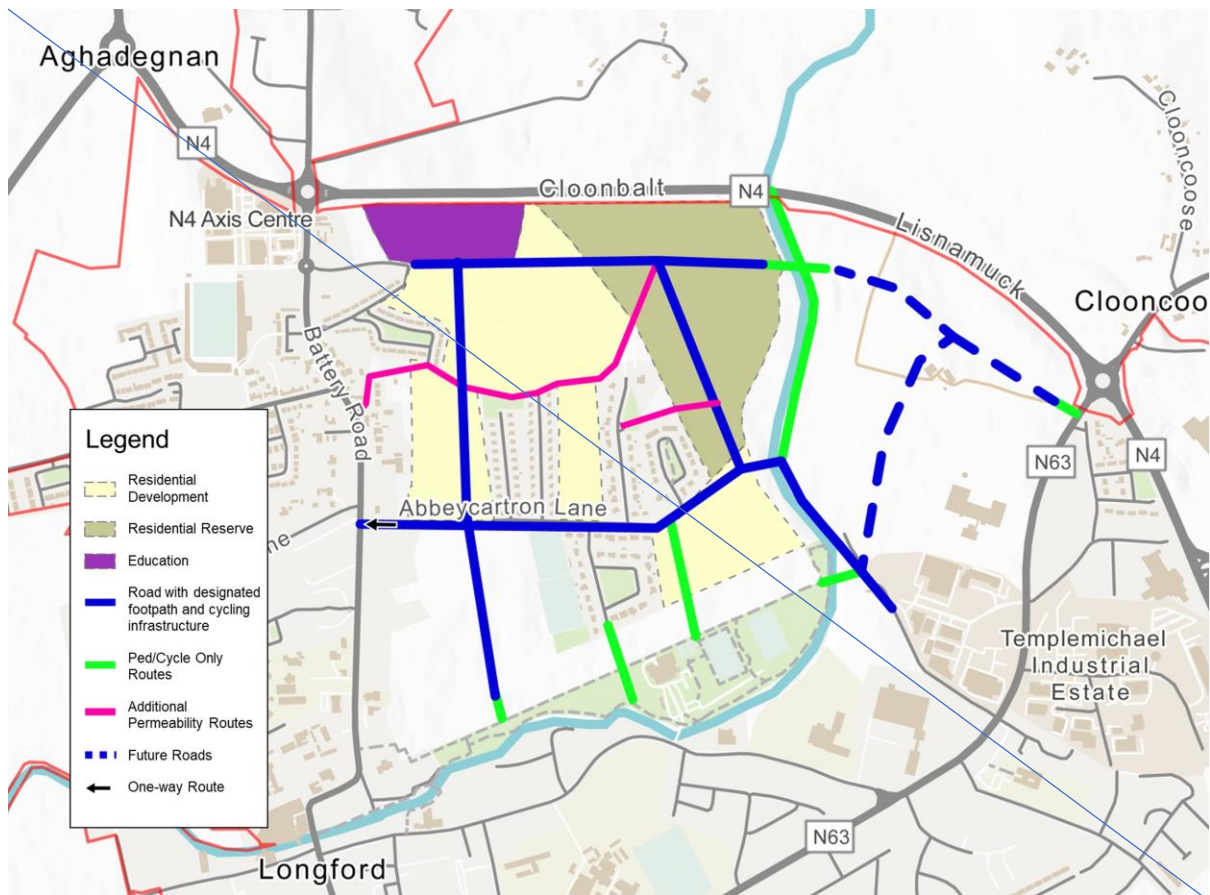


*~~In the 15 years since this plan was published, transport policy and thinking has changed to favour sustainable modes of transport, and to reduce car dependency. Under this direction, a more sustainable schematic (Alternative Sustainable Proposal section) has therefore been developed with this plan as the alternative delivery option.~~*

- On page 215 the following is to be deleted:

*~~Alternative Sustainable Proposal (Figure 5.9 of LTP)~~*

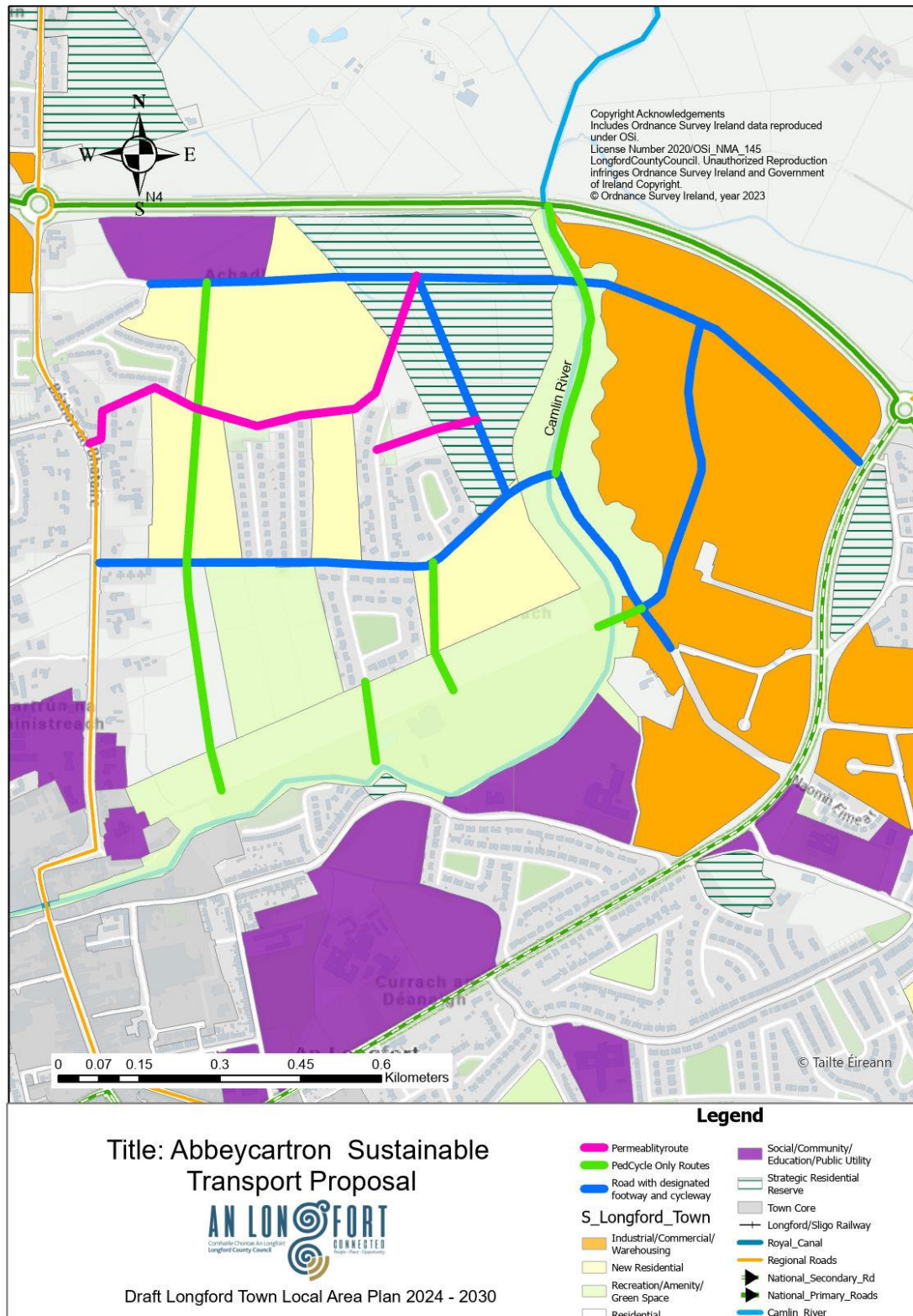






- The following heading and map is to be included in its place:

### *Abbeycartron Sustainable Transport Proposal*



- Section '14.4.9.2 Alternative Sustainable Proposal Option' 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 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.*

'14.6 Sustainable Transport Objectives' include the following additional objectives:

*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.*

- On page 215 the heading above Figure 5.9 of LTP to be renamed as follows:

*Alternative Abbeycartron Sustainable Transport Proposal (Figure 5.9 of LTP)*

- Section '14.6 Sustainable Transport Options' amend ST 26 as follows:

*Require developers in specific areas to provide elements of the road network as indicated in the ~~LTP Abbeycartron Access Strategy~~ Abbeycartron Sustainable Transport Proposal and associated cycle and pedestrian facilities in accordance with the provisions of the DMURS. This will be required and details agreed in association with permission for such development, where this will facilitate the appropriate access to and movement within the development concerned and to strengthen its relationship with the town centre. Where appropriate, infrastructural funding will be addressed through the provisions of contribution schemes prepared under s.48 & 49 of the Act.*

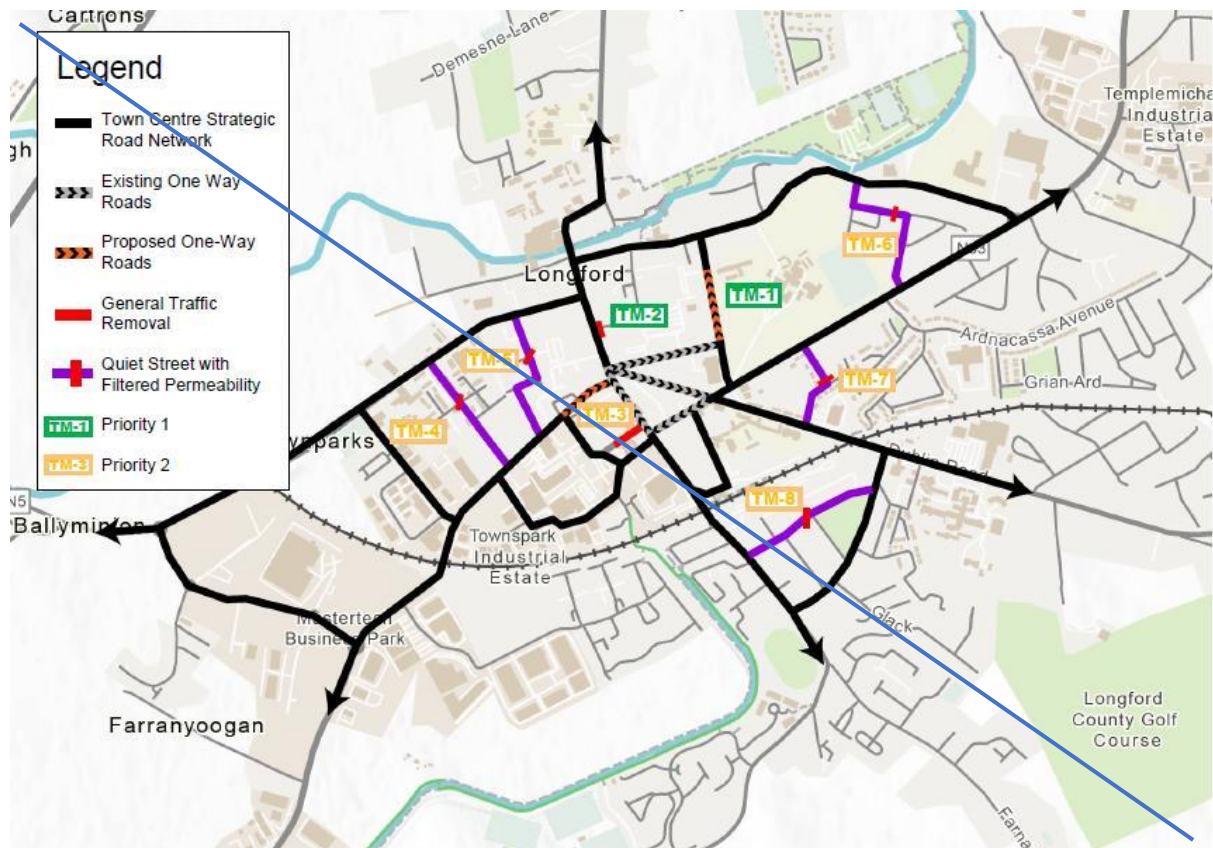
- Section '14.6 Sustainable Transport Options' delete the following objectives:

~~*ST 27 With reference to the LTP Abbeycartron Access Strategy—Longford Northern Environs Local Area Plan 2008-2014 option only, vehicular access to be provided linking Longford town centre and the lands zoned to the north of the Camlin River in the vicinity of Great Water Street, to include a spine road parallel to the Mall Amenity Area. This would be provided by the Local Authority and involve the installation of a new river crossing from the Mall to Great Water Street. This is to be funded through the application of specific levies on development that would benefit from such a link (in accordance with a specific scheme under S. 49 of the Act).*~~

~~*ST 31 With reference to the LTP Abbeycartron Access Strategy—Longford Northern*~~

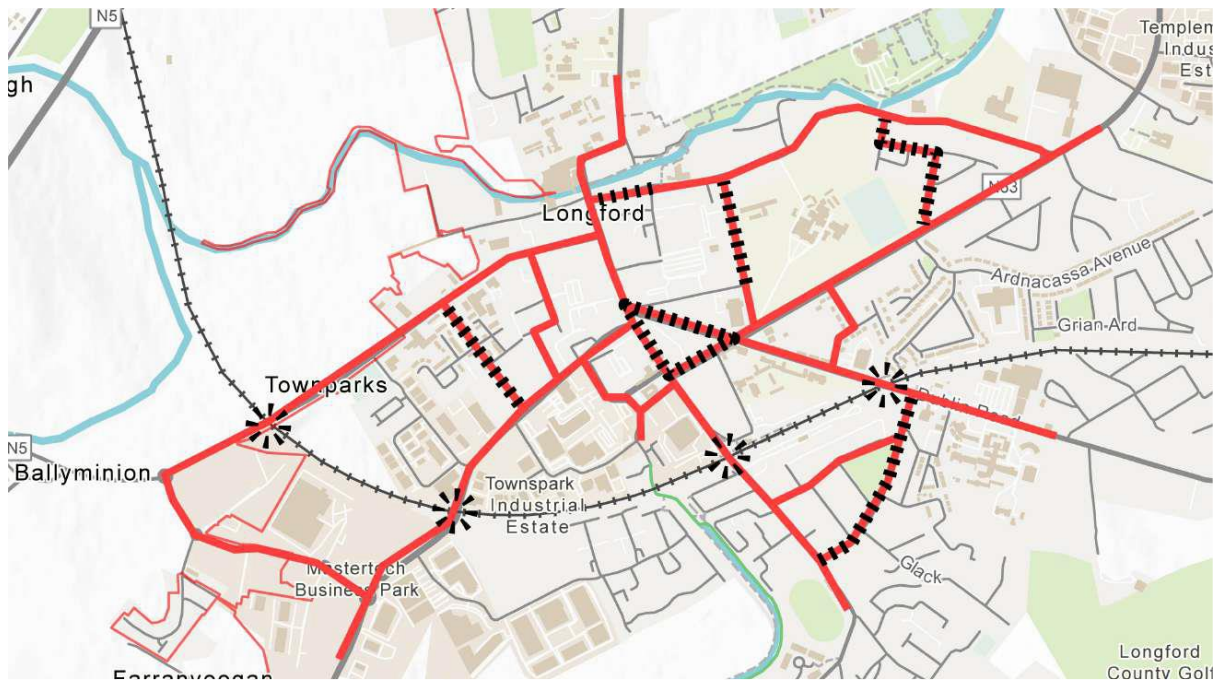
~~Environs Local Area Plan 2008-2014 option only, the southern spine route will be developed as indicated to facilitate the development of lands zoned to the north. All developments permitted that will benefit from the development of this route will be levied in accordance with a special scheme under s. 49 of the PDA to facilitate the construction of this route.~~

- 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 replace with the following map:





- In 'Overlap and potential conflicts between Networks Map the following map to be included:



### 3.2.10 An Post

Submission no.	LLAP2
Name	An Post
Subject	Operational and Supportive Requirements, Deliveries and Access, Longford Transport Plan, Engagement

#### Summary of Issues Raised:

##### Operational and Supportive Requirement

An Post own and operate a regionally important postal facility in Longford Town and may consider expansion and consolidation of their existing site. It is important that necessary infrastructure and unrestricted access is in place to serve the facility.

#### Policy Objectives

An Post supports the following policy objectives in the Draft LAP:

- **ECON 02:** *Support and promote Longford Town as a key hub for employment, enterprise and tourism within the Gateway Region, and in its role as an economic driver complementing the Regional Growth Centre of Athlone.*
- **ECON 06:** *Support the development and expansion of enterprise and employment within Longford Town, and to co-operate with all stakeholders, landowners and relevant agencies to attract investment, while at the same time ensuring there is no resultant negative impact on the vitality and vibrancy of the town centre.*
- **ECON 08:** *Support the economic development and regeneration of the town centre.*
- **ECON 12:** *Support and promote economic and enterprise development and activity in a manner which contributes to the transition to a low carbon, climate resilient and environmentally sustainably town.*

#### Local Transport Plan

An Post is supportive of the below objective to engage with stakeholders during the preparation and implementation of the LTP:

- **CPO 5.9:** *Prepare and implement a Local Transport Plan (LTP) for Longford Town in conjunction with the National Transport Authority (NTA) and other relevant stakeholders. Transport Infrastructure Ireland (TII) and other relevant stakeholders, in accordance with the guidance note Area Based Transport Assessment 2019 (or any subsequent update) produced by the NTA and TII.*

Furthermore, the Local Authority also proposes the following:

- **TM1:** *St Mel's Rd One-Way system*
- **TM3:** *Reorganisation of Market Square/Kilashee St One-way system.*
- **CP1:** *Rationalisation of Main St and Dublin St parking (to facilitate cycle*

*infrastructure).*

It is requested that during both the planning and implementation stages of the improved active travel measures that the Council have regard to HGV movements and all other operational requirements associated with the postal service throughout construction and operational phases of any public realm and active travel works. It is requested that discussions are held with An Post prior to and during any such works, to allow alternative routes (if required) to be investigated.

### **Deliveries & Access**

An Post operate a facility situated on Main Street which serves a significant rural catchment and is a regionally important facility. The times of deliveries/collections and customer access must be protected at all collection points including retail offices, Delivery Service Units and post boxes. Any access restrictions could have a serious impact on the ability of An Post to meet postal needs. It is requested that the Council recognise the operational requirements of An Post, during the finalisation of the Longford Town LAP 2025-2031.

It is requested that the Council engage with An Post should future plans or projects propose to amend delivery operations in the town centre. It is important that sufficient vehicular access is maintained and appropriate loading bays provided to accommodate mail collection and delivery.

### **Engagement with An Post**

An Post is committed to working with the Council to minimise potential disturbances to adjacent properties and provide emission free deliveries in town centres. As part of the preparation of future public realm and movement strategies, An Post would welcome opportunity to engage with the Council to maintain an appropriate level of access whilst improving the appearance and function of town centre areas.

In order to protect the operations of the service, access for deliveries/collections must be maintained without restriction. An Post supports the Local Transport Plan, however it is requested that the Council consider the operational requirements of An Post at all stages of the development process for any active travel and public realm works, such as the provision of one-way systems and that full collaboration and discussions are held with An Post prior to and during such works.

### **Chief Executive Response:**

The commitment of An Post to aim to continue to deliver services within Longford town to meet the needs of its catchment is acknowledged. An Post is one of many valued semi-state organisations, which are a vital component of the economic and social fabric of urban settlements, like Longford. It is considered that the policy objectives and zoning objectives in the Draft LAP are sufficient to cater for any new postal facilities or consolidation of existing operations.



Longford County Council will continue to engage with and support organisations such as An Post, who seek to develop their services any settlement throughout County Longford. However it is not considered necessary to include any specific policies for An Post. Development Management standards are set out in Volume 1 – Chapter 16: Development Management Standards of the County Longford Development Plan 2021-2027 and will be applicable to the Local Area Plan. In the event of the submission of an application for a specific development proposal, site access considerations and parking provision will be assessed on a case-by-case basis during the planning application process.

In regard to reference to public realm proposals advanced by the Council under Part 8 of the Planning and Development Act 2000 (as amended), opportunities to make submissions are available to all stakeholders.

Active Travel have no current or future proposal that restricts public access to postal boxes or vehicular access for their unloading - nor is it the intention. All future proposals of scale subject to statutory consent and public consultation as required, with maintained HGV accessibility assessed during detailed design.

**Chief Executive Recommendation:**

No changes recommended.

### 3.2.11 ESB

Submission no.	LLAP11
Name	ESB
Subject	Property in Longford, Energy Infrastructure, Electric Vehicles

#### Summary of Issues Raised:

##### ESB Property in Longford

ESB owns and operates an Engineering Depot within the boundaries of the LAP. This forms a critical element of ESB operations locally and regionally. ESB Networks provides an essential service building and maintaining the electricity networks in Longford Town and throughout Co. Longford from its Engineering Centre, located off Connaught Road. Good access to the main road network and areas of potential growth is essential to provide an economic service and to meet emergency response times for Longford and its environs. ESB supports the current Land Use Zoning, **Town Core**, on the Engineering Centre at Connaught Road, as set out in the Draft Plan, which protects the integrity of existing operations whilst also allowing future expansion of the existing site to meet future demand.

##### Energy Infrastructure

ESB welcome the recognition in Section 13.2.1 of the Draft Plan of the importance of electricity infrastructure and suggest including distribution infrastructure.

*'...Enhanced development of secure and reliable electricity transmission **and distribution** infrastructure is recognised as being a key factor for supporting economic development and attracting investment to any area...'*

ESB supports the inclusion of Energy Objectives EC 01, EC 02 & **EC 03** as set out in Section 13.2.5 *Energy, Communications and Waste Objectives*. It states that it is an objective of the Council to.

**EC03** *"Seek the undergrounding of all electricity, telephone and television cables within the town, whenever possible, while taking into consideration landscape, residential amenity, and environmental considerations."*

ESB Networks would welcome the opportunity to work with the Council to facilitate the aim of Objective EC03 by undergrounding of electricity cables, when opportunities arise. Early engagement at design stage of key public infrastructure projects offers opportunities to provide ducting/underground cabling in the most economically efficient way and limit disruption to local services.

##### Electric Vehicles

The provision of EV charging points should be in accordance with the Electric Vehicle Charging Infrastructure Strategy 2022-2025.

ESB have noted that the EU Energy Performance of Buildings Directive calls for an increase to 20% for the number of parking spaces which should have provision for

electric vehicle charging infrastructure and requests that the Longford LAP increases the usage of electric vehicles to the levels required and that the EU Energy Performance of Buildings Directive standard is considered in the Final Plan.

#### **Chief Executive Response:**

The commitment of ESB to aim to continue to deliver services within Longford town to meet the needs of its catchment is acknowledged. ESB is one of many valued semi-state organisations, which are a vital component of the economic and social fabric of urban settlements, like Longford. Notwithstanding this, in consideration of all commercial and community facilities, it is not considered appropriate to make the specific requested changes to the LAP to facilitate one particular service provider.

It is considered that the policy objectives and zoning objectives in the Draft LAP are sufficient to cater for any new ESB facilities or consolidation of existing operations. It is not considered necessary to include any specific policies for ESB in this regard. Longford County Council will continue to engage with and support organisations such as ESB, who seek to develop their services any settlement throughout County Longford.

Development Management standards are set out in Volume 1 – Chapter 1xx: Development Management Standards of the current County Longford Development Plan and remain applicable to the Local Area Plan.

In the event of the submission of an application for a specific development proposal, site access considerations and parking provision will be assessed on a case-by-case basis during the planning application process and all applicants equally, will be required to address this.

In terms of Section '13.2.1 Electricity' of the Draft Plan, it is considered that in terms of energy infrastructure that electricity distribution should be included, and that the relevant text change should be made.

Policy Objective **ST 18, ST 19 and ST 20** aim to facilitate the roll-out of additional electric vehicles charging points across Longford at appropriate locations. ST19 is to *'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'*. It is considered that this allows for consideration of the ESB specific Charging Infrastructure Strategy.

In terms of the reference to the EU Energy Performance of Buildings Directive, upon examination of the Plan it is noted that ST18 relates to the provision of electrical charging infrastructure and car parking provision in accordance with the Development Management Standards of the County Development Plan. It is considered that this policy could be augmented to include any relevant updates.

**Chief Executive Recommendation:**

- Section 13.2.1 of the Draft Plan should include the following additional text:

**13.2.1 Electricity**

*At present there is more than adequate electricity infrastructure supplying Longford town. There is capacity available in Longford town for industries and other demand uses wishing to locate in the town. Enhanced development of secure and reliable electricity transmission **and distribution** infrastructure is recognised as being a key factor for supporting economic development and attracting investment to any area. Furthermore, this Plan seeks to continue to encourage and facilitate the undergrounding of overhead electricity cables in built-up areas, particularly in the town centre, during the lifetime of this Plan.*

- Amend ST 18 with additional text as follows:

*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, **relevant Directives, Guidelines and Strategies**.*

### 3.2.12 Uisce Éireann

Submission no.	LLAP17
Name	Uisce Éireann
Subject	<p>Water Services Infrastructure:</p> <p>Water Supply and Network, Wastewater Treatment Capacity, Wastewater Collection</p> <p>Sustainable Drainage: Green-Blue Infrastructure and SuDs; Planned and Planned Road and Public Realm Projects</p> <p>General Comments</p>

#### Summary of Issues Raised

Chapter 13 objectives that support UÉ are welcomed and will ensure sustainable management of water and wastewater in line with national and regional objectives.

#### Water Services Infrastructure:

##### Water Supply and Network

The County Water Supply capacity register will be revised before the Draft LAP is adopted and UÉ will issue Longford Planning Department a copy. Longford Town is supplied by Lough Forbes Water Treatment Plant (WTP) that has limited headroom. There is an ongoing project which will increase supply at the WTP and provide additional supply for the immediate term. UÉ are looking to progress a more significant upgrade to the WTP in the coming years, that will facilitate long term growth.

##### Wastewater Treatment Capacity

UÉ will issue the Planning Department the updated Wastewater Capacity Register when complete. There is sufficient headroom at the Longford Town Wastewater Treatment Plant to serve the population in the County Development Plan and beyond.

##### Wastewater Collection

There are many areas within the sewer network that experience significant capacity challenges; in particular, capacity exceedance will occur more frequently where rainwater from roof or paved surfaces is connected to the wastewater system, most notably in areas served by a single combined sewer network. UÉ strongly encourages the removal (or significant reduction, if full removal is not feasible), of

surface water inflows to the wastewater system (including the removal of other misconnections). To support this, UÉ encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green Infrastructure in existing and new development areas.

There are issues on the wastewater network which are being monitored with operational improvements targeted to achieve improved performance:

- Infiltration into the core network.
- Storm water overflow spills, most notably from Little Water Street Wastewater Pumping Station which is the terminal WWPS for the network.
- Some sections of the network are operating at, or close to capacity which will restrict future development as all flow is routed through the core town network.
- The receiving waterbody (Camlin River) is identified as being at risk of not meeting its environmental objectives under the Water Framework Directive

UÉ have commenced work on a Drainage Area Plan (DAP) for the town. As well as investigating the above issues, the DAP will investigate the root cause of wastewater flooding incidents at a number of locations. The DAP will model the existing sewer network, future scenarios and develop solutions to resolve constraints. This will take a number of years to complete. As there is no upgrade project for Longford Town on UÉ's current Capital Investment Plan, the necessary wastewater infrastructure upgrades required to resolve certain constraints may not be completed within the lifespan of this Local Area Plan. In the interim, developer led solutions will be required. UÉ can work with developers to determine the best solution for individual sites. Should further wastewater network constraints materialise without a dedicated project on UÉ's Capital Investment Plan to resolve them, private developers may carry out the work required to remove the constraint.

An Integrated Urban Wastewater Management Plan will commence for Longford Town as per the requirements of the recast Urban Wastewater Treatment Directive (UWWTD). This includes obligations for the reduction of pollutant load from both wastewater and storm water systems (Storm Water Overflows and Urban Runoff respectively). UÉ will work collaboratively with the Local Authority on the preparation of the plan.

## **Sustainable Drainage:**

### **Green-Blue Infrastructure and SuDs**

UÉ encourages Planning Authority objectives and initiatives supporting the implementation of Sustainable Drainage Systems (SuDS) and the enhancement of green and blue infrastructure, which is provided for in the National Planning Framework. To support sustainable use of the available hydraulic capacity in Combined Sewers, UÉ welcomes the proposal to promote SuDS and in particular promotion of Nature based SuDS (NbSuDS). UÉ recommend the introduction of further objectives in the LAP to promote the introduction of NbSuDS in areas



contributing to combined drainage systems (if applicable) where streetscape enhancement programmes or resurfacing programmes are planned. UÉ is happy to engage with the planning authority in progressing nature-based rainwater management initiatives in line with the Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance document.

### Planned Road and Public Realm Projects:

Planned public realm, active travel and road projects have the potential to impact on UÉ assets and projects. Development in the vicinity of UÉ assets must be in accordance with UÉ Standard Details and Codes of Practice. Diversion Agreements will be required where a UÉ asset needs to be diverted/altered. Where planned development may impact on UÉ assets, early engagement is requested to ensure public water services are protected and access is maintained, and to enable UÉ to plan works and minimise disruption to the public.

### General Comments:

Section Ref	Comment
Section 9 Regeneration & Placemaking	Strategic Site 6 - This area is not currently serviced with a sewer network and there is no current UÉ project to support this. Network extensions will therefore be developer driven.
13.3 Water Supply and Wastewater Services	Suggest that the 2 <sup>nd</sup> sentence is reworded to avoid confusion. <i>"UÉ will invest in infrastructure that facilitates well-planned social and economic growth that is based on principles of environmental sustainability. Public health and environmental compliance are prioritised. Capital investment is subject to the budgetary constraints of UÉ's Capital Investment Plan and therefore prioritised appropriately."</i>
13.3.1 Water Supply	2 <sup>nd</sup> Para, 2 <sup>nd</sup> last sentence, repetition of the following sentence <i>"The provision of piped water services, drinking water and wastewater, are now in the domain of Uisce Éireann with the support of the Local Authority under a service level agreement"</i>  3 <sup>rd</sup> Para – should be moved to 13.3.2 Wastewater Services.  UÉ would welcome the inclusion of an objective on efficient design in new developments and retrofitting programmes. (Water efficient developments with a reduced net water usage / aim to achieve water neutrality e.g. through rainwater harvesting systems).  Reason: It can provide multiple benefits including taking pressure off water resources and infrastructure, reducing carbon emissions and improving climate resilience.

13.3.2 Wastewater Services	1 <sup>st</sup> Para, 1 <sup>st</sup> Sentence, suggest is reworded to avoid confusion. <i>"Where applicable, UÉ will design new infrastructure with foresight, ensuring that it not only meets the current needs but also provides enough headroom to support future growth."</i>
	1 <sup>st</sup> Para, 2 <sup>nd</sup> & 3 <sup>rd</sup> Sentences - suggest these lines are deleted and remainder of paragraph re-worded as there is sufficient capacity at the WWTP to support domestic growth over the period of the LAP in line with the population targets in the CDP. New commercial/industrial developments wishing to connect to an UÉ network are to be assessed through Connections and Developer Service process which will determine the exact requirements in relation to network and treatment capacity. Connections to UÉ networks are subject to our Connections Charging Policy. Further information on this process is available at: <a href="https://www.water.ie/connections/developer-services/">https://www.water.ie/connections/developer-services/</a>
13.3.3 Objectives	WS 03 - Delete the last sentence as does not make sense. <i>"Wastewater will be disregarded completely"</i>
	WS 04 - Delete 2 <sup>nd</sup> sentence - <i>"In this regard, the sewerage treatment plant in the town should be sized, as part of Uisce Éireann investment, to cater for potential large-scale industrial development in particular and in addition to anticipated population projections."</i> Reason: This is not current UÉ policy.
	WS 09 - Suggest this objective not required and source protection, as described in WS 10 & 11 suffices. <i>"Ensure that public water supply shall comply with EU standards and shall be upgraded where necessary to comply with same and to ensure that the public drinking water supply of the Town complies with relevant EU drinking water standards and to extend supply, where necessary and where resources permit, to meet demand."</i> Reason: It is an UÉ responsibility
	WS 13 Delete "move to surface water drainage." This objective should remain in this section as refers to foul sewers and not surface water sewers.
	WS 14 Demand Management We welcome the inclusion of this objective and could include aim for new developments to strive towards water neutrality.

	<p>WS 16 – Wording could be more specific.</p> <p><i>"Require that all developments relating to water supply and wastewater treatment are subject to screening for Appropriate Assessment..."</i>. Does this relate to private developments providing their own water supply and wastewater treatment or UÉ projects? UÉ complies with AA requirements as set out in the EU Habitats Directive.</p> <p>UÉ would welcome the inclusion of an objective to promote the introduction of Nature Based SuDS in areas contributing to combined sewers. In particular, where streetscape enhancement programmes or resurfacing programmes are planned.</p>
<p>13.4. Surface Water Objectives</p> <p>13.4.1</p>	<p>SW 02 - Surface Water management is not within the remit of UÉ. Where it is a case of separating combined systems into separate foul and SW systems, UÉ will work collaboratively with the LA to address these issues. Recommend wording is changed as follows:</p> <p><i>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.</i></p>

### Chief Executive Response:

A section will be added to Section 1.3 "Planning Policy" of the next iteration of the SFRA for the Drainage Area Plan (DAP).

In relation to Section 9 Regeneration & Placemaking Strategic Site 6 and Uisce Éireann 's comments that this area is not currently serviced with a sewer network and that there is no current UÉ project to support this and that as such network extensions will therefore be developer driven, it is considered that reference should be included in Section '9.5.2 Master Planning – Strategic Sites', and in the new Strategic Sites Regeneration Table to be included. See OPR Submission LLAP31.

An objective should be included on efficient design in new developments and retrofitting programmes. (Water efficient developments with a reduced net water usage/aim to achieve water neutrality e.g. through rainwater harvesting systems) as it is accepted that it can provide multiple benefits including taking pressure off water resources and infrastructure, reducing carbon emissions and improving climate resilience.

In relation to 13.3.3 Objectives Table a number of changes are recommended in order to give clarity, avoid repetition be more specific. Some objectives are also removed/ amended as it has been indicated in the UE submission that it is not their current UE policy/responsibility. In relation to the comments and objective amendments, it is considered that the majority of these are positive additions and should be included, except for the following instances.

In relation to WS 16 appropriate assessment is required for all developments relating to water supply and wastewater treatment in accordance with the requirements of Article

6 of the Habitats Directives, and as such the objective is considered satisfactory as written and should not be changed.

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## Chief Executive Recommendation

- Section '9.5.2 Master Planning – Strategic Sites', a new Strategic Sites Regeneration Table to be included. See OPR Submission LLAP31.
- Amend section '13.3 Water Supply and Wastewater Services' as follows:

### **13.3 Water Supply and Wastewater Services**

*The provision of adequate water supply and sewage facilities is an integral part of the proper planning and sustainable development of any area. Uisce Éireann provides water supply and wastewater services to Longford. In the interest of Public Health and Environmental Sustainability, ~~Uisce Éireann Infrastructure capacity requirements and proposed connections to the Water and Wastewater Infrastructure will be subject to the constraints of the Uisce Éireann Capital Investment Programme.~~ Uisce Éireann will invest in infrastructure that facilitates well-planned social and economic growth that is based on principles of environmental sustainability. Public health and environmental compliance are prioritised. Capital investment is subject to the budgetary constraints of UÉ's Capital Investment Plan and therefore prioritised appropriately.'*

- Amend section '13.3.1 Water Supply' 2<sup>nd</sup> paragraph as follows:

#### **13.3.1 Water Supply**

*'...The provision of piped water services, drinking water and wastewater, are now in the domain of Uisce Éireann with the support of the Local Authority under a service level agreement. Longford County Council will collaborate with and support, as relevant and appropriate, Uisce Éireann in its role as authorities for water services towards compliance with the provisions of the relevant regulations. Development will only be permitted in instances where there is sufficient capacity in the public water and wastewater infrastructure. ~~The provision of piped water services, drinking water and wastewater, are now in the domain of Uisce Éireann with the support of the Local Authority under a service level agreement.~~ The Council, in conjunction with Uisce Éireann, shall undertake recommendations made by the EPA arising from any failure to meet drinking water standards and any enlistment on the EPA's Remedial Action List.'*

- Move the 3<sup>rd</sup> paragraph under '13.3.1 Water Supply' to section '13.3.2 Wastewater Services':

*~~The units located on the Lanesborough Road area, which is the subject of the strategic site designation (See Regeneration Chapter – Strategic Site no. 6), are not currently served by means of sewerage. Foul waste from these units is treated by septic tanks and / or treatment systems each serving a group of units and percolating~~*

~~to ground. Uisce Éireann have indicated that connections to Uisce Éireann Infrastructure will be developer led.~~

*The units located on the Lanesborough Road area, which is the subject of the strategic site designation (See Regeneration Chapter – Strategic Site no. 6), are not currently served by means of sewerage. Foul waste from these units is treated by septic tanks and / or treatment systems each serving a group of units and percolating to ground. Uisce Éireann have indicated that connections to Uisce Éireann Infrastructure will be developer led.*

- Section 13.3.3 'Water Supply and Wastewater Services Objectives' include the following additional objective:

*Seek an efficient design in new developments and retrofitting programmes through the development of water efficient developments with a reduced net water usage /water neutrality aim through rainwater harvesting and other systems.*

- 
- Amend '13.3.2 Wastewater Services' as follows:

### **13.3.2 Wastewater Services**

~~In general, Uisce Éireann will have regard for the capacity of the water and sewerage network for the existing and future population in considering any development proposals in Longford Town. Where applicable, UÉ will design new infrastructure with foresight, ensuring that it not only meets the current needs but also provides enough headroom to support future growth. In order to accommodate proposed connections to the municipal WWTP it may require an upgrade to be completed. This upgrade is not on the current Capital Investment Plan (CIP) and is currently proposed for the 2026 to 2030 CIP where works will not commence prior to 2030 (subject to change). For development to proceed in advance of these works being completed, potentially the most expeditious method of facilitating that would be to install an onsite treatment plant to treat the wastewater to agreed parameters. The discharge of the treated effluent to sewer needs to be licensed and they will be required to seek planning permission and all and any other necessary approvals, to provide, to operate and maintain a private on-site wastewater treatment plant at the applicants own risk and the treatment works will not be taken in charge by Uisce Éireann. The operation of such treatment works shall continue until such time as the Longford WWTP Plant upgrade is completed. The design of the private on-site wastewater treatment plant should also include for the decommissioning and bypassing of the plant once the upgrade is completed.~~ *There is sufficient capacity at the Longford WWTP to support domestic growth over the period of the Local Area Plan in line with the population targets in the County Development Plan. New commercial/industrial developments wishing to connect to an UÉ network are to be assessed through Connections and Developer Service process which will determine the exact requirements in relation to network and treatment capacity. Connections to UÉ networks are subject to their Connections Charging Policy.*

- Amend '13.3.3 Water Supply and Wastewater Services Objectives' as follows:
  - **WS 03** Seek to ensure the provision of appropriate and adequate drinking water as part of Uisce Éireann investment and management programmes. ~~Wastewater will be disregarded completely.~~
  - **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. ~~In this regard, the sewerage treatment plant in the town should be sized, as part of Uisce Éireann investment, to cater for potential large scale industrial development in particular and in addition to anticipated population projections.~~
  - ~~WS 09 Ensure that public water supply shall comply with EU standards and shall be upgraded where necessary to comply with same and to ensure that the public drinking water supply of the Town complies with relevant EU drinking water standards and to extend supply, where necessary and where resources permit, to meet demand.~~
  - **WS 13** 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. ~~—move to surface water drainage~~
  - **WS 14** 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 **and measures to promote water neutrality.**
- Include the following additional objective:

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

- Amend '13.4. 1 Surface Water Objective' 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.*



### 3.2.13 Land Development Agency (LDA)

Submission no.	LLAP9
Name	Land Development Agency (LDA)
Subject	Role and Purpose of LDA, Register of Relevant Lands and Report on Relevant Public Lands, Residential Sustainability, Regeneration, Sustainable Movement and Climate Change

#### Summary of Issues Raised:

##### Role and Purpose of the Land Development Agency (LDA)

The LDA welcome the recognition of their role in co-ordinating and developing strategic landbanks and the intent of the Council to work in collaboration. The wording on page 241 could be updated to reflect the current status of the LDA as follows:

*The National Land Development Agency, established following the enactment of the Land Development Agency Act 2021, under the NPF has two main functions:*

- To coordinate appropriate State lands for regeneration and development, opening key sites which are not being used effectively for housing delivery; and*
- To drive strategic land assembly, working with both public and private sector landowners to smooth out peaks and troughs of land supply, stabilise land values and deliver increased affordability.*

~~*the objective of maintaining and enhancing the capacity for co-ordinating and developing large, strategically located land banks, in order to promote the delivery of housing and other development in order to provide more affordable homes. The Agency is to have Compulsory Purchase Order (CPO) powers and drive renewal of strategic areas not being utilised to their full potential (NPF National Policy Objectives 129 and 6610). The Agency will access the Urban Regeneration and Development Fund in order to achieve these goals.*~~ In this regard Longford County Council will work collaboratively with the National Land Development Agency (LDA) in their role to support the consolidation and development of strategically located land banks, particularly publicly owned lands, to unlock housing and regeneration opportunities.

#### Register of Relevant Lands and Report on Relevant Public Land

Longford Town is classified as a census town and is therefore being reviewed as part of the LDA's ongoing work assessing relevant public lands for development potential. In 2023 Longford Town was identified as a census town and will be assessed for the potential delivery of housing on relevant public lands as part of the second round, a report on which will be published early in 2025.

The Register of Relevant Lands Map is publicly available online, and the LDA is

encouraged to see identified lands within Longford acknowledged within the Draft LAP through the inclusion of the map '*Land Development Agency (LDA) Identified Sites in Longford Town*'.

### **Residential Sustainability, Regeneration, Sustainable Movement and Climate Change**

In keeping with higher level plans and guidelines the LDA is committed to the concept of compact growth and brownfield development. The LDA welcome objectives within the Draft Plan which seek to consolidate the town centre by utilising and connecting brownfield, underutilised strategic sites. The LDA can play a role in achieving the Objectives set out in Chapter 6 and welcomes the wording under Section 6.6 'Social and Affordable Housing' of the Draft Plan which acknowledges the LDA's remit and highlights all lands identified on the Register of Relevant Public Land. The LDA supports the inclusion of objective AL 05 to solidify Longford County Council's commitment to supporting the LDA in the co-ordination of development on strategic landbanks. It is suggested that the following amendments to proposed objectives in Section 6.8 could be made to further recognise and strengthen the LDA's ability to support the Local Authority in delivering affordable, sustainable residential development:

- RES 03: Promote and support innovative housing models including live-work units, ~~and~~ specific needs housing ~~and~~ **cost-rental units**.
- RES 04: Require that an appropriate mix of housing type, tenure, density and size is provided in all new residential areas and in appropriate brownfield/infill areas to meet the needs of the population of Longford, including the provision of special needs housing which includes housing for older people, people with disabilities, social housing, affordable housing, **cost-rental accommodation** and accommodation for the travelling community.

The LDA support the wording of proposed objective RES 15 which will serve as a reminder about the correct method for disposing of relevant public land.

Having regard to the necessity of a modal shift away from private car reliance, the LDA welcomes and supports the proposed Objectives of the Draft LAP to integrate land use and transport planning under Climate Change Objectives. Furthermore, consideration of accessibility and sustainability under regeneration will also promote improved redevelopment of strategic lands throughout the town.

The Draft LAP will need to be updated to reflect the revised NPF where necessary.

### **Chief Executive Response:**

Appropriate amendments should be made to the text and objectives of the LAP to further strengthen the policy framework for the sustainable development of Longford Town and the delivery of affordable housing opportunities at appropriate sites. The text changes recommended to reflect the changing role of the LDA and the NPF revisions are considered appropriate. Longford County Council looks forward to working with the LDA and other stakeholders to promote and progress the development of state land to provide sustainable residential communities.

### Chief Executive Recommendation:

- '16.0 Implementation and Monitoring' amend the text under 'Collaboration with National Land Development Agency' as follows:

*The National Land Development Agency, established following the enactment of the Land Development Agency Act 2021, under the NPF has two main functions:*

- *To coordinate appropriate State lands for regeneration and development, opening key sites which are not being used effectively for housing delivery; and*
- *To drive strategic land assembly, working with both public and private sector landowners to smooth out peaks and troughs of land supply, stabilise land values and deliver increased affordability.*

~~*the objective of maintaining and enhancing the capacity for co-ordinating and developing large, strategically located land banks, in order to promote the delivery of housing and other development in order to provide more affordable homes. The Agency is to have Compulsory Purchase Order (CPO) powers and drive renewal of strategic areas not being utilised to their full potential (NPF National Policy Objectives 129 and 6610). The Agency will access the Urban Regeneration and Development Fund in order to achieve these goals.*~~ In this regard Longford County Council will work collaboratively with the National Land Development Agency (LDA) in their role to support the consolidation and development of strategically located land banks, particularly publicly owned lands, to unlock housing and regeneration opportunities.

- Section 6.8 amend the text as follows:
  - *RES 03: Promote and support innovative housing models including live-work units, and specific needs housing and cost-rental units.*
  - *RES 04: Require that an appropriate mix of housing type, tenure, density and size is provided in all new residential areas and in appropriate brownfield/infill areas to meet the needs of the population of Longford, including the provision of special needs housing which includes housing for older people, people with disabilities, social housing, affordable housing, cost- rental accommodation and accommodation for the travelling community.*

### 3.2.14 Aldi

LLAP25			
Submission no.			
Name	Aldi		
Subject	Convenience	Retailing	Provision, District Zoning Request

#### Summary of Issues Raised:

Aldi submits that sufficient provision is made within the LAP for convenience retail commensurate with population growth. The population growth c. 9.4% in the intercensal period to 2022 contributed an additional 944 additional people to the area. The Longford CDP sets a target population of 12,510 by 2027; this population threshold may be exceeded having regard to the anticipated additional population growth assigned to the Eastern & Midlands Region to be set out in the forthcoming revised NPF. Therefore, projections will be required to be recalibrated having regard to population growth figures and those set out in the NPF.

Aldi trade from a single store and have experienced high levels of demand, reflective of population increase and need for additional retail floor space. This has been constrained by the c. 246 sqm of additional retail floorspace observed by the Retail Strategy in the period 2013 to 2021, which is inadequate to serve the increased population growth in the county and Longford Town in the Plan period.

Owing to lack of availability of appropriately sized Town Centre zoned lands capable of accommodating an Aldi store, larger, appropriately located sites, such as in the eastern part of the town, should make provision for suitably scaled convenience retail, particularly adjacent to existing and new residential communities and outside the town centre. This should include District Centre zonings which can implement additional convenience retail and meet identified needs of an increasing population. **Aldi requests the introduction of a District Centre zoning within the eastern environs of the LAP area to facilitate additional convenience retail commensurate with growing residential population in the settlement and surrounding areas.**

Aldi also seek the following additional text to Policy RET 05:

*'RET 05 Support retail development which is of an appropriate size, scale and type to a town centre location in Longford Town's core shopping area, and at other appropriate locations within the LAP boundary to meet the needs of the existing and future resident population and that of the surrounding areas.'*

#### Chief Executive Response:

In terms of provision of sufficient convenience retail commensurate with population growth in the settlement over the Plan period population growth must be examined. The Draft Local Area Plan zonings are based on the County Development Plan which took account of such future growth, to include services and facilities and retail growth. Increase in population requires a commensurate growth in the provision

of convenience retail to meet demand. However as the population growth is below that anticipated and zoned for in higher level plans, it is not considered that there is a need to zone further lands for retail use. It is considered that there is sufficient reserve to accommodate projected population growth. Should the Plan require revision as a result of amended population growth targets when the NPF or RSES is revised, a comparable revision of other zonings including retail use will then take place.

Furthermore, upon examination of the Land Use Zoning Matrix contained within Appendix 1 of the Draft Local Area Plan, it is noted that Retail (Convenience) is 'permitted in Principle in the 'Town Core', and 'Open for Consideration' in a number of other zoning categories; 'Residential', 'New Residential', 'Social/Community/Education/Public Utility'; and 'Industrial/Commercial/Warehousing'. As such there is a wide deal of scope for a number of option locations for additional convenience retailing in the town. As such it is not considered necessary to introduce a district centre zoning, as it is considered that the current zoning and associated zoning matrix has the potential to facilitate additional convenience retail in the settlement. Also, in the Draft LAP section '7.6.3.4.2 District Shopping Centres' is noted which states:

*'... District shopping centres will be considered in the context of their location. Applicants will be required to illustrate the compatibility of their proposal within the County Development Plan and provide a comprehensive report outlining and addressing these issues, including a demonstration of a deficiency in the provision of particular floorspace types and an indication of the demand for proposed additional floorspace. In accordance with the provisions of the Core Strategy, District Centres shall be restricted to Longford Town including, but not restricted to, the Northern Environs area.'*

It is considered that the above provides adequate guidance and will be subject to consideration and assessment through the Development Management process.

In terms of Policy RET05 this aims to *'support retail development which is of an appropriate size, scale and type to a town centre location in Longford Town's core shopping area'*. The inclusion of this policy is in order to protect the vitality and viability of the town centre and complies with higher level guidance and the Retail Strategy Guidelines. It is considered that the inclusion of the additional text sought by Aldi would remove this emphasis and could be contrary to the sentiment of the Retail Planning Guidelines. There are other suitable locations for retail convenience use and the plan identifies them with appropriate policies. As existing residential areas in Longford Town expand and new residential areas are developed, it is imperative that established retail facilities are protected, and that the sustainable growth of these centres is accommodated in line with the Retail Planning Guidelines (2012).

#### **Chief Executive Recommendation:**

No Change.

### 3.2.15 Tesco

Submission no.	LLAP28
Name	Tesco
Subject	Longford Shopping Centre, Local Transport Plan, Delivery and Access

#### Summary of Issues Raised:

Tesco operates a well-established retail store within Longford Shopping Centre. To ensure these facilities continue to provide for the needs of local customers, it is imperative the LAP acknowledges the importance of convenience retailing as part of general retail policy. Additionally, it is important that transport policies are supportive of the continued operation of these stores.

The Draft LAP projects a population of 12,510 persons in Longford Town for 2027, an increase of 2,502 persons from 2016. As existing residential areas in Longford Town expand and new residential areas are developed, it is imperative that established retail facilities are protected, and that the sustainable growth of these centres is accommodated in line with the Retail Planning Guidelines (2012).

The LAP identified the Longford Shopping Centre as a 'Strategic Site' and states that a Masterplan will where appropriate be prepared as per the following objective: MP 05: *Masterplans shall be prepared for the identified 'Strategic Sites' in consultation with the community and also with relevant statutory bodies during the lifetime of this Plan. Additional areas suffering from social and economic deprivation will also be prioritised.* Tesco is supportive of this and request that discussions are held with them as anchor tenant, during the preparation of the Masterplan Plan.

The Local Transport Plan highlights a proposed measures including TM1: *St Mel's Rd One-Way system*; TM2: *Longford Shopping Centre Main St Entrance Vehicular Restriction*. The LTP includes a car parking strategy for the Longford Shopping Centre which is set out under objective CP10: *New one-way system at Longford Shopping Centre car park*. Clarification on the above proposals is sought. As per TM1 and TM2 Great Water Street and Camlin View are not indicated as being proposed one-way systems, however, as per CP10 a new one-way system is proposed into the car park via Camlin View. Should Camlin View become one-way this would cause significant difficulties in servicing the existing store, as the store is currently serviced via Great Water Street and Camlin View. The same is also used to exit the service yard. If it were proposed to make Camlin View one-way this would result in delivery vehicles exiting through the customer car park, an area not originally designed for deliveries, this would raise health and safety concerns for pedestrians. It is requested that the Council consider the operational requirements of Tesco at all stages of any proposed schemes, and that discussions are held prior to works. It is requested that advance notice of any planned closures/diversions are



communicated to Tesco to minimise disruption to operations and customers.

**Chief Executive Response:**

In terms of provision of sufficient convenience retail commensurate with population growth in the settlement over the Plan period population growth must be examined. The Draft Local Area Plan zonings are based on the County Development Plan which took account of such future growth, to include services and facilities and retail growth. Increase in population requires a commensurate growth in the provision of convenience retail to meet demand. However, as the population growth is below that anticipated and zoned for in higher level plans it is not considered that there is a need to zone further lands for retail use. It is considered that there is sufficient reserve to accommodate projected population growth. Should the Plan require revision as a result of amended population growth targets when the NPF or RSES is revised, a comparable revision of other zonings including retail use will then take place.

Furthermore, upon examination of the Land Use Zoning Matrix contained within Appendix 1 of the Draft Local Area Plan, it is noted that Retail (Convenience) is 'Permitted in Principle' in the 'Town Core', and 'Open for Consideration' in a number of other zoning categories; '*Residential*', '*New Residential*', '*Social/Community/Education/Public Utility*', and '*Industrial / Commercial / Warehousing*'. As such there is a wide deal of scope for a number of option locations for additional convenience retailing in the town.

As existing residential areas in Longford Town expand and new residential areas are developed, it is imperative that established retail facilities are protected, and that the sustainable growth of these centres is accommodated in line with the Retail Planning Guidelines (2012).

All Masterplans will be prepared in collaboration with relevant stakeholders and landholders and the public and will be subject to public consultation. Part 8 developments which relate to development carried out by the local authority will also be subject to public consultation as part of the statutory process. Future transportation strategies / active travel / public realm projects will be subject to public consultation. As such this will give retail operators adequate notice of potential works and the opportunity to engage with the Council in terms of operational and other requirements.

In terms of the item raised in relation to the Local Transport Plan this was referred to the Active Travel section which indicated that Figure 6.10 of the Local Transport Plan (as integrated within the current draft Local Area Plan) indicates the diagrammatic conversion of 'Camlin View' to a 'one-way system', however this delivery would be subject to prior traffic assessment should the proposal advance beyond its aspiration, and with greatest ambition of maintaining, or improving existing operational conveniences for retail in the vicinity. Local Transport Plan Schemes are indicative and will be subject to further investigation and consultation prior to a final decision on implementation.

Active Travel has responded to Tesco submission as per the following:

This aligns with the separate objective of making the majority of St. Mel's Road a one-way system and as identified under TM-1 of Figure 8.6 of the LTP. Separately, TM-2 of Figure 8.6 identifies *"no through access for vehicles, ped/cycle access only"* at Grafton Court and is also subject to the same pre-assessment.

**Chief Executive Recommendation:**

None.

### 3.16 Other Submissions:

#### 3.16.1 Zoning

Submission no.	LLAP3; LLAP4; LLAP5; LLAP 7; LLAP8; LLAP12; LLAP13; LLAP16; LLAP18; LLAP20; LLAP21; LLAP30; LLAP 33; LLAP24; LLAP29; LLAP32
Name	L Burns; M Burns; A Conway; L and J Cullen; C Delaney; U McHugh; Chris Walsh; Beryl & James Kearney; Michelle Bannon; Laura Toolan & Piotr Jarocki; Gary Sharkey; Raymond Lyons, Anne Marie Lyons, John & Pauline Lyons; Gary and Bernie Sharkey; Battery Court Residents Association; Longford Tennis Club; Longford Football Rugby Club
Subject	Camlin Quarter, Battery Court, Demesne Lane

A large number of submissions were received which relate to Battery Court, Demesne Lane and the Camlin Quarter. Many of these submissions came from individual residents in the area, as well as from the Battery Court Residents Association, Longford Rugby Club and Longford Tennis Club. For the purpose of this report these submissions are dealt with cumulatively as follows:

#### Summary of Issues Raised

Individual Residents of Battery Court object to the proposed future development of Battery Court are summarised as follows:

##### Camlin Quarter

- **Battery Court** is a quiet and safe place to live. Concerned that opening it up to the public with cycle and walkways would have a very negative impact on the residents in the area, including service users from St. Christopher's.
- The Residents Committee and families on the estate contribute to provide a safe peaceful environment. Do not destroy this and push families to move.
- The cycle/pathway from the barracks through Battery Court will be hazardous to the residents, St Christopher Independence living in Battery Court - welfare and safety will be at risk with public right of ways.
- Currently have a well-kept and maintained estate by the residents association so residents can use the green areas and paths safety.
- Concerns in relation to 9.4 Longford Town Regeneration and Placemaking Objective *REG 15 Develop the Camlin Quarter (including Connolly Barracks, Church St. Great Water Street, Little Water Street onto the Albert Reynolds*

*Peace Park (the Mall), by enhancing the public realm, investigation of potential land uses, landbank assembly and connectivity improvements.* The Camlin Quarter Plan for the old camp field in Connolly Barracks is ridiculous and would be money better spent improving the already excellent facilities in the Mall. Propose instead the development of a soccer pitch (this field was a soccer pitch until the barrack closure in 2012), by leasing the pitch to a local schoolboys/girl's club and allowing them develop an amenity. Currently there is double the number of teams in all age categories and Abbeycartron is struggling to accommodate all.

#### Residential Zoning in vicinity of Battery Court

- Concerned in relation to the zoning land across from the tennis club to "Residential Phase 1". This was looked at in 2003 and there were numerous submissions made regarding public safety of footpaths and lighting. A submission noted the Demesne Lane could not take the volume of traffic proposed without widening. The developer agreed the land was unviable due to restrictions of encroaching on the land of adjacent landowners. 21 years on, nothing has changed, it is still for its most part minimum vehicular width with no footpath or adequate street lighting. Before zoning an area as "Phase 1 Residential" first the infrastructure needs to be put in place.
- Some of the site is within the Architectural Conservation Area.
- This is an area of town that is rich in wildlife, has there been any environmental studies done before rezoning.
- Implore the council to first focus on educational facilities, Healthcare and Public Transportation before zoning any areas in the confines of Demesne Lane/Battery Court.
- Overdevelopment of planned housing in Battery Court and surrounding area would cause serious congestion to a quiet, contained established estate.
- Object to the proposed plan for the land around Battery Court and the Latin Quarter development of the Barracks. This overdevelopment would cause serious congestion to a quiet, contained and established estate.
- Half built houses were previously knocked down at substantial cost.
- The plan states it will ensure the conservation and protection of the built and natural environment. This overdevelopment in the estate will not conserve or protect our environment. The number of houses proposed would make this estate too densely populated and would be overlooking established residents.
- It important to have green/wild area in estates. The estate is quiet and has St Christophers independent houses - concerned with its expansion. The traffic on the Demesne Lane is already at its limit. Proposed houses will be the close to the wastewater treatment plant and in the past malodours have emitted

- causing nuisance. This will become more of an issue if development occurs.
- An idea for the area in Battery Court would be gardening for biodiversity. More trees could be planted for our climate and environment.

#### Demesne Lane

- Demesne Lane is overburdened with traffic, narrow and care must be taken driving/walking. It is used to transport school children and by St Christophers to take children for walks, it is imperative to have it safe. Public lighting is also required along this lane.
- The Lane is not sufficient for current traffic, let alone adding more. Traffic is often blocked with cars from the Tennis Court.
- The Demesne Lane is a cul de sac narrow lane which has become very congested with traffic since the development and subsequent significant increase in residents in Battery Court. Cars travel at speed and there is no footpath. The Council previously granted planning to the Battery Court Development with a condition that a footpath would be provided on Demesne Lane. This planning condition was never fulfilled. Allowing such development will exacerbate the dangerous conditions for pedestrians. In the plan there is a plan for a footpath on the Lane, but this did not happen previously, and we cannot trust that it will happen in the future.

### **Battery Court Residents Association LLAP24**

#### **Demesne Lane Footpath**

The Demesne Lane is the only means of access for vehicles to the Battery Court estate. It also has 14 residential houses along it, Longford Tennis Club and a large working farm at the end of it. There is a considerable traffic at all times on this road, which is very narrow in places that only one vehicle can pass. The road has no footpath in place and limited public lighting. This is a major safety concern for the pedestrians. The lane is also used by St. Christopher's Special School students. The lack of a footpath and lighting poses a major safety risk.

#### **Plans for future housing development on the Demesne Lane.**

In relation to the purposed zoning of lands on the Demesne Lane highlighted in page 240 (see below), have concerns. The Demesne Lane is already under considerable strain from vehicular traffic and already beyond capacity. Additional residential units on these lands would exasperate this and put further congestion on this cul de sac.



### **Resurfacing of footpath leading to Battery Road**

Request inclusion of resurfacing of the footpath leading from the Battery Court estate to the Battery Road. The poor condition of the footpath is a major health and safety concern as a trip hazard and is impeding wheelchair users and pram users.

### **Public access into Battery Court via Sean Connolly Barracks**

Concerns with proposals to have access directly into the estate from proposed public realms in the Sean Connolly Barracks. It is important that it is done in a considered way, as changes could directly affect private dwellings. Battery Court is home to vulnerable and older residents and wish to maintain a safe tranquil environment. In relation to direct access from public realms in the Barracks into the estate, residents are concerned these routes could be targeted by antisocial behaviour and devolve into rat runs. Such permeability raises questions of maintenance of common areas of Battery Court as they would become intertwined with public recreational spaces of the Barracks. Given proximity to Sean Connolly Barracks, residents would appreciate consultation on any development.

### **Longford Tennis Club LLAP29**

Longford Tennis Club have serious concerns about the proposed development at the end of the Demesne Lane, Longford shown on page 241 of the Plan.

#### The Integrity of the Club's Parking Arrangement:

The Tennis Club is accessed down a narrow laneway. Permission was received for the club house with a condition that a car park space along the Demesne Lane be provided. The boundary line was moved back to provide that space. The property used for parking along the Club premises remains the Club property adjoining a narrow track that is Demesne Lane. There was a subsequent large housing development at Battery Court, allowed by the Council without adequate attention to the increase in traffic down this narrow lane. The increased traffic has significantly compromised the safety and effectiveness of the Tennis Club's parking



area. The plan appears to take no account of providing alternative access routes to the development and places pressure on an already inadequate laneway. Concerned that the integrity of the club car parking arrangements will be further compromised.

#### The Safety of Users of the Demesne Lane and people using the Tennis Club:

With the potential for a further large increase in traffic volume, the Tennis Club are seriously concerned for the health and safety of Club patrons. Patrons including children have to navigate the already highly dangerous lane. The tennis club have pleaded with the Council to adopt safety measures to protect people especially children and these requests have been ignored. Safety concerns have been greatly accentuated by this new plan to vastly increase traffic volumes up this narrow lane. A proposed roadway/walkway will run behind our clubhouse and are concerned from a safety point of view for a stray ball from our courts.

#### **Longford Football Rugby Club LLAP32**

Attached to this submission is a map showing the Rugby Club. Land adjoining the rugby club are identified on the Phasing Map as "Residential Phase 2" and is currently used for agricultural purposes. Object to the adjoining land being zoned residential for the following reasons:

- Our facilities used for amenity and recreational purposes, are already surrounded on 3 sides by housing. Another housing estate would seriously detract from the amenity/recreational use of our facilities.
- Cater for c.450 children - another housing estate, surrounding our facilities would negatively impact upon our ability to protect and safeguard children.
- During games balls end up in this land. Currently there is no risk to person or property as balls land in open land. Were housing allowed the balls would pose a risk to people and property. Under no circumstances should the Rugby Club be exposed to legal action by owners of vehicles, houses or property to be built on the adjoining land. Furthermore, currently members go into the field to retrieve balls. That would not be the case were the land to be used for housing purposes and would necessitate trespass. Back gardens will be enclosed by high walls rendering access impossible in any event.
- Our facilities are used by other organisations for the sporting needs of children and resources are stretched. The adjoining land would be our only hope of acquiring land adjacent to existing facilities at an affordable price. We would be unable to compete against a large builder in a bidding war.

The "Walking and Cycling Permeability Schemes" map (figure 6.7 of the LTP) shows scheme PY-15, and on page 203 is described as "Demesne Lane to Lisbrack Road". It appears a Permeability Scheme is intended to be a short cut for people either on foot or by cycle and would traverse our property which is unacceptable. Opening the Rugby Club up to this public route would raise safety concerns in terms of ensuring personal security for underage attendees (450 children) at the rugby club property.

The Rugby Club will not accept responsibility if anything were to happen as a consequence of a Permeability Scheme. To suggest that our facilities will be transformed into a public pedestrian thoroughfare, linking many housing estates with the town, where strangers will come into contact with children is unacceptable.

### **Chief Executive Response**

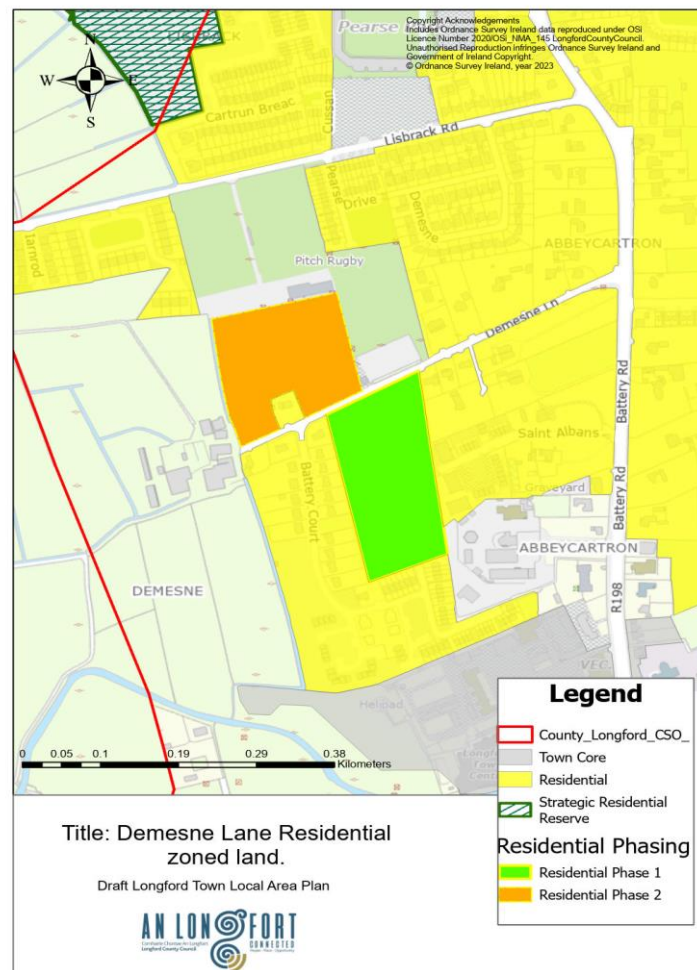
The Camlin Quarter plan contains at a high-level proposals for the regeneration of the northern end of the town and will be subject to further design and consultation prior to implementation of any projects. Any future proposals for projects under Regeneration/Town Centre First will require design, consultation and Part 8, which will be open to submission from the local community. Specifically in relation to concerns related to access between Battery Court and Connolly Barracks, any plan for the redevelopment of the Connolly Barracks site would require a Part 8, which will be advertised and provide an opportunity for the community to engage in and comment on.

In relation to the land to the rear of Connolly Barracks, the Town Centre First Plan did not define specific uses for sites, rather an overall ambition for the development of the site with the identification of possible projects to include tree lined central avenue, playground, allotments, meadow parkland, walking routes, terrace overlooking pond, kick about area and residential development. All of these potential uses would require a more detailed examination including preliminary design and business case before progressing for funding. The proposals for Connolly Barracks can be viewed in the Town Centre Plan at <https://www.longfordcoco.ie/services/regeneration/longford-town-centre-first-strategy/longford-2040-a-town-centre-first-strategy.pdf>.

The current LTP identifies a proposed footpath (p66 Ref. F-19) and cycle (p68 Ref. C-12) scheme along the Demesne Lane, Longford Town. All schemes of this type are complimented by public lighting. The existing road width is known and recognised. Future residential intensification off or along Demesne Lane would rely heavily on the provision of adequate footpath provision and access. Active Travel have not advanced this proposal any further than this identification. Such proposals are aspirational and may never materialise, while their detail will also be subject to feasibility at design stage. The existing road width is known and recognised. The proposed Permeability Scheme PY-15 connecting Lisbrack Road and that of Demesne Lane (as identified within the LTP) is an aspirational connection of benefit to the wider public. The route traverses over private lands, and therefore any delivery of that identified will require advanced landowner commitment.

In terms of the specific land parcels identified in the submissions which are zoned 'New Residential', such residential lands are part of the allocation which forms part of the Core Strategy allocation for the town as defined in the County Development Plan. These lands were initially zoned 'New Residential' in the County Development Plan and this zoning has been retained in the Draft Local Area Plan. An Infrastructure

Assessment Report was used as part of the County Development Plan selection process. These lands are considered suitable for residential development taking account of their proximity to services and facilities and the 'Town Core' and are considered commensurate with the proper planning and sustainable development of the town in a sequential order. It should be noted that the site to the south of Demesne Lane is a serviced site and as such is identified as Phase 1 development; while the other sit to the north requires additional services and as such is identified as Phase 2 (see map).



In terms of phasing, infrastructure is to be developed in tandem with any development of these sites to facilitate such growth. Specific concerns have been raised in relation to the development of these sites, which are project specific, and which can be addressed by way of the development management process.

### Chief Executive Recommendation

No change.

### 3.16.2 Local Transport Plan

Submission no.	LLAP27
Name	Therese Barry
Subject	Local Transport Plan

Concern regarding the reorganisation of the one-way system on Killashee Street (TM3) and that the council are not considering the quiet streets initiative (Q1 St. Michael's Road (between N5 and N63); Q2 Annaly Park (between N5 and N63). Traffic from the town can only go down main street and onto Richmond Street to cross to the Athlone Road area. In doing so cars need to either go through Annaly Park or Saint Michael's Road. This will force traffic into these two estates, which the council has ear marked Quiet Street Scheme Q1 and Q2. The original bypass was introduced to take high volumes of traffic from Richmond Street/Main Street, but this new one-way system traffic will be directed to this area already subject to large traffic volumes. Changing the direction of traffic on Killashee street will adversely affect the community and vulnerable people (children and elderly/disabled). Introducing new pedestrian crossings will be of no benefit, if traffic volumes increase, they won't be quiet streets.

#### **Chief Executive Response:**

Sustainable transport schemes, including the introduction of quiet street initiatives are schematic and indicative and will be subject to further investigation and consultation prior to a final decision on implantation.

#### **Chief Executive Recommendation**

No change.

### 3.16.3 Footpaths

Submission no.	LLAP 34, LLAP22
Name	Rachael Barry Molloy
Subject	Footpaths

A number of submissions were received which specifically related to the condition of the footpaths:

#### **Rachael Barry Molloy - LLAP34**

Ardnacassa is not mentioned in the footpath upgrades for 2025-2031 and the paths are broken and dangerous (photos included in submission). The elderly and buggy users have to walk on the road due to the footpath condition which is dangerous.

#### **Gerard Larkin - LLAP22**

While there are many positives to draw from this plan, a number of areas in the town have been left out especially, in relation to the upgrade/renewal of footpaths as follows:

- The footpaths on both sides of the road along Bridge Street and Lower Main Street are in a state of extreme disrepair (photos included in submission). Both the public and the businesses owners in these areas would be extremely grateful if these paths were included in the Longford Town Local Area Plan 2025-2031.
- The footpaths in the residential areas of Lower Glack, Upper Glack and Golf View, Glack, are in major need of upgrade/renewal (photos included in submission). The repairing of these paths would be of great benefit to all users, both able bodied and residents of poor mobility.
- The Plan should include upgrades to the footpath on the N4 bypass (Red Cow roundabout to Leo Casey roundabout). While it is noted on page 198 the inclusion of a cycle lane (C22) on the southern side, an improved footpath and adequate public lighting along this stretch, would be a fabulous recreational amenity. It would also link up the upgrades that have occurred on the Ballinalee Road and the ongoing infrastructural works on the Battery Road. This would also provide a great alternative for people commuting from the Northern to the industrial parks east of the town, without having to navigate the town centre.

The inclusion of the paths would improve the ascetics of these areas and provide more pleasant and safer infrastructure. It would be a proactive approach in reducing potential litigation due to injury. One of the main aims of this plan is sustainable development, this will only be achieved if there are safe, usable and adequate alternative modes of transport, like high quality footpaths. The inclusion of these footpaths in the Longford Town Local Area Plan 2025-2031, should be prioritised.

**Chief Executive Response:**

Footpaths in the Local Transport Plan are capital projects rather than maintenance works. Also it should be noted that the footpath upgrades included is not exhaustive and subject to review. Upgrades to footpaths are agreed annually at Municipal District level and in accordance with budget allocations.

**Chief Executive Recommendation:**

No change.



## 4.0 Procedure following Chief Executive's Report

In accordance with statutory requirements (Section 20, (d) (i) of the Planning and Development Act 2000 as amended), the members of a planning authority shall consider the proposal to make, amend or revoke a local area plan and the report of the Chief Executive.

Following consideration of the manager's report, the local area plan shall be deemed to be made, amended or revoked, as appropriate, in accordance with the recommendations of the Chief Executive as set out in his report, 6 weeks after the furnishing of the report to all the members of the authority (i.e. no later than 19<sup>th</sup> January), unless the planning authority, by resolution, varies or modifies the proposal, otherwise than as recommended in the Chief Executive's report, or where appropriate decides not to make, amend or revoke, as the case may be, the plan.

Where, following the consideration of the draft LAP and this CE's report, it appears to the members of the planning authority that the draft should be accepted or amended, the members may by resolution, accept or amend the draft and make the LAP accordingly. If the proposed amendment would, if made, be a material alteration of the draft concerned, the planning authority shall, not later than 3 weeks after the passing of a resolution, publish notice of the proposed alteration in at least one newspaper circulating in its area and send notice and a copy of the proposed alteration to the prescribed authorities.

The planning authority shall determine if a strategic environmental assessment (SEA) or an appropriate assessment (AA) or both such assessments are required to be carried out in respect of the proposed material alteration(s). No later than 2 weeks after this determination, the CE shall specify a period as considered necessary following the passing of the resolution to facilitate the SEA and / or AA. The planning authority shall publish notice of the proposed material alteration, and where appropriate in the circumstances, the making of a determination that an SEA and / or AA is required, in at least one newspaper circulating in its area.

Not later than 8 weeks after publishing notice of the proposed amendment, the CE shall prepare a report on any submissions or observation received and submit the report to the members for their consideration (Section 20(3)(k) of the Planning and Development Act 2000 as amended).

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.

## Appendix A: Copy of Public Notice



### Notice of proposal to make the Draft Longford Town Local Area Plan 2025-2031

Notice is hereby given that Longford County Council pursuant to Section 20 of the Planning and Development Act 2000 (as amended) proposes to make a Local Area Plan (LAP) for Longford Town and has accordingly prepared a Draft Longford Town Local Area Plan.

The Draft Plan consists of a written statement, maps and appendices and is accompanied by the following documents:

- Non-Technical Summary of Strategic Environmental Assessment Report
- Strategic Environmental Assessment (SEA) Environmental Report
- Appropriate Assessment (AA) Screening and Natura Impact Statement
- Strategic Flood Risk Assessment (SFRA).

The above is in accordance with the requirements of Article 14 A-E of the Planning & Development (Strategic Environmental Assessment) Regulations, 2004 (as amended), Article 6 of the EU Habitats Directive (92/43/EEC) and the Birds Directive (79/409/EEC) as amended, and the European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. 477).

### View the Plan and Accompanying Documents

The Draft Longford Town Local Area Plan along with the reports outlined above will be on public display and may be inspected during normal office hours from **Friday 6 September to Friday 18 October 2024 (both dates inclusive, excluding weekends and public holidays)** at the following locations:

- Planning Department, Longford County Council, Aras an Chontae, Great Water Street, Longford N39 NH56;
- All County Longford Branch Libraries - Longford, Ballymahon, Drumlish, Edgeworthstown, Granard and Lanesborough Libraries.
- Longford County Council's website [longfordcoco.ie](http://longfordcoco.ie)

### Public Consultation Drop-In Event

A public consultation drop-in event for the Draft Plan will take place at **Longford Town Branch Library on Thursday 3 October, 2.30 - 5.30pm**. At this event, you can

discuss any issue that you may have in relation to the Draft Local Area Plan with an employee of Longford County Council. If you have accessibility requirements, email [lap@longfordcoco.ie](mailto:lap@longfordcoco.ie)

### Submissions or Observations

Longford County Council welcome your submissions or observations in relation to the Draft Longford Town Local Area Plan and accompanying documents during the public display period. Any submissions/ observations can be made **from Friday 6 September until 4pm on Friday 18 October 2024** via **one** of the following methods:

- Writing to: 'Draft Longford Town Local Area Plan', Administrative Officer, Forward Planning, Planning Department, Longford County Council, Aras an Chontae, Great Water Street, Longford, N39 NH56.
- Email: [lap@longfordcoco.ie](mailto:lap@longfordcoco.ie) (with the subject line 'Draft Longford Town Local Area Plan').

Submissions/ observations received during this period will be taken into consideration before the Plan is adopted. **Late submissions will not be accepted.**

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.

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](http://longfordcoco.ie)

**Please note that by giving your contact details you are agreeing to the Council GDPR policy.**

*John Brannigan, Director of Services,*

*Housing, Planning, Regeneration and Capital Projects*

## 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. (34 no. submissions)

Submission Ref. No.	Organisation/Person making Submission
LLAP1	EPA
LLAP2	An Post
LLAP3	Resident Battery Court - Lisa Burns
LLAP4	Resident Battery Court - Maeve Burns
LLAP5	Resident Battery Court - Aisling Conway
LLAP6	Eastern and Midland Regional Assembly
LLAP7	Resident Battery Court - LisaMai and Joseph Cullen
LLAP8	Resident Battery Court - Cristin Delaney
LLAP9	Land Development Agency
LLAP10	National Transport Authority
LLAP11	ESB
LLAP12	Resident Battery Court - Una and Brian McHugh
LLAP13	Resident Battery Court - Chris Walsh
LLAP14	Transport Infrastructure Ireland
LLAP15	Department of Education
LLAP16	Resident Battery Court - Beryl and James Kearney
LLAP17	Uisce Éireann
LLAP18	Resident Battery Court - Michelle Bannon
LLAP19	Department of Env, Climate and Communications (inc. Supplementary submission from GSI)
LLAP20	Resident Battery Court - Laura Toolan & Piotr Jarocki
LLAP21	Gary Sharkey
LLAP22	Gerard Larkin
LLAP23	OPW
LLAP24	Battery Court Residents Association
LLAP25	Aldi Stores Ireland Ltd
LLAP26	The Heritage Council
LLAP27	Therese Barry
LLAP28	Tesco Ireland
LLAP29	Longford Tennis Club
LLAP30	Lyons, Raymond Anne Marie, John and Pauline
LLAP31	OPR
LLAP32	Longford Rugby Football Club
LLAP33	Gary and Bernie Sharkey
LLAP34	Rachel Barry Molloy

## 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
OPR
An Bord Pleanála
The Minister for Media, Tourism, Arts, Culture, Sports and the Gaeltacht
Cavan County Council
Leitrim County Council
Roscommon County Council
Westmeath County Council
Irish Water
EPA
Department of Environment, Climate and Communications
Department of Agriculture, Food and Marine
Development Applications Unit of Department of Housing, Local Government and Heritage