



Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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Longford County Development Plan 2021-2027: Public Consultation Issues Paper

The Eastern and Midland Regional Assembly notes the publication of the ‘Public Consultation Issues Paper’ to inform the preparation of the Longford County Development Plan 2021-2027 and sets out hereunder observations on behalf of the Assembly. The submission has been reviewed by the executive and approved by the members of the Eastern and Midland Regional Assembly at the meeting of 8th November 2019.

Regional Spatial and Economic Strategy (RSES)

The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy for the Eastern and Midland Region which was made on 28th June 2019. In line with the provisions of the Planning and Development Act 2000, as amended, the Planning Authority shall ensure, when making the County Development Plan, that it is consistent with the Regional Spatial and Economic Strategy for the Eastern and Midland Region, thus ensuring full alignment between local, regional and national planning policy. In this regard, The Assembly welcomes the publication of the Issues Paper in preparation of the new Longford County Development Plan.

Legislative Context

As required by Section 11(2) of the Planning and Development Act 2000, as amended, the Regional Assembly received notice from the Council on September 25th 2019, of its intention to review its existing County Development Plan and to prepare a new County Development Plan for its area.

Under Section 27A of the Planning & Development Act, 2000 (as inserted by Section 17 of the Planning and Development Act, 2010) the Eastern and Midland Regional Assembly, is obliged to prepare submissions / observations to be submitted to the relevant planning authority and copied to the Office of the Planning Regulator.

The submission of the Regional Assembly shall include, but shall not be limited to, recommendations regarding a number of matters including, policies or objectives of the Government in relation to national and regional population targets and the best distribution of residential development and

related employment development with a view to promoting consistency with the RSES and assisting in drafting the Core Strategy; promoting regional development through maximising the potential of the region; planning for the best use of land having regard to location, scale and density of new development to benefit from investment of public funds in transport infrastructure and public transport services; and collaboration between the planning authority and the regional assembly in respect of integrated planning for transport and land use, and the promotion of sustainable transportation strategies in urban and rural areas, including the promotion of measures to reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to climate change.

Accordingly, this report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matters along with recommendations as required under Section 27A of the Planning and Development Act 2000 as amended.

Ensuring Consistency with the RSES- Key Areas

Notwithstanding the requirement of the Planning Authority to ensure, when making the County Development Plan, that the Plan in its entirety is consistent with the Regional Spatial and Economic Strategy, the following are key areas that the Assembly would like to bring attention to in order to inform the future Longford County Development Plan 2021-2027.

Growth Strategy of the RSES:

In preparing the forthcoming County Development Plan, it should be noted that Growth Enablers have been specified (Section 3.2) as part of the RSES to facilitate growth across the Region. Growth Enablers are underpinned by the spatial mapping of Functional Urban Areas (FUAs) within the Region. The FUAs for the Eastern and Midland Region are The Dublin Metropolitan Area, The Core Region and The Gateway Region. In this regard, the attention of the Council is brought to the appropriate general Growth Enablers and the Growth Enablers of the Gateway Region, which are relevant to County Longford.

In addition, when formulating the above, the future County Development Plan shall ensure consistency with RPOs 3.2 and 3.3, aimed at securing compact growth in line with the NPF.

Settlement Strategy:

The RSES defines Longford as a Key Town and the Settlement Hierarchy of the County Development Plan is required to reflect this. Acknowledgement of this as part of the Issues Paper is welcomed by the Assembly. In formulating the Core Strategy, the attention of the Council is brought to Chapter 4 of the RSES, including Settlement Strategy RPOs 4.1 and 4.2, and Appendix B of the RSES (SPA and County Population Tables).

Table 4.2 of the RSES outlines the Settlement Typologies to be included as part of the Settlement Hierarchy, which are to be defined by the County Development Plan. This includes Self-Sustaining Growth Towns, Self-Sustaining Towns, Towns, Villages and Rural areas. Regarding the Key Town of Longford, RPO 4.26 addresses the role of Key Towns within Core Strategies and this is augmented by RPOs 4.59-4.63 which specifically relate to Longford. Table 4.3 of the RSES provides further guidance and details policy responses for the different settlement typologies. Future County Development Plan policy should ensure consistency in this regard.

Section 3.1 and Appendix A of the RSES provide detail on the Asset-Based Approach to spatial development and it is considered that the Local Authority will find this useful in formulating a Settlement Strategy for the County Development Plan that secures the proper planning and sustainable development of the area.

Issues Paper

The Regional Assembly welcomes as part of the Issues Paper, the inclusion of 'Section 2.0 National and Regional Strategic Context', outlining the policy hierarchy of national and regional spatial plans within which the County Development will sit. The explicit reference that the County Development Plan must be consistent with the RSES is welcome, as is the inclusion of the three key principles of the RSES, namely Healthy Placemaking, Climate Action and Economic Opportunity.

The broad areas outlined including Settlement Strategy and Housing, Regeneration, Placemaking, Transport and Movement, Critical Infrastructure, Economic Development, Rural Development, Tourism, Natural, Built and Cultural Heritage, Green Infrastructure, Climate Change and Energy and Environment (SEA, AA and SFRA), are considered to provide a robust basis for scoping out and developing the overall County Development Plan. This submission has detailed each of these sections below and consideration should be given to the following in order to ensure consistency with the RSES when formulating the County Development Plan.

Settlement Strategy and Housing:

The Assembly welcomes the emphasis placed on the Core Strategy within this section of the Issues Paper and the stated requirement to align with the national and regional strategies and policies of the National Planning Framework (NPF) and the RSES. Points outlined above, under the heading 'Ensuring Consistency with the RSES- Key Areas' should be considered when crafting the Settlement Strategy for the County. Section 9.3 of the RSES deals specifically with 'Housing and Regeneration', whereas Section 4.8 of the RSES deals with housing in rural places. These sections will provide further direction to assist in formulating related policy for the County Development Plan.

The Council are reminded of the obligation to prepare a Housing Need Demand Assessment (HNDA). RPO 9.5 outlines the commitment of the Regional Assembly to support local authorities in the provision of a Housing Need Demand Assessment. This is in keeping with National Policy Objective (NPO) 37 of the National Planning Framework (NPF). It is also noted that draft Departmental Guidelines on HNDA are currently being prepared that will inform an approach to the preparation of HNDA.

Regeneration:

Regeneration is a recurrent theme of the RSES and the acknowledgement that regeneration and renewal is inherent in the proper planning and sustainable development of the County is welcomed.

The reference to Longford as a Key Town within the Issues Paper is acknowledged and RSES policy in this regard is contained at Chapter 4 of the RSES and is relevant for the Planning Authority in formulating the County Development Plan. This should be considered in tandem with the points outlined above under the heading 'Ensuring Consistency with the RSES- Key Areas'. Specifically, the RSES recognises that 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, whilst also addressing vacancy, derelict buildings and enhancing the vibrancy of the town. Key areas include the Camlin Quarter and Ballyminion Areas with further strategic sites throughout, including possibilities within the southern quarter of the town.

Sections 9.3 and 4.8 of the RSES deal explicitly with Regeneration in urban and rural contexts. In addition, Regional Strategic Outcome 2 specifically emphasises the importance of Compact Growth and Urban Regeneration, whilst one of the key enablers for growth across the Region (Section 3.2) promotes regeneration and revitalisation of small towns and villages and supports local enterprise and employment opportunities to ensure their viability as service centres for their surrounding rural areas. The RSES outlines that Local authorities, in developing their core strategies and settlement hierarchies will consider a number of growth enablers to meet the potential of places within the County including Regeneration and Development, through the identification of significant ready-to-go regeneration projects in the existing built areas of our cities, towns, villages as well as rural regeneration opportunities, which could leverage private and public-sector support and investment, including NPF and European funding with a focus on social as well as physical regeneration.

Placemaking:

This section of the Issues Paper is in keeping with the RSES Key Principle of Healthy Placemaking aimed at promoting people's quality of life through the creation of healthy and attractive places in which to live, work and visit. The information contained as part of Chapter 9 of the RSES, which details subjects including diversity, inclusivity, housing, regeneration, healthy placemaking, social opportunity, economic opportunity, access to childcare, education, health services and access to arts, culture, language and heritage, will support the Local Authority in developing relevant policy for the future County Development Plan.

Transport and Movement:

The Assembly welcome the Transport and Movement Section of the Issues Paper and consider that the points raised are reflective of several Regional Strategic Outcomes (RSOs) across the three Key principles of the RSES namely Healthy Placemaking, Climate Action and Economic Opportunity, particularly RSOs 1, 4, 6, 9, 10 and 15. Information contained at Chapter 8 of the RSES will provide assistance to the Local Authority in developing related policy in this area, including RPO 8.6 which outlines that a Local Transport Plan (LTP) for the settlement of Longford is to be prepared.

Critical Infrastructure:

The inclusion of a Section on Critical Infrastructure is welcome by the Assembly and in particular the reference that integration and coordination between land use and the delivery of services is essential in creating sustainable communities and improving economic competitiveness. Information contained at Chapters 7, 8 and 10 will assist the Local Authority in developing related policy.

Economic Development:

The Assembly welcomes the inclusion of a section on Economic Development as part of the Issues Paper. Economic Opportunity is one of the three Key Principles of the RSES and is supported by RSOs 12-16. Chapter 6 of the RSES deals specifically with Economy and Employment and information contained as part of this chapter will assist the Local Authority in developing related policy. Of

particular note for County Longford are; the relevant stated sectoral opportunities at Section 6.4 of the RSES, RPOs 6.4-6.8 and RPO 4.84 relating to the rural economy, RPO 6.9 which supports relevant actions within the Regional Enterprise Plan related to County Longford and RPO 6.19 that specifically relates to tourism in Longford. Section 6.5 also details specific sectors and should be consulted in developing related policy.

Rural Development:

The RSES recognises the contribution that rural places make towards regional and national development in economic, social and environmental terms. This is specifically reflected in Section 4.8 of the chapter People and Place and Sections 6.4, 6.5, 6.6 and 6.7 of the chapter Economy and Employment, and it is considered that these elements of the RSES will assist in formulating future County Development Plan policy. Given the particular reference as part of the Issues Paper, it should be noted that RPOs 4.80 and 4.81 specifically relate to rural housing provision whilst RPOs 4.84, 6.6, 6.7 and 6.8 relate to diversification within the rural economy including through enhancing sectors such as agriculture and food, forestry and aquaculture, energy and extractive industries, the bioeconomy, tourism and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage.

Tourism:

The Assembly acknowledge the inclusion as part of the issues paper that County Longford, with its wealth of heritage, natural assets and recreational infrastructure has enormous potential to benefit from tourism. Information contained as part of Chapter 6 of the RSES, which specifically relates to Tourism, Natural and Cultural Tourism Assets and Investing in the Tourism Product will assist the Local Authority in developing related policy.

Natural, Built and Cultural Heritage:

The recognition and promotion of the Natural, Built and Cultural Heritage of County Longford is a welcome inclusion within the Issues Paper. Sections 7.5 and 9.7 will assist the Local Authority in formulating future County Development Plan policy. This includes detail around cultural, architectural and archaeological heritage, heritage led regeneration, biodiversity and natural heritage.

Green Infrastructure (GI):

The Green Infrastructure section of the Issues Paper is in keeping with the RSES which dedicates Section 7.7 to Green Infrastructure. The RSES outlines the importance of Placemaking and Green Infrastructure and recognises that at the local authority scale, GI offers an opportunity to develop integrated strategies around economic development, urban placemaking and rural policy, while linking strategic natural assets with cultural and heritage assets further enhances the opportunities for GI strategies to drive recreation and tourism benefits. All of this is particularly relevant for County Longford. The RSES also identifies a number of significant opportunities to develop a number of flagship greenways in the Region, including some of which are relevant to County Longford namely the development of the Shannon and Shannon-erne waterways taking in Lough Ree, The Royal Canal and potential for a Midlands based Regional Peatway taking in the Corlea Trackway. It is considered that these elements of the RSES will assist the Local Authority in formulating future County Development Plan policy in this area.

Climate Change and Energy:

The Climate Change and Energy Section of the Issues Paper is a welcome addition. This is in keeping with the RSES Key Principle on Climate Action, which is supported by RSOs 6-11. Information contained at Chapters 7, 8 and 10 of the RSES will assist the Local Authority in developing related policy. Included as part of this is specific reference to the challenge of climate change and of particular relevance to County Longford attention is drawn to the Guiding Principles for peatland areas and RPO 7.29 which refers to the role of the Peatlands. In line with the Issues Paper, which references emissions targets, the attention of the Council is also drawn to RPO 3.6 and the preceding qualifying paragraphs of the RSES, which outlines the requirement of County Development Plans to assess their impact on carbon reduction targets. To this end, it should be noted that EMRA is leading an ESPON EU research programme (QGasSP) to identify a robust method for quantifying the relative GHG impacts of alternative spatial planning policies, the outputs of which are anticipated in 2020, and may inform the preparation of the development plan.

Environment (SEA, AA and SFRA):

The assembly acknowledge and welcome the statement as part of the Issues Paper that the County Development Plan will be carried out in tandem with the required environmental processes, namely Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. The Assembly recommend early engagement with the relevant bodies in this regard, including the Office of Public Works, Department of Culture, Heritage and the Gaeltacht, the National Parks and Wildlife Service, the Environmental Protection Agency and Irish Water.

General

In formulating the County Development Plan, the Council are advised to give consideration to the style and legibility of the future County Development Plan, in order to ensure that the information contained as part of the County Development Plan is as clear and accessible as possible for future users.

In determining the overall vision of the Longford County Development Plan 2021-2027, it is recommended that the Council consider the Vision, Key Principles and Regional Strategic Outcomes (RSOs) of the RSES (Chapter 2) in crafting this. The RSOs are aligned to the National Strategic Outcomes (NSOs) of the NPF and it should be noted that the ability to demonstrate delivery of these may potentially be linked to future funding sources.

Conclusion

The Regional Assembly welcome the publication of the Issues Paper which marks the beginning of the alignment of planning policy at county and local levels with Regional and National Policy. The Assembly look forward to corresponding with the Council on the forthcoming stages of the County Development Plan process.

It should also be noted that the officials of the Regional Assembly are available to discuss the matters raised above and will be available throughout the County Development Plan process.

Regards,



Jim Conway

Director

Eastern and Midland Regional Assembly

14th November 2019