



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

21st November 2019

Administrative Officer,
Review of the County Development Plan,
Forward Planning Unit,
Longford County Council,
Áras An Chontae,
Great Water Street,
Longford,
N39 NH56

Re: Issues Paper for the Longford County Development Plan 2021 – 2027

A Chara,

Thank you for your authority's work in preparing the Issues Paper for the Longford County Development Plan 2021-2027. The Office of the Planning Regulator acknowledges and welcomes the publication of the 'Public Consultation Issues Paper' and its role to inform the preparation of the Longford County Development Plan.

In accordance with the provisions of Section 31AM of the Planning and Development Act 2000, as amended, (the Act), the Office will evaluate and assess the draft Longford Offaly County Development Plan 2021-2027, when published.

In carrying out its assessments and evaluations the Office will ensure that the draft plan addresses:

- Matters generally to be contained in a development plan (Section 10) and, in particular, s.10(2)(n) in relation to climate change;
- Consistency with the development plan and the National Planning Framework and Regional Spatial and Economic Strategies for Eastern and Midland Regional Assembly;
- Ministerial guidelines under section 28;
- Ministerial policy directives issued under section 29, and,
- Such other legislative and policy matters as the Minister may communicate to the Office in writing.

Issues Paper

The following paragraphs set out broad comments of the Office in relation to the Longford Issues Paper, which your authority might consider in the preparation of the draft Longford County Development Plan.

Such comments are offered without prejudice to any statutory observations and recommendations as may be forwarded by the Office at draft and amended draft development plan stages.

Settlement Strategy and Housing

The National Planning Framework (the NPF) sets out population growth targets for the three regional assembly areas. It is projected that the overall population of Ireland will increase by approximately 1 million over the next 20 years and that 50% of this population growth will be within the Eastern Midland Regional Assembly (EMRA).

The adopted Regional Spatial and Economic Strategy (RSES) for the EMRA, 2019-2031, has designated Longford Town as a 'Key Town' and as such, Longford Town will be a driver for economic development in the region. A primary objective of the NPF is to drive growth in all designated growth centres as well as all towns and villages with more sustained urban focused development. 'Key towns' will have an economic role and function that provides employment and services for a wide catchment area.

The forthcoming Longford County Development Plan will need to underline policy objectives with practical place-making proposals that provide for and make towns and villages more viable and attractive places to live.

Moreover, National Policy Objective (NPO) 3c of the NPF requires the 'delivery of at least 30% of all new homes are targeted in settlements other than the five cities and their suburbs within their existing built-up footprints'.

Policy objectives within the Longford County Development Plan should also underline the need to provide a variety of housing types to accommodate different household needs and to ensure choice whilst ensuring settlements are developed in compact manner. Issues identified in the Longford Issues Paper in relation to settlement strategy and regeneration will play a fundamental role in achieving a more urban focused development whilst achieving the sequential growth model as set out in the Section 28 Ministerial Guidelines.

In this regard, the Office understands that forthcoming updates to the statutory Development Plan Guidelines, which will be published by the Minister of Housing, Planning and Local Government, will

provide guidance in relation to core strategy preparation and also the preparation of a HDNA (Housing Needs Demand Assessment) which is an objective of the National Planning Framework¹.

These strategies will be important in setting out the settlement strategy for the county and, through the Development Plan, achieving brownfield development targets and compact settlements, which are requirements of the National Planning Framework.

The Office acknowledges and supports the recognition in the Longford Issues Paper that in the context of the rural nature of settlement patterns in Longford, it is appropriate that the draft development plan recognises that there remains an on-going demand for rural one-off dwellings in the rural hinterland. In addition, there is a need to strike a balance between facilitating housing for people who have a rural housing requirement whilst at the same time ensuring a balanced and sustainable approach to the development of the county's rich heritage of towns and villages, many of which are facing a decline in population, increasing levels of vacancy or under-occupation of central parts and pressure on the survival of essential local services and amenities.

Activation of the potential of these towns and villages to sustain themselves and grow as drivers of their wider and more rural environs will be a key issue for the plan to grapple with.

Moreover, NPO 15 of the NPF supports managing the growth of areas that are under strong urban influence and encouraging growth in areas that have experienced low population growth.

Regeneration

The policy objectives in the Longford County Development Plan should outline practical proposals to ensure that the various towns and villages in Longford are attractive places to live and work, consistent with NPO 4 of the NPF.

Recognising that the EMRA RSES has identified key regeneration sites within Longford town, the next Longford Development Plan represents a key opportunity to present practical and implementable regeneration proposals to ensure that urban areas become more vibrant and attractive places to live and which will in turn attract inward investment in terms of economic activity. The proposals within your authority's development plan for urban place making, and town and village regeneration policy objectives will play a vital role in securing regeneration and compact growth.

Rural Development

Given the changing dynamic of the rural economy there is a strong need for rural diversification as an economic alternative. Cessation of industrial peat harvesting in Longford presents opportunities for the rehabilitation of peatlands and consideration of appropriate and alternative uses for them including tourism through greenway/blueway development and renewable energy production.

¹ National Policy Objective 37

Such strategies will need to be cognisant of retaining the remaining carbon stores of peatlands and their potential for active carbon sequestration.

Policy objectives in the Longford County Development Plan should underline the importance of environmental sustainability for future generations. NPOs 52, 53 and 54 of the NPF set out the environmental and sustainability goals and these objectives will inform the preparation of the Longford County Development Plan.

Tourism

Longford has very significant tourism resources that serve the region including the newly developed Centre Parcs, Lough Ree, Royal Canal walking / cycling route and the potential for the Mid Shannon Wilderness Park.

A particular strength of successive county development plans in Longford over many years has been your authority's steadfast championing of these initiatives.

These amenities have the scope to attract further significant visitors to the county, which will in turn has the potential to generate direct and indirect employment opportunities and provide for rural diversification of the rural economy, which is consistent with a variety of national policies, including the NPF.

Natural, Built and Cultural Heritage

The role of rural towns and villages in providing more compact development and improving the amenity value of these settlements will also provide choice to those otherwise that tend towards the option of urban generated housing in the countryside and in turn providing for the preservation and protection of the receiving environment.

These rural towns and villages can use their natural and built assets to add to their distinctiveness in terms of place making.

The sense of place is an important factor in making these settlements attractive places to live and work. NPO 17 of the NPF sets out an objective to enhance and protect built heritage in rural town and villages, which will enhance the quality of life and encourage investment.

This objective sets out to make rural towns and villages more attractive places to live and work and identifies the role that the natural environment and built heritage can play in enhancing quality of life. The Office recognises and welcomes Section 11 'Natural, Built and Cultural Heritage' of the Longford Issues Paper which sets out a policy menu for protecting natural, built and cultural heritage.

Climate Change

Having regard to the Climate Action Plan, 2019, and the objectives in the NPF and RSES, the transition to a low carbon economy and the overall reduction in carbon emissions is a central issue in planning policy during the cycle of your next County Development Plan.

The Office understands that the aforementioned and forthcoming updates to the Section 28 Development Plan Guidelines will initiate a process of enhanced guidance in relation to preparing development plans whilst having regard to the need to ensure policy measures, which reduce energy demand and greenhouse gas emissions, and address adaptation requirements in relation to climate change.

The inclusion of the promotion of sustainable settlements and transport strategies for both urban and rural areas to include measures to reduce energy demand, greenhouse gas emissions, and to adapt to climate change, having regard to location, layout and design of new development will be critical. Furthermore, the Office is specifically obliged to address these matters in particular, having regard to Section 10(2)(n) of the Act, in its evaluations under Section 31 AM(2)(a) of the Act. Likewise, the promotion of renewable energy within the county in accordance with the Section 28 Wind Energy Development Guidelines will be critical to ensure Ireland meets its national reductions in energy and greenhouse gas emissions targets.

Summary

The NPF and the RSES for the Eastern and Midland Region will play a pivotal role in informing the preparation of the Longford County Development Plan 2021-2027. The Office looks forward to continued positive engagement with Longford County Council in implementation of national and regional policies at the county and local level.

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 the undersigned or at plans@opr.ie.

Yours sincerely,

