

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

3ú Urlár ó Thuaidh | Ionad Cathartha | An tSráid Mhór | Baile Munna | Baile Átha Cliath 9
3rd Floor North | Ballymun Civic Centre | Main Street | Ballymun | Dublin 9



Draft Longford County Development Plan 2021-2027

The Eastern and Midland Regional Assembly notes the publication of the Draft Longford County Development Plan 2021-2027 and sets out hereunder submissions and observations on behalf of the Assembly. This submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at the meeting of 15th January 2021.

Regional Spatial and Economic Strategy (RSES)

As indicated in the Assembly's previous submission to the County Development Plan review process made under Section 27A of the Planning and Development Act 2000, as amended, The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy for the Eastern and Midland Region, made on 28th June 2019, which consequently initiated the statutory time period within which the Council are required to prepare their Draft Development Plan, as stated at Section 11(1) (b) of the Planning and Development Act 2000, as amended (the Act). In this regard, The Assembly welcomes the publication of the Draft Longford County Development Plan which enables the coordinated and timely incorporation of Project Ireland 2040 - the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES), thus ensuring full alignment between local, regional and national planning policy.

Legislative Context

As required by Section 27B of the Act, The Eastern and Midland Regional Assembly has prepared this submission, and sent a copy of same to the Minister and Office of the Planning Regulator.

In accordance with the aforementioned Act, a submission shall contain a report which shall state whether, in the opinion of the Regional Assembly, the draft development plan, and in particular its core strategy are consistent with the Regional Spatial and Economic Strategy. If, in the opinion of the Regional Assembly the draft development plan, and its core strategy are not consistent with the RSES, the submission / observations and report shall include recommendations as to what amendments, in the opinion of the Regional Assembly, are required to ensure that they are consistent.

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 27B of the Act.

The attention of the Council is also directed to the requirements of Section 12 (4) of the Act, whereby a Chief Executive's Report prepared by the Planning Authority shall summarise the issues and recommendations raised by the Eastern and Midland Regional Assembly, and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the development plan.

Submission

The Assembly would like to acknowledge the extensive work that the Local Authority has carried out in order to prepare the Draft Plan and, in particular, that this work follows a period of considerable change, within a planning policy context, that included the publication of the National Planning Framework (NPF), the RSES and the establishment of the Office of the Planning Regulator. Accordingly, the Assembly welcomes the overall approach and effort of Longford County Council to coordinate and incorporate policies and objectives, so that they are consistent with the RSES and NPF.

The Assembly considers that the overall draft development plan, including its Core Strategy, are generally consistent with the RSES subject to the contents of the remainder of this submission. The submission broadly follows the chapter headings of the Draft Development Plan, under the following headings:

1. Introduction, Strategic Context and County Profile
2. Climate Change
3. Core, Settlement and Housing Strategies
4. Transport, Infrastructure, Energy and Communications
5. Regeneration
6. Placemaking
7. Economic Development
8. Rural Economy
9. Tourism
10. Built and Cultural Heritage
11. Natural Heritage and Environment
12. Green Infrastructure and Landscape Character
13. Monitoring, Evaluation and Implementation, and Development Management Standards
14. SEA, AA and SFRA
15. Other

1. Introduction, Strategic Context and County Profile

The Assembly welcomes the inclusion of the first and second chapters of the draft plan, which provide an overview of scene setting matters including the statutory context, planning context and county profile.

Section 1.8 of the draft plan, identifies that the plan should be read in the hierarchical context of legislation and plans that exist at International, National and Regional level whilst referencing Figure 1.1. It is considered that Figure 1.1 should be amended to clearly demonstrate the planning policy hierarchy of the NPF, RSES and CDP etc., and that other nationally and regionally prepared documents inform this, rather than carry the same weight, which the current graphic as depicted could lead the reader to assume. The inclusion of Section 1.12, which documents the EMRA RSES, is welcomed and in particular the statement that the County Development Plan has been aligned to the relevant Regional Strategic Outcomes (RSOs) and associated relevant Regional Policy Objectives (RPOs). This section could be strengthened by referencing the NPF and RSES in terms of the legislative context and planning policy hierarchy with which the County Development Plan is required to be consistent with.

2. Climate Change

The Inclusion of a standalone chapter on Climate Change which sets out a vision for the future and key actions towards climate change and sustainable development is a positive addition the plan. The Chapter provides a contextual overview of the related policy context and key concepts. The reference to the RSES Key Principle of Climate Action is acknowledged.

It is noted that the chapter indicates that Climate Change is a strategic and cross cutting theme across the County Longford Development Plan, and, as part of the collective need to tackle Climate Change, each chapter of the Plan concludes with a climate context and select number of associated climate actions. This approach is extremely welcome and the initiative of the Council in this regard is to be commended. CPO 3.9 could benefit from including the most up to date terminology such as reference to the Midlands Regional Transition Team.

The Council's attention is drawn to RPO 3.6 and the preceding paragraphs of the RSES which outline the requirement of 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 project (QGasSP) to identify a robust method for quantifying the relative GHG impacts of alternative spatial planning policies, the outputs of which are anticipated in 2021, and should inform the Draft Plan as it progresses. The Eastern and Midlands Climate Action Regional Office (CARO) also play a key role in assisting and supporting the respective local authorities in the region in implementing their climate action strategies and have organised training workshops to help inform potential measures, policies and regulatory tools for the preparation of the Draft Development Plans. It is understood that the forthcoming Development Plan Guidelines will provide similar guidance in this area. Notwithstanding this, the Council are reminded of their obligations to comply with Ministerial Guidelines including the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change published in 2017.

The attention of the Council is also brought to the Climate Action Fund made available under the Department of Communications, Climate Action and Environment, and, in order to be availed of, requires policy support. In this regard, the Council may wish to identify potential projects as part of the finalised Plan.

3. Core, Settlement and Housing Strategies

The Assembly acknowledge the work that has gone into the preparation of Chapter 4 which details the Core Strategy, Settlement Strategy and Housing Strategy.

As part of Chapter 4, the Assembly welcome the inclusion of Section 4.3.3 which details the RSES, including Growth Enablers relevant to County Longford and reference to the Asset Based Approach used.

Statutory Requirements

Longford County Council are reminded of their obligations to prepare a Core Strategy in accordance with the provisions of Section 10 of the Act. Relating specifically to this chapter of the Draft Plan, the Assembly draws the attention of the Council to the contents of Section 10 (2A), (2B) and (2C) of the Act and asks Longford County Council to ensure consistency in this regard.

Core Strategy

Core Strategy Policy

The Draft Plan provides eight Core Strategy Strategic Aims at Section 4.6. These are considered to provide a robust framework for the Core Strategy that includes alignment with the NPF, RSES and securing future growth opportunities within County Longford through optimising the County's economic, social and physical development.

The Assembly welcomes the inclusion of the County Policy Objectives, CPOs 4.43- 4.48, which aim to give effect to the strategic aims of the Core Strategy. The Assembly consider that a policy promoting the regeneration of underused town centre and brownfield/ infill lands in accordance with RPO 3.3 would be a positive addition to the Plan and is recommended to be included.

The inclusion of CPO 4.47 which outlines that the Planning Authority shall maintain a record of residential development permitted in individual settlements in order to ensure compliance with the population allocations defined by the Core Strategy Table, is welcomed. It is recommended that this should be amended to include the monitoring of residential development permitted as single rural houses. This is reflective of NPO 36 of the NPF which outlines that *'New statutory guidelines, supported by wider methodologies and data sources, will be put in place under Section 28 of the Planning and Development Act to improve the evidence base, effectiveness and consistency of the planning process for housing provision at regional, metropolitan and local authority levels. This will be supported by the provision of standardised requirements by regulation for the recording of planning and housing data by the local authorities in order to provide a consistent and robust evidence base for housing policy formulation.'*

Population Allocations

The Core Strategy Table indicates a population increase for County Longford of 4927 people until 2027 from the 2016 baseline population. This level of overall population growth is considered to be in keeping with the population prescribed for the County at Appendix 2 of the NPF Implementation Roadmap, which details a high-level population projection of 45,500 (high) to 2026 and 47,000 (high) to 2031.

Notwithstanding the information provided at Section 4.8.6 of the Draft Plan, The Assembly consider that further clarity is required detailing the percentage allocation of growth to each of the settlements identified as part of the Core Strategy Table.

It is noted that Section 4.8.6 of the Draft Plan identifies that it was decided to grow the 4 settlements of Edgeworthstown, Ballymahon, Granard and Lanesborough as a proportion of Longford Town's equivalent population growth up to 2027; 25% of Longford Town's growth allocated to Edgeworthstown and Ballymahon and 15% to Lanesborough and Granard. The Draft Plan identifies that the stated reason for this approach "is the need for a more balanced network of higher order towns in the Settlement Hierarchy to support the role and function of Longford Town as the principal economic driver and focus of investment for the county".

The Assembly, however, consider that the Draft Plan does not present a robust or evidence-based rationale that demonstrates the sustainability of such an approach. Indeed, the chosen approach means that Longford Town is to grow at a lesser percentage rate, at 19.4%, of 2016 population levels than the settlements listed below Longford Town in the County's Settlement Hierarchy. This has potential to undermine the role of Longford Town which is designated as a Key Town in the RSES.

In addition, it is noted that the Core Strategy Table outlines that the population for Lanesborough is set to increase by 291 people to 2027 from its recorded 2016 population of 757. This marks a growth rate of 39%, which is beyond the percentage growth rates projected for Longford Town, Edgeworthstown, Ballymahon and Granard. The National Planning Framework indicates that in each Regional Assembly area, where it is proposed to target significant growth, i.e. at a rate of 30% or more above 2016 population levels to 2040, in any settlement not identified in Policy 2a or Policy 2b of the NPF, for example where there will be major employment or infrastructure investment, this will be on an agreed basis, aligned with investment in infrastructure and/or the provision of employment, together with supporting amenities and services. This is further detailed by National Policy Objective (NPO) 9 of the NPF. In order to ensure compliance with the requirements of the NPF and RSES, the Council are therefore asked to provide a robust and clear rationale, in accordance with NPO 9, that outlines the suitability, or otherwise, of this growth level for Lanesborough, prior to finalisation of the Draft Plan.

Having regard to the above, it is recommended that a detailed and robust evidence based justification for the percentage allocation of growth to each of the settlements identified as part of the Core

Strategy Table is included in the Draft Plan and that the allocation is revised, where appropriate, to ensure a sustainable settlement hierarchy that is consistent with the NPF and RSES, and which safeguards and promotes Longford Town's designated role as a Key Town.

Table Structure

It is considered that additional clarity is needed in order to enhance the comprehensibility of the Core Strategy Table. This includes clarity around the time period relating to some of the columns included. In this regard, the inclusion of an additional column indicating the population growth envisaged during the plan period, to complement that shown from 2016, would be beneficial and enable readers to understand the basis of the remaining calculations shown. In addition, the inclusion of footnotes explaining the calculations behind the figures presented in each column would also reduce ambiguity. It is therefore recommended that the Core Strategy Table be updated in this regard.

Whilst the Core Strategy table provides a synopsis of how the population projections across the County translate into the required quantum of residential zoned land, the Assembly consider that further clarification is required to ensure consistency and transparency. Whilst the final column outlines 'Quantum of land (Ha.) required for new residential', there is no indication as to the quantum of residential land that is zoned as part of the Draft Plan and Local Area Plans. It is therefore recommended that the Core Strategy Table is amended to clearly demonstrate the quantum of land that is zoned for residential purposes in each of the respective settlement categories, including all zoning categories that provide for residential development in accordance with the provisions of Section 10 (2A) (c) and (d) of the Act.

Furthermore, whilst the column 'At least 30% of residential units on' (presumably built-up footprint) outlines the quantum of residential units required to achieve same, it is not clear as part of the Draft Plan as to whether the lands zoned achieve this or otherwise. Accordingly, it is recommended that the Core Strategy Table be updated to indicate the quantum of new homes that will be delivered within the existing built up footprints of each of the respective settlement categories, where appropriate, based on the location and yield of lands zoned. The Assembly also bring your attention to the requirements of page six of the NPF Roadmap, whereby the Council are asked to include details of the infill/brownfield and greenfield capacity of the lands zoned as part of the Draft Plan.

Settlement Strategy

The key principles of the settlement strategy which are listed as part of the Draft Plan are considered to provide a strong foundation for the basis of the Settlement Strategy including Key Principle 5 which seeks to 'give effect to the principle of 'compact growth' by targeting at least 30% of all new residential development to occur within the existing built-up footprints of towns and villages within the county, with a focus on infill and brownfield land development, rather than peripheral development patterns.'

Settlement Hierarchy

The Assembly welcome the stated utilisation of an approach similar to the RSES's 'Asset Based Approach' in determining the Settlement Strategy for County Longford, as per Section 4.8.3 of the Draft Plan. Notwithstanding this, the Assembly consider that further information is required to be included within the Plan, that demonstrates consistency with the parameters of the NPF and RSES, including RPOs 4.1 and 4.2 which outline that the hierarchy of settlements in development plans shall be determined in accordance with the hierarchy, guiding principles and typology of settlements as set out in the RSES.

The use of consistent terminology, reflective of that contained in the RSES, is appropriate and welcome. The Hierarchy is tiered as follows; Key Town (Longford), Self-Sustaining Growth Towns (Edgeworthstown and Ballymahon), Self-Sustaining Towns (Granard and Lanesborough), Towns and Villages, and Rural which includes the open countryside.

The Assembly considers that the Draft Plan should be strengthened through the provision of a more robust and justified reasoning for the designation of settlements within each tier of the settlement hierarchy. The attention of the Council is drawn to Table 3.1 and Appendix A of the RSES in this regard. Relating to the designation of Self-Sustaining Growth Towns and Self-Sustaining Towns, this should be considered having regard to the definitions of same as stated at Table 4.2 of the RSES. In particular, further information relating to the designation of the self-sustaining towns should be included, relating, for instance, to the designation of Granard having regard to its robust employment base, as documented at Section 4.8.9 of the Draft Plan and need for commensurate population growth. In addition, the designation of Lanesborough, having regard to towns of similar or larger population size in the lower tiers of the proposed settlement hierarchy. Accordingly, it is recommended that an evidence-based rationale is provided for, relating to the settlement hierarchy, in line with the above and where appropriate the settlement hierarchy revised.

It is noted that the Draft Plan states 'A further interventionist approach was undertaken with respect to the housing allocation for the 'Rural' settlement tier to further sustain these settlements and in recognition of historical development trends for rural housing within County Longford.' In this regard, it is noted that adjustments to the housing allocations within the settlements of Longford Town, Edgeworthstown and Ballymahon were undertaken comprising of a reallocation of 40 units from Longford Town and 15 units each from Edgeworthstown and Ballymahon to be distributed throughout the 'Rural' settlement tier. It is not considered that the Draft Plan adequately demonstrates a robust and evidence-based rationale for this approach, and the Assembly are concerned that such an approach would undermine the settlement hierarchy and in particular Longford Town's role as a Key Town. It is therefore recommended that the Draft Plan include a detailed and robust evidence-based justification for the above and, where appropriate, revise the settlement hierarchy to ensure that it is in keeping with the NPF and RSES, and in particular safeguarding Longford Town's role as a Key Town.

Settlement Strategy Policy

The Settlement Strategy policies contained at Chapter 4 are welcome, including policies CPOs 4.1- 4.5 which support strategic issues such as compact growth and arresting decline and stagnation. Policies relating to the Key Town of Longford are provided at Section 4.87 of the Draft Plan. It is considered that this policy framework could be strengthened to reflect RPOs 4.59- 4.63 of the RSES that are specific to Longford.

Rural Settlement Strategy

It is noted that included as part of this section of the Chapter, is criteria detailing the requirement for housing in the open countryside. The intention of the Council to ensure the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid overdevelopment, while sustaining vibrant rural communities, is noted and welcomed by the Assembly. Notwithstanding this, it is recommended that prior to the finalisation of the Draft Plan, the Council ensure that related policy in this regard is consistent with RPOs 4.80 and 4.81, NPO 19 of the NPF and the content of Circular Letter PL 2/2017 "Sustainable Rural Housing Guidelines for Planning Authorities 2005 – Local Needs Criteria in Development Plans." In addition, it is noted that rural typology mapping has been undertaken for County Longford. The methodology used to determine the extent of each typology presented should be detailed as part of the Plan. In this regard, the Council are advised to consult with the section "Functional Urban Areas" and Appendix E of the RSES.

Housing Strategy

Future Housing Requirements and Housing Need Demand Assessment

The Assembly welcomes the inclusion of housing policy that has been informed by the Housing Strategy that includes a Housing Need Demand Assessment (HNDA). The HNDA ensures that the draft plan is supported by a robust methodology to inform policies and funding initiatives around housing and land requirements, whilst supporting the preparation of the housing strategy and other related housing policy outputs. It is acknowledged that Longford County Council have undertaken a HNDA, as part of the Housing Strategy, in accordance with National Policy Objective (NPO) 37 and Regional Policy Objective (RPO) 9.5, during a time when the finalised HNDA guidance at national level was still to be confirmed. The initiative of the Council in this regard is extremely welcome. Notwithstanding this, it is recommended that this information, and where appropriate the associated Core Strategy Table, is updated to reflect the contents of the recent publication 'Housing Supply Target Methodology for Development Planning' issued as Guidelines for Planning Authorities under Section 28 of the Planning and Development Act, 2000 (as amended) in December 2020.

In order to strengthen the Draft Plan, Longford County Council should give consideration to the inclusion of a clearly presented summary of the entire housing need in County Longford, which includes the housing need broken down across tenures, what is required in terms of new housing supply and why this is the case, including social and affordable needs, housing types and sizes. This will present a clear and concise guide as to what is required to successfully deliver the housing requirement for the County over the plan period.

It should be noted that the NPF requires that development plans quantify the demand for single housing in the countryside with National Policy Objective 20 outlining the requirement to '*Project the need for single housing in the countryside through the local authority's overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes*'. In this regard, the Council should consider the inclusion of same as part of the Core Strategy Table.

Residential Densities

The inclusion of Section 4.14.7 relating to residential density is a welcome addition. The Draft Plan indicates that it is important that the density of new development in towns and villages is reflective of the existing character and that growth is linked to infrastructural capacity. This is in keeping with the RSES and NPF, including for instance page 73 of the NPF which states '*Rural town living requires a proportionate and tailored approach to residential development. This means that it is necessary to tailor the scale, design and layout of housing in rural towns to ensure that a suburban or high-density urban approach is not applied to a rural setting and that development responds to the character, scale and density of the town*'. Notwithstanding this, it is noted that a higher density is applied to the Key Town of Longford Town (30 units per hectare), with a reduction in residential densities for Self-Sustaining Growth Towns and Self-Sustaining Towns, and other towns and villages (12 units per hectare). Having regard to the above, the Council should consider a graded reduction in residential densities in accordance with the settlement hierarchy as opposed to a blanket application of density across the settlement tiers outside of Longford Town.

Housing Strategy Policy

The inclusion of a number of county policy objectives to ensure the provision of housing needs within County Longford is welcome. This includes, for example, policy and objectives related to ensuring the provision of specific housing needs for the likes of the elderly, disabled, homeless, travellers etc, encouraging the reuse of upper floors of commercial premises, promoting social integration within residential developments, and the provision of quality social and affordable housing to name a few.

4. Transport, Infrastructure, Energy and Communications

Transportation

The Assembly welcome the inclusion of the transportation section of Chapter 5 of the Draft Plan, which coincides with Chapter 8 Connectivity of the RSES. Policies such as those relating to integrated land use and transport, the road and street network, sustainable public transport, electric vehicles and, cycling and walking, are all positive additions to the Plan.

RPO 8.6 identifies that in order to give local expression to the regional level Transport Strategy within the Region, in conjunction with the NTA, Local Transport Plans (LTP) will be prepared for selected settlements in the Region. This includes the settlement of Longford and in this regard CPO 5.9 which reflects this policy is welcome. In addition, the inclusion of policy to reserve lands in appropriate areas for the improvement, maintenance and management of road traffic systems and specifically relating to the M4 Mullingar to Longford (and Sligo) scheme, is a positive addition and in keeping with RPO 8.10 and Table 8.4 of the RSES which supports the appraisal and delivery of same.

Infrastructure

Water Supply and Wastewater Services

The inclusion of this section is in keeping with Chapter 10 Infrastructure of the RSES. RPO 4.2 is relevant in this regard, requiring Infrastructure investment and priority alignment with the spatial planning strategy of the RSES whereby all residential and employment developments shall be planned on a phased basis in collaboration with infrastructure providers so as to ensure availability of adequate capacity for services (e.g. water supply, wastewater, transport, broadband) to match projected demand and so that the assimilative capacity of the receiving environment is not exceeded.

Having regard to the aforementioned RPO, the inclusion of policies such as CPO 5.72 and 5.80, which promote co-operation with Irish Water during the lifetime of the Plan in the provision, upgrading or extension of wastewater collection and treatment systems in the County, and, to protect existing water infrastructure, to serve existing and planned future populations and enterprise in accordance with the requirements of the Core Strategy, are welcome inclusions within the Draft Plan.

The Draft plan acknowledges wastewater capacity constraints in Edgeworthstown and Ballymahon. Having regard to the position of these settlements within the proposed settlement hierarchy, the inclusion of CPO 5.84, which requires that future development in these settlements is contingent on wastewater capacity available, is a welcome addition to the Plan.

Energy Networks Infrastructure

The Assembly welcome this dedicated section to energy within the Draft Plan, which outlines energy generation relating to electricity, gas and renewable energy sources.

Wind Energy

With reference to Wind Energy, the Assembly welcome the suite of policies related to wind energy. Prior to the finalisation of the Draft Plan, including all related policy and objectives, such as those contained as part of this section and also those contained at the Development Management Standards section, it is recommended that the Council ensure that the Plan has full regard to the provisions of the Wind Energy Development Guidelines 2006, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, and the Draft Revised Wind Energy Guidelines published in December 2019, which are expected to be finalised in the near future.

Communications

The Regional Assembly welcome the recognition in the Draft Plan that the provision of high-speed, reliable and affordable broadband is essential to the economic growth of both County Longford and the wider region in terms of attracting inward investment and increasing competitiveness. This,

alongside CPO 5.155, is in keeping with RPOs 8.25 and 8.26 of the RSES which supports the roll out of the National Broadband Plan.

5. Regeneration

The inclusion of a regeneration chapter as part of the Draft Plan is a positive addition. The insertion of Section 6.3.2, which details the relating RSES policy context, is welcome. Section 6.4 details the types of regeneration including Compact Growth Urban Regeneration, Economic Regeneration, Heritage Led Regeneration, and Rural Regeneration. The specific reference to Compact Growth Urban Regeneration is a welcome addition and in keeping with RSO 2 and RPO 3.2 of the RSES. Furthermore, the indication that the Development Plan has adopted an asset-based approach to the strategic location of new residential development, which will contribute to regeneration, placemaking and compact growth, coupled with the inclusion of Figure 6.1. detailing the RSES Asset Test Criteria for the strategic location of new residential development, enhance the robustness of the Chapter.

The chapter is reinforced through the inclusion of funding streams available to enable regeneration, including URDF, RRDF, the Climate Action Fund and Just Transition Funding streams. Indeed, the proactiveness of the Local Authority in availing of funding streams is noted.

6. Placemaking

The Assembly welcome the inclusion of a chapter dedicated to Placemaking in the Draft Plan. Healthy Placemaking is a Key Principle of the RSES (Section 2.3) and underpins many of the Regional Strategic Outcomes and Regional Policy Objectives of the RSES. Accordingly, the inclusion of the RSES's Healthy Placemaking Strategy at Figure 7.1 of the Draft Plan, coupled with the integration of the RSES's Placemaking Guiding Principles, are positive additions to the Draft Plan.

7. Economic Development

The Economic Development Chapter presented as part of the Draft Plan is welcomed by the Assembly. It is noted that the Draft Plan reiterates the key elements of the Economic Strategy of the RSES, coupled with the statement that guiding principles of the RSES, for the identification of locations for strategic employment growth, have been considered in the County Longford Economic Strategy. The inclusion of an economic profile of County Longford creates a strong evidence base for the formulation of related economic policy.

The Assembly welcomes the statement that the Economic Development Strategy for the County is principally derived from the RSES and the spatial expression for the development of the County provided in the Core Strategy. It is noted that the economic development hierarchy is reflective of the Settlement Hierarchy presented. The inclusion of policies and objectives tailored for each tier of the economic development hierarchy are a positive addition and reinforce the settlement strategy and commensurate economic development of each settlement.

The Assembly welcomes the inclusion of policies such as CPO 8.5 and CPO 8.24, that seek to ensure the provision of physical infrastructure and zoned lands to realise the delivery of strategic employment lands in central accessible locations. Notwithstanding this, and related policy inclusions, an Economic Paper currently being prepared by the Eastern and Midland Regional Assembly, has found a shortage of appropriately sized land banks and FDI/IDA appropriate business premises throughout the Region, including in Longford Town. In this regard, the Assembly ask that the Local Authority consider the inclusion of a complimentary policy and/or objective, to enable the delivery of same. Indeed, this economic paper is forthcoming and may assist the council in the finalisation of the content of this Chapter.

Retail

The Assembly welcome the inclusion of Section 8.7.2 detailing Retail and the Retail Strategy for County Longford. It is stated as part of the Retail Strategy contained at Annex 7 that the purpose of the Longford County Retail Strategy is to ensure that the development of retail floorspace within the county is grounded in an evidence-based framework during its 6-year lifecycle.

It is noted that the Retail Hierarchy presented, whilst consistent with the provisions (table 6.1) of the RSES, is at odds with the Settlement Hierarchy included as part of the Draft Plan. Specifically, this relates to the role of Granard. The Draft Plan acknowledges that the RSES recognises the key role played by Granard's retail function to its inhabitants and wider hinterland in designating it as a Level 3 retail centre. Furthermore, the Draft Plan acknowledges that Granard, given its proximity to the Longford-Cavan border, performs as a key service provider and retail centre for a broad hinterland which extends beyond the County boundary. In this regard, the Council are asked to give full consideration to the role of Granard within the Settlement Hierarchy, having regard to the points raised at Section 3 of this submission.

Notwithstanding the information contained as part of the Draft Plan and Retail Strategy at Annex 7, it is considered that further clarification is required regarding the need for the quantum of additional retail floorspace, whilst also having regard to the quantum of vacant retail floorspace available.

Just Transition

The Assembly welcome the dedicated section to 'Just Transition' and the acknowledgment of the Draft Plan that given its substantial policy and financial support, both nationally and at EU level, 'Just Transition' is a significant catalyst for economic and social change in the midlands representing a significant step forward in the transition towards a low carbon economy. CPOs 8.84 to 8.88 are positive additions in this regard.

8. Rural Economy

The inclusion of a Rural Economic Development Strategy is an extremely welcome addition to the Draft Plan. It is noted that the Rural Economic Development Strategy is underpinned by a number of principles including a focus on supporting vibrant rural communities focused around a network of rural towns and villages, and, facilitating the transition towards a low carbon and climate resilient society for instance. This is in keeping with related RSES policies for 'Rural Areas' contained at Chapter Four of the RSES and also those contained at Chapter 6 that relate to the 'Rural Economy'. The Draft Plan Chapter includes a number of generic policy inclusions, complemented by policy relating to specific sectors including agriculture, forestry and the equine industry.

9. Tourism

The inclusion of a stand-alone Tourism Chapter is a welcome addition to the Draft Plan. The RSES recognises the important role that tourism plays in County Longford, including as a Growth Enabler for the Gateway Region as identified at Section 3.2 of the RSES, as a means to enable and sustain the rural economy as per Section 4.8 of the RSES, and as a sectoral opportunity for the Midlands as per Section 6.4 of the RSES.

It is considered that the content of the Tourism Chapter is reflective of the RSES, including the suite of related policies, namely RPOs 6.8, 6.15-6.18 and 6.21, that seek to enhance the Tourism Sector; and RPO 6.19 that specially deals with tourism development in County Longford. RPO 4.60 also identifies support for Longford as a tourism hub having regard to its accessibility to key tourist destinations in the Region including Center Parcs, and proximity to natural amenities, recreational opportunities and the town's location on the Rebel Longford Trail.

10. Built and Cultural Heritage

The inclusion of this chapter with regard to the Built and Cultural Heritage of County Longford is welcome. In finalising this Chapter, the Council should consult with Section 9.7 of the Draft Plan. It is considered that the policies and objectives of the Draft Plan are in keeping with same, including for instance, supporting the reuse of Protected Structures as outlined at Section 11.7 of the Draft Plan and RPO 9.30 of the RSES.

11. Natural Heritage and Environment

The Assembly welcome the inclusion of Chapter 12 relating to the Natural Heritage and Environment of County Longford. It is considered that the array of topics covered as part of this Draft Plan Chapter is reflective and supportive of the content of the RSES and in particular Chapter 7.

The reference to the related 'Peatland' content of the RSES including the guiding principles is a positive addition to the Plan. The Assembly welcome the reference to the County's Peatlands within this context. This includes policy focused on providing for the future sustainable and environmentally sensitive use of large industrial peatlands sites when peat harvesting finishes, for instance. This is reflective of policy contained as part of the RSES including RPOs 4.84, 6.38 and 7.29.

12. Green Infrastructure and Landscape Character

The inclusion of a Green Infrastructure Chapter positively enhances the Plan. In particular, welcome policies include CPO13.21 which outlines commitment to identify and map Green Infrastructure assets and sites of local biodiversity value over the lifetime of the Plan, and, CPO13.22 that seeks to ensure the Green Infrastructure Strategy reflects a long-term perspective, including the need to adapt to climate change. The recognition of the Blueways, Greenways and Peatways of the County and the contribution that they make to the County's overall Green Infrastructure network, in addition to the many valuable economic, social and environmental benefits they provide, is a positive addition. This includes mapping of same at Appendix 5. In finalising this section of the Draft Plan, the Council should consult with Section 7.7 of the RSES which details policy for green infrastructure and guiding principles for the preparation of Green Infrastructure Strategies. Likewise, Section 7.8 of the RSES documents Landscape consideration.

13. Monitoring, Evaluation and Implementation, and Development Management Standards

The Assembly welcome the inclusion of the Chapter detailing the monitoring, evaluation and implementation of the CDP over its lifespan. The recognition of EMRA's role in this process, coupled with reference to the numerous funding streams available, are positive additions. Chapter 12 of the RSES and Chapter 10 of the NPF, which detail implementation and monitoring measures, may provide further assistance in this regard.

Chapter 16 of the Draft Plan, Development Management Standards, provides a set of development standards to be applied in the assessment of planning applications. It is considered that the inclusion of this section as part of the Draft Plan will enable a robust application of preceding policy chapters.

14. SEA, AA and SFRA

The Draft Plan is subject to Strategic Environmental Assessment (SEA) and an environmental report has recorded the process to date. The inclusion of Ecosystem Services Approach Principles is a welcome addition. The SEA indicates that there are no probable conflicts with the status of SEOs that are unlikely to be mitigated. The Assembly welcome the indication as part of the environmental report that, where appropriate, the measures identified in the RSES SEA have been used, as they are or having been slightly modified, in most instances in order to ensure consistency.

The attention of the Council is drawn to new EPA Guidance on SEA Statements and Monitoring (Second Review of Strategic Environmental Assessment Effectiveness in Ireland), published January 2020, which provides best practice on devising meaningful monitoring measures, suitably detailed indicators and the frequency of monitoring and reporting. This guidance shall inform the iterative SEA process and preparation of the monitoring programme as part of the County Plan's SEA statement.

The Draft Plan is subject to Appropriate Assessment and a Natura Impact Report (NIR) has recorded the decisions that were taken during its preparation. Having incorporated mitigation measures, it is concluded that the Draft Longford County Development Plan is not foreseen to give rise to any significant effects on designated European Sites, either alone or in combination with other plans or projects.

A Strategic Flood Risk Assessment (SFRA) was undertaken of the Draft Plan area having regard to the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities and associated circular. It is noted that all SFRA recommendations, including those related to land use zoning and flood risk management provisions, have been integrated into the Draft Plan.

15. Other


NPO 72a of the NPF states 'Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.' This is further developed at Appendix 3 of the NPF which sets out a methodology for a tiered approach to land zoning. Notwithstanding the reference to this approach at Section 4.3.1 of the Draft Plan, it is unclear how this has been applied. In accordance with the aforementioned national policy objective, it is recommended that the Draft Plan be updated to clearly demonstrate compliance with same.

Conclusion

It is considered that the Draft Longford County Development Plan, and in particular the Core Strategy, can achieve consistency with the Regional Spatial and Economic Strategy (RSES) 2019-2031 by addressing the recommendations and observations set out above.

The Regional Assembly welcomes the Draft Longford County Development Plan 2021-2027, which marks the beginning of the alignment of planning policy at county and local levels with Regional and National Policy. It should be noted that the officials of the Regional Assembly are available to discuss the matters raised above and The Assembly welcome further opportunities to engage in the statutory process of the making of the Longford County Development Plan.

Regards,



Jim Conway
Director
Eastern and Midland Regional Assembly
15th January 2021