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Forward Planning,  
Planning Department,  
Longford County Council,  
Áras an Chontae,  
Great Water Street,  
Longford,  
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14 October 2024

## **RE: Draft Longford Town Local Area Plan 2025-2031**

A Chara,

The Land Development Agency (LDA) welcomes the opportunity to participate and engage with Longford County Council on the preparation of a new Local Area Plan (LAP) for Longford Town. The LDA is a commercial, state-sponsored, body set up by the Government with two main functions:

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

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

The enactment of the Land Development Agency Act 2021, which established the LDA, marked a historic move to identify and use certain relevant public lands to provide for housing and affordability needs into the future. It is imperative that the ability of state lands to deliver residential development forms part of policy in County Development Plans, as supported by Local Area Plans, and that role and mandate of the LDA is recognised as a key part of this delivery.

The primary function of the LDA is to progress the development and regeneration of large-scale, strategic sites to increase the supply of housing in the State, particularly affordable and social housing. It is considered that a significant amount new development in the coming years in our cities and towns will be large-scale regenerative projects. As part of this regeneration, the LDA is committed to the delivery of quality cost rental homes, at scale.

Cost rental is a new rental tenure product for Ireland that is supported by the Department of Housing, Local Government, and Heritage and the Affordable Housing Act 2021. As an emerging rental option, it is noted that cost rental is not widely understood as a tenure type by decision-makers or the public. Cost rental housing provides affordable rented accommodation to people on middle incomes (net household income below €66,000 per annum for Dublin and €59,000 for everywhere else in the country). It is aimed at people who are above the threshold for social housing but have difficulty affording private rented accommodation or purchasing a home.

With cost rental, rent covers the cost of the construction, management, and maintenance of the new home, with rents to be set at least 25% below regular market rents. Cost rental offers a long-term, secure tenancy that is more affordable. Over the period up to 2026, Housing for All commits to the delivery of 10,000 cost-rental homes in urban centres by local authorities, Approved Housing Bodies (AHBs), and the LDA.

The LDA welcome the recognition in the Draft Plan of the LDA's role in co-ordinating and developing strategic landbanks and the intent of Longford County Council to work in collaboration with the LDA in achieving this mandate. It is respectfully suggested that the wording regarding this collaboration, included on page 241 of the Draft Plan, could be updated to reflect the current status and role of the LDA, as established under the Land Development Agency Act 2021. It is noted that the National Planning Framework is currently under review, and, on this basis, it may be prudent to update the wording of this section as follows:

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

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

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

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

It is noted that Longford Town is classified as a census town and is therefore being reviewed as part of the LDA's ongoing work assessing relevant public lands for development potential. The Register of Relevant Lands and Report on Relevant Public Land facilitate the identification and assessment of the potential of relevant public land to provide affordable housing both now and in the future. As part of the first round of assessment in 2023, Longford Town was identified as a census town and will be assessed for the potential delivery of housing on relevant public lands as part of the second round, a report on which will be published early in 2025.

The Register of Relevant Lands Map is publicly available online, and the LDA is encouraged to see identified lands within Longford acknowledged within the Draft LAP through the inclusion of the map '*Land Development Agency (LDA) Identified Sites in Longford Town*'.

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

In keeping with the overarching principles of the National Planning Framework (currently under review), the Eastern and Midland Regional Assembly's Regional Spatial and Economic Strategy (RSES) (which recognises Longford as a Key Town within the Gateway Region), the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024) and other relevant policy documents and Section 28 Guidelines, the LDA is committed to the concept of compact growth and brownfield development. In this regard, the LDA welcome Objectives within the Draft Plan which

seek to consolidate the town centre by utilising and connecting brownfield, underutilised strategic sites.

In terms of the delivery of sustainable residential development, the LDA can play a role in achieving the Objectives set out in Chapter 6. The LDA welcomes the wording provided under Section 6.6 'Social and Affordable Housing' of the Draft Plan which acknowledges the LDA's remit and highlights all lands identified on the Register of Relevant Public Land. The LDA supports the inclusion of objective AL 05 to solidify Longford County Council's commitment to supporting the LDA in the co-ordination of development on strategic landbanks.

It is respectfully suggested that the following amendments to proposed objectives contained at Section 6.8 could be made to further recognise and strengthen the LDA's ability to support the Local Authority in delivering affordable, sustainable residential development:

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

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

The LDA is committed to delivering developments that are designed to encourage a more sustainable form of living, creating new communities in tandem with the delivery or enhancement of existing services and amenities, in a manner which promotes sustainability and a transition away from a reliance on private vehicles. The National Planning Framework, National Development Plan, S28 Guidelines for Planning Authorities, and Regional Spatial and Economic Strategies, share the objective of facilitating and promoting more sustainable transport. In addition, the Climate Action Plan is also seeking to reduce transport carbon emissions by 20% which will include reductions in travel demand and journeys by private car.

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

The LDA notes the recent, ongoing, consultation with regard to Revision 1 of the National Planning Framework (NPF). While consultation on the NPF is ongoing, the Draft LAP will need to be updated to reflect the intentions of the revised NPF where necessary.

## Conclusion

The LDA supports Longford County Council in the progression and ultimate implementation of a Local Area Plan for Longford Town. The LDA requests that this submission is taken into consideration, and, where appropriate, amendments are made to the text and objectives of the LAP to further strengthen the policy framework for the sustainable development of Longford Town and the delivery of affordable housing opportunities at appropriate sites.

The LDA look forward to working with Longford County Council, and other stakeholders, to promote and progress the development of state land to provide sustainable residential communities.

Yours faithfully,

*Aoife O'Connor-Massingham*

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Town Planner

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