



Draft Longford Town Local Area Plan 2025-2031

The Eastern and Midland Regional Assembly notes the publication of the draft Longford Town Local Area Plan (LAP) 2025-2031 and sets out hereunder submissions and observations on behalf of the Assembly. This submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at its meeting of 11th October 2024.

1.0 Legislative Context

The role and function of the Regional Assembly, including the scope of the RSES, is currently provided for in the Planning and Development Act 2000 (as amended). It should be noted that this legislation is currently under review, with the new Planning and Development Bill 2023 approved by Cabinet on 3rd October 2023 and has completed Seanad Éireann, Third Stage (July 2024). It is anticipated that the Planning and Development Bill 2023 will be enacted into legislation in the coming months.

The Regional Assembly is not required under Section 27 of the Planning and Development Act 2000 (as amended), to prepare a submission and observation on a local area plan prepared by a local authority as is the case for a development plan, or variation thereof, however the Regional Assembly considers that regionally important and strategic plans should be commented upon by the Assembly, and in this case a plan for a designated Key Town in the Region is considered as such. In this regard the Assembly makes this submission and the comments hereunder to be taken into consideration by the local authority in the making of the Longford Town Local Area Plan 2025-2031.

2.0 Regional Spatial and Economic Strategy (RSES)

The RSES for the Eastern and Midland Region, which was made by the Members of the Assembly on 28th June 2019, is a strategic plan and investment framework to shape future growth throughout the Region. It identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives (RPOs).

The overall vision of the Strategy is to create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunity for all. The vision is supported by sixteen Regional Strategic Outcomes (RSOs) that are framed around three key principles of Healthy Placemaking, Climate Action and Economic Opportunity.

A primary statutory objective of the Regional Spatial and Economic Strategy (RSES) is to support the implementation of the National Planning Framework (NPF), alignment with the investment priorities of the National Development Plan 2021-2030 (and thus Project Ireland 2040), by coupling new development with the requisite investment in services and infrastructure. The RSES is of critical

importance for the delivery of Project Ireland 2040, given that it is the succeeding tier of policy delivery in Ireland.

The RSES for the Eastern and Midland Region presents a Spatial Strategy, devised and informed by a complementary Economic Strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. This includes championing the capital city of Dublin as a smart, climate resilient and global city region; identifying Regional Growth Centres which act as regional economic drivers and supports for their wider catchment areas; and promoting a network of large economically active Key Towns that provide employment and services to their surrounding areas. All of this is supported by Self-Sustaining Growth Towns, Self-Sustaining Towns and a network of multifaceted Rural Places. The RSES identifies Regional Growth Centres and Key Towns within the Region, however Self-Sustaining Growth Towns, Self-Sustaining Towns and Rural areas are to be defined by Development Plans.

Longford Town is identified as a Key Town in the RSES growth strategy, being located in the Gateway Region. The RSES outlines that Longford Town, along with Mullingar, Tullamore, Portlaoise and Graiguecullen (Carlow), are large economically active towns located within the Gateway Region. These towns provide important connections with adjoining regions and have the capacity and future growth potential to accommodate above average growth in tandem with the requisite investment in employment creation, services, amenities and sustainable transport.

Furthermore, the RSES states that Longford Town is strategically located on the N4/M4 motorway and the Dublin to Sligo rail line. The town acts as a portal to the Northern and Western Region and provides a supporting role to the Regional Growth Centre of Athlone. Longford also acts as a key employment centre with strong retail, administrative and service functions that serve a wide catchment. Key priorities in the RSES for Longford 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.

3.0 Submission

At the outset, the Assembly would like to acknowledge the extensive work that Longford County Council has carried out in order to prepare the draft Longford Town Local Area Plan (LAP) and, in particular, the overall approach and effort of the Council to coordinate and incorporate policies and objectives so that they are consistent with the RSES is welcomed.

The draft LAP outlines the strategic policy framework that highlights how the plan will be informed by a hierarchy of planning guidance, including the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region and the Longford County Development Plan 2021-2027, as varied (CDP). The structure and content of the draft LAP constitutes the following headings:

1. Introduction
2. Spatial Planning and Hierarchy Context
3. Town Profile and Socio-Economic Context
4. Strategic Vision and Aims
5. Core Strategy Compliance
6. Residential Sustainability and Placemaking
7. Economic Development
8. Tourism
9. Regeneration and Placemaking
10. Social Infrastructure
11. Natural Heritage and Green Infrastructure
12. Built and Cultural Heritage
13. Infrastructure
14. Sustainable Transport
15. Climate Change
16. Implementation and Monitoring

The Assembly considers that these areas of focus satisfactorily align with the three key principles of the RSES (Healthy Placemaking, Climate Action and Economic Opportunity) and the sixteen Regional Strategic Outcomes (RSOs), which are outlined in Section 2.3 of the RSES.

3.1 Introduction

Chapter 1 of the draft LAP provides an introduction to the plan preparation process indicating that the proposed new plan will act as the key statutory planning document that will guide the overall development of Longford Town to the year 2031. It will replace the current Longford Town and Environs Local Area Plan 2016-2021.

The draft LAP sets an overall strategy for the proper planning and sustainable development of Longford in the context of the Longford County Development Plan (CDP) 2021-2027. The draft LAP states that it has been prepared having regard to national, regional and local policy documents in addition to ministerial guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended).

The plan preparation commenced with a six-week pre-draft public consultation stage between 7th October to 18th November 2022 with a total of 19 no. submissions received.

The publication of the draft plan commences the statutory process of making the new LAP with the draft LAP being on public display for six weeks.

The draft LAP includes a written statement and accompanying maps which should be read in tandem with the Longford County Development Plan 2021-2027. The draft LAP is accompanied by a number of separate assessments and reports that have been undertaken in parallel with the preparation of the document. These include Strategic Environmental Assessment (SEA), Appropriate Assessment (AA), Strategic Flood Risk Assessment (SFRA), and the Battery Road Architectural Conservation Area (ACA) Statement of Character. In addition, Appendix 3 of the Longford CDP 2021-2027 includes an Infrastructural Assessment Report (IAR) with the proposed land use zonings contained in the draft LAP having been informed by same. Furthermore, the draft LAP states that it includes the relevant objectives of the Longford Town Transport Plan 2023 which was prepared in close collaboration with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII).

The Assembly considers the overall plan preparation to be comprehensive, with the structure and content being in accordance with Local Area Plan Guidelines for Planning Authorities 2013.

3.2 Spatial Planning and Hierarchy Context

Chapter 2 of the draft LAP highlights the overall spatial planning framework the proposed new draft LAP will sit within. Figure 4 of the draft LAP provides a clear outline of the hierarchy of spatial plans with the National Planning Framework, the Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) 2019-2031, the Longford County Development Plan 2021-2027 and the proposed new Longford Town Local Area Plan 2025-2031 all referenced.

Section 2.2.1 of the draft LAP provides an outline of the National Planning Framework with Table 1 of the draft LAP listing the most relevant National Policy Objectives (NPOs) contained in the NPF that are applicable to the draft LAP. In addition, Section 2.2.2 of the draft LAP provides a discussion of the Regional Spatial and Economic Strategy (RSES) 2019-2031. It includes recognition of Longford being identified as a Key Town for economic growth and development within the Gateway Region and the County which characterises such settlements as *'economically active towns that provide employment for their surrounding areas and the capacity to act as regional drivers to complement the Regional Growth Centres'*.

The draft LAP recognises that the town provides important connections with adjoining regions and has the capacity and future growth potential to accommodate above average growth in tandem with the requisite investment in employment creation, services, amenities and sustainable transport. 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, and specifically, Key Principle 6 relates to Longford Town with its aim to *'Focus on the need for more balanced development amongst the network of higher order towns in the Settlement Hierarchy to support the role and function of Longford Town as the principal economic driver and focus of investment for the county'*. In addition, Table 2 in the draft LAP lists specific Regional Policy Objectives (RPOs) in the RSES that are applicable to Longford Town which is welcomed by the Assembly.

3.3 Town Profile and Socio-Economic Context

Chapter 3 of the draft LAP provides an overall profile for Longford Town which is recognised as the dominant settlement in County Longford in terms of population, economic activity, services, infrastructure and connectivity.

The Assembly welcomes the recognition in the draft LAP regarding the role of Longford from a regional perspective within Section 3.1 including reference to Longford Town as being a 'Strategic Portal' to the North-West in the RSES. The town is also the commercial, retail, services and industrial centre of the County. The inclusion of this reference is supportive of RPO 4.63 in the RSES.

The draft LAP acknowledges the strengths of the town including being located in a central position both within the country and the county with good communication links. It is located on a strategic junction at the intersection of the N4 (Dublin-Sligo) and N5 (Dublin-Castlebar/Westport) national primary routes. The N63 national secondary route to Roscommon also traverses the town. Longford Town is also positioned on the Dublin-Sligo rail line which links to the town to Dublin and Mullingar to the east and Sligo and Leitrim to the north-west. The town also benefits from frequent bus services to Dublin and elsewhere in the county.

Section 3.3 of the draft LAP provides a detailed Socio-Economic Context for Longford Town mainly derived from Census 2022 data and analysis under various topics including population, gender, age, migration and ethnicity, travelling community, language, Irish speakers, housing, tenure and home ownership, housing vacancy, education/employment and economy, commuting, working from home, broadband, childcare, health and deprivation.

The Assembly welcomes the inclusion of this socio-economic analysis. From a regional perspective with Longford Town being identified as Key Town in the RSES, it is noted that the percentage population growth rate for Longford Town between 2016 and 2022 (+944 persons, 9.43%) is lower than the average growth rate experienced for County Longford (+5,878 persons, 14.38%) during the same six-year intercensal period. This is a trend that will require regular monitoring as part of the implementation of Longford County Development Plan 2021-2027 and the draft Longford Town Local Area Plan 2025 – 2031 core strategy and an effective monitoring mechanism should be included in Chapter 3 of the draft LAP.

3.4 Strategic Vision and Aims

Chapter 4 of the draft LAP introduces the overall 'Strategic Vision' for Longford Town being;
'To set out a framework for the sustainable physical development of Longford Town, ensuring the conservation and protection of the built and natural environment, while providing in an equitable manner for all our people within the town'.

The draft LAP states that this vision is underpinned by a number of strategic aims which are designed to provide a level of focus and direction to the objectives of the Local Area Plan. These were developed

on the basis of higher-level policy, the many strengths of the town and seek to overcome the weaknesses and threats identified in order to future proof Longford and provide for its long-term growth and sustainable development.

In total, there are 12 strategic aims listed in Section 4.1 of the draft LAP. In particular, the Assembly welcomes the inclusion of the following strategic aims which compliment the 3 Key Principles of the RSES in relation to Healthy Placemaking, Climate Action and Economic Opportunity;

Strategic Aim 1: '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'.

Strategic Aim 2: To support and facilitate the development of integrated sustainable neighbourhoods that respond to the needs of changing demographics in terms of housing delivery.

Strategic Aim 3: To encourage sustainable employment growth and economic activity and promote Longford as a local and regional centre of trade, business and tourism.

Strategic Aim 11: 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.

3.5 Core Strategy Compliance

Chapter 5 of the draft LAP provides an outline as to how compliance with the Core Strategy of the Longford County Development Plan 2021-2027 will be achieved. Section 5.1.2 includes the following statement;

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

An adapted extract from the Core Strategy Table of the Longford CDP 2021-2027 has been included to highlight the above.

Section 5.1.2 also includes an analysis of Census 2022 population data as compared to the allocations provided to Longford Town in the core strategy of the Longford CDP 2021-2027. It is noted that on average, Longford Town had a growth of 157 persons a year between 2016 and 2022. For the next 5

years from 2022 to 2027 a similar growth rate (157 persons a year) would result in an addition 785 persons. Based on the above information, there is an allowance for a further population growth of 1,558 persons (15.57%) in the town up to 2027.

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

Section 5.2 of the draft LAP discusses Future Development Priorities in the plan area. It is stated that the draft plan presents an opportunity to initiate the necessary transition to a low carbon and sustainable model of development that will improve the quality of life for people living in the town. Accordingly, the priorities for the plan are to achieve compact growth based on the prioritisation of the town centre sites and the development of infill sites and to identify new residential sites at sustainable densities. This is reflected in objectives CS 03, CS 05 and CS 07 of the draft LAP.

The Assembly supports the inclusion of these objectives which align with Regional Strategic Outcome (RSO 2) relating to compact growth and urban regeneration, in addition to RPO's 3.2 and 3.3 in the RSES facilitating compact growth.

3.6 Residential Sustainability and Placemaking

Chapter 6 of the draft LAP provides commentary on how the draft plan will enable the development of sustainable residential development during the plan period. Section 6.2 highlights the publication of the 'Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities' in January 2024 which are ministerial guidelines published under Section 28 of the Planning and Development Act 2000 (as amended). Sections 6.2.1, 6.2.2 and 6.2.3 of the draft LAP provides a discussion on growth priorities, residential densities, quality design and placemaking indicators and development standards for housing as informed under the above new ministerial guidelines.

These requirements are reflected in objectives RES 01, RES 02 and RES 04 in the draft LAP, which are considered to be complimentary to RPO 6.12 in the RSES in relation to placemaking. It is however considered that the draft LAP can be strengthened further by including reference to Section 9.4 of the RSES in relation to Healthy Placemaking and the 'Guiding Principles for the Creation of Healthy and Attractive Places'.

3.7 Economic Development

Chapter 7 of the draft LAP discusses economic development in the plan area with the strategic aim being *'to encourage employment growth and economic activity and promote Longford as a local and regional centre of trade, business and tourism'*.

Section 7.2 of the draft LAP provides an economic profile for the town which acknowledges that it acts as a key employment centre with strong retail, administrative and service functions that serve a wide catchment. The Assembly welcomes the continued emphasis in this chapter of Longford Town being a 'Key Town' in the RSES on account of its role as an economically active service town providing employment for its surrounding area, as well as being endowed with high-quality transport links and the capacity to act as a regional driver to complement the Regional Growth Centre of Athlone. Furthermore, it is considered that economic development objectives ECON 02 and ECON 03 align with RPO 4.63 in the RSES that promotes *'Longford Town as a strategic portal to the northwest and south in recognition of its location at the junction of the N55; M4/N4 Dublin/Sligo and N5; due to its proximity to the regional growth centre of Athlone; and support its role as a strategic employment centre.'*

This chapter also makes reference to the Upper Shannon Erne Future Economic Project which is a collaboration between Cavan, Leitrim and Longford local authorities with ESB and Bord na Móna to provide opportunities to deliver cross regional economic projects. This project is also referenced in the RSES. Reference is also made in the draft LAP to the Midlands Regional Enterprise Plan (REP) to 2024 which has critical objectives across themes such as placemaking, climate change and advanced manufacturing.

The draft LAP states that the challenge for Longford is to identify projects, partners and collaborators that can help to drive further economic growth. Opportunity exists to build further resilience by growing a strong advanced manufacturing base with world class R & D facilities, a vibrant food and drink sector, a low carbon / green enterprise sector; an improved tourism offering and better quality of life.

The draft plan states that it has provided for up to c.197ha of land zoned for employment purposes across a range of employment land-use types, and corresponds with the Longford Town Zoning Map contained in the Longford CDP 2021-2027. Whilst the Assembly supports the continued availability of readily serviced employment zoned lands to enable the future economic development of Longford as a Key Town in the RSES, this chapter would benefit by providing more detailed information including a breakdown on developed and available undeveloped employment zoned lands in the settlement and the methodology used to identify the location and extent of same in accordance with 'Development Plans: Guidelines for Planning Authorities (2022) (Appendix A, Section 1.4 Enterprise and Employment Zoning)' published by the Department of Housing, Local Government and Heritage.

The Assembly considers that this chapter could be enhanced further by making reference to Figure 6.3 Economic Strategy of the RSES which has the five key principles including Smart Specialisation, Clustering, Orderly Growth, Placemaking and Future Proof and Risk Management.

It is also considered that the draft LAP would benefit by referencing the 'Guiding Principles to Identify Strategic Employment Development' contained in Section 6.3 of the RSES (Economic Strategy) as to how strategic employment sites in the town have been identified. The OPR Practice Note PN04 on 'Planning for Employment Growth – The Development Plan and Employment Lands' (August 2024) is also a noteworthy publication that should be considered in this context.

In relation to retail, Section 7.6 of the draft LAP recognises the retail position of Longford Town as Level 3 settlement in the Retail Planning Guidelines and as a Level 2 centre (Major Town Centres and County (Principal) Town Centres) in the RSES. A Retail Strategy is contained in Section 7.6.3.1 of the draft LAP with the Retail Strategy Map identifying the Core Retail Area provided in this section. The draft plan states that in order to tackle commercial vacancy rates in the town, the Core Retail Area will be the focus and preferred location for retail development during the plan period. The Assembly supports this statement and also welcomes retail objective RET 01 that aims to *'promote and encourage major enhancement of town centre activities within Longford town to enable it to maintain its strategic role as defined in the Eastern and Midland Regional Spatial and Economic Strategy.'*

3.8 Tourism

Chapter 8 of the draft LAP provides commentary on how the draft plan will encourage and provide for the continued expansion of the tourism sector in the plan area. The draft LAP recognises that Longford Town has a rich cultural heritage with potential to develop as a recreation and tourism hub, building on its proximity to attractions such as Centre Parcs, the Royal Canal, the Dublin-Westport Greenway and Mid Shannon Wilderness Park and key assets within the town such as St Mel's Cathedral, the River Camlin, a theatre and walking routes such as the Rebel Trail and Literary Trail.

The Assembly welcomes the inclusion of RPO 4.60 in this Chapter which states;

'Support the development of Longford as a tourism hub having regard to its accessibility to key tourist destinations in the Region including Center Parcs, and proximity to natural amenities, recreational opportunities and the town's location on the Rebel Longford Trail.'

The draft plan states that it will support the continued roll out of the tourism brand in Longford Town and ensure that provision is made for the development of the town as a tourism hub in accordance with RPO 4.60 of the RSES. This will include the development of appropriate tourism facilities and infrastructure. A number of tourism objectives in the draft LAP support the above RPO 4.60 including TOU 02, TOU 03, TOU 4, TOU 06 and TOU 09 which is welcomed.

3.9 Regeneration and Placemaking

Chapter 9 of the draft LAP provides commentary on how the draft LAP will provide for regeneration in the plan area, in particular focusing on the rejuvenation of the town centre by identifying and presenting co-ordinated actions to improve retail and commercial attractiveness of the Core Retail Area, provide for enhanced permeability and sustainable mobility within the town centre and improve links between the core and surrounding residential and employment areas. The draft LAP highlights key areas include the Camlin Quarter and Ballyminion areas with further strategic sites throughout, including possibilities within the southern quarter of the town. There are opportunities for improved links between both ends of the town and enhanced rejuvenation of, and connections between, the Royal Canal Greenway and the former location of the canal harbour around the Market Square.

Section 9.5.2 of the draft LAP provides an overview of strategic sites in Longford Town that will be subject to masterplans including the identification of strategic sites for regeneration on the Strategic Sites Map. This is further supported by objectives MP 02 and MP 05 in the draft LAP in relation to regeneration of strategic sites and the need for master plans to be prepared for same in consultation with the community and with relevant statutory bodies.

The Assembly welcomes the inclusion of objectives REG 02 *‘Support and prioritise Longford Town regeneration opportunities and the associated co-ordination of relevant stakeholders in recognition of its Key Town status within the County’*, objective REG 08 *‘Support the plan-led development and regeneration of publicly owned land banks in the town for residential, employment, education, community, cultural and recreational opportunities’* and also objective REG 09 *‘Support the consolidation of the town centre and the enhancement and linking of brownfield and outlying sites to the town centre, with a focus on the regeneration of underused buildings and strategic sites’* that are considered supportive of RPO 4.62 in the RSES which states *‘support the plan-led development and regeneration of publicly owned land banks in the town for residential, employment, education, community, cultural and recreational opportunities and the consolidation of the town centre and the enhancement and linking of brownfield and outlying sites to the town centre, with a focus on the regeneration.’*

3.10 Social Infrastructure

Chapter 10 provides commentary on how the draft LAP will facilitate and secure the provision of social infrastructure to support existing and new communities with the draft LAP area in a manner which provides flexibility to respond to varied and changing community needs. The draft LAP defines social infrastructure facilities to include, but are not limited to,- schools, health services, community facilities, sports and recreational activities. It states that ‘Social infrastructure’ facilities provide an invisible platform of community and social interaction which many residents may rely upon for personal wellbeing. As such, the provision of the requisite levels of social infrastructure within

Longford Town is vital to support the needs and quality of life of the existing and planned residential base as well as the local catchment area.

As part of the plan-making process a Social Infrastructure Audit was carried out to examine the availability and capacity of existing social infrastructure facilities in Longford Town, to determine future requirements and make recommendations based on anticipated settlement growth.

Section 10.3.3 of the draft LAP includes assessment and analysis of early years services/childcare facilities, education and training, and health facilities with corresponding objectives listed in Section 10.3.4 which are generally welcomed by the Assembly and support RPOs 9.20, 9.21 and 9.23 of the RSES in relation to childcare, education and the provision of health services.

3.11 Natural Heritage and Green Infrastructure

Chapter 11 provides commentary on how the draft LAP will protect and enhance natural heritage and biodiversity in the plan area. The draft LAP considers that whilst somewhat underutilised, natural heritage has huge potential, if appropriately and sensitively developed, to improving the overall wellbeing and quality of life of the town's residents whilst also providing critical economic and tourism opportunities. The draft LAP refers to the County Longford Heritage Plan 2019-2024 that also incorporates the Longford Biodiversity Action Plan. Section 11.3 includes details for Designated Sites in the plan area. Whilst there are no Special Areas of Conservation (SAC) or Special Protection Areas (SPA) in the boundary of the plan, there is a proposed Natural Heritage Area (pNHA) being the Royal Canal. The 'Longford Spur' of the Royal Canal enters the town to the southwest, and the pNHA comprises the canal channel and the banks on either side of it. The canal supports important habitats and a diverse range of species. This pNHA is shown on the designated sites map in Section 11.3 of the draft LAP.

In relation to Green Infrastructure, Section 11.5 of the draft LAP provides a brief overview of the Green Infrastructure assets in Longford Town with a Green Infrastructure map provided in this section. Section 11.6 provides information on green links and ecological connectivity. Section 11.7 of the draft LAP commits to preparing habitat mapping and a green infrastructure survey for the town during the lifespan of the LAP.

From a review of the related objective in this Chapter, there does not appear to be a specific objective included in the draft LAP for the preparation of a Green Infrastructure survey and strategy for the town during the lifetime of the plan which should be included. Objective NHB 24 does include for the preparation of Habitat Mapping and a Wetland Survey of the town in consultation with the National Parks and Wildlife Service.

The Assembly welcomes the focus on Green Infrastructure set out in Chapter 11 and supporting objectives for same. It is, however, considered that this section of the draft LAP could be further strengthened by making reference to the *‘Guiding Principles in the preparation of Green Infrastructure Strategies’* in Section 7.7 of the RSES which mentions the need to identify and protect existing Green Infrastructure assets; the importance of connectivity; consideration of the ecological impacts of greenways; integrating an ecosystem services approach; carbon sequestration and integration with the natural and built environment.

3.12 Built and Cultural Heritage

Chapter 12 provides commentary on how the draft LAP will protect and enhance the built and cultural heritage of Longford Town. Section 12.2 provides details on the heritage profile of the town with 154 no. protected structures in the town, along with 1 no. designated Architectural Conservation Area (Battery Road ACA) as identified on the Protected Structure and Architectural Conservation Area Map in this same section of the draft LAP.

Section 12.9 of the draft LAP provides details on Archaeological Heritage in the plan area included a corresponding map of such national monument sites (National Monument Sites and Zones of Notification) with corresponding objectives to protect such sites in Section 12.9.2.

The Assembly welcomes the inclusion of such objectives and measures to protect built and cultural heritage in Longford Town during the plan period.

3.13 Infrastructure

Chapter 13 of the draft LAP provides commentary on how the draft LAP will seek to provide for the delivery of high-quality infrastructure that can service the demands of the town’s population. This includes a wide range of infrastructure provision including road, water, wastewater, utilities (e.g. broadband, electricity, gas), flood and surface water management measures through a plan-led approach in accordance with the Longford County Development Plan Core Strategy and the County Climate Strategy. Section 13.2 includes information on local energy and communications including electricity, gas, broadband, and waste and recycling infrastructure with corresponding objectives listed in Section 13.2.5. The objectives are generally welcomed by the Assembly which are considered to support RPO 4.2 relating to infrastructure investment and priorities aligning with the spatial strategy of the RSES.

Section 13.3.1 provides an analysis of the current public water supply serving Longford Town with the main source being from Lough Forbes on the River Shannon. Uisce Éireann has recently completed capital upgrade works at the Lough Forbes Water Treatment Plant which will ensure effective water supplies for existing and future development needs of the town.

In relation to wastewater, Section 11.3.2 provides details on this infrastructure with indications that Uisce Éireann may require to upgrade the municipal wastewater treatment plant. This upgrade is not on the current Capital Investment Plan (CIP) and is currently proposed for the 2026 to 2030 CIP where works will not commence prior to 2030 (subject to change). In the meantime, the draft LAP suggests interim private onsite options for wastewater treatment may be considered to agreed parameters.

Section 13.3.3 of the draft LAP includes objectives for both water supply and wastewater services. The Assembly is generally supportive of the various objectives contained therein for public water supply and wastewater which align with RPO 10.1 (efficient and sustainable use and development of water resources) and RPO 10.12 (support strategic wastewater treatment infrastructure investment).

Section 13.4 of the draft LAP provides a short overview regarding surface water drainage measures in the plan area including the need for new developments to ensure sufficient surface water capacity exists in an area prior to the submission of an application for development. The objectives for surface water drainage are listed in Section 13.4.1. It is noted that objective SW 05 promotes the use of nature-based solutions including sustainable drainage systems (SuDS) minimising the extent of hard surfaces/paving and smart solutions such as innovate green infrastructure. This objective is considered to align with RPO 10.15 of the RSES. In general, it is considered that Section 13.5 of the draft LAP can be expanded and improved upon by including reference to the 'Guiding Principles for SuDS' contained in Section 10.2 (Sustainable Management of Water) of the RSES.

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

Section 13.5 of the draft LAP covers the topic of flooding, with flood risk being recognised as a key consideration in the preparation of the draft LAP with the River Camlin (a tributary of the River Shannon) traversing the town. The River Camlin has a narrow channel with the catchment area to the north and west of Longford Town representing the historic floodplain. A Flood Relief Scheme for Longford is being progressed with the OPW which will address flood considerations and support the appropriate use of riverside locations. In addition, a Strategic Flood Risk Assessment (SFRA) report for the draft LAP has been prepared and published alongside the draft plan as part of the public consultation. The inclusion of same is considered in compliance with RPO 7.12 requiring future statutory land use plans to include an SFRA. It is considered that this section of the draft LAP can be further expanded upon by including reference to RPO 7.15 in the RSES whereby local authorities shall take opportunities to enhance biodiversity and amenities and ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned.

3.14 Sustainable Transport

Chapter 14 provides commentary on how the draft LAP will promote the use and increase delivery of sustainable modes of transport within the town. The Assembly welcome the recognition in Section

14.1 of the draft plan to the emphasis placed in the National Planning Framework to deliver improved sustainable mobility in towns and villages, with further measures included in the RSES in relation to the guiding principles for the integration of land use and transport planning, in addition to RPO 8.6 in the RSES requiring the preparation of Local Transport Plans for a number of settlements within the Region, including Longford Town.

The Assembly also welcomes the statement in Section 14.1 of the draft LAP;

‘Given the importance placed on planning for more compact settlement forms across the planning policy hierarchy, there is a clear need for greater coordination between land use and public transport provision. As such future growth, both in terms of employment and residential development must be based on sustainable modes of transport’.

It is noted that the Longford Local Transport Plan (LTP) was prepared in 2023 following an objective in the Longford CDP 2021-2027. The LTP was prepared by Longford County Council in consultation with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII). The Longford LTP includes a number of transport strategies that encourage sustainable transport including a pedestrian strategy, cycling strategy, permeability strategy, public transport strategy, traffic management strategy, car parking strategy and the Abbeycarton Access Strategy. Various measures and objectives contained in the LTP have also been included in Chapter 14 of the draft LAP.

Section 14.5 of the draft LAP re-iterates that the plan will support sustainable transport provision including walking, cycling and public transport linked closely with planning as traditional high car dependency has led, in certain circumstances to low density settlement patterns and poor integration of public transport facilities and services. Walking and cycling measures will be continuously reviewed and improved within the town. These modes of travel will be encouraged in the first instance, followed by public transport, in compliance with higher level policy requirements. The Assembly welcomes the emphasis provided in this chapter of the draft LAP to improving sustainable transport measures in Longford Town during the plan period.

Section 14.6 lists a total of 32 no. sustainable transport objectives for the town, which in general are supported by the Assembly. However, the Assembly does consider that this section of the draft LAP would be enhanced by making specific reference to the ‘Guiding Principles for the Integration of Land Use and Transport’ as set out in Section 8.3 of the RSES and how the draft LAP incorporates the relevant measures contained there.

3.15 Climate Change

Chapter 15 of the draft LAP provides commentary on how the draft LAP will enable a climate resilient town by promoting the economic, social and environmental benefits of low-carbon development.

The chapter cites the comprehensive suite of legislative and policy frameworks relating to climate action that have been developed in Ireland over the past number of years including National Planning Framework NSO 8 highlighting the need to initiate a transition to a low carbon and resilient society and the governments Climate Action Plan long term goal to achieve net zero emissions by 2050. The draft LAP also references County Longford's Climate Adaptation Strategy 2019 which has significantly influenced the preparation of the draft LAP. A detailed breakdown of the 6 strategic high-level goals of the Longford Climate Adaptation Strategy 2019 is provided in Section 15.4 of the draft LAP.

Furthermore, Section 15.5 briefly discusses Chapter 3 of the Longford CDP 2021-2027 in relation to climate change, with Section 15.6 providing details of the Longford County Council Climate Action Plan 2024 – 2029. It outlines the structure, function, and aspirations with respect to climate change of the County Council and also details the climate actions currently underway. It outlines the Council's framework for climate action and its strategic goals, objectives, and actions.

The climate change objectives in the draft LAP are listed in Section 15.6 which seek to align with the climate change and adaptation objectives contained in the plans referenced above. The Assembly broadly welcomes these climate change objectives. However, it is noted that this chapter does not reference the Regional Spatial and Economic Strategy for the Region which includes Climate Action as one of the three key principles of the RSES. The final LAP should be amended to include reference to this key principle in the RSES in addition to Section 7.9 of the RSES that covers climate change. The Assembly considers that best practice should be applied in order to mitigate and reduce the effects of climate change, and in this respect the Assembly would like to draw attention to Figure 7.4 Climate Strategy of the RSES which should be referred to in the final LAP.

3.16 Implementation and Monitoring

Chapter 16 of the draft LAP is concerned with the implementation and monitoring of the draft LAP objectives, including the strategic aim;

'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.'

The chapter includes specific focus on active land management measures to achieve compact growth targets with a database to be established so that brownfield site re-use can be managed and co-ordinated across multiple stakeholders. Monitoring of the core strategy household unit progression in the Longford CDP 2021-2027 will be carried out via residential units permitted and developed on an annual basis. The phasing of residential and employment zoned lands in the plan area will also be monitored including the progression of Tier 1 and Tier 2 lands from the information provided in the Infrastructural Assessment Report (IAR) included in the preparation of the Longford CDP 2021-2027.

This section of the draft plan also includes a phasing map for both residential and industrial/commercial and warehousing type developments. A strategic residential reserve is also identified.

The Assembly welcomes the commitment given in Chapter 16 that Longford County Council will put in place an effective monitoring system to ensure that progress on key objectives in the Plan are evaluated.

3.17 SEA, AA and SFRA

The Assembly welcomes the preparation of the draft LAP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

The SEA Environmental Report sets out an assessment of the environmental effects in combination with the wider planning framework arising from the draft LAP to provide a clear understanding of the likely environmental consequences of decisions arising from the LAP.

Mitigation measures and recommendations are set out in Chapter 6 of the SEA Environmental Report with a monitoring programme included in Chapter 7. Whilst the Assembly notes the various measures contained within, it is considered that the SEA Environmental Report would benefit from having a clear conclusion statement on the outcome of the overall SEA process as part of this report which does not appear to be provided.

The draft LAP was also subject to Appropriate Assessment (AA), and a Natura Impact Statement (NIS) has been prepared as an accompanying document to the overall draft LAP.

It should be noted that Section 177T (1) (a) of the Planning and Development Act 2000 (as amended) requires a Natura Impact Report be prepared for the implications of a land use plan, on its own or in combination with other plans and projects, for one more European site in view of the conservation objectives of the site or sites. Whereas Section 177T (1) (b) defines a Natura Impact Statement to mean a statement, for the purposes of Article 6 of the Habitats Directive, of the implications of a proposed development, on its own or in combination with other plans or projects, for one or more than one European site, in view of the conservation objectives of the site or sites. The preparation of an NIS is therefore relevant to a proposed development rather than the preparation of a land use plan.

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

Finally, a Strategic Flood Risk Assessment (SFRA) has been undertaken, which aligns with RPO 7.12 of the RSES, alongside the preparation of the draft LAP, the SEA and the NIS. The recommendations from the SFRA are stated to have been integrated into the draft LAP which is welcomed. In keeping with best practice, it is recommended that the local authority take opportunities to enhance biodiversity and amenities, including where flood risk management measures are planned, in line with RPOs 7.14 and 7.15 of the RSES.

4.0 Recommendations

The Regional Assembly would like to acknowledge the extensive work that Longford County Council has carried out in order to prepare the draft Longford Town Local Area Plan 2025-2031 and, in particular, the overall approach and effort of the Council to coordinate and incorporate policies and objectives so that they are consistent with the RSES which is welcomed.

The Regional Assembly advises that Longford County Council pay particular attention to the following issues in the preparation of the Longford Town Local Area Plan 2025-2031 in order to ensure consistency with the RSES, and makes the following recommendations:

Core Strategy

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

Placemaking

- Chapter 6 of the draft LAP could be strengthened further by including reference to Section 9.4 of the RSES in relation to Healthy Placemaking and the 'Guiding Principles for the Creation of Healthy and Attractive Places'.
Reason: In the interest of demonstrating consistency with the RSES.
- Chapter 6 of the Draft LAP should be enhanced by promoting an appropriate housing mix of suitable levels of private, social and affordable housing types in accordance with the Longford Key Town Requirements contained in the RSES, namely *"Central to this is the requirement to provide high quality housing products that meet a variety of housing needs, including those required by employees of existing and potential industry and enterprises within the town"*.
Reason: In the interest of consistency with the RSES.

Economic Development

- Chapter 7 of the draft LAP could be enhanced by providing more detailed information including a breakdown on developed and available undeveloped employment zoned lands in the settlement and the methodology used to identify the location and extent of same in accordance with *'Development Plans: Guidelines for Planning Authorities (2022) (Appendix A,*

Section 1.4 Enterprise and Employment Zoning) published by the Department of Housing, Local Government and Heritage.

Reason: In the interest of clarity and consistency with ministerial guidelines.

- Chapter 7 should make reference to Figure 6.3 Economic Strategy of the RSES which has the five key principles including Smart Specialisation, Clustering, Orderly Growth, Placemaking and Future Proof and Risk Management.

Reason: In the interest of demonstrating consistency with the RSES.

- Chapter 7 of the draft LAP would further benefit by referencing the *'Guiding Principles to Identify Strategic Employment Development'* contained in Section 6.3 of the RSES (Economic Strategy) as to how strategic employment sites in the town have been identified. The OPR Practice Note PN04 on *'Planning for Employment Growth – The Development Plan and Employment Lands'* (August 2024) is also a noteworthy publication that should be considered in this context.

Reason: In the interest of demonstrating consistency with the RSES and best practice guidance.

Culture and Heritage

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

Reason: In the interest of demonstrating consistency with the RSES.

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

Reason: In the interest of demonstrating consistency with the RSES.

Sustainable Transport

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

Reason: In the interest of demonstrating consistency with the RSES.

- Chapter 14 of the Draft LAP should make reference to the importance of the M4 corridor to Longford town having regard to the RSES recognising the importance of maintaining,

improving and protecting the strategic function of the key transport corridors in alignment with RPO 8.10 and Table 8.4 (Road Projects for the Region).

Reason: In the interest of consistency with the RSES.

Climate Action

- Chapter 15 of the draft LAP should be amended to include reference to the Regional Spatial and Economic Strategy for the Region which includes Climate Action as one of the three key principles of the RSES, in addition to reference to Section 7.9 of the RSES regarding climate change.

Reason: In the interest of demonstrating consistency with the RSES.

- The Assembly considers that best practice should be applied in order to mitigate and reduce the effects of climate change, and in this respect the Assembly would like to draw attention to Figure 7.4 Climate Strategy of the RSES which should be referred to in the draft LAP.

Reason: In the interest of demonstrating consistency with the RSES.

- The draft LAP should align with RPOs 7.14 and 7.15 of the RSES regarding flood risk management.

Reason: In the interest of demonstrating consistency with the RSES.

Infrastructure

- Chapter 13 of the draft LAP could be further strengthened by making reference to the 'Guiding Principles for Sustainable Drainage Systems' as set out in Section 10.2 of the RSES.

Reason: In the interest of demonstrating consistency with the RSES.

- Section 13.4 of the draft LAP on surface water drainage may be enhanced by noting and making reference to the publication of '*Nature Based Management of Urban Rainwater and Urban Surface Water Discharges – A National Strategy*' by the Department of Housing, Local Government and Heritage, May 2024.

Reason: In the interest of proper planning and sustainable development.

Strategic Environmental Assessment (SEA)

- It is considered that the SEA Environmental Report would be improved upon by including a clear conclusion statement on the outcome of the overall SEA process as part of this report.

Reason: In the interest of clarity and best practice.

Appropriate Assessment (AA)

- The final Appropriate Assessment report should be amended to reflect the requirements for the preparation of a Natura Impact Report for the draft Longford Town Local Area Plan 2025-

2031 being a land use plan as per Section 177T (3)(d) of the Planning and Development Act 2000 (as amended).

Reason: To ensure compliance with the Planning and Development Act 2000 (as amended).

5.0 Conclusion

It is considered that the draft Longford Town Local Area Plan 2025-2031 is generally consistent with the Regional Spatial and Economic Strategy (RSES) 2019-2031 and would be further enhanced by addressing the recommendations set out above.

It should be noted that the officials of the Eastern and Midland Regional Assembly are available to discuss the matters raised and the Assembly welcomes further opportunities to engage in the statutory process of the making of the draft Longford Town Local Area Plan.

Regards,



Clare Bannon
A/Director
Eastern and Midland Regional Assembly
11th October 2024