

18th November 2022

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

Re: Issues Paper for the Longford Local Area Plan 2023-2029

A chara,

Thank you for your authority's work in preparing the Issues Paper for the proposed Longford Local Area Plan 2023-2029 (the Issues Paper). The Longford Local Area Plan 2023-2029 (the LAP), which will replace the Longford Town and Environs LAP 2016-2022 is a mandatory local area plan under section 19(1)(b) of the *Planning and Development Act 2000*, as amended (the Act).

The Office welcomes the commencement of the plan-making process, through the publication of the Issues Paper, in view of the recent adoption of the Longford County Development Plan 2021-2027 (the Development Plan) and the provisions under sections 18(4)(b) and 19(2B) of the Act.

The Office acknowledges your authority's work, more broadly, in advancing the preparation of the LAP.

As section 20(1) does not prescribe the requirements for public consultation at pre-draft stage for LAPs, the planning authority is commended for publishing this Issues Paper, engaging proactively with the public and notifying the Office of the intention to prepare the

LAP. The future LAP has the potential to deliver on key objectives of the Development Plan, including housing, employment and services.

In accordance with the provisions of section 31AO of the Act, the Office is obliged to evaluate and assess local area plans in the context of certain statutory parameters including:

- matters generally within the scope of section 19;
- consistency with the objectives of development plan, its core strategy, the Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly (the RSES);
- ministerial guidelines made under section 28;
- ministerial policy directives issued under section 29; and
- such other matters as the Minister may prescribe under section 262 or otherwise prescribe.

The Office has set out some broad issues, relevant to the preparation of most, if not all LAPs, in addition to some specific issues of particular relevance to the preparation of this LAP, under the following nine themes:

1. Strategic policy framework
2. Development plan and core strategy
3. Zoning, compact growth and infrastructural services
4. Regeneration
5. Education, social and community
6. Economic development and employment
7. Transport and mobility
8. Environment and natural and built heritage
9. Climate change mitigation and adaptation

The Office's comments are offered without prejudice to any observations and recommendations as may be forthcoming from the Office at future stages of the plan making process. They do not affect the obligation on your planning authority to comply with the relevant legislative requirements, or to be consistent with the fullness of the detailed policy context of the higher order plans and strategies and Ministerial guidelines.

1. Strategic Policy Framework

The planning authority will be aware that section 20(5) of the Act requires the LAP to be consistent with the objectives of the RSES, in addition to the *National Planning Framework* (NPF), the specific planning policy requirements (SPPRs) of section 28 guidelines and the relevant the development plan.

The provisions of the RSES have generally been transposed through the Development Plan. Therefore, in ensuring consistency with the Development Plan and core strategy, the planning authority can ensure that it is also generally consistent with the RSES and NPF. However, the Office would encourage the planning authority to liaise with the Eastern and Midland Regional Assembly (EMRA) in preparation of the draft LAP to ensure consistency with the RSES, particularly where clarity is required on the objectives and guiding principles set out therein.

The Issues Paper demonstrates a clear understanding of the role of the settlement within the wider county and regional context. Longford Town is identified as a Key Town in the RSES that acts as a key employment centre with a strong retail, administrative and service function for the wider catchment. In this regard, RPO 4.63 seeks to support Longford Town as a strategic portal to the northwest and south due to its proximity to the Regional Growth Centre of Athlone and its role as a strategic employment centre. The RSES also acknowledges Longford Town as a key tourism destination. RPO 4.60 seeks to support the development of Longford as a tourism hub having regard to its accessibility to key tourist destinations such as Centre Parcs.

In aligning with the RSES, the LAP should consider the strategic vision, goals and guiding principles of the RSES, in addition to consistency with the relevant regional policy objectives (RPOs).

The LAP should also consider practical implementation issues and measures that can best be promoted via the policies and objectives of the LAP.



2. Development plan and core strategy

Section 19(2)(b) of the Act also requires that the LAP shall be consistent with the objectives of the development plan and its core strategy. A key message of the section 28 *Local Area Plan Guidelines for Planning Authorities (2012)* (LAP Guidelines) is that consistency between local area plans and the core strategy of development plans is an essential requirement, particularly in relation to the quantum and location of lands identified for development.

The Office therefore cautions against the introduction of any objectives that would conflict with the core strategy settlement hierarchy and/ or the housing supply target for the settlement.

In this regard, the Office notes that the core strategy of the development plan provides for a population increase in Longford town of 2,502 persons over the 2021 – 2027 plan period, and a requirement for 1,304 housing units and 34.77 hectares of residential land.

3. Zoning, compact growth and infrastructural services

Having regard to section 19(2)(b), the Office advises against the introduction of objectives, including any land use zoning objectives, that would be inconsistent with any objectives relating to land use zoning or otherwise in the Development Plan.

In this regard, the objectives of the LAP are required to be consistent with the policy objectives of the RSES, including, in particular, the any strategic development sites for the delivery of residential, employment or other uses.

It is noted that the land use zoning for Longford Town has been provided for in the Development Plan. However, it will be essential for any additional land use objectives to demonstrate consistency with the objectives for compact growth under the NPF (NPO 3c), the RSES (RPO 3.2) and the efficient use of land (NPO 35). Compact growth will play a central role in achieving the National Climate Objective and the Government's climate action target of 51% for greenhouse gas (GHG) emissions reduction by 2030 and for a carbon neutral economy by 2050.

In this regard any provisions or standards for residential density or building height in the LAP should have regard to relevant section 28 guidelines, including *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities*,

Towns & Villages (2009), Urban Development and Building Heights Guidelines for Planning Authorities (2018), and Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) and should be consistent with any Specific Planning Policy Requirement therein.

Land use zoning should also follow the policy and objective for a sequential approach to zoning for residential development set out under section 6.2.3 of the *Development Plans, Guidelines for Planning Authorities (2022)* (the Development Plans Guidelines). Where land use zoning objectives are proposed to be included in the LAP, the planning authority will need to ensure consistency with the provisions for tiered approach to zoning under NPO 72 a-c of the NPF. This will require the carrying out of an infrastructure assessment for the town in accordance with Appendix 3 of the NPF and with section 4.5.2, Settlement Capacity Audit, of the Development Plans Guidelines.

It will be of critical importance to the implementation of the LAP to ensure that all lands zoned for residential and other development are serviced or will be serviceable during the plan period. This will enable the planning authority to meet the growth targets for the plan period through the delivery of strategic land, such as the Camlin Quarter and Ballyminion Areas identified in the RSES. The Office therefore advises the planning authority to liaise closely and collaborate with the relevant prescribed authorities concerning the delivery of essential services and infrastructure.

4. Regeneration

Both the NPF (NPO 4, 6, 18a, 18b and 35) and the policy objectives and provisions of the RSES place a strong emphasis on the opportunities for urban and village regeneration to create attractive, liveable, well-designed, high quality urban places that provide for a high quality of life and well-being. Regeneration and revitalisation of settlements through reuse of brownfield sites and vacant / underutilised buildings will play a crucial role in mitigating climate change and in achieving the Government's obligatory target of 51% for GHG emissions reduction by 2030 and for a carbon neutral economy by 2050.

Where the RSES identifies any opportunity sites to support town centre regeneration, these opportunity sites and others should be clearly identified in the forthcoming LAP. However, an evidence-based approach should be taken to the identification of

regeneration sites, or vacant or underutilised buildings, generally, in accordance with the guiding principles of the RSES for urban infill and regeneration, where applicable.

The designation of 'regeneration areas' in the LAP or in the development plan is a requirement for the implementation of the Vacant Site Register under the Urban Regeneration and Housing Act, 2015. In larger settlements (>10,000), the Development Plans Guidelines advise that the identification of 'regeneration areas' should be coordinated with the identification of 'Settlement Consolidation Sites' determined by the planning authority.

The LAP should align with the objectives of the regeneration strategy of the Development Plan and focus development on the key regeneration sites identified. There is pressing need to implement a strong policy framework to support the use of existing buildings, brownfield/infill sites, and derelict and underutilised sites. Proactive land activation measures, including the planning authority's powers in respect of land acquisition / compulsory purchase, derelict sites and the vacant land, among others, should all be considered.

Also important in this respect is the Government's *Town Centre First: A Policy Approach for Irish Towns*, which policy envisages Town Centre First (TCF) Plans as central to informing the future direction of towns and the priority investment interventions supported through TCF-aligned funding streams.

The identification of intended sources of funding to facilitate, support or complement key regeneration projects, such as the recently announced *Croí Cónaithe (Towns) Fund Scheme*, is a further land activation measure to be considered in the LAP.

5. Education, social and community

Access to quality childcare, education and health services' is a National Strategic Outcome of the NPF. In this regard, the LAP should be consistent with NPO 31, which seeks to align population and employment growth with investment in childcare and education facilities on well-located sites within or close to the existing built-up areas to meet the diverse needs of local populations. The LAP should also be consistent with the objectives of the RSES for education facilities.

It is an objective (NPO 4) of the NPF to ensure the creation of liveable places that are home to diverse and integrated communities and to (NPO 28) provide improved integration and greater accessibility in delivering sustainable communities and associated services. This includes planning for the housing / transport / accessibility and leisure needs of an aging population (NPO 30) and for the Traveller community. The LAP should also be consistent with the objectives of the RSES for social and community facilities.

The NPF expects that the local authority's Local Economic and Community Plan (LECP) would inform the LAP to provide for the co-ordinated spatial planning of community services for the area. In addition, the local authority's *Traveller Accommodation Programme* should also inform the LAP.

Having regard to NPO 33 to prioritise new homes that can support sustainable development at an appropriate scale of provision relative to location, it is important that the LAP takes an integrated approach to the planning of education, social and community facilities and amenities. The LAP should consider the capacity of existing facilities, including community centres, leisure, amenity and cultural facilities to serve existing and future residents. In addition, and aligned with the need for a sustainable settlement and transport strategy, the LAP should also ensure that education, childcare, social and community facilities can be easily accessed by walking or cycling from existing and proposed new residential areas.

6. Economic development and employment

The LAP Guidelines state that LAPs should include objectives to promote local economic development and employment growth by focusing on issues such as the creation of vibrant and dynamic city and town centres where local businesses thrive and the provision of low cost accommodation for start-up businesses.

The NPF, RSES and the LAP Guidelines emphasize the need to take an evidence-based approach to the inclusion of objectives for employment and other commercial uses. The NPF expects that the local authority's Local Economic and Community Plan (LECP) would inform the LAP to provide for the co-ordinated spatial planning for the area.

The LAP is required to be consistent with any objectives of the RSES concerning strategic enterprise / employment sites or in respect of development type or location-specific development (e.g. rural development). In this regard, both the RSES and the Development

Plans Guidelines recognise accessibility as a central consideration in selecting employment zonings and the transport provision of potential locations for development needs to be strategically considered, including through the application of the sequential approach.

The facilitation of retail facilities will also need to be considered to provide for the anticipated population growth. Regard should be had, in particular, to the sequential approach to the location of retail development and other provisions of the *Retail Planning Guidelines for Planning Authorities (2012)* (Retail Guidelines), and the position of the settlement in the retail hierarchy of the Development Plan.

The application of the sequential approach to the zoning of lands for employment and commercial land uses, and the reuse of appropriate brownfield sites and vacant premises will contribute to the delivery of compact growth consistent with the National Strategic Objective of the NPF and will help implement the Government's Town Centre First Policy.

An integrated approach to land use and transport planning for enterprise, employment and commercial development will also play an important role in mitigating climate change and in achieving the Government's obligatory target of 51% for GHG emissions reduction by 2030 and for a carbon neutral economy by 2050.

7. Transport and mobility

The objectives and provisions of the NPF (NPO 27, NPO 33 and NPO 64, among others) and the RSES recognise the importance of implementing an integrated land use and transportation approach.

A mandatory national target of 51% reduction in GHG emissions by 2030 will be implemented through the *Climate Action Plan 2021*, which commits to delivering an additional 500,000 daily sustainable journeys by 2030 (an increase of 14% on current levels) through, among others, a significant increase in walking and cycling, supported by the goals of government's *National Sustainable Mobility Policy (2022)* (NSMP).

An integrated approach to land use and transport planning will be central to achieving these targets. In addition to the above, the LAP should be informed by the guiding principles and be consistent with the RPOs of the RSES relating to integration of land use and transport planning, where applicable.

The RSES sets out guiding principles for integration of land use and transport planning and identifies the requirement for local transport plans (LTPs) for certain settlements and / or under certain circumstances. The Development Plan (CPO 4.9 and CPO 5.9) also commits to the preparation of an LTP to inform the LAP in consultation with the NTA and TII.

The LAP should also set out an ambitious (but realistic) modal shift target for the town, and the LTP will be key to informing the objectives, policies and measures in the LAP so that this target can be achieved. The NTA's and TII's *Area Based Transport Assessment Advice Note (2018) (ABTA)* and *ABTA How to Guide Guidance Document Pilot Methodology (2021)* should be considered by the planning authority in preparing any LTP.

Consistency with the transport strategy and associated objectives and policies of the Development Plan is also required.

The transport strategy of the LAP should also demonstrate consistency with 'Avoid-Shift-Improve' principle, the implementation of the 'Decide Provide' approach and the '10-minute town concept'.

The proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019), including in particular 'filtered permeability', will ensure that over time the area will better accommodate pedestrians and cyclists, in addition to public transport where available. Similarly, the implementation of the NTA's *Permeability Best Practice Guide* will also ensure enhanced pedestrian and cycle routes within the area of the LAP.

The planning authority is advised to refer to the submission from the NTA for further details.

8. Environment and natural and built heritage

The planning authority is the competent authority for the purposes of Strategic Environmental Assessment and Appropriate Assessment. The planning authority will be aware of its obligations and responsibilities under the SEA Directive and under the Habitats Directive.

In this regard the planning authority is required to have regard to the revised section 28 *Strategic Environmental Assessment Guidelines for Regional Assemblies and Planning Authorities* (2022). It should also consider the *Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities* (2009), as revised.

It is an objective (NPO 52) of the NPF to ensure that the planning system responds to national environmental challenges and that development occurs within environmental limits. The planning authority should ensure the LAP is consistent with objectives of the NPF concerning environmental protection (NPO 52, NPO 57, NPO 58, NPO 60, NPO 62, NPO 63, NPO 64 and NPO 65, among others), in addition to the objectives or guiding principles of the RSES.

In particular, the Office highlights the importance of integrating green and blue infrastructure into the LAP, in accordance with NPO 58 and the objectives and guiding principle of the RSES. Planning for green and blue infrastructure, such as public parks and water bodies can contribute to climate change adaptation, in particular flood risk management through nature-based solutions. It can also make a positive contribution to climate mitigation, when integrated with greenways, and have positive impacts on biodiversity.

Regarding built-heritage, the RSES and several section 28 guidelines (LAP Guidelines and the Development Plans Guidelines, among others) recognise that protecting, conserving and managing sites and features of special interest, in addition to public realm improvements, can instigate a heritage-led regeneration of settlements to generate economic benefits in terms of tourist footfall, improved retail environment and improved quality of life. The re-use of built heritage will contribute to compact growth and regeneration and to climate change mitigation having regard to embodied carbon.

Although the key built-heritage related objectives and policies are contained in the Development Plan, the planning authority should consider what location specific objectives or measures would assist in the protection or improvement of built heritage over the period of the LAP. In this regard, the planning authority should have regard to the *Architectural Heritage Protection Guidelines for Planning Authorities* (2004), as amended.

9. Climate change mitigation and adaptation

It is a National Strategic Outcome of the NPF to transition to a low carbon climate resilient society. It is an objective (NPO 52) of the NPF to ensure that the planning system responds to national environmental challenges and that development occurs within environmental limits. The NPF acknowledges climate change as a national environmental challenge and it is an objective (NPO 54) to reduce Ireland's carbon footprint in support of national targets for climate policy mitigation and adaptation, including targets for GHG emissions reduction.

The effective implementation of climate mitigation objectives through the LAP, consistent with national and regional policy objectives (and guiding principles) identified by the Office under each of the themes, above, will be critical to the achievement of the Government's GHG emissions reduction target to mitigate climate change.

In terms of climate adaptation, flood risk management is the most critical climate change adaptation measure to be addressed in the LAP, informed by Strategic Flood Risk Assessment (SFRA). The planning authority should ensure that it has regard to the detailed requirements and provisions of section 28 *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009), including in particular the application of the sequential approach and requirement to carrying out the plan-making Justification Test.

The planning authority should also overlay the flood risk zones on any proposed land use zoning maps, to illustrate the potential flood risk arising and to demonstrate how the sequential approach has been applied and where the plan-making Justification Test is required.

The planning authority is requested to make a copy of digital mapping data for flood risk and land use zoning data available to the Office and to the OPW to facilitate assessment.

The planning authority is advised to liaise with the OPW in the carrying out of SFRA to avoid issues arising at draft LAP stage. This will be of particular importance where land use zoning objectives are proposed to be included.

As noted, above, the implementation of objectives for green and blue infrastructure consistent with national and regional policy objectives should also form an important part of the LAP's response to climate change adaptation.

In accordance with NPO 57, the LAP is required to integrate sustainable water management solutions, such as Sustainable urban Drainage Systems (SuDS). In this regard the Office would draw the planning authority's attention to *Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design, Best Practice Interim Guidance Document (2021)* which was issued by the Department of Housing, Local Government and Heritage after the adoption of the Development Plan.

The planning authority is advised to refer to the submissions from Irish Water and the OPW in respect of climate change mitigation and adaptation.

Summary

In summary, the Office commends your authority for the preparation of this Issues Paper. The Office advises your authority to pay particular attention to the following issues in the preparation of the draft LAP:

- in relation to land use zoning, the LAP should be consistent with the zoning objectives as set out in the Longford County Development Plan 2021-2027. Where new zonings are proposed, that do not conflict with the Development Plan, the land use objectives shall demonstrate consistency with the objectives for compact growth under the NPF (NPO 3c), the RSES (RPO 3.2) and the efficient use of land (NPO 35); where new zonings are proposed, that do not conflict with the Development Plan, the land use objectives shall demonstrate consistency with the objectives for compact growth under the NPF (NPO 3c), the RSES (RPO 3.2) and the efficient use of land (NPO 35);
- with regard to Regeneration, the draft LAP should identify specific regeneration lands, such as the Camlin Quarter and Ballyminion Areas in accordance with the RSES and the Development Plan. The planning authority should also utilise available funding to enhance and improve the public realm and address vacancy to improve the overall vitality of the area;



- in terms of Economic Development, the draft LAP should align with the RSES in respect of building on the significant investment in tourism and recreational infrastructure in particular the nearby flagship Centre Parcs Holiday Village and support the collaboration between surrounding counties, ESB and Bord na Mona through the Upper Shannon Erne Future Economic Project for opportunities to deliver cross regional economic projects;
- in relation to Accessibility and Transport, the draft LAP should be informed by the preparation of a local transport plan in accordance with CPO 4.9 and CPO 5.9 of the Development Plan. The draft LAP should integrate land use and transport planning to provide for enhanced pedestrian and cycle routes within the town in line with Longford walking and cycling strategy to achieve the 10 minute town concept. The planning authority is advised to engage with the NTA and TII in this regard;
- with regard to climate change mitigation and adaptation, the draft LAP should seek to include policies and objectives in relation to the implementation of Sustainable Urban Drainage Systems (SuDS) and nature based solutions to address the capacity challenges with the sewer network. The planning authority is advised to liaise with Irish Water in this regard; and
- in relation to flooding, the planning authority should demonstrate that the sequential approach has been applied with land use zonings overlaid with both Flood Zone A and B in a clear, legible manner. In this regard the Office would appreciate if the planning authority would make the digital mapping data available to it and to the OPW to facilitate assessment. The planning authority should ensure that plan-making Justification Tests are carried out where required under the Flood Guidelines and ensure that the flood relief schemes in Longford town are incorporated within the LAP objectives to protect these areas from inappropriate development proposals. The planning authority is advised to liaise with the OPW in this regard.

The Office looks forward to reviewing the future draft LAP and is committed to continued positive engagement with your authority in implementation of national and regional policies at the county and local level.



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

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.

Is mise le meas,

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations
