

18<sup>th</sup> October 2024

Administrative Officer,  
Forward Planning,  
Planning Department,  
Longford County Council,  
Áras an Chontae,  
Great Water Street,  
Longford,  
N39 NH56.

**Re: Draft Longford Town Local Area Plan 2025-2031**

A chara,

Thank you for your authority's work on preparing the draft Longford Town Local Area Plan 2025-2031 (the draft Local Area Plan).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authority has put into the preparation of the draft Local Area Plan.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the draft Local Area Plan under the provisions of sections 31AO(1) and 31AO(2) of the Planning and Development Act 2000, as amended (the Act) and this submission has been prepared accordingly.

The Office's evaluation and assessment has had regard to the Longford County Development Plan 2021-2027 (the County Development Plan), the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly(EMRA), and relevant section 28 guidelines. This submission makes eight (8) recommendations and three (3) observations.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.

A submission can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning authority is requested by the Office to give full consideration to the advice contained in a submission.

## **Overview**

The Office welcomes the preparation of the draft Local Area Plan, having regard to the statutory requirements under section 19 of the Act.

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

The Planning Authority is also commended for the work it has carried out to date on the Camlin Quarter and securing Urban Regeneration and Development Fund (URDF) funding for regeneration of the area. The Camlin Quarter will act as a catalyst for investment and regeneration in the town.

Further to this, the identification of the strategic sites for regeneration provides a clear development strategy for the town moving forward. The proposed use of masterplans for the eighteen strategic sites, however, raises concerns in terms of the time it takes to prepare such plans, which may defer investment. The Local Area Plan and its land activation measures are therefore critical to Longford Town achieving its population targets set down in the County Development Plan's core strategy. In this regard, the

regeneration aims and principles of the strategic sites would be better contained within the Local Area Plan, placing their objectives on statutory footing and avoiding the need to prepare masterplans.

The Office commends the Planning Authority on the preparation and presentation of the Local Transport Plan (LTP) and the integrating of its policy objectives into the draft Local Area Plan. However, it would be preferable if the access strategy for the Abbeycartron lands prioritises one transport arrangement which focuses on sustainable travel modes and promotes active travel.

A number of other recommendations below focus on the need to provide a clearer and more detailed strategy on the development of the town to assist in assessing specific proposals at development management stage.

It is within this context the submission below sets out eight (8) recommendations and three (3) observations under the following themes:

<b>Key theme</b>	<b>Recommendation</b>	<b>Observation</b>
<a href="#">Residential Development Strategy</a>	<a href="#">Recommendation 1</a> and <a href="#">2</a>	-
<a href="#">Regeneration</a>	<a href="#">Recommendation 3</a>	-
<a href="#">Transport and Accessibility</a>	<a href="#">Recommendation 4</a>	<a href="#">Observation 1</a>
<a href="#">Economy and Employment</a>	<a href="#">Recommendation 5</a>	<a href="#">Observation 2</a>
<a href="#">Education</a>	<a href="#">Recommendation 6</a>	-
<a href="#">Infrastructure</a>	<a href="#">Recommendation 7</a>	-
<a href="#">Flood Risk Management</a>	<a href="#">Recommendation 8</a>	-
<a href="#">Implementation and Monitoring</a>	-	<a href="#">Observation 3</a>

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

Section 19(2) of the Act requires that a Local Area Plan is consistent with any RSES that applies to the area of the plan.

Longford Town is located within the Eastern and Midland Region and is designated as a Key Town in the RSES:

*Key Towns are large towns which are economically active towns that provide employment for their surrounding areas. They have high quality transport links and the capacity to act as regional drivers to complement the RGC's.*

Key regional priorities for Longford Town are to promote compact growth, the regeneration of the town centre and to expand Longford's role as a hub for enterprise, employment and tourism. In this regard, the Office welcomes the preparation of the LTP consistent with Regional Policy Objective (RPO) RPO 8.6 of the RSES. Further, the draft Local Area Plan identifies 18 strategic sites which include the regeneration of two existing housing estates (Ardnacassa and St. Michael's Road) which is in line with RPO 4.61 of the RSES.

The draft Local Area Plan is deemed to be broadly consistent with the RSES and is in general compliance with section 19(2) of the Act, except as may otherwise be identified below.

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

Section 19(2) of the Act requires a Local Area Plan to be consistent with the objectives of the development plan and its core strategy. This requirement also applies under section 20(5) of the Act.

Longford Town is the dominant settlement in the county in terms of population, economic activity, level of service and infrastructure and connectivity. The County Development Plan sets out Longford's settlement strategy which is to direct future growth towards key designated settlements such as Longford Town.

The core strategy of the County Development Plan provides for a housing target of 1,304 homes in Longford Town and a population increase of 2,502 persons over the 2021 – 2027 plan period (i.e. 471 persons per year), growing the town's population to 12,510 persons by 2027. The land use zonings for the town were carried out as part of the preparation of the County Development Plan.

It is clear from the draft Local Area Plan that achieving these targets will be difficult based on the growth rate over the first two years of the County Development Plan. A key issue for the Local Area Plan to address will be in terms of ensuring robust land activation measures to ensure the town meets its population targets set down in the core strategy. This is addressed in greater detail in section 4 below. Regular and effective monitoring of

planning applications and commencement notices are important for the implementation of the Local Area Plan.

### 3. Residential Development Strategy

A phasing map is provided in the draft Local Area Plan and identifies four residential sites as Phase 1 and one site for Phase 2 and Phase 3. The Office welcomes this prioritisation but considers that the Local Area Plan would benefit from providing a breakdown of the site areas, quantum of housing units, servicing requirements and phasing arrangements (if required) for the selected residential sites. This will be important in terms of achieving compact growth, regeneration and investment in infrastructure.

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

#### Recommendation 1 – Residential Development Strategy

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

- RPO 3.2 and RPO 4.26 of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly for compact growth, and RPO 4.61 and RPO 4.62 of the RSES for the regeneration of Longford Town;

---

<sup>1</sup> Graphics and maps could be similar to the Strategic Development and Regeneration Area maps in the Dublin City Council Development Plan 2022-2028

- Policy Objectives CPO 4.2, CPO 4.4 and CPO 4.6 of the Longford County Development Plan 2021-2027 (the County Development Plan) or compact growth and regeneration;
- Key principle 4 of the County Development Plan for the co-ordination of housing and infrastructure; and
- section 4.2 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) and section 5 of the Local Area Plans, Guidelines for Planning Authorities (2013),

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

### **3.1 Density**

Longford Town is classified as a 'Key Town and Large Town (5,000+ population)' in the Compact Settlement Guidelines. The draft Local Area Plan includes the density ranges from the Compact Settlement Guidelines for both the 'centre and urban neighbourhood' and the 'suburban / urban extension' areas. The draft Local Area Plan would benefit from including a map identifying these two distinct areas of the town.

Policy Objective 3.1 of the Compact Settlement Guidelines recommends that density ranges are applied and refined based on consideration of centrality and accessibility to services and public transport and considerations of character, amenity and the natural environment. In respect of residential density on some of the strategic sites which are zoned Town Core, it is not made clear if there is any intention to seek higher densities and / or taller elements where appropriate and where site context and conditions allow. This relates to the point above regarding the need for additional detail on the build out of the development sites. A recommendation to therefore refine the densities for this Key Town is therefore included below.

## Recommendation 2 – Height and Density Strategy

Having regard to:

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

the Planning Authority is required to:

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

### 4. Regeneration

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

The draft Local Area Plan identifies eighteen strategic sites for regeneration within the town, all of which are subject to the preparation of individual masterplans. These areas are all prominently located and varying in size, scale, development potential and objectives. While the Office welcomes the identification of the sites, it is concerned that the preparation of individual masterplans for the eighteen sites will take time and delay investment. Improved focus should be provided by setting out the overall regeneration

strategy for each of the sites and also carrying out a prioritisation exercise to target investment accordingly. Additionally, the Local Area Plan would benefit from greater detail in respect of these development and renewal areas, having regard to section 4.2 of the Compact Settlements Guidelines and section 5 of the LAP Guidelines. For example, in text and graphic form, provide guidance on design, layout, massing, materials, permeability and a phasing strategy for the delivery of infrastructure (if required). Thereby placing the development objectives on a statutory footing in the Local Area Plan, proactively activating land and avoiding the need to prepare masterplans.

With respect to the Camlin Quarter, a Framework Plan was prepared in 2019 for this area which is located to the north of Main Street (c. 22ha) and URDF was successfully secured in 2021. The County Development Plan promotes the Framework Plan (section 6.5.3.1) and the draft Local Area Plan in turn includes a number of objectives to support this ambitious and welcome project citing the Camlin Quarter Plan (REG 14, 15 and TOU 07).

The draft Local Area Plan however, rationalises the Framework Plan and breaks the overall regeneration quarter down into individual sites which will be subject to new masterplans. Given the significant work to date on the Camlin Quarter, the URDF funding and the need to positively attract development and investment into the town, this Local Area Plan should also provide greater detail on the regeneration aims and principles of these individual projects for the Camlin Quarter, in lieu of preparing individual masterplans. Further, the Office welcomes the recent publication of the Longford 2024: A Town Centre First Strategy (2024) and encourages consideration of this document in addressing this matter.

The Ballyminion area is identified in the RSES as a regeneration area. This area is largely located outside of the CSO Settlement boundary<sup>2</sup> to the south west of the town, and includes an existing housing estate and lands zoned industrial / commercial / warehousing and areas of constrained land use. MP 07 of the draft Local Area Plan

---

<sup>2</sup> This means within the existing built-up footprint of all sizes of urban settlement, as defined by the CSO in line with UN criteria i.e. having a minimum of 50 occupied dwellings, with a maximum distance between any dwelling and the building closest to it of 100 metres, and where there is evidence of an urban centre (shop, school etc.).

includes an objective to ‘finalise and agree a masterplan for the appropriate regeneration and renaturing of the floodplain areas’ of the Ballyminion area. The draft Local Area Plan would benefit from more appropriately setting out the regeneration aims and design intent for these lands to provide a clearer direction for investment decisions and greater co-ordination for development and infrastructure delivery.

#### **4.1 Estate Regeneration**

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

#### **4.2 Dereliction and Vacancy**

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

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

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

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

the Planning Authority is required to:

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

## **5. Transport and Accessibility**

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

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

Policy Objective ST 16 of the Local Area Plan supports the development of an integrated transport hub which is supported by the Office as a measure to promote sustainable travel modes. However, the LTP did not examine this provision and it is unclear from the draft Local Area Plan where this hub will be located. The Local Area Plan provides an

opportunity to identify a location for the hub within the town centre, enhancing accessibility and sustainable mobility as per RPO 4.59 of the RSES. Site selection should be carried out in consultation with the National Transport Authority (NTA).

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

In addition to the above, some incorrect maps and projects are transposed from the LTP into the draft Local Area Plan. To ensure full alignment with this policy objective, the Office requests the Planning Authority to review the draft Local Area Plan to confirm the priority projects and maps are contained therein (for example, draft Local Area Plan includes all the bike schemes, public transport projects and car parking strategy but does not include the prioritised routes / projects).

### **5.1 Abbeycartron Access Strategy**

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

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

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

#### **Recommendation 4 – Transport and Accessibility**

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

- section 8.3 and RPO 4.59 and 8.1 of the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly;
- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, and the Climate Action Plan 2024, and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021); and
- Policy Objectives CPO 5.1, CPO 5.3, CPO 5.5, CPO 5.7, CPO 5.8, CPO 5.45, CPO 5.46, CPO 5.47 and CPO 5.71 of the Longford County Development Plan 2021-2027,

the Planning Authority is required to:

- (i) provide a specific objective for modal share targets for Longford Town;
- (ii) include the alternative sustainable proposal access arrangement for the Abbeycarton lands and remove references to the traffic arrangements from the Longford Northern Environs Local Area Plan 2008-2014; and
- (iii) provide greater detail on the proposed integrated transport hub, noting a preference for a town centre location and to consult with the National Transport Authority on this proposal.

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

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

## 6. Economy and Employment

Longford is a key town which provides a long established employment base in the county. Key regional priorities for Longford Town are: to promote compact growth, the regeneration of the town centre and to expand Longford's role as a hub for enterprise, employment and tourism.

RPO 4.63 of the RSES seeks to support Longford Town's role as a strategic employment centre. To support and grow economic activity in the town, 197 ha of land is zoned and available for employment purposes. The Local Area Plan would benefit from providing more detailed information including a breakdown of developed and available undeveloped employment zoned lands in the town and their locations.

The LTP maps the employment density of Longford Town which highlights that there is a greater employment density in the centre of the town, with areas further from the town centre having fewer jobs. This employment pattern is positive as it aligns with public transport provision. Policy Objective ECON 06 supports the continuation of this sustainable pattern of development and is welcomed. With the exception of the town centre, the other employment generating lands are all located on the outskirts of the town, adjoining the strategic road network and are not in close proximity to residential zones or public transport services. The economic lands would benefit from greater integration of transport and land-use planning by identifying the types of employment uses for the different locations based on their accessibility, as per section 1.4 of appendix A of the Development Plans Guidelines:

*accessibility is a central consideration in selecting employment zones and the transport provision of potential locations for development needs to be strategically considered:*

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

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

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

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

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

### Recommendation 5 - Economic development and employment

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

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

the Planning Authority is required to:

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

## 6.1 Retail

In the Retail Planning Guidelines for Planning Authorities (2012), Longford Town is defined as a Level 3 Settlement, assigning it the role of providing retail support at a sub-regional level. The importance of Longford Town has also been recognised in the RSES for EMRA, which has classified the town as a Level 2 centre (Major Town Centres and County (Principal) Town Centres). Longford Town's Core Retail Area is to be the focus and preferred location for retail development during the plan period. This is supported by Policy Objective RET 06 of the Local Area Plan and welcomed by the Office.

Section 7.6.3.4.1 of the draft Local Area Plan states that in order to maintain the role of Longford Town as a driver of development in the north midlands area and to maintain its position within the Regional Retailing Hierarchy, the potential for regional shopping facilities will be considered subject to relevant planning criteria. Longford Town has two existing shopping centres, one in the centre of the town and the second to the north, with a portion of the latter repurposed, with the rest vacant. The Local Area Plan should clearly identify either the location or the criteria for the location of any such future development, focussing on protecting the vitality and viability of the existing town centre.

### Observation 2 – Retail

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

## 7. Education

The Office welcomes the preparation of the Social Infrastructure Audit. Access to quality childcare, education and health services is a National Strategic Outcome of the National Planning Framework (NPF). In this regard the new development area of Abbeycartron should be appropriately planned to include sufficient social infrastructure and supports. The draft Local Area Plan states that a site has been identified by the Department of Education as a potential Post Primary School site; Dempsey's Field in Abbeycartron.

This site is zoned New Residential. While education is a permitted use under this land use zoning, this site is prioritised as a Phase 1 residential site in the draft Local Area Plan.

While the need for a school in the Abbeycartron area is fully acknowledged, this site is located at the most easterly point of the overall development area, requiring a significant number of active travel arrangements to access the site. The LTP does not include any school provision for this site.

The Office therefore strongly advises the Planning Authority to engage with the Department of Education and the NTA in relation to school provision and site selection.

### Recommendation 6 - Abbeycartron school site

Having regard to:

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

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

The Planning Authority should consult with the Department of Educational and Skills and the National Transport Authority in addressing this recommendation.

## 8. Utilities and Infrastructure Capacity

The draft Local Area Plan sets out infrastructure issues facing the town, including upgrades to the wastewater treatment plant, a lack of sewerage services and deficiencies in surface water drainage.

Following a review of the submission from Uisce Éireann (UÉ), there are some matters that need clarification or revision.

With respect to wastewater, the UÉ submission states that there is sufficient capacity at the Longford Town Waste Water Treatment Plant to support the delivery of the housing and population targets in the core strategy of the County Development Plan.

With respect to water supply, the UÉ submission notes that the Lough Forbes Water Treatment Plant (WTP) has limited headroom but a more significant upgrade to the WTP will be required to facilitate long term growth in Longford.

The Office advises the Planning Authority to consult with the UÉ in relation to these matters.

Additional text should also be included on the forthcoming Integrated Urban Wastewater Management Plan which will soon commence for Longford Town as per the requirements of the recast Urban Wastewater Treatment Directive.

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

The draft Local Area Plan supports the use of SuDS and nature based solutions through Policy Objectives SW 04 and SW 05. The Office is, however, concerned that there is not sufficient consideration of green (and blue infrastructure) in the draft Local Area Plan, consistent with RPO 7.22 and RPO 7.23 of the RSES and NPO 57 of the NPF.

Integrating these strategies into the plan making process produces better outcomes by informing the other plan elements, such as the design of open spaces, parks, public realm etc. This in turn contributes to the creation of healthy, low carbon, resilient and connected settlements and places (see section 4.4 of the Compact Settlement Guidelines). This point is especially prevalent for the larger development sites, such as Abbeycarton Lane, extension to the existing Ardnacassa residential estate and the new industrial zoned lands on the eastern outskirts of the town and in the south west. Additionally, the greater use of SuDS will assist in addressing the surface water issues raised in the Local Area Plan.

## Recommendation 7 - Green and Blue Infrastructure

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

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

the Planning Authority is required to:

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

## 10. Flood risk management

The Office welcomes the preparation of the Strategic Flood Risk Assessment (SFRA) and accompanying plan making justification tests (Justification Tests) to inform the policies and objectives of the draft Local Area Plan. Flood risk areas are represented by a constrained land use designation in the land use zoning map and Policy Objectives FR 02 and FR03 provide additional support for the management and sustainable use of the flood risk areas.

There are, however, some errors within the SFRA which also been identified by the the Office of Public Works (OPW) in its submission:

- SFRA does not include the most up to date versions of the policy objectives of the draft Local Area Plan;
- Justification Tests have been included for residential lands sites OP7 and OP8, however, these lands appear to have been zoned for water compatible open space; and

- SFRA utilises superseded datasets and includes links to websites which are no longer operational.

As such, the Office requests the Planning Authority to review and amend accordingly.

Additional detail should also be provided within the SFRA on where integrated and area based provision of SuDS and green infrastructure are appropriate to avoid reliance on individual site by site solutions – as per comments and recommendation above regarding the need for increased focus on SuDS measures to address and alleviate surface water issues in the town.

The Longford Flood Relief Scheme (FRS) is welcomed to address flood considerations and support appropriate use of riverside locations. A policy objective supporting and protecting the progression of the FRS should be included.

With respect to the consideration of climate change impacts, it is acknowledged that the land use zonings for Longford Town were prepared as part of the County Development Plan, and the draft Local Area Plan must be in compliance with this County Development Plan. The Planning Authority is, however, advised to actively engage with the OPW on these matters when preparing its new County Development Plan, work on which is due to commence in 2025. In particular, greater consideration of the precautionary approach for climate change impacts and future scenario mapping at the plan making stage will be required.

### **Recommendation 8 – Flood Risk Management**

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

- RPO 7.12 of the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly; and
- the Planning System and Flood Risk Management Guidelines (2009),

the Planning Authority is required to:

- (i) include a policy objective to support and protect the Longford Flood Relief Scheme;
- (ii) overlay the Flood Zone A and B on the land use zoning map;

(iii) provide greater consideration of climate change impacts and overlay these maps on the land use zoning maps; and

(iv) review the Strategic Flood Risk Assessment as per the submission from the Office of Public Works (OPW).

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

## **11. Implementation and Monitoring**

Section 6.5 of the LAP Guidelines states that planning authorities are encouraged to periodically review the success or otherwise of the implementation of the policies and objectives of a local area plan by effective monitoring systems such as reviewing the progress in securing the objectives of the county development plan in accordance with section 15 of the Act.

Section 16 of the draft Local Area Plan sets out the implementation and monitoring strategies of the Planning Authority. The chapter states the Planning Authority will establish a database of strategic brownfield and infill sites so that brownfield sites reuse can be managed as part of the active land management process and it will monitor the number of residential units permitted and developed on an annual basis to ensure compliance with the core strategy and its housing allocation.

It is considered, however, that a more systematic approach to monitoring would better assist the Planning Authority in implementing the key objectives / actions of the draft Local Area Plan, and by identifying lead responsibility, suitable indicators for measuring policy objectives and a timeline for implementation of actions / projects. For example, tackling dereliction and vacancy rates, as detailed above.

Guidance on monitoring and implementation is provided in chapter 10 of the Development Plans Guidelines. Further, the Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030 and the Newcastle West Local Area Plan 2023-2029 both provide examples of good practice in this area.

### Observation 3 – Monitoring and Implementation

Having regard to section 15(1) and 15(2) of the Planning and Development Act 2000, as amended, the Planning Authority is requested to review the proposed provisions of the draft Longford Town Local Area Plan 2025-2031 (draft Local Area Plan) concerning implementation and monitoring to provide a more detailed systematic approach to monitoring the implementation of key objectives and/or actions of the draft Local Area Plan.

#### Summary

The Office requests that your authority addresses the recommendations and observations outlined above.

As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 20 of the Act must summarise these recommendations and the manner in which they will be addressed. Where your authority decides not to comply with the recommendations of the Office, made in the draft Local Area Plan and report, please outline the reasons for the decision in the Chief Executive's Report.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through [plans@opr.ie](mailto:plans@opr.ie).

Is mise le meas,

---



**Anne Marie O'Connor**

Deputy Regulator and Director of Plans Evaluations

---