

# Strategic Environmental Assessment of the Longford Town Local Area Plan

Non-technical summary

# **Longford County Council**

Final report

Prepared by LUC June 2024

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Strategic Environmental Assessment of the Longford Town Local Area Plan

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# Introduction

- **1.1** Longford County Council commissioned LUC to undertake the Strategic Environmental Assessment (SEA) of the Longford Town Local Area Plan (LAP) 2024-2030.
- **1.2** The Strategic Environmental Assessment (SEA) process is a requirement of the SEA Directive 2001/42/EC **[See reference 1]** which requires that an environmental assessment is carried out of certain plans and programmes in this case the Longford Town LAP which are likely to have significant effects on the environment.
- **1.3** The purpose of the Environmental Report is to:
  - inform the development of the Longford Town LAP;
  - identify, describe and evaluate the likely significant effects (both positive and negative) of implementing the Longford Town LAP and reasonable alternatives to the Longford Town LAP; and,
  - provide an early opportunity for the statutory and non-statutory consultees to offer views on any aspect of the Environmental Report and accompanying Draft Longford Town LAP, through consultation.
- **1.4** This is the Non-Technical Summary (NTS) of the Environmental Report of the Draft Longford Town Local Area Plan and should be read in conjunction with that report.

# Description of the Longford Town Local Area Plan

# Context for the Longford Town Local Area Plan

- **1.5** Longford Town is in the centre of County Longford and is the principal town of the county, with established employment areas and substantial administrative and retail functions. The plan area is shown in **Figure 1**.
- **1.6** Located on the banks of the Camlin River, the land within the town core is predominately flat, with a pronounced rise towards the south-east. A spur of the Royal Canal enters the town to the south-west. Agricultural and amenity land in close proximity to the town centre significantly contributes to the character of the settlement. On the western outskirts of the town are significant areas of land which are subject to substantive flooding.
- **1.7** Longford Town is strategically positioned as a portal to the Northern and Western Region, with the town well served by transport links in the form of the Dublin to Sligo rail line, and several strategic roads including the N4 (Dublin Sligo) and N5 (Dublin Castlebar/Westport), both of which are components of the Trans-European Transport Networks (TEN-T) Comprehensive Network. This high degree of accessibility has helped retain and enhance a range of enterprises within the town, as well as attract new businesses and industries to the locality.
- **1.8** Longford Town has a distinct layout, built heritage and strong identity. The industrial, administrative, transportation and military history of the town is reflected in this identity through the Camlin River, Royal Canal, Connolly Barracks and St. Mel's College and Cathedral.

# Background to the Longford Town Local Area Plan

**1.9** The current Longford County Development Plan (CDP) [See reference 2] came into effect on 30<sup>th</sup> November 2021. The CDP sets out the statutory framework for land-use planning and sustainable development for the six-year period between 2021 and 2027. County Policy Objective (CPO) 4.9 of the CDP states that the Council will prepare and implement a Local Area Plan (LAP) for Longford Town within two years from the adoption of the Longford CDP 2021-2027. The CDP states that the LAP will be informed by a Local Transport Plan (LTP) to be prepared for Longford Town.

#### **1.10** Other CPOs specific to Longford Town are as follows:

- Support the role and function of Longford Town as the principal economic driver and focus of investment for the county (i.e. a 'Key Town' as identified by the RSES) (CPO 4.7 4.9).
- Support and prioritise regeneration opportunities in Longford Town including enhanced accessibility and sustainable mobility; town centre improvements; developing the town as a tourism hub; regeneration at the River Camlin, the Camlin Quarter, the Ballyminion area; improved linkages; and wider regeneration (CPOs 6.62 6.80).
- Promote regional-scale employment in the Primary Economic Growth Centre of Longford Town and promote the town's role as a key hub for employment, enterprise, tourism and innovation (CPOs 8.26 8.33).
- Improve the retail and high-street environment of Longford Town (CPOs 8.76 8.79).
- Protect the character of the Architectural Conservation Area in Longford Town (CPOs 11.27 11.29).
- Encourage a residential density of 35-40 units/ha in Longford town centre (CPO 16.17).

# Scope and content of the Longford Town Local Area Plan

- **1.11** The aim of the LAP for Longford Town is to establish a strategic framework for investment in transport in Longford, which is to be fully reflected in the Draft LAP. The function of the LAP is to enhance accessibility and sustainable mobility within Longford Town centre, by improving links between the core and surrounding areas through the further integration of public transport, walking and cycling facilities. The Longford Town LAP does not contain any policies.
- 1.12 The Vision for the Longford LAP is "to ensure that Longford is an attractive place to live, work and visit through the appropriate integration of transport and land use, with a primary focus on ease of access for all by sustainable transport" (p.48).
- **1.13** The Vision for Longford Town is underpinned by 12 strategic aims which are designed to provide a level of focus and direction to the objectives set out the in document. The principles of the Longford Town LAP are:
  - Core Strategy Compliance: to support the sustainable long-term growth of Longford Town in accordance with the Core Strategy of the Longford County Development Plan 2021-2027 (or any succeeding plan), the provisions of the National Planning Framework and the Regional Spatial and Economic Strategy 2019-2031.
  - Residential Sustainability and Placemaking: to support and facilitate the development of integrated sustainable neighbourhoods that respond to the needs of changing demographics in terms of housing delivery.
  - **Economic Development**: to encourage sustainable employment growth and economic activity and promote Longford Town as a local and regional centre of trade, business and tourism.
  - **Tourism**: to encourage and provide for the continued expansion of the tourism sector by the continued sustainable development and

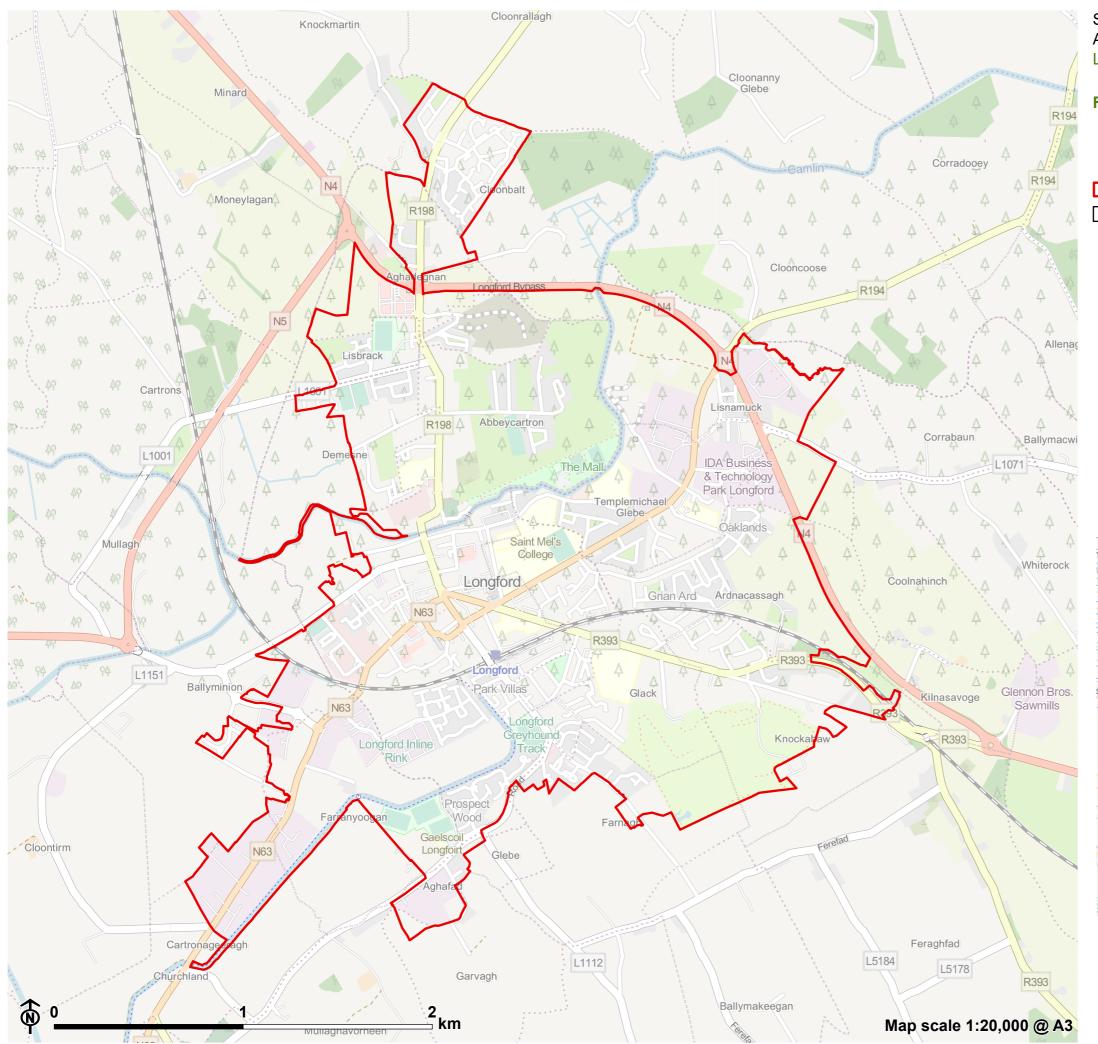
enhancements of visitor attractions and activities capitalising on Longford Town's natural and cultural assets in a sustainable manner.

- Regeneration and Placemaking: 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 and socio-economic measures to address the physical, economic, social and environmental problems associated with dereliction and decay.
- **Social Infrastructure**: to facilitate and secure the provision of social infrastructure to support existing and new communities in Longford Town in a manner which provides flexibility to respond to varied and changing community needs.
- Natural Heritage and Green Infrastructure: to contribute towards the protection and enhancement of natural heritage and biodiversity within the Local Area Plan boundary and to provide a wide range of environmental, social and economic benefits.
- Built and Cultural Heritage: to conserve and manage Longford Town'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 the relevant statutory obligations.
- Infrastructure: to ensure that the delivery of infrastructural services is guided by the principles of sustainable development in facilitating more efficient land use and physical development, whilst providing for the continued social and economic growth of the County.
- Sustainable Transport: to promote the use of and increased delivery of sustainable modes of transport within Longford Town, in order to contribute towards the achievement Ireland's carbon emission reduction requirements.
- Climate Change: to ensure Longford Town becomes a climate resilient town by promoting the economic, social and environmental benefits of low-carbon development, creating an integrated green infrastructure network, prioritising sustainable mobility and building at sustainable densities in appropriate locations.

■ Implementation and Monitoring: to ensure development occurs in tandem with the delivery of supporting physical and social infrastructure, in an orderly and efficient manner and in accordance with the principles of proper planning and sustainable development.

# Stage of the Longford Town Local Area Plan

**1.14** Longford County Council is currently preparing the Draft Longford Town LAP. It is anticipated that the Draft Longford Town LAP will be published for public consultation by the Council in summer 2024. The submissions and observations received during the public consultation period will be reviewed and considered by the Council during the finalisation of the Longford Town LAP. Depending on the scale and nature of Material Alterations to the Draft LAP, a revised version of the LAP may be published for public consultation. It is expected that the Longford Town LAP will be adopted in winter 2024/25.



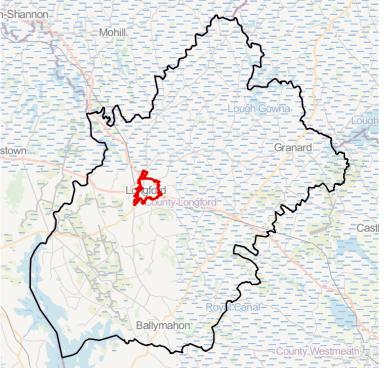
SEA of the Longford Town Local Area Plan Longford County Council



Figure 1.1: Location

Longford Town LAP Study Area

Longford County





# Strategic Environmental Assessment

- **1.15** The Strategic Environmental Assessment (SEA) process is a requirement of the SEA Directive 2001/42/EC which requires than an environmental assessment is carried out of certain plans and programmes (P/P), including land-use plans, which are likely to have significant effects on the environment. The purpose of SEA, as defined in Article 1 of the SEA Directive is 'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans...with a view to promoting sustainable development'.
- **1.16** In Ireland, the SEA Directive has been transposed into national legislation through:
  - S.I. No. 435 of 2004 (European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 [See reference 3], as amended by S.I. No. 200 of 2011 (European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011) [See reference 4]; and,
  - S.I. No. 436 of 2004 (Planning and Development (Strategic Environmental Assessment) Regulations 2004 [See reference 5], as amended by S.I. No. 201 of 2011 (Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011) [See reference 6] (i.e. the SEA Regulations).
- **1.17** The objective of this SEA is to ensure that the environmental effects of the LAP are identified during its development, providing the opportunity for negative environmental effects to be avoided, mitigated or compensated and for positive environmental effects to be enhanced, where opportunities arise. In this way, environmental considerations can be integrated into the preparation of the Longford Town LAP.

# Appropriate Assessment

- 1.18 SEA does not stand alone in environmental assessments of plans and programmes, including the Longford Town LAP. There is a high level of overlap between the SEA process and the Appropriate Assessment (AA) process, in particular relating to biodiversity, human health, water, etc.
- **1.19** Article 6(3) of the EU Habitats Directive [See reference 7] is transposed for certain plans in Ireland by S.I. No. 477/2011 (European Communities (Birds and Nature Habitats) Regulations, 2011 [See reference 8], as amended by S.I. No. 293 of 2021) [See reference 9], and Part XAB of the Planning and Development Act 2000, as amended [See reference 10]. All plans and projects that, either individually or in combination with other plans, are likely to have a significant effect on any site in the Natura 2000 network (i.e., those designated as Special Areas of Conservation or Special Protection Areas, collectively referred to as 'European sites'), require an AA to determine whether these effects will adversely affect the integrity of these sites. If the effects are deemed to be significant, potentially significant, or uncertain then the plan or project must undergo Stage 2 AA.
- **1.20** Screening for AA of the Longford Town LAP, using the precautionary principle (without the application of mitigation measures), was prepared in February 2024. The findings of the Screening for AA determined that the implementation of the Longford Town LAP could result in the following Likely Significant Effects:
  - Loss of functionally linked land in relation to the Lough Ree SPA and Lough Ree SAC.
  - Non-physical disturbance (off-site only) in relation to the Lough Ree SPA and Lough Ree SAC.
  - Air pollution in relation to the Ballykenny-Fisherstown Bog SPA, Lough Ree SPA, Lough Forbes Complex SAC and Lough Ree SAC.
  - **Recreation pressure** in relation to the Lough Ree SAC, Lough Forbes Complex SAC, Lough Ree SPA and Ballykenny-Fisherstown Bog SPA.

- Changes to hydrology including water quality and quantity in relation to the Ballykenny-Fisherstown Bog SPA, Lough Ree SPA, Lough Ree SAC and Fortwilliam Turlough SAC.
- 1.21 Therefore, an Appropriate Assessment of the Longford Town LAP was undertaken in March/April 2024. The Appropriate Assessment identified that the above Likely Significant Effects will not, in light of mitigation and avoidance measures outlined in Chapter 4 of the Natura Impact Statement, result in Adverse Effects on Integrity (AEoI) of the European sites either alone or incombination with other plans or projects.
- **1.22** The findings of the AA have been taken into account in the Environmental Report and this NTS.

# Strategic Flood Risk Assessment

- 1.23 The requirement for Strategic Flood Risk Assessment (SFRA) of certain plans is provided under 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' [See reference 11] and 'Circular PL2/2014: Flood Guidelines' [See reference 12].
- 1.24 A SFRA was undertaken alongside the Draft LAP which identified and assessed flood risk to inform the content of the LAP including policies, objectives and land use zoning. The findings of the SFRA have been taken into account in the Environmental Report and this NTS.

# SEA methodology

# Stages in SEA process

1.25 The SEA of the Longford Town LAP comprises the following principal stages:

- Stage 1: Scoping (completed): Consultation with the Environmental Authorities on the scope and level of detail to be considered in the assessment; and finalisation of the Scoping Report taking into account the submissions and observations received from the Environmental Authorities.
- Stage 2: Draft Environmental Report (current stage): An assessment of the likely significant impacts on the environment as a result of the Longford Town LAP.
- Stage 3: Consultation on the Draft Environmental Report (next stage).
- Stage 4: Evaluation of the submissions and observations made on the **Draft Environmental Report.**
- Stage 5: Addendum Environmental Report: An assessment of the material alterations to the Longford Town LAP will be undertaken, if required.
- Stage 6: Consultation on the Addendum Environmental Report, if required.
- Stage 7: Evaluation of the submissions and observations made on the Addendum Environmental Report, if required.
- Stage 8: Final Environmental Report: Preparation of a Final Environmental Report that is consistent with the finalised plan.
- Stage 9: SEA Statement: Identifying how environmental considerations and consultation have been integrated into the final Longford Town LAP.

# Stage 1: Scoping

- **1.26** The Scoping Report, prepared in March 2023, provided information for consideration in respect of the requisite content of the SEA. The main stages in carrying out scoping are as follows:
- Identifying plans, programmes, and environmental objectives of relevance to the LAP.
- Scoping of SEA Topics [See reference 13] relevant to the LAP.
- Identifying geographic, temporal and transboundary scope of the LAP.
- Collecting baseline information.
- Identifying sustainability issues and problems.
- Developing the Environmental Protection Objectives (EPO) Framework comprising environmental objectives, indicators and targets to allow the evaluation of impacts on the environment.
- Consulting on the scope of the SEA.
- 1.27 In accordance with Article 14C of the SEA Regulations, the competent authority preparing the Longford Town LAP, in this case Longford County Council, is required to consult with consultation bodies on the scope and level of detail of the information to be included in the Environmental Report. This Scoping Report was issued to the Environmental Authorities and adjoining local authorities for the four-week statutory consultation period from Tuesday 28<sup>th</sup> March to Thursday 27<sup>th</sup> April 2023. The consultation period was extended by two days to account for the two bank holidays which coincided with the consultation period. The Scoping Report was subsequently updated to take account of the submissions received from the Environmental Authorities and adjoining local authorities. Two submissions were received in response to the SEA Scoping Report. These were from Geological Survey Ireland and the Environmental Protection Agency. The issues raised in these submissions and how they have been taken into account and are detailed in Appendix A of the Environmental Report.

# Stage 2: Draft Environmental Report

**1.28** The SEA Regulations require an Environmental Report to be prepared, in line with the completed Scoping Report. This Environmental Report contains the findings of the assessment of the likely significant effects on the environment resulting from implementation of the Longford Town LAP. It reflects the requirements of the SEA Directive and the transposed SEA Regulations by providing the following information:

- An outline of the contents of the LAP and its relationship with other relevant plans and programmes.
- The environmental characteristics of the study area, including any problems and issues identified and their likely evolution without the LAP.
- Key environmental policy objectives set at the international, national and local levels that are relevant to the LAP.
- The EPO Framework and the criteria used to make judgements about the effects of the LAP.
- The likely significant effects of the LAP and reasonable alternative options appraised against each of the Environmental Protection Objectives (EPOs) in the EPO Framework, taking into account mitigation (which may take the form of policy safeguards in national policy or other regulatory mechanisms).
- Any difficulties encountered during the assessment process, including data limitations.
- How consultation comments have been taken into account, including those received during Scoping.
- Proposed monitoring framework for significant effects identified (including uncertain effects where these could become significant).
- Appendices, including the consultation responses tables, and SEA matrices.

- 1.29 This Environmental Report clearly sets out the SEA conclusions for the Longford Town LAP, highlighting any likely significant effects, and makes recommendations for mitigating potential negative effects identified. The assessment of significant effects includes likely secondary, cumulative, synergistic, short-medium-long term, permanent, temporary, positive and negative effects, as well as the interrelationships between each SEA topic, as set out in Schedule 2B of the SEA Regulations. This Non-Technical Summary accompanies the Environmental Report.
- **1.30** The EPO Framework presented in the Environmental Report is set out below; each primary bullet point constitutes an EPO objective and the sub-bullet points set out further guidance to help guide the appraisal of each objective. The EPO Framework is structured to encompass each SEA topic, however, some topics are covered in more than one EPO.

#### **EPO Framework**

## EPO 1: Biodiversity, flora and fauna

- Conserve and enhance Longford's biodiversity including designated sites, habitats and protected species.
  - Does the LAP conserve and enhance designated and undesignated ecological assets, including promoting habitat connectivity; avoiding fragmentation; and adverse impacts on habitats and species from development-related changes to air quality, water quality and quantity, noise levels and light levels?
  - Does the LAP maintain and enhance the nature network of ecological assets and green/blue spaces, taking into account the impacts of climate change?

#### EPO 2: Population and human health

- Create a healthy living environment, encourage healthy lifestyles, enable people to stay independent, reduce inequalities, provide a suitable mix of new and affordable housing to meet identified needs of the whole community, and ensure adequate access to services and facilities for all.
  - Does the LAP provide the amount and mix (size, tenures) of homes to meet local needs over the plan period?
  - Will the LAP increase the range and affordability of housing to support the growing population and for all social groups?
  - Will the LAP address the housing needs of older people, disabled people and vulnerable groups e.g., accessible and adaptable housing, extra care housing or sheltered housing?
  - Does the LAP reduce the quantity of vacant homes in the town?
  - Does the LAP reduce the need to travel by private car to access essential services, facilities and employment areas?
  - Does the LAP promote healthy lifestyles by encouraging and facilitating active travel, such as walking and cycling?
  - Does the LAP promote physical activity and outdoor recreation by maintaining, connecting and creating a range of accessible, new, high quality, multifunctional open spaces, green and blue infrastructure, recreation, play and sports facilities?
  - Does the LAP protect physical and mental health and wellbeing by preventing, avoiding and mitigating adverse health effects associated with air pollution, noise, vibration, odour, and contamination of land and water?
  - Does the LAP promote economic growth to encourage sustainable development and the retention of the working age population?
  - Does the LAP ensure that planned population growth is matched with the required public infrastructure and services?

#### EPO 3: Energy and climate change mitigation

- Minimise greenhouse gas emissions and encourage energy efficiency and the transition to renewable / low carbon energy sources in new developments.
  - Does the LAP minimise energy consumption and greenhouse gas emissions from transport, domestic, commercial and industrial sources?
  - Does the LAP promote energy efficiency by encouraging the use of energy efficient buildings and the use of renewable or low carbon energy sources in development?
  - Does the LAP encourage the provision of renewable energy infrastructure in appropriate locations?
  - Does the LAP encourage the use of sustainable construction methods and materials in development, with a focus on reducing the embodied carbon in new buildings and infrastructure?

#### EPO 4: Flood risk and climate change adaptation

- Reduce the risk and effects of flooding, both now and in the future.
  - Does the LAP seek to build resilience and adapt to the impacts of climate change such as flood, drought, overheating and extreme weather events particularly on groups more vulnerable to the effects of climate change?
  - Does the LAP direct development away from areas at highest risk of flooding and avoid inappropriate development in areas at risk of flooding, taking into account the effects of climate change and mitigate residual risks without increasing flood risk elsewhere?
  - Does the LAP promote the use of SuDS, where appropriate?
  - Does the LAP encourage the creation, management and enhancement of a coherent green and blue infrastructure (GBI) network?

- Does the LAP identify, allocate and safeguard open space for flood storage, where appropriate?
- Does the LAP seek to manage current and future flood risks to the historic environment?

#### EPO 5: Air

- Improve air quality by reducing emissions and concentrations of harmful atmospheric pollutants and avoiding their emission.
  - Does the LAP improve air quality by minimising pollutant emissions from all sources?
  - Does the LAP reduce the need to travel by petrol or diesel vehicles?
  - Does the LAP encourage a modal shift to sustainable modes of transport by supporting maintenance and expansion of public and active transport networks?
  - Does the LAP support the provision of facilities for electric vehicle charging?

#### EPO 6: Soil

- Conserve and enhance Longford's soil resources and geological sites.
  - Does the LAP help to maintain Longford's soil resources by directing new development to brownfield / previously developed land in preference to greenfield land, where appropriate?
  - Does the LAP avoid the loss of best and most versatile agricultural land?
  - Does the LAP conserve designated and undesignated geological assets?

#### EPO 7: Water

- Preserve and enhance the quality and quantity of waterbodies and groundwater.
  - Does the LAP maintain or improve the quality of waterbodies and groundwater by avoiding adverse impacts from pollution / changes to drainage?
  - Does the LAP minimise and mitigate runoff from new development and infrastructure?
  - Does the LAP minimise inappropriate development in groundwater Source Protection Areas?
  - Does the LAP promote the efficient use of water, such as minimising water consumption and abstraction and by encouraging re-use of grey and rainwater?

# EPO 8: Cultural heritage including architectural and archaeological heritage

- Conserve and enhance the significant qualities, fabric, setting and accessibility of Longford's historic environment.
  - Does the LAP conserve designated and undesignated heritage assets, including their setting and their contribution to wider local character and distinctiveness, avoiding adverse effects on their significance from direct loss, damage, or detraction from their setting?
  - Does the LAP support heritage-led regeneration of Longford Town?
  - Does the LAP improve access to, as well as enjoyment and understanding of, the local historic environment?

#### EPO 9: Landscape

- Conserve and enhance Longford's landscape and townscape, ensuring development does not detract from the quality of views and local distinctiveness.
  - Does the LAP adversely impact, protect or enhance the townscape and visual amenity of Longford Town?
  - Does the LAP reduce the amount of derelict, degraded and underused land?
  - Is the scale/density of development in keeping with important and valued features of the local landscape?
  - Does the LAP encourage high-quality design principles to respect local character and visual amenity?
  - Does the LAP encourage the retention and planting of green infrastructure alongside development to protect landscape character and create a sense of place?
  - Does the LAP improve access to valued landscapes, townscapes and viewpoints, including by sustainable and active travel modes to reduce the impact of road traffic?

#### **EPO 10: Material assets**

- Use resources intelligently, optimising reuse and recovery to keep waste to a minimum, minimising impacts on existing infrastructure and the transport network.
  - Does the LAP optimise existing infrastructure and provide new infrastructure sufficient to meet demand?
  - Does the LAP maximise energy efficiency and minimise the consumption of non-renewable energy?
  - Does the LAP encourage the re-use/enhancement of existing buildings and promote the use of recycled and secondary materials in construction?

 Does the LAP support the efficient use of natural resources, minimising waste and promoting appropriate waste management?

# Identifying and appraising reasonable alternatives

- **1.31** One of the critical roles of the SEA is to facilitate an evaluation of the likely environmental consequences of a range of reasonable alternatives to the proposals in the Longford Town LAP. The reason for assessing alternatives is to determine if the significant adverse effects of the Longford Town LAP can be reduced or avoided. Therefore, the SEA must appraise not only the proposed 'objectives' for inclusion in the plan but also 'reasonable alternatives' to these. This implies that alternatives that are not reasonable do not need to be subject to appraisal.
- 1.32 In order to be considered reasonable, the alternatives appraised by the SEA should meet the following criteria:
  - Take into account the geographical scope, hierarchy and objectives of the LAP – be realistic;
  - Be based on socio-economic and environmental evidence **be justified**;
  - Be capable of being delivered within the LAP's timeframe and resources be implementable; and
  - Be technically and institutionally feasible **be viable**.
- **1.33** One of the reasonable alternatives considered was the 'do nothing' scenario i.e. continued use of the existing Longford Town LAP 2016-2022. However, this was discounted as a reasonable alternative as the Longford County Development Plan (CDP) 2021-2027 [See reference 14] (see Chapter 3 of the Environmental Report) requires the preparation of a Local Area Plan for the town within two years from the adoption of the Longford CDP. A scenario which promotes the even development of zoned land was also considered. However, this was discounted as a reasonable alternative as it is not feasible to

develop Tier 2 sites (not currently serviced with infrastructure) as quickly as Tier 1 sites (serviced land).

- **1.34** Therefore, the following reasonable alternatives considered in the Environmental Report are:
  - Alternative 1: Town Centre First Approach Develop Longford Town in line with the Draft Town Centre First Approach Strategy and the key priorities for growth of a 'Key Town' in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (i.e. more consolidated and compact growth).
  - Alternative 2 Dispersed growth (less consolidated and compact).
- **1.35** The SEA findings are not the only factors taken into account when determining a preferred approach to take forward in the LAP. Indeed, there will often be an equal number of positive or negative effects identified by the SEA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national legislation will also be taken into account when selecting the preferred approach for the Longford Town LAP. Further information on the assessment of alternatives is detailed in Chapter 5 of the Environmental Report.

## Appraisal methodology

1.36 The Longford Town LAP and reasonable alternatives have been appraised against the objectives in the EPO Framework set out above. The findings from the SEA are presented in SEA matrices in Chapter 5 and Appendix D of the Environmental Report, which include colour coded symbols showing the score of each component of the LAP against each of the SEA objectives along with a concise justification for the score given. The use of colour coding in the matrices allows for likely significant effects (both positive and negative) to be easily identified, as shown in Table 1.

**Table 1: SEA scoring of effects** 

SEA effect	Description of effect	
++	Significant positive effect likely	
++/-	Mixed significant positive and minor negative effects likely	
+	Minor positive effect likely	
+/-	Mixed minor effects likely	
++/	Mixed significant effects likely	
-	Minor negative effect likely	
/+	Mixed significant negative and minor positive effects likely	
	Significant negative effect likely	
0	No or negligible effect likely	
?	Likely effect uncertain	
N/A	Assessment criterion not applicable	

- **1.37** The dividing line between environmental scores is often guite small. Where significant effects are distinguished from more minor effects this is because, using the appraisal questions and criteria and applying professional judgement, the effect of the option in relation to achievement of the EPO will be of such magnitude that it will have a noticeable and measurable effect compared with other factors that may influence the achievement of that objective.
- **1.38** Minor effects are still identified as these assist with the identification of cumulative and synergistic effects, can help identify opportunities for enhancements (e.g. enhancing a minor positive to make it significant) and also better enable the Council to make a more informed decision over the sustainability performance of options.

- **1.39** Where a potential positive or negative effect is uncertain, a question mark has been added to the relevant effect (e.g., +? or -?) and the effect is colour coded as per the potential positive, negligible or negative effect (e.g., green, white, pink, etc.). Schedule 2B of SEA Regulations identifies criteria for determining the likely significance of effects on the environment (see below) which has guided the approach to scoring in the assessment.
- **1.40** The prediction and evaluation of effects of options in the Longford Town LTP relies heavily on the EPO Framework – every option will be appraised for their likely impacts in relation to achievement of the EPO objectives. In line with the SEA Regulations, the following characteristics of effects will be predicted and evaluated: probability, duration, frequency, reversibility, the cumulative nature of effects, the transboundary nature of effects, the risk to human health of the environment, the magnitude and spatial extent of the effect, the value and vulnerability of the area likely to be affected, and effects on areas or landscapes with recognised national, European Union or international protection status.

# **Monitoring**

**1.41** An Environmental Monitoring Programme is required to monitor the likely significant effects of implementing the Longford Town LAP. The Environmental Monitoring Programme focusses on the significant effects identified during the assessment phase. The Environmental Monitoring Programme is presented in Chapter 7 of the Environmental Report and has been developed in line with the EPA's Guidance on SEA Statements and Monitoring.

# Stage 3: Consultation

Public consultation will be carried out on the Draft Longford Town Local Area Plan and the accompanying Environmental Report and Non-Technical Summary for a six-week period in summer 2024.

**1.42** The Draft Environmental Report and associated Non-Technical Summary will be published on Longford County Council's website for consultation during this period.

# Stage 4: Evaluation

**1.43** The submissions and observations received during the public consultation period will be reviewed and responded to in the Chief Executive's Report. The LAP will be subsequently updated to take account of the submissions.

# Stage 5: Addendum Environmental Report

1.44 A screening assessment of the alterations to the LAP, where proposed, will be undertaken to determine their likely significant effects. If likely significant effects are identified, an Addendum Environmental Report will be prepared to accompany the Proposed Material Alterations to the LAP.

# Stage 6: Consultation on the Addendum **Environmental Report**

1.45 Public consultation will be carried out on the Addendum Environmental Report and Proposed Material Alterations to the LAP for a four-week period.

# Stage 7: Final Environmental Report

1.46 Submissions from the previous round of public consultation will be responded to in the Chief Executive's Report. A Final Environmental Report and accompanying Non-Technical Summary will be prepared that is consistent with the finalised LAP and will be made available on the Council's website.

# Stage 8: SEA Statement

1.47 An SEA Statement will be prepared identifying how each of the requirements in Article 14L of the SEA Regulations have been met during the SEA process. The finalised SEA Statement will be published after the Council adopts the Longford Town LAP.

#### Difficulties encountered and data limitations

- 1.48 Schedule 2B of the SEA Regulations states that the Environmental Report should identify any difficulties encountered during the assessment process. No significant difficulties were encountered during the assessment of the LAP. The main difficulties and data gaps encountered were as follows:
  - The Longford Town LAP is prepared in accordance with the requirements of the Planning and Development Act 2000 (as amended), which specifies various types of objectives that must be provided for by the plan and in accordance with higher-level national, regional and statutory planning provisions. Therefore, alternatives available for the LAP are significantly limited by the requirements of plans such as the National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region, the Longford County Development Plan 2021-2027, and Statutory Planning Guidelines.
  - JBA's Flood Maps for the Local Area Plan area were not available.
- **1.49** No other specific data limitations or difficulties were encountered during the SEA process.

# Sustainability context for development in Longford Town

# Policy context

**1.50** The Longford Town LAP is greatly influenced by other plans and by broader environmental objectives. The LAP must conform to environmental protection legislation and the environmental objectives established at international, European and national levels, as well as contributing to the goals of a wide range of other plans and programmes.

Schedule 2B of the SEA Regulations requires, among other things:

- "an outline of the contents and main objectives of the plan and relationship with other relevant plans"; and
- the environmental protection objectives, established at international, European Union or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation".
- **1.51** A review of the key international, European and national legislation and plans of relevance to the Longford Town LAP is detailed in **Appendix B** of the Environmental Report. It should be noted that this Environmental Report has been prepared to be proportionate to the scale and nature of the proposed changes that may result from the implementation of the plan. It is not intended to be a register of all legislation / plans, but rather an examination of the key environmental protection objectives relevant to the Longford Town LAP. A summary of the most relevant plans is provided in Chapter 3 of the Environmental Report.

1.52 Figure 2 illustrates the links and inter-relationships between the Longford Town LAP and other key relevant international, national, regional and local plans.

Figure 2: Hierarchy of plans



## Environmental baseline information

**1.53** Baseline information provides the context for assessing the sustainability of the proposals in the Longford Town LAP. It also provides the basis for

identifying trends, predicting the likely effects of the document and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends.

Schedule 2B of the SEA Regulations requires information to be provided on:

"The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.

The environmental characteristics of areas likely to be significantly affected.

Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to the Birds Directive or the Habitats Directive."

- **1.54** To fulfil the requirements of Schedule 2B, this chapter, supported by **Appendix C** of the Environmental Report, sets out a description of the state of the environment at present; a discussion of the key issues / problems currently being faced in the study area; a description of the expected evolution of the environment without the LAP; and the corresponding Environmental Protection Objectives in the EPO Framework.
- **1.55** It is key that the current state of the environment is described using the most up-to-date environmental data, information and reports. Where updates of significant environmental data and associated reports become available, this new information has been incorporated into the baseline of the Environmental Report.

# Key sustainability issues

# Biodiversity, flora and fauna

- 1.56 County Longford contains many areas of high ecological value including the Royal Canal pNHA in Longford Town. Development proposed in the Longford Town LAP has the potential to put pressure on biodiversity sites including through disturbance and damage from recreational use, air pollution, and loss of functionally linked habitat. Although designated sites represent the most valued habitats, the overall ecological network is important for biodiversity as a whole. Fragmentation and erosion of habitats and the ecological network in the town is an ongoing threat to biodiversity.
- 1.57 If the Longford Town LAP was not implemented, it is considered that adequate protection would be afforded to Longford's habitats and species through policies in the Longford County Development Plan (most notably through the policies in Chapter 12: Natural Heritage and the Environment, and in particular policies CPO 12.1- CPO 12.85) as well as through the statutory protection of certain habitats and species. However, without the Longford Town LAP it is possible that future development could be sited inappropriately and adversely impact biodiversity sites, even if indirectly. The LAP presents an opportunity to manage the sensitivities of the sites and biodiversity networks, for example by locating development away from the most sensitive locations, provide for new green infrastructure, and ensure that growth does not adversely affect their current condition but where possible contributes to their improvement.

# Population and human health

1.58 Longford has a young and growing population which will place additional demand on local services and facilities including housing, education, healthcare and childcare services. In line with national trends, the older population in Longford is projected to grow significantly, placing additional pressures on

housing and social care services, as well as public transport services. Without the LAP, it is likely that services and facilities will still be delivered. However, it is less likely that these will be in appropriate locations, or of sufficient quality and quantity to keep pace with demand arising from new residential development. The LAP offers an opportunity to deliver these in a coherent, sustainable manner alongside development.

1.59 Longford Town will accommodate a substantial number of additional new homes over the County Development Plan period to 2027. Although Longford has a projected social and affordable housing need of less than 5%, anecdotally there appears to be a strong demand for affordable housing, based on the number of applications refused for social housing support indicating that there is a cohort of people needing housing support in the county. Longford's growing young population will create additional demand for larger family homes (the current demand is highest for two-bed homes and three-bed homes), while relatively low levels of income will need to be taken into account through the provision of affordable accommodation. There is a need to provide for housing to meet the needs of the aging population, such as Age Friendly Homes, adaptable dwellings and supported living. There is also a need for new accommodation to be developed that meets the needs of the whole community including members of the Travelling Community, and people with disabilities. Substantial spatial variation exists in housing deprivation across Longford Town. Longford Town currently has a high proportion of housing stock that is vacant (13.73%), significantly higher than the national average of 2%. The LAP offers the opportunity to facilitate and expedite the delivery of a variety of housing (size, tenures, design), including affordable housing and housing to meet the needs of an ageing population. The LAP also offers the opportunity to target residential development in areas where the barriers to housing are greatest.

**1.60** In the 2022 Census, Longford Town recorded the lowest number of people in 'very good' health (4,626 people; 42.24%) and the highest number of people in Ireland who stated that their health was 'bad' (262 people; 2.4%) or 'very bad' (67 people; 0.61%) [See reference 15]. There is a strong correlation between people reporting poor health and less affluent areas [See reference 16]. The LAP has an important role to play in encouraging active lifestyles through the

provision of sufficient quality open spaces/recreational resources and active travel routes. Without the LAP, the current negative trends may continue.

- **1.61** Commuting and HGV traffic travelling through the town contribute towards traffic congestion and a decline in air quality. There is potential for the Longford Town LAP to reduce air and/or noise pollution by creating a safe and accessible active travel network, thereby improving the health and wellbeing of the population of Longford.
- **1.62** The most densely populated areas in Longford Town are generally in the centre, south and eastern parts of the town. These areas tend to coincide with higher levels of relative deprivation and unemployment, along with lower levels of educational attainment. The Longford Town LAP provides an opportunity to help close the gap through spatial planning, particularly with a view to encouraging new development that will provide jobs, raise income levels, support education/skills/training, reduce crime, and remove barriers to housing and services.
- 1.63 In the absence of the Longford Town LAP, the policies in the Longford County Development Plan would apply, however, without the LAP, these sustainability issues would be less well addressed, and the opportunities identified above may not be fully realised.

## **Climatic factors**

**1.64** There is a need to significantly reduce Longford's greenhouse gas emissions to help meet international and national greenhouse gas reduction targets. The effects of climate change in Longford are likely to result in extreme weather events (e.g., intense rainfall and flooding, prolonged high temperatures and drought) becoming more common and more intense. Climate change is therefore likely to affect habitats and species and how people live, work and play. In the absence of the Longford Town LAP, the actions outlined in the Climate Change Adaptation Strategy and the policies of the Longford County Development Plan will apply which seek to respond to the Climate Emergency

by reducing energy demand and greenhouse gas emissions; improving energy efficiency of buildings; maintaining and enhancing green infrastructure; and supporting low carbon and renewable energy generation (Climate Change policies CPO3.1 -CPO3.19).

**1.65** The Longford Town LAP provides an opportunity to adapt and mitigate climatic factors by promoting sustainable development, for example by locating development in sustainable locations that would not be significantly impacted by flooding (or likely to increase flooding elsewhere) and ensuring it is designed to be flood resilient; reducing the need to travel by private car; creating and enhancing green and blue infrastructure networks; incorporating Sustainable urban Drainage Systems (SuDS) as part of new developments; identifying suitable locations for new public EV charging infrastructure; promoting low carbon design and energy efficiency of new developments; and promoting the use of renewable or low carbon energy sources in new developments.

#### Air

- 1.66 In the absence of the Longford Town LAP, the legally binding ceilings for emissions of air pollutants would continue to apply set by the EU Air Quality Directive [See reference 17], as well as the policies in the Longford County Development Plan. These plans support the preservation of 'best ambient air quality' in the county, the promotion of alternative and sustainable transport methods to maintain good air quality, and the retention and planting of green infrastructure as a means of air purification and filtering (Air Quality policies CPO12.104 -CPO12.108). Additionally, Longford Town's status as a smokeless fuel town and decarbonisation area would continue to apply.
- **1.67** However, the Longford Town LAP provides an opportunity to improve air quality in the town by:
  - locating development sustainably i.e. with good access to services and sustainable transport modes which will reduce the need to travel by petrol/diesel vehicles;

- developing an accessible and inclusive transport network in the town that supports a modal shift from private car use to public transport and active travel:
- supporting the uptake of electric vehicles and e-bikes in preference to petrol/diesel vehicles through the provision of electric vehicle charging infrastructure; and
- developing and enhancing green infrastructure, particularly along major roads.

### Soil

- **1.68** There are several vacant sites in Longford, however, the extent of infill / brownfield land and vacant and derelict buildings is likely to be reduced in the future as the regeneration of Longford Town progresses. The town contains one proposed Geological Site, St. Mel's Cathedral, which should not be lost or compromised as new development occurs. There are several notable construction projects that are either planned, programmed or underway in Longford, which will require significant amounts of mineral resources in the future, including the N4/M4 Mullingar to Longford (Roosky) Upgrade which will pass Longford Town and the Royal Canal Way.
- **1.69** In the absence of the Longford Town LAP, the policies in the Longford County Development Plan would apply. These support the protection of Geological Sites, the reuse of brownfield land, the remediation of contaminated land, and the protection of high-quality agricultural soils (Soil Protection policies CP012.115-CPO12.124). However, the Longford Town LAP provides an opportunity to ensure that development is located and designed to take into account the sensitivities of the soil environment and geological sites of value. Furthermore, the Longford Town LAP has the opportunity to support the regeneration of Longford Town's infill/brownfield land through regeneration of particular sites.

## Water

**1.70** The River Camlin is failing to meet the WFD objective of 'good' ecological and chemical status. Without the Longford Town LAP, it is possible that new developments could be located in areas that could lead to further water quality issues and risks to the natural environment. The water environment has the potential to be both directly and indirectly affected by the Longford Town LAP, with development potentially contributing to the pollution of nearby watercourses and groundwater and adversely affecting drainage of surface water. However, existing safeguards, such as the Water Framework Regulations, would help to reduce the potential for this to occur. Policies in the County Development Plan also seek to protect and enhance water quality (Water Quality and Groundwater Protection Policies CPO12.92 – CPO12.103). The LAP provides an opportunity to ensure that development is located and designed to take into account the sensitivity of the water environment; to plan for adequate wastewater infrastructure; to incorporate sustainable drainage systems (SuDS); and to promote water efficiency and grey water recycling.

# Cultural heritage including architectural and archaeological heritage

- 1.71 There are many heritage assets and areas of historical and cultural interest in Longford that could be adversely affected by poorly located or designed development. The increasing occurrence of extreme weather events means that all cultural asset structures, particularly those in a ruinous or dilapidated condition, are susceptible to the effects of climate change. Air pollution can also contribute to the degradation of heritage assets. Increasing transport levels from the projected population increase can have a range of direct and indirect effects on heritage assets including effects from noise and air pollution from busy traffic in close proximity to culturally significant areas which may make them less appealing to visit or decrease their visual amenity.
- **1.72** In the absence of the Longford Town LAP, the statutory protection of important heritage assets, such as the protection of RPS and ACA designations

through the Planning and Development Act and the National Monuments Acts would continue to apply, as well as the policies in the Longford County Development Plan (Built and Cultural Heritage Policies CPO 11.1 - 11.57) which support the conservation and enhancement of heritage assets and their settings and the promotion of access to and understanding of heritage assets in Longford.

- **1.73** However, the Longford Town LAP provides opportunities to protect these assets (including their settings) from inappropriate development at a local level. It is likely that the maintenance and management of existing buildings and infrastructure, and the delivery of any new development, would be required to consider the potential effects on any nearby heritage assets and historic areas, and to incorporate elements that help to enhance their setting.
- 1.74 The Longford Town LAP also supports heritage-led urban regeneration of the historic town including at Connolly Barracks and the Camlin Quarter area of the town. The regeneration of the town will protect and enhance heritage assets and their settings, as well as improve accessibility and interpretation of distinctive features of local heritage.

## Landscape

**1.75** Major new development projects, including those relating to regeneration and public realm enhancements, transport infrastructure, and renewable and non-renewable energy development have the potential to influence both positive and negative landscape / townscape change. In the absence of the Longford Town LAP, the policies in the Longford County Development Plan will apply which seek to conserve and enhance the uniqueness of each Landscape Character Type (LCT); preserve important views; support public realm improvements; encourage the redevelopment of infill / brownfield land in preference to greenfield sites; support the regeneration of key strategic sites in Longford Town; and develop the green and blue infrastructure network (Landscape Character policies CPO14.1 – CPO14.37; Regeneration policies CPO6.62 – 6.85; and Green Infrastructure policies CPO13.1 – CPO13.35).

**1.76** The Longford Town LAP offers an opportunity to ensure that the variation in landscape character is taken into account in the design and siting of new development, and that opportunities for the protection and enhancement of the landscape are maximised. The LAP provides an opportunity to ensure that local level landscape sensitivities are protected from inappropriate development; Longford Town's landscape and townscapes are enhanced, particularly areas that currently detract from the overall landscape quality of the town; and urban and rural connectivity is enhanced which will deliver improved access to valued landscapes, townscapes and viewpoints. Without the LAP, these sustainability issues would be less well addressed, and the opportunities may not be fully realised.

### **Material assets**

- **1.77** Commuting by private car is the most dominant mode of transport in Longford Town at 57.6%, although this is slightly below the national average of 63%. Longford Town experiences low levels of public transport usage (2.8%) compared to 5% nationally), poor train frequencies, limited bus services and connectivity, fragmented and poor cycling facilities, and traffic/parking issues along Main Street.
- 1.78 In the absence of the Longford Town LAP, the policies in the Longford County Development Plan would apply (Transport policies CPO5.1 – CPO5.80). These support measures to reduce dependency on cars; improve traffic and travel management; develop active travel networks; support a modal shift from private car use to walking, cycling and public transport; and to direct new development to sustainable locations which limits the need to travel and offer a choice of transport modes. However, without targeted action at the local level, it is anticipated that car dependency will continue to increase with the rising population. The Longford Town LAP provides an opportunity to develop an accessible and inclusive transport network that supports the needs of the population of Longford Town by:
  - Reducing dependency on cars in favour of increased walking, cycling and public transport use.

- Supporting a modal shift from private car use to public transport and active travel.
- Reducing road accidents and creating a sense of safety for all transport network users.
- **1.79** New development and population growth will generate additional waste which should be managed according to the waste hierarchy. In the absence of the LAP, the Eastern and Midlands Waste Management Plan 2015-2021 [See reference 18] would apply which supports driving waste management up the waste hierarchy. However, the LAP provides the opportunity to guide the sustainable use of resources and minimise waste impacts by:
  - promoting the use of locally sourced, reclaimed, recycled or low environmental impact materials in construction; and,
  - encouraging the re-use/enhancement (to high standards of sustainable resource-efficient design) of existing buildings and infrastructure.
- **1.80** Currently, there are surface water drainage deficiencies in some areas within Longford Town, including Springlawn and the Teffia Park/Dublin Road Junction. These areas are associated with combined sewer systems. Furthermore, the Longford Wastewater Treatment Plant may need to be upgraded, however, any upgrade works would not commence within the lifetime of the LAP. In the interim period, there may be increased need for new developments to install onsite treatment plants to treat wastewater. These would be subject to meeting agreed parameters and securing appropriate planning permission, licences etc.
- **1.81** In the absence of the LAP, the policies of the Longford County Development Plan would apply (Water Supply and Distribution CPO5.83 – CPO5.90 and Wastewater CPO5.91 - CPO5.99) which seek to maximise water infrastructure capacity, conserve water use, and protect and enhance water quality. However, the LAP provides opportunities to ensure adequate drinking water provision and wastewater treatment services by:
  - Seeking to ensure the adequate supply and quality of water, recognising future demands from population growth;

- Extending wastewater services where resources permit, utilising developer contributions;
- Separating any remaining combined sewers within the town;
- Restricting large-scale development on unserviced land; and,
- Requiring new development to incorporate surface water drainage facilities, including SUDS.

# SEA findings of the Longford Town Local Area Plan

- 1.82 This section presents the summary of the SEA findings for the appraisal of the LAP's reasonable alternatives, 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.
- **1.83** The detailed SEA matrices for the proposed LAP and reasonable alternatives are presented in **Appendix D** and a full summary is presented in **Chapter 5** of the Environmental Report.

Table 3: Summary of the SEA findings for the Longford Town Local Area Plan

	1: Biodiversity, Flora and Fauna	2: Population and Human Health	3: Energy and Climate Change Mitigation	4: Flood Risk and Climate Change Adaptation	5: Air	6: Soil	7: Water	8: Cultural Heritage	9: Landscape	10: Material Assets
Alternative 1	+/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-
Alternative 2	/+	/+	/+	/+	/+	/+	/+	/+	/+	/+
Vision and Strategic Aims	+	+	+	+	+	+	+	+	+	+
Core Strategy Compliance	+/-?	++/-	++/-	+/-	++/-	++/-	+/-	++/-?	++/-?	++
Residential Sustainability and Placemaking	-?	++	+/-?	0	+/-?	+	-?	+/-?	+/-?	+?
Economic Development	-?	++	+/-?	0	+/-?	+	0	+/-?	+/-?	+
Tourism	+/-?	++	+/-?	+/-	+/-?	+/-	+/-	+/-?	++	++
Regeneration and Placemaking	+/-?	++	+/-?	+/-	+/-?	++/-	+/-	++/-?	++	++
Social Infrastructure	+/-	++	+/-	+	+/-	+	+	+	++	+
Natural Heritage and Green Infrastructure	++/-	++	++	++	++	+	+	+	++	+
Built and Cultural Heritage	-?	+	+	0	0	+	+	++	++	+
Energy and Communications	+/-?	+/-?	++	++	+	+/-?	++/?	+/-?	+/-?	++
Sustainable Transport	+/-?	++/-?	++/	-?	++/	?	?	-?	+/-?	++/
Climate Change	++	++	++	++	++	++	++	+	+	++
Implementation and Monitoring	+/-	++	+/-?	+/-	+/-?	++/-	+/-	+/-	++/-	++/-

# Mitigation and recommendations

- 1.84 The proposals in the Longford Town LAP (in a similar way to other plans and projects from any sector) will have to demonstrate compliance with various legislation, policies, plans and programmes, including requirements for lowertier Appropriate Assessment, Environmental Impact Assessment and other licencing requirements as appropriate.
- 1.85 The following paragraphs set out potential effects for each SEA topic and the County Policy Objectives (CPOs) included in the Longford County Development Plan [See reference 19] which are likely to provide mitigation measures for adverse effects, or enhancement of positive effects.

Several recommendations can apply to multiple EPOs. To avoid repetition these are only recorded once under one EPO. Some EPOs do not have any specific recommendations.

**1.86** Recommendations were made in an internal draft of the Environmental Report to strengthen the mitigation provided in the LAP. The Council took these recommendations into account when preparing the Draft LAP for public consultation. The following sections outline the SEA recommended mitigation measures and where they have been taken into account in the LAP.

# Biodiversity, flora and fauna

**1.87** There may be adverse effects on some habitats and species from the measures included in the Longford Town LAP. These relate primarily to loss of habitat through development of semi-natural land, and increased disturbance as a result of greater tourism and recreational pressure within the town.

- **1.88** Mitigation at project-level is likely to be provided by adherence to the following policies of the Longford County Development Plan:
  - Development Management Standards (DMS) 16.201 16.203 set out the criteria that the Council will consider when assessing development proposals for their impacts on natural heritage.
  - CPO 12.10 sets out the requirement for the clear demonstration of no significant effects from the appropriate level of assessment for development on/adjacent to designated sites, including pNHA (i.e. the Royal Canal pNHA). CPO 12.17 requires Ecological Impact Assessment (EcIA) for development which may impact protected species and nondesignated habitats of biodiversity value.
  - CPO 12.19 12.23 provide measures for the protection of non-designated sites, including the requirement for the appropriate level of ecological assessment for proposals. Non-designated sites include locally important landscapes or landscape features which form part of a network of habitats essential for wildlife.
  - CPO 12.57 12.71 provide measures to protect biodiversity and for nature conservation. For example, CPO 12.63 requires mitigation measures in cases where it is evident that biodiversity is likely to be affected by development. Measures could include the establishment of wildlife areas/corridors/parks, tree planting, wildflower meadows/marshes and other areas.
  - CPO 12.72 12.81 provide particular protection for trees, woodlands and hedgerows.
  - CPO 12.113 aims to control lighting in urban and rural areas to minimise impacts on habitats and species.

Table 4: Biodiversity, flora and fauna recommendations

Draft LAP Objective	SEA Recommendation	Addressed in the LAP
NHB 04 Ensure screening for Appropriate Assessment (AA), in accordance with Article 6(3) of the Habitats Directive is carried out with respect to any plan or project within or adjacent to the Royal Canal pNHA.	In line with the recommendation in the AA, objective NHB 04 could be strengthened to encompass any plan or project that is likely to have a significant impact on the Royal Canal pNHA as well as the River Camlin as this links to the Lough Forbes Complex SAC / Ballykenny Bog SPA:  NHB 04 Require screening for	NHB 04 updated to incorporate SEA recommended mitigation.
	Appropriate Assessment (AA), in accordance with Article 6(3) 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.	
New objective (from recommendation in the AA)	"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".	New objective, NHB 05, included in the LAP as recommended in the SEA/AA.
New objective (from recommendation in the AA)	"Ensure the provision of appropriate Riparian strips of not less than 10 meters from the top of the bank of all watercourses to enhance biodiversity and preserve the natural flood regime of the area. The full extent of the biodiversity protection zone should be determined on a case-by-case basis by the Council, based on site specific characteristics and sensitivities".	New objective, NHB 09, included in the LAP as recommended in the SEA/AA.

Draft LAP Objective	SEA Recommendation	Addressed in the LAP
NHB 06 (previously NHB 05 in earlier draft) Prohibit any development that would be harmful to or that would result in a significant deterioration of habitats and/or disturbance of protected species within Longford town.	Additional mitigation provided in italics:  NHB 06 Prohibit any development that would be harmful to or that would result in a significant deterioration of habitats and/or disturbance of protected species within Longford town. Appropriate species surveys (e.g., bat surveys, bird surveys etc.) will be required for proposals to redevelop and reuse existing buildings, recognising that these structures can provide niche habitats and places of shelter for protected species.	Objective updated to incorporate SEA recommended mitigation.
NHB 12 (previously NHB 11 in earlier draft) Promote the protection and preservation of existing natural vegetation features and hedgerows and encourage the planting of native hedgerow and tree species. Existing feature vegetation (e.g. groups of trees, shrubs, hedgerows etc) should be integrated into any new development wherever possible.	Additional mitigation provided in italics:  NHB 12 Promote the protection and preservation of existing natural vegetation features and hedgerows and encourage the planting of native hedgerow and tree species. Existing feature vegetation (e.g. groups of trees, shrubs, hedgerows etc) should be integrated into any new development, wherever possible. Where the loss of the existing features is unavoidable, new biodiversity features should incorporate native species, and species of local provenance to replace existing hedgerows and trees.	Objective updated to incorporate SEA recommended mitigation.
NHB 21 (previously NHB 20 in earlier draft) Ensure that proposals for the lighting/flood lighting of waterways infrastructure, buildings or pedestrian/cycling routes	Additional mitigation provided in italics:  NHB 21 Ensure that proposals for the lighting/flood lighting of waterways infrastructure, buildings or pedestrian/cycling routes along waterways minimise	Objective updated to incorporate SEA recommended mitigation.

Draft LAP Objective	SEA Recommendation	Addressed in the LAP
along waterways incorporate bat friendly lighting schemes as set out in 'Bats and Lighting, Guidance Notes for: Planners, engineers, architects, and developers'.	adverse impacts on protected species (e.g. bats, birds, otters, etc) and incorporate lighting schemes as set out in 'Bats and Lighting, Guidance Notes for: Planners, engineers, architects, and developers'.	
NHB 17 (previously NHB 16 in earlier draft) Protect the important stands of trees from damage / removal.	The objective could be strengthened as follows:  NHB 17 Support a presumption against tree felling, topping, lopping or wilful destruction of mature trees as part of development proposals. Where a development proposal involves the felling, topping, lopping or threatens the destruction of a mature tree or trees, a tree survey will need to be included in the submission, carried out by a qualified Tree Specialist to justify the exceptional circumstances for their actions. The applicant must demonstrate the justification and rationale for removal of mature trees in terms of effect on ecology and landscape and demonstrate how replacement planting will compensate for loss of trees and woodland features. An assessment of potential tree roost features by a qualified and experienced ecologist may also be requested as part of such proposals.	Objective updated to incorporate SEA recommended mitigation.
NHB 25 (previously NHB 24 in earlier draft) Facilitate the control and eradication of invasive species within the Plan area.	The objective could be strengthened as follows:  NHB 25 Ensure that where the presence of invasive species is identified at the site of any proposed development or where the proposed activity has an elevated risk of resulting in the	Objective updated to incorporate SEA recommended mitigation.

Draft LAP Objective	SEA Recommendation	Addressed in the LAP
	presence of these species, details of how these species will be appropriately managed and controlled will be required.	
GI 01 Protect, enhance and further develop the Green Infrastructure network to provide a shared space for amenity, recreation and biodiversity to thrive and to strengthen links to the wider regional network.	Additional mitigation provided in italics: GI 01 Protect, enhance and further develop the Green Infrastructure network to provide a shared space for amenity, recreation and biodiversity to thrive and to strengthen links to the wider regional network. This should be informed by appropriate ecological surveys and assessment.	Objective updated to incorporate SEA recommended mitigation.
GI 03 Integrate new and existing green infrastructure as an essential component of all new developments and to restrict development that would fragment, damage or prejudice the integrity of the green infrastructure network.	Additional mitigation provided in italics: GI 03 Integration new and existing green infrastructure as an essential component of all new developments and to restrict development that would fragment, damage or prejudice the integrity of the green infrastructure network. Site specific ecology surveys should be carried out to inform proposed developments.	Objective updated to incorporate SEA recommended mitigation.
Water Supply and Wastewater Services Objectives	A new objective could be included in the LAP as follows:  Require that all developments relating to water supply and wastewater treatment are subject to screening for Appropriate Assessment to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any European sites and that the requirements of Article 6 of the EU Habitats Directive are met.	New objective, WS 16, is included in the LAP as recommended in the SEA.

# Population and human health

1.89 There may be adverse effects for population and human health as improvements in road infrastructure, may encourage people to travel more by private vehicle and reduce active travel. Furthermore, more cars on the roads may increase exposure to noise/air/vibration/light pollution from private vehicles. In addition, promoting development in the town may result in denser developments with a reduction in residential amenity and living conditions.

## **1.90** Mitigation at project-level is likely to be provided by the following CPOs of the Longford CDP:

- CPO 7.1 CPO 7.8 support healthy placemaking including supporting public health policy, ensuring all levels of disability are catered for, and cycling and walking are promoted. These measures are likely to enhance the positive effects of the Longford Town LAP.
- CPO 7.15 7.17 promote and encourage universal design within the public realm and built environment.
- CPO 7.23 supports investment in town centres so they become more sustainable places for communities to live, work and enjoy.
- CPO 7.26 7.54 focus on the provision of key services and facilities, including social and community infrastructure, healthcare and educational facilities, and recreation, sports facilities, and open space provision.
- CPO 8.26 8.27 set out objectives to promote Longford Town as a centre for economic development and employment with CPO 8.76 – 8.79 supporting retail development within the town.
- Development management standards (DMS) 16.17 16-71 set out the criteria that the Council will consider when assessing residential development proposals for residential amenity (e.g., housing density, open space, overlooking, overshadowing etc.)
- CPOs within Chapter 8 of the CDP also set out requirements for other community facility developments which help support the local community.

Table 5: Population and human health recommendations

Draft LAP Objective	SEA Recommendation	Addressed in the LAP
New objective in Chapter 7: Economic Development (Retail)	New objective recommendation to emphasise the need for regeneration of the town and to support the measures in the Local Transport Plan:	New objective, RET 03, is included in the LAP as recommended in the SEA.
	'To support, promote and facilitate measures, such as town centre regeneration, implementation of the Longford Town Local Transport Plan to improve accessibility and public realm improvements and other town centre first initiatives over the plan period, to reduce retail and commercial vacancy in Longford town centre'.	
MP 02 Promote the development and regeneration of the 'Strategic Sites' identified in the Longford Local Area Plan, to include on a Master Plan basis.	This objective could be strengthened as follows (new text in italics): MP 02 Promote the development and regeneration of the 'Strategic Sites' identified in the Longford Local Area Plan, which contribute to the regeneration, vibrancy, diversity, vitality, attractiveness, safety, liveability and compact growth of the town centre. In conjunction with this, proposed developments must demonstrate how they will interact within its context and the wider urban area through the preparation of masterplans.	Not included in the LAP.
Public Realm, Universal Design and Age Friendly Objectives	Although the promotion of healthy place-making is referred to in RES 09, a new objective could be included in the 'Public Realm, Universal Design and Age Friendly Objectives' as follows:	New objective, PUA 02, is included in the LAP as recommended in the SEA.

Draft LAP Objective	SEA Recommendation	Addressed in the LAP
	Support and encourage the principle of healthy place-making in Longford Town.	
Public Realm, Universal Design and Age	A new objective could be included in the LAP as follows:	New objective, PUA 03, is included in
Friendly Objectives	'Support the development of public realm projects in Longford that enhance the aesthetics of the town's built and natural character and improve the overall ambience and visitor experience of the town'.	the LAP as recommended in the SEA.
CC 13 Create and develop well planned sustainable communities, where	This objective could be revised to refer to low-carbon communities, climate adaptation and mitigation as follows:	Objective updated to incorporate SEA recommended mitigation.
sustainable modes of travel are encouraged to local facilities, such as education, work and commercial activity.	Support the development of sustainable low-carbon climate resilient communities and encourage a climate adaptation and mitigation approach to developments which will enable regeneration.	

# Energy and climate change mitigation

- **1.91** There may be adverse effects on climate change mitigation from some of the measures included in the Longford Town LAP. Improvements to the road network will encourage people to travel by private vehicle over more sustainable modes of travel. Furthermore, promoting Longford Town as a tourism location will lead to more people travelling from further afield in private vehicles. Mitigation at project-level is likely to be provided by the following policies of the Longford CDP:
  - Development management standards (DMS) 16.181 16.182 set out the criteria that the Council will consider when assessing renewable energy development proposals.

- CPO 5.137 5.140, 5.143 5.146 support and encourage renewable energy development, and sets out planning applications should consider and have regard to.
- 1.92 Mitigation is also provided in the Longford CDP through the proposed climate actions that will be undertaken by Longford County Council:
  - A5.1 A5.5 requires the installation of EV charging points.
  - A5.6 requires provision of cycle parking spaces as part of non-residential developments.
  - A5.15 and A5.17 promotes community scale and micro-generation of renewable power, and encourages all building electricity to be sourced from renewable sources.

Table 6: Energy and climate change mitigation recommendations

Draft LAP Objective	SEA Recommendation	Addressed in the LAP
New objective for Chapter 7: Economic development	Recommendation for new objective as follows:  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.	New objective, ECON 12, is included in the LAP as recommended in the SEA.
New objective for Chapter 13: Energy, Communications and Waste	Recommendation for new objective as follows:  Protect environmental quality in Longford through the implementation of European, national and regional policy and legislation relating to air quality, greenhouse gases, climate change, light pollution, noise pollution and waste management.	New objective, EC 07, is included in the LAP as recommended in the SEA.

Draft LAP Objective	SEA Recommendation	Addressed in the LAP
New objectives for Chapter 14: Climate Change	Recommendation for new objective as follows:  Promote sustainable patterns of development including development in sustainable locations.	New objective, CC 14, is included in the LAP as recommended in the SEA.
	Recommendation for new objective as follows:	New objective, CC 19, is included in the LAP
	Support the adaption of existing homes to reduce energy use, including Protected Structures and those located within Architectural Conservation Areas, providing there is no adverse impact on historic character or appearance.	as recommended in the SEA.
	Recommendation for new objective as follows:	New objective, CC 23, is included in the LAP
	Support the delivery of facilities needed to divert waste away from landfill and promote the prevention, reuse, recycling and recovery of materials (including heat from waste) with disposal to landfill as the final option.	as recommended in the SEA.
	Recommendation for new objective as follows:	New objective, CC 20, is included in the LAP
	Minimise resource and energy requirements for new developments through appropriate siting, design, and layout, making the most of natural systems both within and around buildings.	as recommended in the SEA.
	Recommendation for new objective as follows:	New objective, CC 24, is included in the LAP
	Promote and encourage positive community and/or co-operative led climate action initiatives and projects in Longford Town that seek to reduce carbon emissions, improve energy efficiency, enhance	as recommended in the SEA.

Draft LAP Objective	SEA Recommendation	Addressed in the LAP
	green infrastructure and encourage awareness on climate change issues.	
	Recommendation for new objective as follows:	New objective, CC 21, is included in the LAP
	Support high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retrofitting of appropriate energy efficiency measures in the existing building stock, and to actively retrofit Longford County Council's housing stock to a B2 Building Energy Rating (BER) in line with the Government's Housing for All Plan retrofit targets for 2030	as recommended in the SEA.
	Recommendation for new objective as follows:	New objective, CC 22, is included in the LAP
	Support Energy Master Plans prepared by Sustainable Energy Communities in Longford Town.	as recommended in the SEA.
	Recommendation for new objective as follows:	New objective, CC 25, is included in the LAP
	Encourage innovation and facilitate the development of pilot schemes in Longford Town that support climate change mitigation and adaptation measures.	as recommended in the SEA.
CC 07 Encourage the development of local	Objective could be strengthened by (additional text in italics):	Objective updated to incorporate SEA
renewable and low carbon energy sources in Longford Town both retrofitting and as part of new development proposals in accordance with the Local Authority Renewable Energy Strategy (LARES).	CC 07 Encourage the development of local renewable, low carbon, and zero-carbon energy sources in Longford Town through retrofitting and as part of new development proposals, which meet the highest feasible environmental standards during construction and occupation, in accordance with the Local	recommended mitigation.

Draft LAP Objective	SEA Recommendation	Addressed in the LAP
	Authority Renewable Energy Strategy (LARES).	
CC 09 Support and promote the use of biodiversity techniques, such as green roofs and walls and the integration of Sustainable Drainage Systems (SUDS) into all new development schemes.	Objective could be strengthened by (additional text in italics):  CC 09 Support and promote the use of biodiversity techniques, such as green roofs and walls and the integration of Sustainable Drainage Systems (SUDS) / Nature Based Solutions into all new development schemes.	Objective updated to incorporate SEA recommended mitigation.
CC 16 (CC 14 in an earlier draft) Support the delivery of Longford Town as a 'Decarbonisation Zone'.	The objective could be strengthened to:  'CC 16 Support the delivery of the 'Decarbonisation Zone' in Longford Town and associated implementation plan promoting measures to reduce Greenhouse Gas (GHG) emissions and improve general environmental conditions in this area'.	Objective updated to incorporate SEA recommended mitigation.

# Flood risk and climate change adaptation

- **1.93** There may be adverse effects for flooding where new developments are located in areas within Longford Town with higher risk of flooding. New development should support flood resilient design, the incorporation of Sustainable urban Drainage Systems (SuDS) and green infrastructure, and be designed to be adaptable to the changing climate.
- 1.94 Mitigation at project-level is likely to be provided by the following policies of the Longford CDP:
  - Development management standards (DMS) 16.205 16.207 set out the criteria that the Council will consider when assessing development proposals for flooding.

■ CPO 5.106 – 5.120 set out standards for flood risk management in County Longford.

Table 7: Flood risk and climate change adaptation recommendations

Draft LAP Objective	SEA recommendation	Addressed in the LAP
SW 05 Incorporate Sustainable Urban Drainage in all new developments. Note attenuation is not SUDS.	This objective could be updated to refer to minimising hard surfaces and incorporating GI as well as incorporating SuDS:  Minimise flood risk arising from pluvial (surface water) flooding in Longford Town by promoting the use of nature-based solutions including sustainable drainage systems (SuDS), minimising extent of hard surfaces/paving, and smart solutions such as innovative green infrastructure.	Objective updated to incorporate SEA recommended mitigation.
FR 02 Require that development proposals within the 'Constrained Land Use' zone shall be accompanied by a detailed Flood Risk Assessment, carried out in accordance with The Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014 (or as updated), which shall assess the risks of flooding associated with the proposed development.	The objective could be strengthened to:  FR 02 Require that development proposals within the 'Constrained Land Use' zone shall be accompanied by a detailed Flood Risk Assessment, carried out in accordance with The Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014 (or as updated), and consider the potential impacts of climate change in the application of these guidelines. Applicants should have regard to the most up-to-date Flood Mapping as presented on the Office of Public Works (OPW) maps.	Objective updated to incorporate SEA recommended mitigation.

Draft LAP Objective	SEA recommendation	Addressed in the LAP
New objective for Chapter 13: Flood Risk Management Objectives	Recommendation for new objective as follows:  Demonstrate that future development will not result in increased risk of flooding elsewhere, restrict flow paths, where compensatory storage / storm water retention measures shall be provided on site.	New objective, FR 04, is included in the LAP as recommended in the SEA.

## Air

- 1.95 There may be adverse effects on air quality and climate change from some of the measures included in the Longford Town LAP, including those relating to increased tourism and road improvements. Mitigation at project-level is likely to be provided by the following policies of the Longford CDP:
- CPO 12.104 12.108 provide measures for improving air quality in County Longford.
- CPO 12.91 assesses new development in terms of its potential impact on existing adjacent developments, existing land uses and/or the surrounding landscape to mitigate adverse effects on the amenities of the area.

**Table 8: Air recommendations** 

Draft LAP Objective	SEA Recommendation	Addressed in the LAP
New objective (from recommendations in the AA)	Recommendation for new objective as follows:  'Promote the preservation of best ambient air quality compatible with sustainable development in accordance with the EU Ambient Air Quality and Cleaner Air for Europe	New objective, CC 17, is included in the LAP as recommended in the SEA/AA.

Draft LAP Objective	SEA Recommendation	Addressed in the LAP
	(CAFE) Directive (2008/5/0/EC) and ensure that all air emissions associated with new developments are within Environmental Quality Standards as out in the Air Quality Standards Regulations 2011 (SI No. 180 of 2011) (or any updated/superseding documents)'.	

## Soil

- **1.96** There may be some adverse effects on soil resource from measures within the Longford Town LAP due to increased soil sealing and the delivery of development on greenfield land outside the town centre (including some Strategic Sites in the LAP). Mitigation is likely to be provided by the following policies of the Longford CDP:
- CPO 12.115 CPO 12.123 provide measures for soil protection.

## Water

- **1.97** There may be adverse effects on the water quality of water bodies within Longford Town from some of the measures included in the Longford Town LAP, due to increased soil sealing and surface water runoff. Mitigation is likely to be provided by the following policies of the Longford CDP:
  - CPO 12.92 12.103 provide water protection measures for water quality and groundwater.
  - CPO 12.91 assesses new development in terms of its potential impact on existing adjacent developments, existing land uses and/or the surrounding landscape to mitigate adverse effects on the amenities of the area.

**Table 9: Water recommendations** 

Draft LAP Objectives	SEA recommendations	Addressed in the LAP
Water Supply and Wastewater Services Objectives	Recommendation for a new objective:  Discourage the over concentration/proliferation of individual septic tanks and treatment plants to minimise the risk of groundwater pollution.	New objective, WS 18, is included in the LAP as recommended in the SEA.
	Recommendation for a new objective:  Ensure that all new development proposals include a Drainage Impact Assessment.	New objective, WS 19, is included in the LAP as recommended in the SEA.
	Recommendation for a new objective:  Work alongside Uisce Éireann to minimise the number and frequency of storm overflows of sewage to watercourses.	New objective, WS 20, is included in the LAP as recommended in the SEA.
	Recommendation for a new objective (recommendation from the AA):  "Promote the sustainable use of water and water conservation in existing and new developments within the town by encouraging demand management measures among all water users and requiring new developments to incorporate water conservation measures".	New objective, WS 14, is included in the LAP as recommended in the SEA/AA.
WS 12 (previously WS 11 in an earlier draft) Protect valuable groundwater sources and important surface water bodies from pollution through infiltration by domestic, agricultural or other sources of effluent/pollutant material.	WS 12 could be strengthened as follows (recommendation from the AA):  "Maintain, improve and enhance the environmental and ecological quality of surface waters and groundwater in Longford Town in conjunction with the EPA and in accordance with the River Basin Management Plan for Ireland 2022-2027 and future cycles of this Plan".	Objective WS 12 updated to reflect recommended mitigation in the SEA/AA.

# Cultural heritage including architectural and archaeological heritage

1.98 Measures within the Longford Town LAP may result in adverse effects for the historic environment of Longford Town. Mitigation at project-level is likely to be provided by the following policies of the Longford CDP:

- DMS 16.190 16.200 set out development management criteria that Council's will consider development proposals against, for Protected Structures, Architectural Conservation Areas and Archaeology.
- CPO 6.31 6.34 support heritage-led urban regeneration which are likely to enhance the positive effects of the Longford Town LTP on the historic environment.
- CPO 11.1 11.13 provide measures to protect and enhance architectural heritage.
- CPO 11.14 11.26 provide protection measures for structures included on the Record of Protected Structures (RPS).
- CPO 11.27 11.30 provide protection measures for the Architectural Conservation Areas (ACAs) within Longford.
- CPO 11.31 11.35 support the protection and enhancement of historic gardens, demesnes or designed landscapes.
- CPO 11.47 11.57 provide protection for known and unknown archaeological heritage in Longford.

# Landscape

1.99 There may be adverse effects on landscape and townscape character and setting from development proposals which come forward. Mitigation is likely to be provided by the following policies of the Longford County Development Plan:

- DMS 16.204 requires landscape and visual impact assessments to be prepared by suitably qualified professionals for planning applications for development which may have significant impact on landscape character areas of medium or high sensitivity.
- CPO 13.1 13.8 sets out measures that protect green infrastructure and CPO 13.9 – 13.14 set out measures for the ongoing development and improvement of green infrastructure within Longford Town.
- CPO 14.1 14.8 provide measures for the protection and enhancement of landscape character within Longford, including the requirement for landscape and visual impact assessment for some development.
- CPO 7.9 7.14 promotes public realm improvements and enhancement of the townscape.

**Table 10: Landscape recommendations** 

Draft LAP Objective	SEA recommendation	Addressed in the LAP
EC 03 Seek the undergrounding of all electricity, telephone and television cables in the town centre.	Objective could be strengthened as follows:  EC 03 Seek the undergrounding of all electricity, telephone and television cables in the town centre, wherever possible, while taking into consideration landscape, residential amenity, and environmental considerations.	Objective updated to incorporate SEA recommended mitigation.

# Material assets

1.100 There may be adverse effects associated with the use of resources and material assets in Longford arising from the LAP. This could include increased pressure on community services and facilities, and loss of non-renewable resources such as greenfield land. Policies and development management

criteria throughout the Longford CDP are likely to provide mitigation for the sustainable use of land, natural resources, energy and waste management.

**Table 11: Material assets recommendations** 

Draft LAP Objectives	SEA Recommendations	Addressed in the LAP
New objectives for Chapter 7: Economic development	Recommendation for new objective as follows:  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.	New objective, ECON 06, is included in the LAP as recommended in the SEA.
New objective for Chapter 7: Economic Development (Retail)	Recommendation for new objective as follows:  The Council, in accordance with the Retail Planning Guidelines for Local Authorities, will continue to protect and promote the vitality and viability of Longford town centre, including applying a 'town centre first approach' or sequential test for retail developments.	New objective, RET 06, is included in the LAP as recommended in the SEA.
EC 02 Promote and facilitate the development and renewal of energy and communications networks, including broadband services, while protecting the amenities of the town.	Additional mitigation provided in italics:  EC 02 Promote and facilitate the development and renewal of energy and communications networks, including broadband services, while taking into consideration landscape, residential amenity, and environmental considerations.	Objective updated to incorporate SEA recommended mitigation.
New objective for Chapter 13: Energy,	Recommendation for new objective as follows:	New objective, EC 09, is included in the LAP as

Draft LAP Objectives	SEA Recommendations	Addressed in the LAP
Communications and Waste Objectives	'Support local schools, town and community groups such as Longford Green Towns Initiative, Longford Tidy Towns through education and awareness programmes and where available, through the provision of grant aid.	recommended in the SEA.
EC 04 Adequately maintain existing recycling and bring bank facilities and assess their locations, and secure the provision of additional facilities at appropriate locations, as required, including in conjunction with development.	The objective could be reworded slightly as follows:  EC 04 Adequately maintain existing recycling and bring bank facilities and assess their locations, and secure the provision of additional facilities at appropriate locations that will not adversely affect residential amenity or environmental quality, including in conjunction with development.	Objective updated to incorporate SEA recommended mitigation.
Recommendation for new objective in Chapter 13: Energy, Communications and Waste Objectives	Recommendation for new objective as follows:  Require all commercial and residential developments to be provided with adequate internal and external space for the correct storage of waste and recyclable materials. This is particularly important in relation to shared bin spaces such as apartment developments.	New objective, EC 08, is included in the LAP as recommended in the SEA.
Recommendation for new objectives for Chapter 13: Sustainable Transport Objectives	ommendation for Recommendation for new objective as follows: pter 13: Sustainable	

Draft LAP Objectives	SEA Recommendations	Addressed in the LAP
ST 02 supports compliance with the Longford County Development Plan 2021-2027, including Sustainable Transport, Sustainable Public Transport, Cycling and Walking County Policy Objectives.	The objective could be strengthened as follows:  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, Sustainable Public Transport, Cycling and Walking County Policy Objectives and the Design Manual for Urban Roads and Streets (2019).	Objective updated to incorporate SEA recommended mitigation.
ST 14 Support the NTA in the provision of new and upgraded bus stops.	This objective could be strengthened to incorporate other stakeholders and infrastructure as follows:  'Engage and cooperate with the	Objective updated to incorporate SEA recommended mitigation.
	Department of Transport, National Transport Authority, Transport Infrastructure Ireland, Irish Rail, Local Link and other stakeholders to improve the provision of public transport and public transport facilities in Longford'.	

# Monitoring

**1.101** Article 17 of the SEA Regulations requires that the competent authority (in this case Longford County Council) monitors the significant environmental effects of implementing the Longford Town LAP in order to identify, at an early stage, any unforeseen adverse effects due to the implementation of the proposed Plan and to take remedial action. Monitoring can also demonstrate the positive effects facilitated by the LAP. Reference has been made to the EPA's Guidance on Strategic Environmental Assessment Statements and Monitoring [See reference 20] in devising the monitoring programme.

- 1.102 The occurrence of significant adverse environmental effects not predicted and mitigated by this assessment, which are directly attributable to the implementation of the Longford Town LAP, would necessitate consideration of these effects in the context of the plan and potential remediation action(s) and/or review of part(s) of the LAP.
- **1.103** Monitoring is based around indicators and targets which allow quantitative measures of trends and progress over time relating to the Environmental Protection Objectives identified in Chapter 2 and used in the evaluation. Given the position of the LAP in the land use planning hierarchy below the Longford County Development Plan, the measures that are proposed in the Monitoring Programme for the Longford Town LAP are derived and modified, where necessary, from the Environmental Report of the Longford County Development Plan [See reference 21]. Monitoring indicators and targets are also derived from Chapter 16 of the Longford Town LAP which sets out the phased approach to residential and employment zoned lands.
- **1.104** Monitoring is an ongoing process, and the programme allows for flexibility and the further refinement of indicators and targets. The Monitoring Programme may be updated to deal with specific environmental issues – including unforeseen effects – as they arise.
- **1.105** Sources for indicators may include existing monitoring databases (including those maintained by planning authorities and national/regional government departments and agencies) and the output of lower-tier environmental assessment and decision making (including a review of project approvals granted and associated documents and the output of any EIA monitoring programmes).
- **1.106** The following sections outline the indicators and targets which have been selected for monitoring the likely significant environmental effects of implementing the LAP, as well as the remedial actions to be taken if targets are not met

# EPO 1: Biodiversity, flora and fauna

Table 12: Monitoring for EPO 1: Biodiversity, flora and fauna

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
EPO 1: Biodiversity, flora and fauna	Condition of European sites identified in the Natura Impact Statement.	No deterioration in the condition of European sites identified in the NIS as a result of implementation of the objectives and development of the Strategic Sites within the LAP.	Where condition of a European site is found to be deteriorating this will be investigated with the Regional Assembly and the DHLGH to establish if the pressures are related to the LAP actions / activities. A tailored response will be developed in consultation with these stakeholders in such a circumstance.	DHLGH report of the implementation of the measures contained in the Habitats Directive (every 6 years).  DHLGH National Birds Directive Monitoring Report for the under Article 12 (every 3 years).	DHLGH NPWS

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
	Area of green and blue infrastructure in urban areas (square metres) of Longford Town.	Increase in the overall provision of GBI within the built-up footprint of Longford Town.	Where there is a decrease in the extent of GBI in the built-up footprint of Longford Town, this will be investigated by the local authority to establish if this is related to the implementation of the LAP. A tailored response will be developed in consultation with any relevant stakeholders in such a circumstance.	CORINE Project updated every six years, including information about changes over the past six years.	European Commission CORINE Land Cover dataset Copernicus Land Monitoring Services
	Status of water bodies as reported by the EPA Water Monitoring Programme for the WFD.	No deterioration in the status of any surface water body and not to affect the ability of any surface water achieving 'good status'.	Where water bodies are failing to meet at least good status this will be investigated with the DHLGH Water Section, the EPA Catchment Unit, the Regional Assembly and, as relevant, Uisce Éireann to establish if the pressures are related to LAP actions / activities. A tailored response will be developed in consultation with these stakeholders in such a circumstance.	EPA Monitoring Programme for WFD compliance.	EPA

SEA Topic Indi	dicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
plan perr LAP prov prot Biod flora see "Nat and	enning rmissions with IP measures oviding for the otection of odiversity and ra and fauna – e Chapter 11	For planning permission to be granted when applications demonstrate that they comply with all LAP measures providing for the protection of biodiversity and flora and fauna – see Chapter 11 "Natural Heritage and Green Infrastructure".	Where planning applications are granted which do not comply with LAP measure on the protection of biodiversity, the Council will ensure that appropriate mitigation and management measures are in place.	Internal monitoring of likely significant environmental effects of grants of permission.	Longford County Council.

# EPO 2: Population and human health

**Table 13: Monitoring for EPO 2: Population and human health** 

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
EPO 2: Population and human health	Implementation of LAP measures relating to the promotion of economic growth as provided for by Chapter 7 "Economic Development".	For review of progress on implementing LAP objectives to demonstrate successful implementation of measures relating to the promotion of economic growth as provided for by Chapter 7 "Economic Development".	Where planning applications are being approved which do not comply with LAP measure on economic development, the Council will ensure that appropriate mitigation and management measures are in place.	Internal review of progress on implementing LAP objectives.	Longford County Council
	Number of spatial concentrations of health problems arising from environmental factors resulting from development permitted under the LAP.	No spatial concentrations of health problems arising from environmental factors as a result of implementing the LAP.	Where there is an increase in health problems, the Council will coordinate with the Regional Assembly, the DHLGH, DECC, NTA and Health Service Executive to develop a tailored response.	Consultations with the Health Service Executive and EPA	Health Service Executive Longford County Council

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
	Proportion of people in Longford Town reporting regular cycling / walking to school and work above 2016 CSO figures.	Increase in the proportion of people in Longford Town reporting regular cycling / walking to school and work above 2016 CSO figures.	Where the proportion of the population shows an increase in private car use above CSO 2016 figures, the Council will coordinate with the Regional Assembly, the DHLGH, DECC and NTA to develop a tailored response.	Census data (every five years or as Census data is released).	CSO
	Area of green and blue infrastructure in urban areas (square metres) of Longford Town.	Increase in the overall provision of GBI within the built-up footprint of Longford Town.	Where there is a decrease in the extent of GBI in the built-up footprint of Longford Town, this will be investigated by the local authority to establish if this is related to the implementation of the LAP. A tailored response will be developed in consultation with any relevant stakeholders in such a circumstance.	CORINE Project updated every six years, including information about changes over the past six years.	European Commission CORINE Land Cover dataset Copernicus Land Monitoring Services

# EPO 3: Energy and climate change mitigation

Table 14: Monitoring for EPO 3: Energy and climate change mitigation

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
EPO 3: Energy and climate change mitigation	Implementation of LAP measures relating to climate reduction targets as provided for by LAP provisions including those provided for and referenced in Chapter 15 "Climate Change".	For review of progress on implementing LAP objectives to demonstrate successful implementation of measures climate reduction targets as provided for by LAP provisions including those provided for and referenced in Chapter 15 "Climate Change".	Where planning applications are being granted which do not comply with LAP measures on climate change, the Council will ensure that appropriate mitigation and management measures are in place.	Internal review of progress on implementing LAP objectives.	Longford County Council
	Proportion of journeys made by private fossil fuelbased car compared to 2016 levels.	Decrease in the proportion of journeys made by residents of the Longford Town using private fossil fuel-based car compared to 2016 levels.	Where targets are not achieved, the Council will liaise with the Regional Assembly and the Eastern and Midlands Climate Action Regional Office to establish reasons and develop solutions.	EPA Annual National Greenhouse Gas Emissions Inventory reporting	CSO data Climate Action Regional Office EPA

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
		Contribute towards the target of aggregate reduction in carbon dioxide (CO2) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors.		Census data (every five years or as Census data is released).	
	Proportion of people reporting regular cycling / walking to school and work above 2016 CSO figures.	Increase in the proportion of people resident in the Longford Town reporting regular cycling / walking to school and work above 2016 CSO figures.	Where targets are not achieved, the Council will liaise with the Regional Assembly and the Eastern and Midlands Climate Action Regional Office to establish reasons and develop solutions.	Census data (every five years or as Census data is released).	CSO Climate Action Regional Office
		Contribute towards the target of the Renewable Energy Directive (2009/28/EC), for all Member States to reach a 10% share of renewable energy in transport by 2020.			

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
	Number of new developments granted permission which include renewable or low carbon energy	Increased uptake of renewable energy options and a move away from fossil fuels.	Where fewer renewable energy planning applications are being submitted and approved which reduces Longford Town's contribution to renewable energy targets, the Council will liaise with the Regional Assembly and the Eastern and Midlands Climate Action Regional Office to establish reasons and develop solutions for the greater uptake of such technologies.	Internal monitoring of grants of permission.	Longford County Council

# EPO 4: Flood risk and climate change adaptation

Table 15: Monitoring for EPO 4: Flood risk and climate change adaptation

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
EPO 4: Flood risk and climate change adaptation	Number of incompatible developments permitted within flood risk areas.	Minimise developments granted permission on lands which pose - or are likely to pose in the future - a significant flood risk.	Where planning applications are being permitted on flood zones, the Council will ensure that such grants are in compliance with the Flood Risk Management Guidelines and include appropriate flood risk mitigation and management measures	Internal monitoring of likely significant environmental effects of grants of permission (grant by grant)	Longford Town Council
	Area of green and blue infrastructure in urban areas (square metres) of Longford Town.	Increase in the overall provision of GBI within the built-up footprint of Longford Town.	Where there is a decrease in the extent of GBI in the built-up footprint of Longford Town, this will be investigated by the local authority to establish if this is related to the implementation of the LAP. A tailored response will be developed in consultation with any relevant stakeholders in such a circumstance.	CORINE Project updated every six years, including information about changes over the past six years.	European Commission CORINE Land Cover dataset Copernicus Land Monitoring Services

EPO 5: Air

**Table 16: Monitoring for EPO 5: Air** 

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
EPO 5: Air	Proportion of journeys made by private fossil fuelbased car compared to 2016 Census for Longford Town.	Decrease in proportion of journeys made by private fossil fuel-based car compared to 2016 Census for Longford Town.	Where proportion of population shows increase in private car use above CSO 2016 figures, Council will coordinate with the Regional Assembly, DHLGH, DECC and NTA to develop a tailored response.	Census data (every five years or as Census data is released).  Data from the National Travel Survey.  Consultations with Department of Transport and DECC	CSO National Travel
	NOx, SOx, PM10 and PM2.5 as part of Ambient Air Quality Monitoring.	Improvement in Air Quality trends, particularly for transport related emissions of NOx and particulate matter.	Where proportion of population shows increase in private car use above CSO 2016 figures, Council will coordinate with the Regional Assembly, DHLGH, DECC and NTA to develop a tailored response.	EPA Air Quality Monitoring.	EPA

EPO 6: Soil

**Table 17: Monitoring for EPO 6: Soil** 

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
EPO 6: Soil	Proportion of population growth occurring on infill and brownfield lands compared to greenfield.	Maintain built surface cover to below the EU average of 4% as per the NPF. Achieve the 40% target for growth on infill as per NPF.	Where the proportion of growth on infill and brownfield sites is not keeping pace with the targets set in the NPF and the RSES, the Council will liaise with the Regional Assembly to establish reasons and coordinate actions to address constraints to doing so.	Environmental Protection Agency (EPA), Geoportal. Internal monitoring of likely significant environmental effects of grants of permission.	EPA
	Number of AA determinations and environmental assessments undertaken to support applications for brownfield and infill development prior to planning permission	Increased number of AA determinations and environmental assessments which support brownfield and infill development.	Where there is an increase in the number of AA determinations for development of greenfield land, the Council will work with the Regional Assembly, the EPA and other stakeholders to address the pressures through additional mitigation.	Internal monitoring of likely significant environmental effects of grants of permission.	Longford County Council

## EPO 7: Water

**Table 18: Monitoring for EPO 7: Water** 

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
EPO 7: Water	Status of water bodies in Longford Town as reported by the EPA Water Monitoring Programme for the WFD.	No deterioration in the status of any surface water. Not to affect the ability of any surface water to achieve 'good status'. Not to cause any additional waterbodies to fail to achieve at least 'good status'.	Where water bodies are failing to meet at least good status this will be investigated with the DHLGH Water Section, the EPA Catchment Unit, the Regional Assembly and, as relevant, Uisce Éireann to establish if the pressures are related to LAP actions / activities. A tailored response will be developed in consultation with these stakeholders in such a circumstance.	EPA Monitoring Programme for WFD compliance.	EPA

# EPO 8: Cultural heritage including architectural and archaeological heritage

Table 19: Monitoring for EPO 8: Cultural heritage including architectural and archaeological heritage

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
EPO 8: Cultural heritage including architectural and archaeological heritage	Percentage of entries to the Record of Monuments and Places, and their setting, which are protected from adverse effects resulting from development which is granted permission under the LAP.	Protect entries to the Record of Monuments and Places, and their setting, from adverse effects resulting from development which is granted permission under the LAP.	Where monitoring reveals visitor pressure is causing negative effects on key cultural tourist features, the Council will work with Regional Assembly, Fáilte Ireland and other stakeholders to address the pressures through additional mitigation.	Internal monitoring of likely significant environmental effects of grants of permission (grant by grant).	Longford County Council
	Percentage of entries to the Record of Protected Structures and Architectural Conservation Areas and their setting, which are protected from significant adverse effects arising from new development granted permission under the LAP.	Protect entries to the Record of Protected Structures and Architectural Conservation Areas and their setting from significant adverse effects arising from new development granted permission under the LAP.	Where monitoring reveals visitor pressure is causing negative effects on key cultural tourist features, the Council will work with Regional Assembly, Fáilte Ireland and other stakeholders to address the pressures through additional mitigation.	Internal monitoring of likely significant environmental effects of grants of permission (grant by grant).	Longford County Council

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
	Proportion of vacant and derelict buildings/ properties within Architectural Conservation Areas (ACAs)	Reduction in number of vacant and derelict properties within ACAs.	Where the proportion of refurbishment of vacant and/or derelict properties for housing is not keeping pace with the targets set in the NPF and the Housing for All Plan, or there has not been a high uptake of vacant property grants, the local authority will liaise with the Regional Assembly to develop a tailored response.	Census data (every five years or as Census data is released).	CSO

# EPO 9: Landscape

**Table 20: Monitoring for EPO 9: Landscape** 

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
EPO 9: Landscape	Number of developments permitted which result in avoidable adverse visual impacts on the landscape resulting from development which is granted permission under the LAP.	No developments permitted which result in avoidable adverse visual impacts on the landscape resulting from development which is granted permission under the LAP.	Where monitoring reveals developments permitted which result in avoidable adverse visual impacts on the landscape, the Council will reexamine LAP provisions and the effectiveness of their implementation.	Internal monitoring of likely significant environmental effects of grants of permission.	Longford County Council
	Number of vacant properties being retrofitted.	Increase in the number of properties retrofitted for housing since Census 2022.	Where the proportion of refurbishment of vacant and/or derelict properties for housing is not keeping pace with the targets set in the NPF and the Housing for All Plan, or there has not been a high uptake of vacant property grants, the local authority will liaise with the Regional Assembly to develop a tailored response.	Census data (every five years or as Census data is released).	CSO

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
	Number of Vacant Property Refurbishment Grants awarded.	Increase in the number of Vacant Property Refurbishment Grants awarded since 2023.	Where the proportion of refurbishment of vacant and/or derelict properties for housing is not keeping pace with the targets set in the NPF and the Housing for All Plan, or there has not been a high uptake of vacant property grants, the local authority will liaise with the Regional Assembly to develop a tailored response.	Vacant Property Refurbishment Grant: Croí Cónaithe Towns Fund.	DHLGH

## EPO 10: Material assets

**Table 21: Monitoring for EPO 10: Material assets** 

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
EPO 10: Material assets	Programmed delivery of Uisce Éireann infrastructure for Longford Town in line with Uisce Éireann's Investment Plan to ensure sustainable growth can be accommodated.	All new developments granted permission to be connected to and adequately and appropriately served by waste water treatment over the lifetime of the LAP.	Where planning applications are rejected due to insufficient capacity in waste water treatment plants, the Council will consider whether it is necessary to coordinate a response with the Regional Assembly, EPA and Uisce Éireann to achieve the necessary capacity.	Consultations with Uisce Éireann.	Uisce Éireann.
	Number of new developments granted permission which can be adequately and appropriately served with waste water treatment over the lifetime of the LAP.	All new developments granted permission to be connected to and adequately and appropriately served by waste water treatment over the lifetime of the LAP.	Where planning applications are rejected due to insufficient capacity in waste water treatment plants, the Council will consider whether it is necessary to coordinate a response with the Regional Assembly, EPA and Uisce Éireann to achieve the necessary capacity.		

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
	Proportion of population who report regular cycling / walking to school and work above 2016 CSO figures.	Increase in the proportion of people resident in the County reporting regular cycling / walking to school and work above 2016 CSO figures.	Where targets are not achieved, the Council will liaise with the Regional Assembly and the Eastern and Midlands Climate Action Regional Office to establish reasons and develop solutions.	CSO data Climate Action Regional Office	CSO CARO
	Proportion of population growth occurring on infill and brownfield lands compared to greenfield.	Maintain built surface cover nationally to below the EU average of 4% as per the NPF.  Achieve the 40% target for growth on infill as per NPF.	Where the proportion of growth on infill and brownfield sites is not keeping pace with the targets set in the NPF and the RSES, the Council will liaise with the Regional Assembly to establish reasons and coordinate actions to address constraints to doing so.	Environmental Protection Agency (EPA), Geoportal Internal monitoring of likely significant environmental effects of grants of permission.	EPA Longford County Council

SEA Topic	Indicator	Target	Remedial Action	Data source and frequency data is released	Monitored by
	Number of properties retrofitted for housing	Increase in the number of properties retrofitted for housing since Census 2022.	refurbishment of vacant and/or derelict properties for housing is not keeping pace with the targets set in the NPF and the Housing for All Plan, or there has not been a high uptake of vacant property grants, the local authority will liaise with the Regional Assembly to develop a tailored response.  Ene Authority is not keeping pace with the targets sche (and report parts) and the Housing for All Plan, or there has not been a high uptake of vacant property grants, the local authority will liaise with the Regional Assembly to develop a tailored response.  Cen (every year of parts)	Energy E Authority of Ireland grant schemes	Sustainability Energy Authority of Ireland Central Statistics Office DHLGH
	Proportion of vacant and derelict buildings/ properties within Longford Town.	Reduction in number of vacant and derelict properties within Longford Town.		reporting) Census data (every five years or as Census data	
	Number of Vacant Property Refurbishment Grants awarded.	Increase in the number of Vacant Property Refurbishment Grants awarded.		is released).  Vacant Property Refurbishment Grant: Croí Cónaithe Towns Fund.	

# Next steps

**1.107** This Non-Technical Summary and Environmental Report will be published alongside the finalised LAP and made available on Longford County Council's website. An SEA Statement will be prepared identifying how each of the requirements in article 16 and 17 of the SEA Regulations have been met during the SEA process. The SEA Statement will be prepared after the publication of the Longford Town LAP.

LUC

June 2024

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