

Longford County Council
Submission on
Proposed Material Amendments to
Draft EMRA RSES



April 2019

In relation to the proposed material amendments to the Draft EMRA RSES, Longford County Council wish to recommend that same are favourably considered. Specifically the support and amendment of the following are highlighted: -

Proposed Material Amendment No.

3. Amend RSO 15 Enhance Strategic Connectivity to read as follows

'Protect and enhance international connectivity and regional accessibility to support economic development, build economic resilience and support strengthened rural communities and economies including the blue-green economy and tourism'.

However in relation to improvements to the N55, while not specifically name checked in the document, it is the opinion of Longford County Council that supporting text should be included to reference improvements to the N55.

11. Amend Table 4.1 as follows;

'Omit population thresholds for 'small towns and villages' and rural areas'.

The removal of the population threshold for the definition of 'small towns and villages' and 'rural areas' is welcomed, as it allows for places like Granard to be rightly identified as a town and not a 'rural area'.

13. Amend Section 4.3 to include additional guidance that reads as follows;

'Core Strategies should apply prioritisation measures rather than de-zoning of land where a surplus of lands are identified in existing plans, with regard to the NPF Implementation Roadmap up to 2031. In preparing Core Strategies, account should also be given to the consideration of sequential lands which are suitable for the delivery of housing but may not be forthcoming in the Plan period having regard to 2031 Roadmap targets, subject to proper planning and sustainable development'.

This RPO is particularly important, as in terms of the headroom population allocation, all other counties in the EMRA region with the exception of Longford, Offaly and Laois have an additional headroom allocation of 25% over the figure specified in the NPF

Roadmap. This is inequitable and will result in the creation of greater disparity and increased depravity between those counties being left out. The decision to bring natural gas to County Longford, job announcements by a number of large employers, expansion plans of existing businesses, the construction of the largest holiday facility in the country in Longford (Center Parcs), and the high level of inward commuting has the potential to increase population figures substantially upon those projected. Accordingly the flexibility of this RPO should be afforded in order to allow for longer term planning having regard to future roadmap targets. Attention is drawn to the following:-

- The RSES baseline allotted population allocation to 2026 represents a shortfall of approximately 2,000-3,000 persons/400-800 houses (appendix 1). In addition there is a current Social Housing Demand of over 800 houses which has not been taken into account. This makes it even more imperative that the additional headroom contingency of 25% is permitted.
- We are already seeing evidence of the shortfall in affordable housing and the impact this is having on employers trying to fill vacancies. Currently Longford has the highest percentage of inward commuters in the country.
- The role of Longford town as a strategic portal to the northwest and south should be considered more, particularly taking account the proposed N5 Ballaghaderreen Bypass, N4 upgrade and N55 planned works. This makes Longford an attractive base for business investment and expansion and a place to live.
- In terms of increased population growth, the large employment generator of Center Parcs, which is to open in Summer 2019, and the job announcements by a number of existing businesses should be factored in.

3 new RPO's for Longford Town

The inclusion of the following 3 new RPO's for Longford Town are welcomed:-

49. New RPO – Longford.

- *'Support the plan-led development and regeneration of publicly owned land banks in the town for residential, employment, education, community, cultural and recreational opportunities and the consolidation of the town centre and the*

enhancement and linking of Brownfield and outlying sites to the town centre, with a focus on the regeneration of underused buildings and strategic sites’.

50. New RPO - Longford

- *‘Support Longford Town as a strategic portal to the northwest and south in recognition of its location at the junction of the N55; ‘M4/N4 Dublin/Sligo’ and N5; and due to its proximity to the regional growth centre of Athlone’.*

51. New RPO – Longford

- *‘To ensure that the future strategic development of Longford takes account of the close proximity of sites of international nature conservation interest’.*

Other

Inclusion of Employment RPO – Longford Town

In relation to specific RPO’s for Longford Town, on page 44 of the *Director’s Report*, as part of the *Director’s ‘Response’* it is stated that *‘in relation to the proposed employment related RPO, it is considered that such an RPO may serve to support the existing role of Longford as a key employment centre and therefore should be incorporated’.* However as per the *‘Recommendation’* on pages 50-51 it is not within the 3 no. additional RPO’s recommended. As such while this is not a proposed amendment, perhaps this could be considered as an editing fault and changed accordingly. The previous submission by Longford County Council requested the inclusion of the following employment objectives:-

Employment Related Regional Policy Objectives: Longford Key Town

- The continued development of Longford Town as a strategic employment hub, which is particularly attractive as a location for firms with a national and international market reach.
- Support Longford town’s role as an important employment hub by improving the ratio of jobs to resident workers in the town.

- Support and promote employment clusters in Longford e.g. advanced manufacturing, robotics, engineering, pharma, energy potential, back office services and food and agri-related businesses etc.
- Development of enterprise, innovation and digital hubs to promote and support fledgling industry/enterprise;

Omission of 2 RPO's – Longford Town

Also a number of RPOs are still included which Longford County Council had previously requested to be omitted. In terms of Longford Town the omission of the following 2 no. RPO's had been requested: -

- RPO 4.39 as this is appropriate in a large urban city area, but not for a provincial town.
- RPO 4.42 as this is covered under CFRAMS, and the town in comparison to other towns (Athlone), is not at a particularly higher risk of flooding.

However these RPO's have been retained unchanged and read as follows: -

RPO 4.39 *'Improve accessibility and sustainable mobility in the town centre by enhancing modal choice through integration of rail, bus and taxi services'*.

RPO 4.42 *'Support the proposed Longford Flood Relief Scheme subject to the outcome of appropriate environmental assessment and the planning process'*.

At a meeting in December last between the Longford County Council Executive and the technical staff of EMRA, concern was expressed at the inclusion of these RPO's for Longford Town and the negative perception they would create. Coming away from this meeting there was a feeling that these RPO's were to be excluded. As such consideration should be given to their current omission as an oversight or administrative error.

Conclusion

It is hoped that these meet with your favourable consideration in the adoption of the final RSES.

APPENDIX 1

Population and Housing Projections for County Longford (2016-2026 and 2026-2031)

Longford County Council Planning Department has undertaken a preliminary assessment of recently published population targets for County Longford by the Department of Housing, Planning and Local Government (DHPLG) for the target years of 2026 and 2031. This assessment also examined the projected population targets for Longford Town, as prescribed in the most recent working draft of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly (EMRA) which is based on the population targets provided by the DHPLG.

The purpose of this assessment was to provide an overview of the future planning and development implications for County Longford and, principally, the level of future residential development that can be accommodated for the County and Longford Town on the basis of such population targets.

Table 1 sets out the recorded Census 2016 population figures (rounded to the nearest 500) and the population projections for the Midlands Strategic Planning Area of the EMRA as established by the DHPLG in its recent publication, *Implementation Roadmap for the National Planning Framework* (July, 2018).

Table 1: County Population Projections to 2031 for Midlands SPA

Midlands SPA	2016	2026	2031
Longford	41,000	44,500-45,500	46,000-47,000
Westmeath	89,000	96,500-98,500	100,000-102,500
Laois	84,500	92,500-94,000	95,500-97,500
Offaly	78,000	85,000-86,500	88,000-90,000
Sub-total	292,500	318,500-324,500	329,500-337,000

The population targets for 2026 and 2031 are rounded to the nearest 500 persons and expressed as a range with 20% variation.

Effectively, even allowing for the higher projected range values, the population projections for County Longford (including Longford Town) provide for **an additional 4,500 persons from 2016-2026 and an additional 1,500 persons from the period 2026-2031**. This equates to a population increase of approx. 11% over 2016-2026 (or 1% population growth per annum); and an increase of approx. 3.3% over 2026-2031 (or 0.66% population growth per annum).

The veracity of these population projections is questionable in the context of historic population trends in County Longford as demonstrated in Table 2 below, where the population of the County grew by approximately 35.5% (additional 10,707) over the 20 year period between 1996 and 2016.

Table 2: County Population Projections to 2031 for Midlands SPA

Census Year	Recorded Population	Absolute Change in Population From Previous Census	% Change From Previous Census Record
1996	30,166	-	-
2002	31,068	+902	+3.0%
2006	34,391	+3,323	+10.7%
2011	39,000	+4,609	+13.4%
2016	40,873	+1,873	+4.8%

Whilst the inter-censal period of 2011-2016 was characterised by significant economic recession across the country, the population in County Longford still maintained a steady increase, albeit not to the same scale as the preceding 10 years. Notwithstanding this, County Longford was second only to Co. Offaly (5.1%) in terms of rate of population increase between 2011-2016 in the Midlands SPA and ranked highest in rate of population increase in comparison to any of its neighbouring counties.

Since 1996, County Longford has averaged a population increase of approximately 8% increase on each census period since 1996. Accordingly, it would appear that the population projections for County Longford as depicted by the DHPLG, and retained in the working draft of the EMRA RSES, are significantly less than the historical reality for County Longford. Moreover, the per annum population projections for County Longford over the period 2016-2026 (1% population growth per annum) is comparable to the actual rate of per annum population increase between the period 2011-2016 (0.8% per annum), a period which was characterised by significant emigration and economic decline in the County as well as nationally. The veracity of the per annum population projections for the period 2026-2031 (0.66%) are even more questionable given previous populations trends in the county.

As well as the historical population trends in the County, the economic landscape within the County has seen substantial improvements recently, with significant employment expansion currently taking place in the County through Centre Parcs (1,000 jobs) and another 1,000 jobs planned for further expansions of existing operations such as Finesse Medical, Red Seal Cups, Panelto Foods, Tool and

Plastic and Abbott Ireland, amongst others. The increase in direct employment in such facilities will also lead to significant indirect employment for trade and service providers.

Set within this context, it is feasible that the population of County Longford could increase approximately in line with the average rate as recorded in the inter-censal period between 1996 and 2016, i.e. 8-9%. Taking the upper limit, this would equate to a per annum population **rate of increase of 1.5%**. Applying this rate to County Longford would see a population figure of **47,500 persons in 2026 and 51,300 in 2031**.

From the above DHPLG population projections, an initial assessment on the number of residential units required for these additional population figures can be undertaken. Using an average household size of 2.5 (as envisaged by the NPF up to 2040), **an additional 3,100 residential** units will be required throughout the County (including Longford Town) over the period **2016-2026**. This equates to an average of **310 units per annum**. Over the period **2026-2031**, **600 residential units** will be required for the entire County, equating to **120 units per annum**.

The Planning Department has conducted a rudimentary population projection for the county up to 2026 and 2031 on the basis of historical population trends and recent significant improvements in the local economy. This high-level analysis suggests a population rate of increase of 1.5% per annum more accurately reflects the population and economic trends for County Longford. Table 3 provides an overview of the population and housing projections for County Longford, as determined by the DHPLG and from initial high level analysis conducted by the Planning Department.

Table 3: Population and Housing Projections for 2026 and 2031 for Co. Longford (inc. Longford Town) based on DHPLG and LCC Figures

Year	County Population Target (DHPLG)	Number of Additional Houses (DHPLG)	County Population Target (LCC)	Number of Additional Houses (LCC)
2026	45,500	3,100	47,500	3,800
2031	47,000	600	51,300	1,400

- The Midlands should be specifically identified and targeted as a location for the siting and development of data centres to facilitate further economic development.