



Oifig an  
Rialaitheora Pleanála  
Office of the  
Planning Regulator

**OPR Ref: MA-051-22**

5<sup>th</sup> March 2025

Senior Staff Officer,  
Planning Department,  
Longford County Council,  
Áras an Chontae,  
Great Water Street,  
Longford Town,  
County Longford,  
N39 NH5.

**Re: Proposed Material Alterations to the Draft Longford Town Local Area Plan  
2025-2031**

A chara,

Thank you for your authority's work in preparing the proposed Material Alterations to the draft Longford Town Local Area Plan 2025-2031 (material alterations).

As your authority is aware, a core function of the Office of the Planning Regulator (the Office) is the strategic evaluation and assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. This includes a requirement to make submissions on statutory plans, including any observations or recommendations the Office considers necessary to ensure the effective co-ordination of national, regional and local planning requirements.

The Office has evaluated and assessed the proposed material alterations under the provisions of sections 31AO(1) and 31AO(2) of the Planning and Development Act 2000, as amended (the Act), and within the context of the Office's earlier recommendations and observations.

The Office's evaluation and assessment of the proposed material alterations has regard to the Longford County Development Plan 2021-2027 (County Development Plan), the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly (EMRA) and the relevant section 28 guidelines.

## **Overview**

The Office's submission to the draft Longford Town Local Area Plan 2025-2031 (Local Area Plan) included eight recommendations on the draft Local Area Plan and three observations.

Subject to the below, the Office is otherwise satisfied with the proposed response to Recommendations 1, 2 and 3 in relation to the residential development strategy, height and density strategy, and regeneration strategy.

However, in relation to the response for the renewal of the Ballyminion, Ardnacassa and St. Michael's Road housing estates that these matters would be in line with the housing department's requirements, this does not provide a clear policy framework for the development of these lands (Recommendation 3). The Office reiterates its view that the regeneration aims and principles of for these housing areas should be set out in the Local Area Plan to guide future development, provide clarity for communities, facilitate funding, and address the socio-economic issues facing the town in alignment with RPO 4.61, RPO 4.62 of the RSES and the strategic aim 5 (Regeneration and Placemaking) of the draft Local Area Plan.

Two of the Office's recommendations (Recommendation 1 and 3) also requested additional detail on urban structure, massing, materials, permeability, open space and Sustainable Urban Drainage Systems for the residential and economic development sites. The Chief Executive's response highlights resources as an issue and states that this will be addressed through the development management process.

The Office fully acknowledges the resource requirements of such an exercise. However, identifying land activation measures and clarifying the development potential of Longford Town's sites in the Local Area Plan would ensure a plan-led approach to the development of these lands. This would create a strong policy framework for assessing future development proposals through the development management process, while offering certainty for developers and the community and

supporting housing delivery. Looking ahead, the Office therefore strongly urges the planning authority to include such information as part of its statutory plan making.

In terms of flooding matters under Recommendation 8, the Chief Executive's (CE's) Report states for the most part that these issues will be addressed in the next iteration of the Strategic Flood Risk Assessment. The Office assumes that this refers to the process of adopting the Local Area Plan. These matters should, however, have been addressed at the material alterations stage.

If the Planning Authority decides to make the Local Area Plan inconsistent with the recommendations made by the Office to the draft Local Area Plan, this should be highlighted in your authority's notice letter upon adoption as per section 31AO(5) of the Act, and the matter will be fully considered by the Office at that stage.

The material alterations provided for in the response to Recommendation 5 addressing economic development are acknowledged and welcomed. The Planning Authority should however improve the clarity of the map provided under MA 10, specifically with respect to the numbering and boundary of sites.

The submission from the Department of Education is noted in addressing Recommendation 6.

Finally, it is noted that some of the changes to the draft Local Area Plan, pursuant to this Office's submissions, have raised additional matters where further consideration is recommended. These largely relate to points of clarity and set out in the three observations below.

In relation to the material alterations, with the exception of one recommendation below which relates to access arrangements to the Abbeycartron lands, the Office generally considers that the approach taken is evidence-based and is consistent with the objectives of proper planning and sustainable development.

It is within this context the submission below sets out one (1) recommendation and three (3) observations under the following themes:

<b>Key theme</b>	<b>Recommendation</b>	<b>Observation</b>
<a href="#">Abbeycartron Access Arrangements</a>	<a href="#">MA Recommendation 1</a>	-
<a href="#">Development Strategy</a>	-	<a href="#">MA Observation 1</a>

<a href="#">Regeneration Strategy</a>	-	<a href="#">MA Observation 2</a>
<a href="#">Sustainable Urban Drainage Systems</a>	-	<a href="#">MA Observation 3</a>

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the Planning Authority is requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The Planning Authority is advised by the Office to action an observation.

A submission can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The Planning Authority is advised by the Office to give full consideration to the advice contained in a submission.

### **1. Abbeycartron Access Arrangements**

Recommendation 4 (ii) of the Office’s submission on the draft Local Area Plan required clarity on the access arrangements for the Abbeycartron lands. The Office welcomes the proposed material alterations to address this recommendation, specifically the removal of the access arrangements previously provided for the Abbeycartron lands in the Longford Northern Environs Local Area Plan 2008-2014 so that the lands will be accessed via the ‘alternative sustainable proposal’ also proposed in the draft Local Area Plan (with amendments).

However, the material alterations include a new objective ST 27 (MA 66), and supporting text at section 14.4.9.2 Abbeycartron Sustainable Transport Proposal (MA 51) which reiterates Objective ST 27, which facilitate a reversal of this position.

## Objective ST 27:

*Ensure implementation of the Abbeycartron Sustainable Transport Proposal is dependent on prior 'traffic and transport' and permeability assessment, to the satisfactory standard and detail of Longford County Council and in consultation with TII, and it's determined alignment with Section 2.4 'Design Standards and Guidelines' of the current LTP. In the absence of said prerequisites, all development within the defined site of LTP's Fig. 5.8 shall revert to its Northern Environs Local Area Plan 2008-2014 infrastructural arrangement. [our emphasis]*

The inclusion of the last line of this new text is in conflict with proposed MA 63 (Sustainable Transport Objective ST 26) which requires developers to provide elements of the road network as per the Abbeycartron Sustainable Transport Proposal. Having regard to Recommendation 4 (ii) of our submission on the draft Local Area Plan, and to avoid conflict between the material alterations, the Planning Authority is recommended to omit the last line of MA 51 and MA 66.

The Office also has concerns regarding the new map proposed under MA 51 for the Abbeycartron Sustainable Transport Proposal (section 14.4.9.2). This amended map is proposing a 'road with designated footway and cycleway' over the Camlin River into the Templemichael Industrial zoned lands. At draft Local Area Plan stage this was a 'ped/cycle only route'. This alteration will create a full east-west orbital road through the lands and a parallel route to the N4 immediately to the north, increasing capacity for the private car in Longford and facilitating car-dependency and car movements for the Abbeycartron and adjoining Templemichael lands. This proposal will undermine Ireland's commitment to achieving its mandatory climate action targets under the Climate Action and Low Carbon Development Act 2015, as amended.

It is noted that the Local Transport Plan (LTP) did not consider this route / crossing and its proposed inclusion will undermine RPO 8.6 of the RSES and Policy Objective CPO 5.9 of the County Development Plan requiring preparation of a LTP for Longford Town. It also conflicts with objective ST 30 which supports the 'priority schemes' of the LTP:

*Support and facilitate the implementation of the pedestrian, cycle, public transport, car parking, traffic management, and permeability 'Priority Schemes' set out in the Local Transport Plan. Proposals for new development will be required to demonstrate how they will integrate with the provisions of the Local Transport Plan.*

The Planning Authority is therefore recommended to remove the new map proposed under MA 51 and replace it with the previous map from the draft Local Area Plan, entitled Alternative Sustainable Proposal (Figure 5.9 of LTP).

### **MA Recommendation 1 – Abbeycartron Access Arrangements**

Having regard to the integration of land use and sustainable transportation, and in particular to:

- section 8.3 and RPO 4.59 and RPO 8.1 of the RSES for the EMRA;
- RPO 8.6 of the RSES and Policy Objective CPO 5.9 of the Longford County Development Plan 2021-2027 (County Development Plan) requiring the preparation of a local transport plan;
- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, and the Climate Action Plan 2024, and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021); and
- Policy Objectives CPO 5.1, CPO 5.3, CPO 5.5, CPO 5.8, CPO 5.45, CPO 5.46, CPO 5.47 and CPO 5.71 for sustainable transport and mobility of the County Development Plan,

the Planning Authority is recommended to:

- (i) omit the last line of MA 51 and MA 66; and
- (ii) remove the new map proposed under MA 51 and replace it with the previous map from the draft Local Area Plan, entitled Alternative Sustainable Proposal (Figure 5.9 of LTP).

## 2. Development Strategy

Recommendation 1 of the Office’s submission to the draft Local Area Plan required the Planning Authority to set out a clear development strategy for the residential sites. As part of the response to this recommendation, the Planning Authority amended the phasing scheme for both the New Residential and Industrial/Commercial/Warehousing lands. The revised phasing maps and tables provided for both land uses under MA 73 are welcomed.

However, the infrastructural servicing information provided in the tables is quite limited for both land uses and the Local Area Plan could benefit from setting out the infrastructural requirements in more detail.

Additionally, the Planning Authority is advised to update the analysis carried out during the Local Area Plan preparation with submissions from prescribed bodies to consultations during the plan preparation (for example, the submission from Uisce Éireann (UÉ) on the draft Local Area Plan highlights deficiencies in the sewer network for these lands and network extensions will need to be developer driver). This information is not included in the new table provided under MA 73.

### MA Observation 1 – Development Strategy: Phasing Tables

Arising from the Planning Authority’s response to Recommendation 1 of the Office’s submission to the draft Longford Town Local Area Plan 2025-2031, and to ensure the co-ordination of development and infrastructure capacity, the Planning Authority is advised to make the Local Area Plan with minor modifications to MA 73 to ensure any infrastructural deficiencies are highlighted (for example the Athlone Road lands) and to provide more detail on the infrastructural requirements for both the New Residential and Industrial/Commercial/Warehousing lands in the new phasing table.

The draft Maynooth and Environs Joint Local Area Plan 2025-2031 provides a good example of this, see table 11.5 of the draft Joint Local Area Plan.

### 3. Regeneration Strategy

Recommendation 3 of the Office’s submission to the draft Local Area Plan required the Planning Authority to review and prioritise the regeneration strategy which originally identified eighteen strategic sites to target investment more appropriately.

The detailed response in the CE’s Report regarding the Planning Authority’s approach to tackling vacancy is appreciated. These measures, such as the Vacant Homes tracker and the functions of the Vacant Homes Office, reflect the positive work of the Council and should be incorporated into the Local Area Plan, including in the Implementation and Monitoring Chapter.

The consolidation of the Camlin Quarter sites and subsequent rationalisation of the Strategic Sites from eighteen to twelve is noted and welcomed, along with the new map and table (MA 24). The amendment of Objective MP 02 to develop the strategic sites in line with the Longford 2040: A Town Centre First Strategy (TCFS) is welcomed (MA 17), together with omitting the requirement to prepare masterplans for the strategic sites (MAs 16, 17, 18, 19, 20, 21). Nevertheless, the Local Area Plan could benefit from providing additional detail regarding the TCFS, highlighting its publication and aims, especially given the valuable work and details it contains.

In addition to the above, the new objective MP 05 (MA 23) should be further strengthened by linking it to the LTP and/or transport measures set out in the Transport Chapter of the draft Local Area Plan.

#### MA Observation 2 – Regeneration Strategy

Arising from the Planning Authority’s response to Recommendation 3 of the Office’s submission to the draft Longford Town Local Area Plan 2025-2031 (Local Area Plan) and in the interests of consistency and clarity and to ensure the implementation of the Local Area Plan, the Planning Authority is advised to make the Local Area Plan with minor modifications to:

- (i) include the measures set out in the Chief Executive’s Report to address vacancy, such as the Vacant Homes tracker and the functions of the Vacant Homes Office, in the Local Area Plan, including in the Implementation and Monitoring Chapter;



- (ii) MA 17, to include additional background detail on Longford 2040: A Town Centre First Strategy regarding its publication and aims; and
- (iii) MA 23, to strengthen this objective further by linking it to the Local Transport Plan and/or transport measures set down in the Transport Chapter of the Local Area Plan.

#### 4. Sustainable Urban Drainage Systems

Recommendation 7 of the Office’s submission to the draft Local Area Plan required the Planning Authority to review and amend the sustainable infrastructure policy framework. MA 45 addresses this recommendation appropriately. It is suggested that the wording of this new objective (WS 22) is expanded to refer to both existing and new developments. UÉ’s submission makes a similar request.

#### MA Observation 3 – Sustainable Urban Drainage Systems

Arising from the Planning Authority’s response to Recommendation 7 of the Office’s submission to the draft Longford Town Local Area Plan 2025-2031 (Local Area Plan) and in the interests of consistency and clarity and to ensure the implementation of the Local Area Plan, the Planning Authority is advised to make the Local Area Plan with a minor modification to MA 45 to strengthen this objective further by referring to both existing and new developments.

#### Summary

The Office requests that your authority addresses the recommendation and observations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 20 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office within **five working days** of the making of the Local Area Plan under section 31AO(5) of the Act. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the Local Area Plan in such a manner as to be inconsistent with the recommendations of the Office, the Chief Executive must, in the notice letter, inform the Office accordingly and state the reasons for the decision of the planning authority.

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 [plans@opr.ie](mailto:plans@opr.ie).

Is mise le meas,

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A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive, slightly slanted style.

**Anne Marie O'Connor**

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015

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