



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

16th July 2021

Forward Planning Section,
Offaly County Council,
Áras an Chontae,
Charleville Road,
Tullamore,
County Offaly.

Re: Material alterations to Offaly County Development Plan 2021-2027

A chara,

Thank you for your authority's work in preparing the material alterations to the draft Offaly County Development Plan 2021-2027 (the draft Plan).

As your authority will be aware, one of the key functions of the Office of the Planning Regulator (the Office) includes strategic evaluation and assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the material alterations to the draft Plan under the provisions of sections 31AM(1) and (2) of the *Planning and Development Act, 2000*, as amended, (the Act) and within the context of the Office's earlier recommendations and observations.

As outlined in the submission of the Office to the draft Plan, the Office considered the draft Plan to be generally consistent with policies in the *National Planning Framework* (NPF) and the *Regional Spatial and Economic Strategy* (RSES) for the Eastern and Midland Regional Assembly area, and recommended changes to enhance its alignment with national and regional policies in the aforementioned, including, inter alia, compact growth (NPO 3c/RPO 3.2).

The Office also recommended amendments for consistency with legislative requirements under section 10(2)(n) relating to objectives for a sustainable transport strategy (climate action), section 10(2A) core strategy (existing housing delivery; housing yield on mixed use lands; and the growth allocations across the settlement hierarchy) and section 10(2)(a) zoning (provisions for Portarlington and Edenderry; certain zonings for Moneygal).

Recommendations also issued in respect of consistency with the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)* (2009), the *Wind Energy Development Guidelines* (2006), and the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (2017).

It is acknowledged that the material alterations have satisfactorily addressed, for the most part, the issues relating to the provision of a sustainable transport strategy; existing and projected housing delivery, targets and allocation; inappropriate zonings; the settlement hierarchy tiers; and climate action and renewable energy. The provisions for monitoring implementation of the Plan are also an important addition, as is the detailed Infrastructural Assessment Report.

In particular the Office commends the planning authority for the proposed amendments to transport provisions in the draft Plan, including the introduction of baseline data on modal share and the revisions to the policy approach to provide a coherent sustainable transport strategy.

The planning authority is also strongly commended for omitting the 2km separation distance between wind turbines and settlements, which will enable Offaly to continue to play a strong role in renewable energy development and contribute to the *Climate Action Plan 2019*. The Office notes, however, that no target for renewable energy, and in particular wind energy, has been included as required by the Specific Planning Policy Requirement in the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (2017).

The Office has also identified a small number of proposed amendments that are inconsistent with national and regional policy relating to New Residential zonings in Tullamore, Clara and Ferbane; an Enterprise and Employment zoning in Tullamore, and the proposed amendment to the Core Retail Area in Tullamore. These are addressed in the recommendations below.

The planning authority will be aware that section 12(10) of the Act provides the members of the planning authority with scope to make a further modification to an alteration subject to The limitations set out in subsection 10(c) parts (i) and (ii). The observations and recommendations set out in this submission are cognisant of these restrictions and the

Office advises that the planning authority, in responding to same, should satisfy itself that any material alterations are consistent with the aforementioned limits.

The planning authority will note that 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 required 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 requested by the Office to action an observation.

The submission below sets out four recommendations and six observations under following six key themes:

- Core strategy and settlement hierarchy
- Compact growth
- Economic development and employment
- Transport and accessibility
- Climate action
- Implementation and monitoring

1. Core strategy and settlement hierarchy

1.1 Core strategy and residential land supply

Proposed amendment MA19 of the core strategy including the revision to housing targets in accordance with the *Housing Supply Targets Methodology Guidelines for Planning Authorities* (2020) issued by the Minister under Section 28 of the Act. The county housing target has been apportioned across the settlement hierarchy to generally reflect the projected population growth envisaged up until the end of the plan period, and the quantum of 'New Residential' land use zoning required to accommodate the projected housing growth has been identified in addition to the quantum lands proposed to be so zoned. The Office welcomes this transparent approach.

The Office has, however, concerns regarding the following material amendments which increase the quantum of residential land zoned in Tullamore, Clara, and Ferbane in a manner which is inconsistent with the Core Strategy:

- In relation to Tullamore, proposed amendment MA265 changes the zoning of the land from New Residential to Industrial and Warehousing. While it is reasonable to propose an alternative area for New Residential commensurate with the area affected by MA265, together the two proposed amendments MA264 and MA265 provide for additional New Residential zoning significantly in excess of the Core Strategy. This means that the zoning objectives for Tullamore are inconsistent with the core strategy, contrary to the *Guidance Note on Core Strategies* (2010) and the achievement of the National Strategic Objective for compact growth (NSO 1) and Regional Strategic Objective (RSO 2).
- In relation to Clara, proposed amendment MA299 inserts an additional zoning for New Residential at the southern end of the village which is inconsistent with the core strategy and with the aforementioned guidance note. It will also expand the settlement boundary in a piecemeal manner that will not contribute to the development of a compact settlement as per NSO 1 and the RSO 2.
- In relation to Ferbane, proposed amendment MA330 represents a significant additional zoning in a location that would not support the objectives under NSO 1 and RSO 2 for compact growth when there are extensive other lands closer to the town centre that would appear suitable. In addition, the Natura Impact Report notes the potential for this rezoning to affect the Ferbane Bog SAC (see comment under Environmental Assessments below).

A number of additional material alterations also insert additional New Residential zonings for proposed for Villages which are not necessary to meet core strategy targets, including proposed amendments MA348 (Bracknagh), MA352 (Clonbullogue), MA395 (Rhode). The Office accepts that some level of excess zoning may provide the necessary flexibility to ensure that the targeted level of growth in villages is achieved. However, it will be important that, in monitoring residential development in accordance with objective CSO-01 of the Plan, the planning authority ensures that the level of housing permitted in any one village is not disproportionate and that the housing target for the Village tier is not exceeded.

MA Recommendation 1 - Core strategy and housing

Having regard to:

- the population and housing targets for the individual settlements set out in the core strategy under proposed amendment MA19, which have been determined generally in accordance with the *section 28 Housing and Supply Targets Methodology Guidelines for Planning Authorities (2020)*;
- the requirement under the *Guidance Notes for Core Strategies (2010)* that the core strategy provides a transparent evidence-based rationale of the amount of land to be zoned for residential and allied mixed-use zoning; and
- the national and regional objectives for compact growth (NPO 3c and RPO 3.2);

the planning authority is required to:

- (i) remove either of the New Residential zonings under proposed amendment MA264 or proposed amendment MA265 for Tullamore, or both if proposed amendment MA267 is not retained, to ensure greater consistency with the core strategy; and
- (ii) remove the New Residential zoning under proposed amendment MA299 for Clara and proposed amendment MA330 for Ferbane which are inconsistent with compact growth and sequential development, in addition to the potential to affect Ferbane Bog SAC.

1.2 Core Strategy and settlement hierarchy

The Office welcomes proposed amendment of objective CSO-02 to commit to the variation or review of Edenderry and Portarlinton Local Area Plans (LAP) to ensure consistency with core strategy within the period of the draft Plan. The planning authority will be aware of the requirements of section 19(2B) of the Act that where any objective of an LAP is no longer consistent with the development plan the planning authority must as soon as may be (and no later than one year after the making of the development plan) amend the LAP to make it consistent.

The Office acknowledges the date of expiration of the two LAPs and recognises the significant challenge of completing the process of LAP material alteration or review within the timeframe. The wording of CSO-02 should, however, avoid reference to any timeframe that would conflict with statutory provisions.

MA Observation 1 – Core Strategy and Local Area Plans

Having regard to the provisions of section 19(2B) of the Act concerning the time limit for ensuring consistency between existing LAPs and the development plan, the planning authority is advised to revisit the wording of proposed amendment MA24 of objective CSO-02 to ensure that any reference to timeframes for material alteration or review of the LAPs for Edenderry and the Joint LAP for Portarlinton are not in conflict with the statutory provisions.

The Office welcomes proposed amendment MA33 of table 2.4 Settlement Hierarchy to re-designate the settlements of Daingean, Ferbane and Kilcormac as Smaller Towns, which is taken into account in the proposed amendment MA19 of the core strategy. However, although the order of the settlement hierarchy is unaltered from the draft Plan, the settlement typologies have been re-ordered with Birr (and Crinkle) indicated as a lower order Self-Sustaining Settlement, and Edenderry and Portarlinton indicated as higher order Self-Sustaining Growth Towns. This is inconsistent with the order of the settlement typology for the RSES (table 4.2).

The Office assumes this is an error as no changes are proposed to table 2.4 Settlement Hierarchy, objective SSP-08 (Birr Self-Sustaining Growth Town) or SSP-09 (Self-Sustaining Towns Edenderry and Portarlinton), and there is no reference to same in the Chief Executive's Report on Draft Consultation Stage (March, 2021). The Office would anticipate that this discrepancy would be corrected in the final version of the Plan.

The Office notes that the Chief Executive's Report provided justification for the designation of Birr as a Self-Sustaining Growth Town and for Edenderry and Portarlinton as Self-Sustaining Towns in response to the submission of EMRA. This is considered reasonable in view of the settlement typologies in the RSES, however the Office is conscious of the higher designation assigned to Portarlinton in the draft Laois County Development Plan

2021-2027 and is concerned that the differing designations might have implications for the co-ordinated planning of the settlement between the two planning authorities.

The Office would advise that, in the absence of application of the same settlement typology for Portarlinton by the two planning authorities that the Plan should acknowledge the status assigned to Portarlinton in the draft Laois County Development Plan and commit to supporting that designation in an appropriate manner.

2. Compact growth

2.1 Residential density

Proposed amendment MA19 of the core strategy introduced a separate table setting out the assumptions regarding density for each settlement tier. Proposed amendment MA232 of DMS-02 omitted reference to those densities as ‘recommended maximum’ densities, generally in response to Recommendation 12 of the Office’s submission. This is welcomed by the Office.

However, the densities detailed in the table differ from the wide range of densities that may be considered under the *Sustainable Residential Densities for Urban Areas, Cities, Towns and Villages, Guidelines for Planning Authorities (2009)* (SRDUAGs). This risks confusion and inappropriate residential density standards being applied through the development management process.

MA Observation 2 - Residential density

Having regard to the *Sustainable Residential Densities for Urban Areas, Cities, Towns and Villages, Guidelines for Planning Authorities (2009)*, issued under section 28, the planning authority is advised to omit the density table included under the core strategy (proposed amendment MA19), and to amend the development management standard DMS-02 Density (proposed amendment MA232) to omit the fourth bullet point ‘*Densities per settlement tier as shown in Table 2.2 Core Strategy Table in Chapter 2 of this Plan*’.

2.2 Settlement boundary

Proposed amendment MA277 extends the southern settlement boundary for Birr and Crinkle. The Office is concerned that this approach will set a precedent for other incremental extensions to the settlement, which is already quite extensive, undermining the

built form of an important heritage town and the objectives for compact growth under NSO 1 and RSO 2. The Office would therefore encourage the planning authority to remove proposed amendment MA277.

MA Observation 3 – Settlement boundary

Having regard to the national and regional strategic outcomes for compact growth (NSO 1 and RSO 2), the planning authority is requested to remove proposed amendment MA277.

3. Economic development and employment

3.1 Core Retail Area

Under section 3.3 of the *Retail Planning Guidelines for Planning Authorities (2012)* (RPGs) development plans are required, at minimum, to define on a map the boundaries to the core shopping areas of a town. The RPGs require that the strategy and details of the plan in relation to retailing, including the definition of the core retail area, must be evidence-based through supporting analysis and data. In the absence of an up to date Retail Strategy which supports the proposed expansion of the core retail area boundary for Tullamore (MA274), there is no evidence-base for the proposed amendment. The extended core retail area is also considered to be inconsistent with the existing form and pattern of retail and services in the town, and has the potential to undermine the vitality and viability of the retail core contrary to the provisions of the section 28 guidelines.

MA Recommendation 2 - Core Retail Area

Having regard to the provisions of the *Retail Planning Guidelines for Planning Authorities (2012)*, the planning authority is required to remove proposed amendment MA274 extending the core retail area boundary for Tullamore as it is not supported by the required evidence-based approach as part of an up to date Retail Strategy, and has the potential to undermine the vitality and vibrancy of the existing town centre.

3.2 Employment and Enterprise zoning

The proposed amendment MA263 provides for an additional area of 3.65ha for 'Enterprise and Employment' zoning to the east of Tullamore, outside (east of) the N52 and the junction

with L2025. The draft Plan, however, already includes extensive zonings for Employment and Enterprise, Industry and Warehousing (including 6.86ha zoned for the expansion of the adjacent Cappincur Industrial Estate) and 'Business / Technology', in addition to two Strategic Employment Zones. The Office is satisfied that these areas provide a substantial choice of locations for employment uses commensurate with Tullamore's role as a major employment centre, and no evidence basis has been provided to justify the additional zoning.

The peripheral location of the land outside of the Bypass is also remote from the existing built up area of the town and would result in car dependent development that is not consistent with a sequential approach to development, resulting in unnecessary sprawl on the edge of the town inconsistent with National Strategic Outcome 1 for compact growth.

Furthermore, section 2.7 of the *Spatial Planning and National Roads Guidelines (2021)* (SPNRGs) require that planning authorities exercise particular care in their assessment of development plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges/junction on national roads. Due to the potential cumulative traffic impact of the site, taken with other proposed zoned lands and existing development in close proximity to the junction with the N52, Tullamore by-pass, the proposed amendment would be inconsistent with the requirement of the guidelines that investment in the capacity of national roads must be protected through appropriate policies and local planning in collaboration with TII.

MA Recommendation 3 - Employment and Enterprise Zoning

Having regard to NSO 1 and RSO 2 for compact growth and to the provisions of the *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)* and to the peripheral location of the subject lands outside of the N52 (Tullamore bypass) in the vicinity of a junction on the National Road, the planning authority is required to remove proposed amendment MA263 as it is inconsistent with compact growth and with the requirements under the Guidelines to implement an the evidence based approach to zoning in the vicinity of junctions on national roads and to the protect the investment in the capacity of national roads.

4. Transport and accessibility

4.1 Road design standards

Arising from Observation 3 of the Office's submission on the draft Plan, the Office welcomes proposed amendment MA230 which states the locational contexts to which the *Design Manual for Urban Roads and Streets* (DEHGL and DTTS, 2013, updated 2019) (DMURS) applies. However, development standard DMS-03 Layout only requires 'due regard' be had to DMURS.

In addition, development standard DMS-97 (MA247) which sets the required sight distances for vehicular entrances onto the road network for the entire county, is not appropriate to urban areas where the 60kph or less applies and is inconsistent with DMURS. The application of such sight distances will act against the achievement of National Strategic Objective 1 for compact growth and against the development of an urban environment that facilitates and encourages walking and cycling, with implications for achieving objectives for climate action as required under section 10(2)(n) of the Act.

The planning authority should be aware that DMURS does not constitute section 28 guidelines but is the mandatory design standards adopted by the Department of Transport and the Department of Housing, Local Government and Heritage (Circulars PL 17/2013 and RW 6/2013 from the respective departments, refer). In this regard, section 1.3 of the Manual states:

The principles, approaches and standards set out in this Manual apply to the design of all urban roads and streets (that is streets and roads with a speed limit of 60 km/h or less), except:

(a) Motorways.

(b) In exceptional circumstances, certain urban roads and streets with the written consent of Sanctioning Authorities.

As noted by the Chief Executive, the Manual does not purport to account for every scenario but leaves many matters to the professional expertise and judgement of users of the Manual or to other relevant standards, many of which are cross-referenced in the document. However it clearly states that (formerly titled) DMRB standards shall no longer apply to urban roads and streets other than in exceptional circumstances.

The Manual also acknowledges that the application of DMURS standards requires a degree of flexibility. Accordingly, it identifies mandatory requirements, recommended standards or approaches and also those that are optional. For clarity the Manual requires that '*Local authorities shall facilitate the implementation of ... the Manual in carrying out their development planning functions under the Planning Code.*'

MA Observation 4 - Road design standards

Arising from Observation 3 of the Office's submission on the draft Plan, having regard to the mandatory status of the *Design Manual for Urban Roads and Streets* (2019) and the important role that the application of these roads design standards will play in implementing compact growth and in achieving an increased mode share for walking and cycling through creating a safe and welcoming street/urban road environment, the planning authority is advised to:

- (i) revise proposed amendment MA230 and development standard DMS-03 Layout to be consistent with DMURS section 1.3 *Application of this Manual*; and
- (ii) amend DMS-97 to clarify that these standards apply only to locations other than those to where DMURS applies.

4.2 Mode share targets

The material amendments include extensive proposed amendments MA180 to MA210 for chapter 8 Sustainable Transport Strategy in response to Recommendation 2 of the Office's submission. This introduces (MA183) baseline data for the county on mode share, (MA194) allows for a reduction car parking standards in town centres, (MA204) amending SMAO-02 to prepare Local Transport Plans (LTPs) in accordance with Area Based Transport Assessment Guidance of the NTA and TII and to supports consideration of LTPs for Birr, Edenderry and Portarlington in addition to the Key Town of Tullamore, (MA205) includes an objective to specify baseline and target modal share for new/amended LAPs. The Office strongly commends the planning authority for the extensive work in preparing the proposed amendments which provide a clear strategic basis for the development of all transport modes over the plan period, on a solid evidence base, supported by sensible car parking standards.

The Office considers the proposed amendments to provide a coherent and strategic basis upon which to develop a more sustainable modal share for the county, including settlements. It is noted, however, that the planning authority has not included modal share targets to be achieved over the Plan period in accordance with the recommendation. The *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)* recommend that where investment is planned and committed for sustainable modes, the Plan should set specific targets to increase the percentage share of persons travelling by these modes.

The inclusion of such targets would provide a clear focus for the implementation of the Council's sustainable transport strategy and facilitate the monitoring of an important key indicator over the plan period to support the introduction of Chapter 14 Implementation and Monitoring under proposed material alteration.

MA Observation 5 - Modal share targets

Arising from the planning authority's response to Recommendation 2 of the Office's submission on the draft Plan, which included setting out a strategic approach to the consideration of transport matters and the provision of detailed baseline data for mode share for the county and main settlements, and having regard to the requirements under section 10(2)(n) of the Act, the planning authority is encouraged to set realistic targets for mode share for the end of the Plan period in consultation with the NTA.

The planning authority might also consider whether it is feasible at this stage of the plan preparation process to include reference in its sustainable transport strategy to the implementation of the Avoid-Shift-Improve (A-S-I) framework¹ through the development plan, which may provide some additional direction to the planning authority to achieving more sustainable modal share targets.

4.3 Public rights of way

The Office welcomes proposed amendment MA172 inserting TRO-22 to examine the feasibility of identifying and mapping new public rights of way. In this regard the Office

¹ As referenced in *Ireland's Environment - An Integrated Assessment 2020* (EPA, November 2020).

would direct the attention of the planning authority to '*Public Rights of Way and the Local Authority Development Plan*' (OPR, 2021) for future reference.

5. Climate Action

5.1 Renewable Energy Targets

The Office strongly commends the planning authority for proposed amendment MA47 amending section 3.1.7 inserts the SPPR for the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (2017) and proposed amendment MA65 of section 3.9 of the draft Plan and MA256 amending DMS-109 to omit the mandatory 2km setback for wind turbines in response to Recommendations 13 and 14, respectively.

It is noted, however, that no target for wind energy development has been included, as required by the aforementioned SPPR, to indicate how the development plan will contribute to realising overall national targets (under the *Climate Action Plan 2019*) on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts).

MA Recommendation 4 - Renewable energy targets

Arising from proposed amendment MA47 and to the requirements under Specific Planning Policy Requirement for the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change*, the planning authority is required to include in the final Plan, either:

- (i) indicate how the implementation of the Plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts); or
- (ii) include an objective to determine within 6 months of the making of the Plan how the implementation of the Plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts).

6. Flood risk management

The Office commends the approach taken by the planning authority in carrying out Strategic Flood Risk Assessment and in implementing an appropriate policy response to flood risk in the draft Plan, which is generally consistent with *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) and clarifying *Circular PL2/2014* (the FRMGs).

However, the Office would request that in finalising the Plan that the planning authority corrects the wording of proposed amendment MA53 of section 3.11.3 Strategic Flood Risk Management (last sentence of point 2) which incorrectly refers to ‘*constrained land uses designation*’ being applied only to ‘*undeveloped lands*’ when it applies, as is required under the Guidelines, to developed lands also. This is correctly stated in the SFRA accompanying the draft Plan.

7. Environmental assessment

The Office notes that the Stage 2 Appropriate Assessment of the draft Plan recommends that the following text is integrated into the Plan at further modification stage in respect of proposed amendment MA330 Ferbane: “*Any proposal for development at these lands must demonstrate that it will not affect the nearby Ferbane Bog SAC, including as a result of changes to drainage patterns*”. The wording does not appear to have been include in the proposed amendment.

The Office has recommended, above, that proposed amendment MA330 be removed from the draft Plan. In the event that the said proposed amendment is adopted as part of the Plan, the planning authority as the competent authority for AA must be satisfied that this zoning objective will not adversely affect the integrity of the SAC, having regard to the site’s conservation objectives, before making the plan.

8. Implementation and monitoring

The Office welcomes the insertion of chapter 14 Implementation and Monitoring under proposed amendment MA258, which commits the planning authority to securing and monitoring the implementation of the strategies, policies and objectives of the Plan. However, in view of the constraints on resources it is unlikely to be practical for the planning authority to monitor the implementation of every policy or objective and therefore a more

strategic approach to monitoring will be required to facilitate the planning authority in carrying out effective monitoring.

The Office would suggest that implementation monitoring would be best to focus on the anticipated or proposed key outcomes of the plan, as determined by the planning authority. These may relate to the core strategy (e.g. population growth and housing delivery), urban and rural regeneration (e.g. projects implemented under URDF and RRDF), the sustainable transport strategy (e.g. modal share, preparation of Local Transport Plan), climate action (e.g. renewable energy development, projects supported by climate action funds (RPO 12.3, refers), biodiversity and landscape (e.g. status of designate habitats) and others.

The draft Plan already contains commitments to monitor certain outputs, such as housing delivery (CSO-01 and HO-03) and water resources (appendix 2 Infrastructural Assessment Report). In addition, the Office has also requested that the final Plan set realistic mode share targets for the Plan period. These and other similar quantifiable indicators could be used to determine whether key outcomes have been achieved.

Observation 6 – Implementation and monitoring

Having regard to the commitment of the planning authority to securing and monitoring the implementation of the strategies, policies and objectives of the Plan, the Office would advise the planning authority to consider how chapter 14 Implementation and Monitoring could be amended to ensure that any monitoring is strategic in nature and practical to be carried out.

9. Other issues

Regarding proposals for masterplans under the draft Plan, the Office would remind the planning authority of the importance of ensuring engagement with prescribed authorities as part of the plan making process and the potential implications for AA and SEA for non-statutory plans that determine spatial development of lands

10. Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the Chief Executive of your authority

prepared for the elected members under section 13 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 decision of the planning authority in relation to the draft Plan. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by this Office, then the Chief Executive must inform the Office and give reasons for this decision.

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,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations
