



18 October 2024

Draft Longford Town Local Area Plan,
Administrative Officer,
Forward Planning,
Planning Department,
Longford County Council,
Áras an Chontae,
Great Water Street,
Longford,
N39 NH56

Dear Sir/Madam

Re: Draft Longford Town Local Area Plan 2025-2031

The Heritage Council was established as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995.

We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage. We welcome the opportunity to comment on the *Draft Longford Town Local Area Plan 2025-2031*.

Ireland's national heritage is defined in the Heritage Act, 1995 as including: 'monuments, archaeological objects, heritage objects, architectural heritage, flora, fauna, wildlife habitats, landscapes, seascapes, wrecks, geology, heritage gardens, and parks and inland waterways'.

National and Local Policy Context

It is important to state from the outset that the **National Planning Framework – Project Ireland 2040**, identifies "*Enhanced Amenities and Heritage*" as one of our national strategic outcomes. Within this, the NPF correctly notes that built, cultural and natural heritage has intrinsic value in defining the character of urban and rural areas, adding to their attractiveness and sense of place. National policy objectives 16, 17 and 52 in the NPF give further support to this ambition and there is a need to reflect this in LAPs.

Development Plans – Guidelines for Local Planning Authorities were prepared for county and city councils in June 2022. Within these guidelines, there are detailed requirements for local forward planning objectives. Features of special architectural, historical, or natural value are our heritage assets, and mandatory objectives under the themes of 'heritage and landscape' have been identified throughout these guidelines.

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There is an obligation on local authorities to ensure the inclusion of such objectives in their statutory plans.

The 4th edition of Ireland's **National Biodiversity Action Plan (NBAP) 2023 – 2030** was published in January 2024. The NBAP states that "local authorities play a key role in biodiversity conservation through the planning system". There are several targets identified under Outcome 2A (*The protection of existing designated areas and protected species is strengthened and conservation and restoration within the existing protected area network are enhanced, regarding designated areas and protected species*) that are relevant for local authorities in their plan making functions. However, of key importance is Outcome 3C (*Planning and development will facilitate and secure biodiversity's contributions to People*). Action Numbers 3C2 and 3C3 are especially important, whereby the objectives of the NBAP are to be aligned and integrated within the statutory land use plans. In addition, actions 1B9, 1C5 should also be key considerations for all plans.

Heritage Ireland 2030 was published in February 2022 and details a number of action points relevant for local authorities and these should be included in LAPs. Most importantly are Action 22 - *Introduce policies on supports for urban biodiversity and tree planting*; Action 26 - *Support nature-based solutions for land-use management*; and Action 37 - *Integrate heritage considerations into urban and rural regeneration to ensure that built and natural heritage objectives underpin the planning and development process and inform the 'Town Centres First' policy approach*.

The **Guidelines for Planning Authorities on Architectural Heritage Protection** were developed in 2004 and give expression to the provisions of the Planning and Development Act 2000, with regards to built heritage. Chapter 2 and 3 give detailed guidance on the role of statutory county level plans with regards to the Record of Protected Structures and Architectural Conservation Areas. The Office of the Planning Regulator has also provided guidance on **Archaeology in the Planning Process** through **Planning Leaflet 13**.

The **Eastern & Midland Regional Assembly's Regional Spatial & Economic Strategy 2019-2031** is the current regional plan for County Longford. Whilst the RSES primarily deals with spatial planning matters at the regional level, there are several sections within the RSES that are relevant for LAPs. We would bring particular attention to Objective RPO 7.21, which aims to ensure that local authorities promote an ecosystem services approach to statutory land use plans, while Objective RPO 9.30 supports the sensitive reuse of protected structures.

The **Longford County Development Plan 2021-2027** has a comprehensive chapter on built and cultural heritage. Policy Objectives 11.1 to 11.45 cover architectural heritage including the record of protected structures, while there are further policies present on archaeological heritage. Chapter 12 has also detailed policies on natural heritage that covers both designated and undesignated sites, geological sites and other ecological assets such as wetlands and peatlands.

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These pertinent national and local policies are emphasised to provide context to our comments. Additional guidelines and policies are identified for specific sections of the draft LAP in the following paragraphs.

General Comments

The Heritage Council are growing increasingly concerned regarding the accessibility of the planning system to the public. Therefore, whilst we welcome the aspiration for Longford Town, and recognise that there are many important objectives and policies in the plan, the plan as drafted needs to be more concise, and the objectives need to be drafted to be more tangible for development management purposes.

Firstly, there is often unnecessary lengthy supporting information in the preambles to objectives, much of which can either be consolidated in supporting evidence base documents or put in an appendix.

Furthermore, some of the policies lack tangibility and it is not clear how development management proposals can address them or comply with them. As an example, the regeneration and placemaking section has several individual policies, each for supporting Longford as a “key town”, a “strategic portal to the northwest”, “a strategic employment centre”, a “tourism hub” and “support centre to Athlone”. Policies in a LAP should be drafted to steer development proposals at the settlement level and detail how development proposals contribute specifically to such goals. In fact, such strategic ambitions are more suitable to the strategic/vision aspects of the plan or regional spatial strategies and county development plans. Simultaneously many sections lack clear development management specific objectives that are needed at settlement level.

We recommend that a review of all objectives be carried out to ensure that they are tailored to a local area plan, as per the hierarchy of land use plans.

Specific comments on the Draft LAP

Chapter 4 Strategic Vision and Aims

The Strategic Vision and Aims for the plan are introduced after 37 pages. The Heritage Council welcomes the emphasis on the “natural and built environment” in the vision for the town. However, we would recommend the following amendments to the following strategic aims [**bold** is suggested new text with ~~striketrough~~ suggested deletions]:

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

Re: Natural Heritage and Green Infrastructure *“to contribute towards the protection and enhancement of ~~the~~ natural heritage and the biodiversity within the ~~Local Area Plan~~”*

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boundary, within the town and its environs and to provide a wide range of environmental, social and economic benefits”

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

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

Chapter 6 - Core Strategy Compliance

We support policies that ensure consolidated and compact growth. At the level of first principles negative impacts on natural and cultural heritage are the result of poor and inefficient land use planning. Achieving more consolidated growth will reduce greenhouse gas emissions from the built environment, but it will also ensure that land take is restrained and does not pose undue threats to cultural and natural heritage. In addition, it also ensures greater integration between patterns of development and sustainable transport, which will aid climate mitigation ambitions. Policy Objectives CS 03 and CS 05 are supported. Although in the case of the latter, we recommend the following amendment:

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

We would also emphasise the need to identify land activation in Objective CS 07 and we also recommend a policy on greenfield sites. It is essential to ensure that any greenfield release in strategic reserves and other areas, makes efficient use of land, whilst providing the mix of homes necessary, and having densities and facilities, that are conducive to public transport roll out, and cycling and walking. There is currently no policy in this section that accurately reflects this, and we recommend that a new policy is provided here.

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Chapter 6 – Residential Sustainability and Placemaking

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

A specific theme of interest regards optimising site potential. The Heritage Council believe that linear terraced houses have a relatively efficient high density-high coverage land use form that accommodates family homes. The more sustainable aspects of this design can be combined with more modern development typologies to achieve efficient use of land in settlements such as Longford town. We encourage this LAP to accommodate such development forms and encourage this typology in inner core development sites. We recommend that policy be provided in this regard i.e. to encourage residential development to respond positively to the historic context, while making efficient use of sites. This type of policy could provide greater tangibility to the objectives in this section.

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

Chapter 10 – Regeneration and Placemaking

Progressive placemaking has the potential to increase the attractiveness of all towns. There are many attractive buildings in the town, with the Main Street having a nice linear rhythm, with attractive prominent buildings present. However, its wide boulevard, which once would have been an attractive avenue, now lends itself to a particularly car dominated urban environment, with little quality public realm and soft landscaping. There is also evidence of poorly designed more modern developments in the town, which ignored the existing character. Such development should be avoided in the future.

As alluded to in the general comments to this submission, there are far too many vague and possibly non-planning related aspirational objectives in this section. Far more detailed policies on the following are needed:

- How infill and brownfield developments will be pursued as part of good design for placemaking objectives.
- Specific design standards that respond positively to context
- The importance of existing heritage and character, and how this will inform design proposals in the town.

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- Specific and detailed information on public realm ambitions, and how these will be designed in terms of material palette and soft landscaping

In addition, there should be far greater detail and development considerations for the strategic areas/regeneration areas identified in this chapter. Whilst it is not reasonable to have masterplans developed for each site at LAP stage, there should be clear high-level aspirations as guidance, in terms of expected uses, development types, along with the identification of environmental constraints for each of the areas. The proposed uses for the area and the development considerations (i.e. what heritage, and environmental assets need to be considered) should be provided. This is the specificity that is expected and needed in local area plans. We note Objective MP03 and the intention to identify additional regeneration areas, however we would suggest that this is one of the key rationales behind a local area plan and should have been already advanced for this draft.

Chapter 11 – Natural Heritage and Green Infrastructure

The Heritage Council has particular interest in this chapter. There are several important provisions that forward plans, both county development plans and local area plans, should make policy for. The highest designation in an Irish context is the natura 2000 network, namely Special Protection Areas (SPAs), and Special Areas of Conservation (SACs). Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) sit beneath the European sites, while nature reserves may also be present in some local authority areas.

In addition, there are many locally important biodiversity sites, that provide important habitats for ecological assets commensurate with county/regional importance.

Section 11.3 rightly notes the presence of the Royal Canal pNHA and it is mapped on the Designated Sites Map. This is welcome. Whilst there are no European designated sites within the town boundary, the zone of influence for developments for SACs and SPAs is 15km (rule of thumb), with hydrological connectivity and ex situ conservation impacts often meaning a larger radius for assessment. Accordingly, developments that occur within the LAP boundary may have impacts on SACs outside the town and need to undergo the required Appropriate Assessment. Therefore, these sites should be mentioned in this chapter. These would include at a minimum Brown Bog SAC, Lough Forbes Complex SAC, and Ballykenny-Fisherstown Bog SPA. The following recommendations are also made:

- Ensure a new objective is drafted to ensure compliance with the Birds and Habitats Directive, or amend NHB 05 i.e. a policy that fully provides for the need for appropriate assessment of projects that may have impacts on SACs/SPAs in the region.
- Amend NHB 03 to state: *Protect, conserve and enhance Longford's biodiversity and natural heritage that includes wildlife (flora and fauna), habitats and landscapes of importance to wildlife, particularly along the Royal Canal pNHA and*

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Camlin River. Any developments that may potentially impact on the pNHA should be accompanied by an Ecological Assessment.

In the case of the second recommendation, it is noted that the subsequent policy (NHB 04) seeks an Appropriate Assessment under the Habitats Directive. There is a misunderstanding here of ecological designations. The Habitats Directive provides appropriate assessment for SAC/SPAs. Natural Heritage Areas are not European designations. In this case an ecological assessment, as suggested above, is the means to assess impacts on the pNHA. NHB 05 also seems to be confused on this matter.

The Heritage Council support NHB 06. However, by specifying buildings and bats and birds, the policy is unintentionally excluding all other protected species. This needs to be redrafted to avoid this. Objective NHB 08 and NHB 10 through to NHB 14 are welcomed. However, there is a need to include “existing hedgerows” to NHB 17. Whilst we agree that there is regular needless removal of trees to ‘tidy’ a site before construction, other features such as long-established hedgerows should also be retained, and in many cases may be more ecologically rich than existing single trees. The Heritage Council also strongly support NHB 18, as we believe that TPOs are underutilised as a means of protecting heritage, both cultural and natural, in forward plans.

It is important to note at this stage that the Heritage Council aspires for the identification of locally important biodiversity sites, that will sit under NHAs in a hierarchy. However not all features will be worthy of this identification. Therefore, policies on green infrastructure networks/ecological corridors, which are present in this plan, are welcome in terms of their importance for ecological features that are critical for wider landscape level ecological connectivity.

Chapter 12 – Built and Cultural Heritage

The Heritage Council strongly supports and commends the introductory sections to this chapter which puts heritage on a sound footing within the context of the town’s future development trajectory.

The Battery Road Architectural Conservation Area is of particular interest. This designation needs to be upheld. The row of buildings along Church Street are attractive, notwithstanding the negative impact that the modern town centre building has had on the setting of the ACA. While more individual attractive buildings are evident as the R198 travels northward. The area is car dominated however, although it is recognised that the R198 is one of the main arteries out of the town. The Heritage Council’s view is that there is need to recognise Irish towns and villages as the settlements they were designed to be. Greater settlement-based design and traffic management is needed to ensure places like Longford Town are “*places to be, not places to pass through*”. Accordingly, work could be progressed on a new public realm design in the car parking area at the corner of Church Street, adjacent to Fee Court.

Whilst the general policies for the ACA are welcomed, an objective that reflects our points here could be drafted to enable greater potency in policy making.

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The Heritage Council broadly support the policies and objectives in this chapter which are more succinct and tangible. However, we would strongly recommend that the flexible implementation of development management standards be included in PS 05. Designated and non-designated historic assets should be treated flexibly. Given the issue of vacancy and dereliction, and the sometimes-challenging requirements for re-using heritage assets, there is a need to ensure that blunt car parking requirements, privacy distances etc do not compromise more important strategic planning objectives.

Chapter 15 – Climate Change

Climate Action is a thread that should run through an entire forward plan. Given the impacts that climate change is having, and is expected to have on our natural heritage, the Heritage Council strongly support policies in the planning system that both reduce emissions at source (mitigation) and ensure adaptation to the worst impacts of climate change.

The Heritage Council believe that at the level of first principles, together with the reuse of the embedded carbon in existing buildings, that ensuring land use patterns and mobility are integrated, is the most important role the planning system has for addressing climate change. In overarching terms, we wish to:

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

Some of the policies from CC 01 to CC 25 caters in some way to the above points, however we would recommend that some of the existing policies be redrafted to fully capture the above points. As an example, CC13 and CC14 need to be redrafted to account for the point regarding integration of transport with patterns of development.

It may be more appropriate that some of these points are addressed in other chapters. However, we will leave this at the discretion of the local authority.

Strategic Environmental Assessment/ Appropriate Assessment

There will be an SEA and Appropriate Assessment required for the LAP. There is a need to ensure that all future policies drafted are individually assessed against the SEA objectives. The Heritage Council recommends that the SEA/AA guidance prepared by the Office of the Planning Regulator (OPR) be consulted when preparing the SEA/AA for the LAP.

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Conclusion

The Heritage Council strongly encourage Longford County Council to continue to acknowledge the primacy of Longford's heritage resource. The built and natural heritage of the town should be the focus for guiding any future strategy. We recommend that this important heritage and character continues to guide a sustainable future development trajectory for the town and its environs.

I trust these comments will be considered carefully as the Council progresses the Longford Town LAP 2025-2031.

Yours sincerely,

Ian Doyle
Head of Conservation

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