



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

17th April 2026

Forward Planning Department,
Longford County Council,
Aras an Chontae,
Great Water,
Longford,
N39 NH56.

Re: Proposed Variation No. 1 to the Longford County Development Plan 2021-2027

A chara,

Thank you for your authority's work on preparing the Proposed Variation No. 1 (proposed Variation) to the Longford County Development Plan 2021-2027 (County Development Plan).

As Longford County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546 and this submission has been prepared accordingly.

Recommendations issued by the Office further to section 58(9) of the Act relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government. As such, planning authorities are requested to implement or address recommendations made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations issued by the Office pursuant to section 546 of the Act may take the form of a request for further information or justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are considered

necessary to ensure alignment with policy and legislative provisions. Planning authorities are requested by the Office to action an observation.

A submission can also include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will assess it in accordance with the statutory framework in section 63 of the Act.

Overview

The Office notes that the proposed Variation focuses on the Strategic Residential Reserve lands in the County Development Plan by way of response to the updated housing growth requirements set out in the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines) and the following elements:

- no proposed changes to the core strategy;
- policy amendments to Strategic Residential Reserve Zoning Objective text in Volume 2: Appendices; and
- proposed potential release of all Strategic Residential Reserve lands in 11 settlements as additional zoning amendments.

The Office acknowledges the Chief Executive's (CE's) Report which accurately sets out that the housing growth requirements as the same as the current County Development Plan target of 428 units per annum and that Objective 2 only applies in this case, with a 50% additional provision of approximately 40 hectares of land, equating to 1248 units for the county.

Notwithstanding the above, the Office welcomes the Planning Authority's approach to amend the current Strategic Residential Reserve policy to create additional residential development opportunities for the county, particularly over the medium term, and taking due account of the Housing Growth Guidelines.

The Office notes, however, that no infrastructure assessment or Settlement Capacity Audit (SCA) has been prepared to support the delivery of housing on these lands and

recommends that your authority undertakes such an assessment. Greater clarity is also recommended in terms of the core strategy to clarify the overall quantum of lands to be released and how these additional lands are distributed throughout the settlement hierarchy.

The Office also notes, with significant concern, that the Preliminary Flood Risk Assessment (PFRA) flood mapping used to inform the Strategic Flood Risk Assessment (SFRA) for the County Development Plan can no longer be used. The Planning Authority is recommended to review and update the flood extent mapping datasets and flood extents based on up to date National Indicative Fluvial Mapping (NIFM), review all lands to be released and carry out flood risk assessments where appropriate with particular attention to proposed Strategic Residential Reserve lands potentially being released at lands to the north of Longford Town, Aughtnaclyffe and Ballinamuck, which may require partial or full omission should such lands be located in Flood Zones A or B. Given the significance of this matter, it must be addressed in advance of adopting the Variation.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within this context the submission below sets out two (2) recommendations under the following themes:

Key theme	Recommendation	Observation
Implementation of the housing growth requirements	Recommendation 1	-
Flood risk management	Recommendation 2	-

1. Implementation of the housing growth requirements

Having regard to the Housing Growth Guidelines, the Office acknowledges the objective of facilitating additional residential development through a focus on Strategic Residential Reserve lands within the county. However, the Office notes that the proposed Variation is not supported by an SCA. In this regard, the Office recommends that all Strategic Residential Reserve lands are subject to an SCA to determine which lands are fully serviceable in relation to water and sewerage accessibility as well as accessible to road networks, pedestrian and cycleways and public transport routes in order to take account of the Housing Growth Guidelines.

Subsequently, once this audit has been carried out, the Office recommends that any lands which are considered to meet the Development Plans, Guidelines for Planning Authorities (2022) (Development Plans Guidelines) and the Housing Growth Guidelines be rezoned and identified as New Residential with the quantum, density and potential yield included. Furthermore, such lands should be identified on accompanying maps as part of the Variation.

In relation to the Core Strategy County Policy Objectives, the proposed Variation is not considered to fulfil the requirements for development plans as this is required to be updated to reflect the new requirements set out in the Housing Growth Guidelines. While the Office notes the proposal to release Strategic Residential Reserve lands, the overall approach, quantum and distribution of these lands need to be revised at the Core Strategy Table and relevant sections of the County Development Plan as part of the Variation. Furthermore, as density and compact growth approaches are important elements of the implementation of the Development Plans Guidelines, the Office recommends the inclusion of reference to the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) in the relevant sections of the chapter 4: Core, Settlement and Housing Strategies of the County Development Plan as part of the Variation.

Recommendation 1 - Implementation of the Housing Growth Guidelines

In order to ensure clarity within the core strategy and the co-ordination of housing and infrastructure, and having considered the following:

- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including Policy and Objectives 1 and 2 and section 2.4 to incorporate the objectives of the Housing Growth Guidelines into development plans;
- NPO 101, NPO 102 and NPO 103 of the NPF to consider the serviceability of land zoned for development; and
- the Development Plans, Guidelines for Planning Authorities (2022),

the Planning Authority is recommended to:

- (i) update and clarify approach to the Housing Growth Guidelines within chapter 4: Core, Settlement and Housing Strategies of the Longford County Development Plan 2021-2027, update and include a revised Core Strategy Table 4.12 to clarify the new housing growth requirements figure and include the 50% additional provision and updated quantity of additional lands proposed for housing and estimated yield housing units and new final overall target figures for the county;
- (ii) update and clarify the proposed updated proportion of growth per settlement in the county at table 4.12;
- (iii) provide an updated Settlement Capacity Audit (SCA) of lands to be released from Strategic Residential Reserve to New Residential;
- (iv) provide details on the quantum (ha) density and housing yield of each new residential zoning within the SCA;
- (v) identify and review the serviceability of each zoning including accessibility to water and wastewater infrastructure, roads, lighting and footpaths; and
- (vi) include updated reference to the Housing Growth Guidelines within chapter 4: Core Settlement and Housing Strategies, and the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024).

2. Flood risk management

The Office notes that an SFRA was not carried out as part of the proposed Variation as the Planning Authority has indicated that the potential release of Strategic Residential Reserve lands is not considered new additional residential land, however, the Office notes that the PFRA indicative flood mapping used to establish the flood zones in the current County Development Plan has been superseded by the national indicative fluvial, coastal and ground water flood mapping systems.

The NIFM project was completed in 2020, providing more up to date robust analysis of current conditions and mid-range and future scenarios taking account of climate change, therefore the mapping provided in 2012 can no longer be used. As highly vulnerable residential development is not appropriate in Flood Zone A or B, the Planning Authority should review and update the flood datasets and flood zones and ensure that the Planning

System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines) and the sequential approach are adhered to.

Should this review indicate that any New Residential lands are located within Flood Zones A and B partially or fully, they should be omitted or rezoned to appropriate uses. Furthermore, should any changes to zoning designations in areas of flood risk be implemented, the Planning Authority may need to carry out their own flood risk assessments to an appropriate level of detail and that appropriate justification for any decisions that are made are in accordance with the Flood Guidelines. The Office of Public Works (OPW) does not provide any predictive fluvial flood maps for catchments with an area below a certain scale that were not included in the OPW's Catchment Flood Risk Assessment and Management (CFRAM) Programme.

The Office notes in particular three areas highlighted by the OPW which may have watercourses on, or in the vicinity of, Strategic Residential Reserve lands which are not included in the CFRAM Programme and therefore the Planning Authority may need to carry out its own flood risk assessments to inform the definition of Flood Zones for these areas, which includes lands north of Longford Town, Aughnaclyffe and Ballinamuck.

As a result of any potential changes and emerging issues relating to flood risk management, the Office recommends the Planning Authority reviews and updates the Strategic Environmental Assessment accordingly.

Recommendation 2 - Flood Risk Management and Environmental Protection

Having regard to flood risk management, and having considered the following:

- NPO 78 of the NPF to avoid inappropriate development in areas at risk of flooding that do not pass the Plan Making Justification Test;
- RPO 7.12 of the RSES to seek to avoid inappropriate land use zonings and development in areas at risk of flooding in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and
- the Flood Guidelines,

the Office recommends that the Planning Authority:

- (i) reviews and update the flood extent mapping datasets and flood extents based on updated National Indicative Fluvial Mapping (NIFM);
- (ii) carries out Strategic Flood Risk Assessments to an appropriate level on proposed Strategic Residential Reserve zonings potentially affected by flood risk, including Longford Town, Aughnacliffe and Ballinamuck and any flood extent changes identified and appropriate justifications for any decisions are made as set out in the Flood Guidelines;
- (iii) omits Strategic Reserve Residential lands located in flood zones A or B as identified in the updated NIFM flood mapping review at points (i) and (ii) including Strategic Residential Reserve lands north of Longford Town, Aughnacliffe and Ballinamuck; and
- (iv) reviews and updates the Strategic Environmental Assessment (SEA) and SEA determination in light of emerging issues relating to flood risk management.

The Planning Authority is advised to liaise with the Office of Public Works to address this recommendation.

Summary

The Office requests that your authority addresses the recommendations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 58(11) of the Act must summarise these recommendations and how the Chief Executive proposes they should be dealt with.

Where a Planning Authority makes a variation, it is required to notify the Office **within one week** of the decision to adopt the Variation. Where an authority decides not to comply with the recommendations of the Office, then it shall inform the Office as soon as practicable and provide reasons for the decision not to so comply.

Your authority is also required to send the Office a copy of the Variation and any submissions made by the Minister, the relevant regional assembly and the National Transport Authority during the Variation preparation process.

Please be advised that planning authorities are also required to publish notice of the Variation within a week of the adoption, stating that a copy of the County Development Plan as varied will be available for inspection on a website and at a place specified in the notice no later than five weeks after the date of adoption.

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.

Is mise le meas,

—

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

—