



6th January, 2021

**Administrative Officer
Draft County Development Plan
Forward Planning Unit
Longford County Council
Áras An Chontae
Great Water Street
Longford
N39 NH56**

RE: Draft Longford County Development Plan 2021-2027

A Chara,

I refer to your notification of 27th October 2020, confirming that the Draft Longford County Development Plan 2021 – 2027 has been prepared and inviting submissions / observations.

The Northern and Western Regional Assembly wish to commend Longford County Council on the publication of the draft Plan and appreciate being given the opportunity to comment on it. It is a very important and timely policy intervention that shall shape the future of the county. It is also important to areas that lie beyond the county area, including part of the administration area of the Northern and Western Regional Assembly (NWRA).

The NWRA adopted the Regional Spatial & Economic Strategy 2020 – 2032 (RSES) for the Northern and Western Region in January 2020. I would like to take this opportunity to thank Longford County Council for their collaborative input to this strategy, as an adjoining Local Authority. The Strategy is available on our website www.nwra.ie/rses

Longford is part of the Eastern and Midlands Regional Assembly area and will be guided by the RSES for it's area. However, the RSES for the Northern and Western region is also of particular relevance to Longford, being crafted on the principle that collaborative working shall deliver effective regional development for all our communities, regardless of administrative boundaries. It is within this context that the NWRA is making this submission, having provided a report to Members of the NWRA at its December Monthly Meeting.

The format of this submission concentrates on items and issues of common interest and it is not proposed to provide a comprehensive indepth analysis. It is restricted to the following topics: population projections, renewable energy, landscape character, retail strategy, remote working and greenways.

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Population Projections: The Draft uses the population projections outlined in the implementation roadmap published by the DHPLG to inform their plan. The higher end of the range in the roadmap is used, there is no clear rationale for selecting this option. Densities of 30 units per ha is planned for in Longford town and 12 units per ha for other towns in the county. These figures would be considered to be at the lower end of what is typical national practice and it could be argued would not be consistent with achievement of compact development. However, the Draft also proposes that even though there are zoning maps included in the annexes to the Draft, the urban areas will be subject to LAPs which will undoubtedly examine densities at a finer grain and densities different to the above could emerge. There is little information provided as to the methodologies to be used to ensure how the planned release and prioritisation of development land will be managed. It is the intention of the council to do so and this is likely to be a feature of development plans in this region, so the methodologies would be of much interest. The current population distribution in the county is 66% rural and 34% urban, this distribution has remained virtually unchanged over the last two censuses. The future development of the county recognises the above and even though there is a bias towards Longford Town in terms of numbers (39% of future population increases). This can be considered to be a balanced proposal for the county. It is likely that development plans in our region will have to wrestle with similar issues.

Renewable Energy: Longford has no significant renewable energy infrastructure and the energy infrastructure in the county was based around a peat burning power station in Lanesboro. This will come to a close shortly and will leave in its wake large areas of bog which may have the potential for locating solar and wind energy infrastructure. There are areas of similar bogland in north east Roscommon of similar scale which would have similar potentials. The Draft proposes to identify strategic energy zones in the county. This is similar to policy outlined in our RSES, RPO6.14, which requires identification of potential renewable energy sites of scale. This is a welcome planning initiative and creates a collaborative policy development opportunity across two regions.

Landscape Character: In relation to landscape character, there are similar opportunities for collaboration with Local Authorities in this region. This is consistent with our regional policy RPO5.2 for a collaborative approach by Local Authorities. The two collaborative items above are suitable to be considered as part of Just Transition and initiatives could be developed under this program.

Retail Strategy: Having examined the retail strategy proposed in the Draft, the NWRA has concern at the quantum of new retail development proposed (at almost 20,000m²). This is in addition to the nearly 10,000m² of vacant retail space already in existence in the county. It is likely that if development of this scale occurs there could be adverse impacts on existing retail operations in our region. The strategy is proposing an immediate delivery of additional floor space and it is assuming there is a direct linear relationship between increased population and increased consumer demand. It is also assuming that existing retail facilities in the county are operating at full capacity. These assumptions are not evidenced based and it would be prudent if some primary research were provided to justify them. It would, we advise, be prudent and more sustainable to first use the existing vacant facilities and make them operational before contemplating the construction/development of new retail space. The assembly also notes the proposed settlement hierarchy and the retail hierarchy are not consistent with each other.



Remote Working: The NWRA note the examination of remote working in the Draft and the potential it offers the county. This phenomenon is something that the three Regional Assemblies have reported upon recently as having the potential to open up an array of economic and environmental opportunities for all our towns, villages and rural areas – see Regional Co-working Analysis via the following link <https://www.nwra.ie/wp-content/uploads/2020/10/regional-co-working-analysis-22102020.pdf>

The NWRA note the policies proposed in relation to remote working (e.g. 6.28,89. 8.33,37,44,77,89,90,91.) and the contention that remote working is and has been a success. We would advise that similar policies would be appropriate for development plans in our region.

Greenways: The NWRA note the extensive greenways that exist and are proposed in the Draft. They are comprehensive and will densify this type of infrastructure in the county. There is potential for collaborative development with adjoining counties in our region and we would fully support this.

I hope that the above observations are of assistance in shaping the new County Development Plan in a manner that shall be of benefit to our communities. The NWRA commend Longford County Council on the broad thrust of the plans and policies and would ask that the above observations are taken into consideration in finalising this important development plan.

The Assembly look forward to further engagement with Longford County Council as the preparation of the plan is progressed and implemented. If you have any queries in respect of the above observations then do not hesitate to revert.

Yours Sincerely,

David Minton
Director