

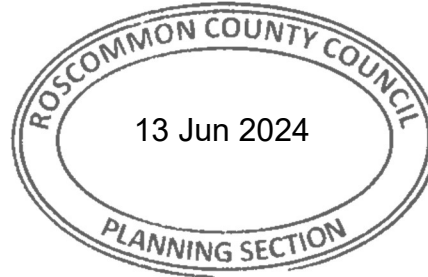


Oifig an  
Rialaitheora Pleanála  
Office of the  
Planning Regulator

OPR Ref: MA-041-22

13<sup>th</sup> June 2024

Forward Planning Section,  
Roscommon County Council,  
Aras an Chontae,  
Roscommon  
F42 VR98



**Re: Material Alterations to Draft Roscommon Town Local Area Plan 2024-2030**

A chara,

Thank you for your authority's work in preparing the proposed Material Alterations (the proposed material alterations) to the draft Roscommon Town Local Area Plan 2024-2030 (the draft LAP).

As your authority is aware, a core function of the Office of the Planning Regulator (the Office) is the strategic evaluation and assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. This includes a requirement to make submissions on statutory plans, including any observations or recommendations the Office considers necessary to ensure the effective co-ordination of national, regional and local planning requirements.

The Office has evaluated and assessed the proposed Material Alterations under the provisions of sections 31AO(1) and 31AO(2) of the *Planning and Development Act 2000*, as amended (the Act), and within the context of the Office's earlier recommendations and observations.

The Office's evaluation and assessment of the proposed Material Alterations has regard to the Roscommon County Development Plan 2022-2028 (the Development Plan), the Regional Spatial and Economic Strategy (RSES) and relevant section 28 guidelines.



## Overview

The Office acknowledges the extensive work undertaken by the planning authority in responding to the issues raised by the Office in its recommendations and observations and in preparing the proposed Material Alterations.

As outlined in the Office's submission to the draft LAP, the Office concluded that, subject to the matters raised in its recommendations and observations, the draft LAP would set out a positive, evidence-based, planning strategy to guide the development of Roscommon Town over the six-year plan period.

The Office considered it necessary to make eight recommendations on the draft LAP, and made four observations where further consideration was advised.

Generally, the Office was satisfied with the approach in relation to residential development in the draft LAP, in particular the general consistency with the core strategy of the Development Plan. While the Office has no objection to most of the material alterations that propose to zone land for residential development, there are five individual residential zonings, which are located on the periphery of the town and are not consistent with the core strategy.

The Office recommends, therefore, that your authority makes the LAP without the proposed material alteration identified in MA Recommendation 1, which undermines the very positive policies, objectives and strategies in the draft LAP, promoting consolidated and proportionate growth, sustainable mobility and the transition to a low carbon and climate resilient society.

In relation to lands zoned for Employment Uses in the draft LAP, the Office notes the Proposed Amendment - MA 45 - to zone additional land for employment generating uses, in a peripheral location and in a piecemeal manner would not be consistent with a compact pattern of development in accordance with the *National Strategic Outcome* (NSO) for compact growth of the NPF and is provided without an evidence-base for such zoning.

In relation to integration of a Local Transport Plan (LTP) into the draft LAP to inform policy and objectives of the draft LAP, the Office recommended in its submission to



the draft LAP that the planning authority prepare a LTP or review and refine the *Roscommon Town Approaches and Movement Study* (RTMAS). The Office notes that the planning authority did not comply with Recommendation 6 (Integration of Transport and Sustainable Mobility) of the Office’s submission to the draft LAP. These matters are addressed in this submission under Section 5 below.

Notwithstanding the positive approach in respect of achieving town centre regeneration and more compact settlements that encourage more active travel, the Office has concerns with specific proposed alterations which respectively omit Opportunity Sites no. 1, 3 and 4 from the draft LAP.

In relation to flood risk management, the Office welcomes the general approach by the planning authority in response to the Office’s Recommendation 8 (Flood Risk Management) to the draft LAP. Nonetheless, the Office has concerns with regard to three individual material alterations. These matters are addressed in this submission under MA Recommendation 1 and MA Recommendation 3 below.

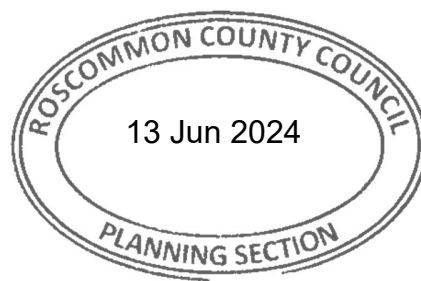
It is within this context, the submission below sets out three (3) recommendations and under the following themes:

Key theme	Recommendation	Observation
<a href="#">Core strategy and land use zoning for residential use</a>	<a href="#">Recommendation 1</a>	-
<a href="#">Regeneration</a>	<a href="#">Recommendation 2</a>	-
<a href="#">Land use zoning for Employment</a>	<a href="#">Recommendation 3</a>	-

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.



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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.

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

### **1. Core strategy and land use zoning for residential use**

The Office noted in its submission to the draft LAP that the housing targets and the policy objectives of the draft LAP to be generally consistent with the Development Plan and its core strategy, and the Office was satisfied that the draft LAP provided sufficient zoned lands to provide for the town's housing supply target in a compact and sustainable manner.

The Office commends the planning authority for its approach in strengthening the alignment of the draft LAP with the RSES with the inclusion of material alterations (MA 6 and MA 9). Furthermore, the Office welcomes the inclusion of additional policy objectives that clarify the density ambition for zoned lands and policy objectives committing the draft LAP (MA 5 and MA 11) to implementing density ranges for key towns consistent with the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)* (Residential Development and Compact Settlement Guidelines).

Notwithstanding the positive approach in relation to material alterations in respect of achieving more ambition in relation to compact settlements aligned with the RSES, the Office has concerns in relation to five individual proposed material alterations that are poorly located, lack necessary infrastructure provision, overlap with designated flood risk areas, and are not necessary to ensure a sufficient supply of zoned land consistent with the core strategy in the recently adopted Development Plan. The proposed alterations relate to sites on the periphery of the settlement and



in all cases the proposed alteration relates to a change from un-zoned land to New Residential. These sites are as follows:

- Proposed Amendment MA 30 (Lisnamult);
- Proposed Amendment MA 31 (Hawthorn Drive);
- Proposed Amendment MA 43 (Ballinagard);
- Proposed Amendment MA 46 (Cloonybeirne); and
- Proposed Amendment MA 50 (Ballinagard).



MA 30 and MA 31, both proposed to change from un-zoned land to New Residential zoned land, are in response to Recommendation 4 of the OPR's submission to the draft LAP which relates to White Lands. Recommendation 4 required the planning authority to either zone the 'un-zoned lands' referred to as White lands in the draft LAP for an appropriate use subject to an infrastructure assessment, or amend the LAP boundary to omit the subject lands. The Office advised, in its recommendation, that the subject lands are not considered appropriate for residential or employment uses.

In respect of MA 30, the site, which measures approximately 1.9 ha, was inside the settlement boundary and un-zoned in the draft LAP and was previously un-zoned in the Roscommon Town Local Area Plan 2014 – 2020. The Office notes that potential access to the site is from St. Theresa's Road to the immediate west of the said lands. St. Theresa's Road is a minor rural road with no footpath or cycle lane provision.

The proposed material alterations do not include an infrastructural assessment and the Office notes from the Uisce Éireann submission to the material alterations that the nearest networks are some 200-300m away from the site, with connections required.

Moreover, given the peripheral location of the site, the rezoning of the land would not represent a sequential approach to zoning for residential development, and as such

would be inconsistent with section 6.2.3 of the *Development Plans, Guidelines for Planning Authorities* (2022) (the Development Plans Guidelines).

In respect of MA 31, which measures approximately 1.9 ha, the site was inside the LAP settlement boundary and un-zoned in the draft LAP, and was previously zoned Transitional Agriculture in the Roscommon Town Local Area Plan 2014 – 2020. The proposed material alteration does not include an infrastructural assessment and the Office notes the following from Uisce Eireann submission to the material alterations that '*depending on quantum watermain network upgrades may be required*'.

Furthermore, the rezoning of the land would not represent a sequential approach to zoning for residential development consistent with section 6.2.3 of the Development Plans Guidelines.

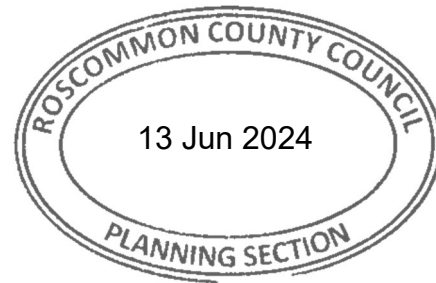
In the case of both proposed alterations (MA 30 and MA 31), the Office notes that the draft LAP provided sufficient land to meet anticipated development requirements set out in the core strategy in a sequential and coordinated manner. Furthermore, there are preferably located lands which are zoned and serviced to meet demand. There is, therefore, no evidence-based rationale to support the requirement for MA 30 and MA 31 to ensure that adequate housing is available.

Furthermore, Recommendation 4 of the Office's submission to the draft LAP advised that the lands which are the subject of MA 30 and MA 31 respectively were not considered appropriate for residential development. The planning authority is therefore required to review this and take appropriate action.

In relation to MA 43, the site measures approximately 2 ha, and was un-zoned and located outside the settlement boundary in the draft LAP and the Roscommon Town Local Area Plan 2014 – 2020. The Office notes that the site is located on the periphery of the settlement, and that there are more favourably located lands zoned New Residential situated to the north east, closer to the Town Core.

The Office also notes that the Office of Public Works (OPW), in its submission to the proposed material alterations, has raised concerns with the proposed material





alteration. It is evident from the Strategic Flood Risk Assessment (SFRA) that a portion of the site, to the east, is the subject of Flood Zone A and Flood Zone B, which is inconsistent with national policy to avoid placing people and property at unnecessary risk from future flood events, and therefore contrary to NPO 57, RPO 3.10 and *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) (Flood Guidelines).

In respect of MA 50, the site measures approximately 3.8 ha, and the Office notes the site was un-zoned and located outside the settlement boundary in the draft LAP and the previous plan. Further the site is located on the periphery of the settlement, and that there are more favourably located lands zoned New Residential situated to the north east, closer to the Town Core.

The Office also notes that the OPW, in its submission to the proposed material alterations, has also raised concerns with the proposed alteration. The SFRA designates a portion of the site, to the centre and north of the site subject of Flood Zone B, which is inconsistent with aforementioned policy framework.

In respect of MA 46, the site measures approximately 2.7 ha, and was un-zoned and located outside the settlement boundary in the draft LAP and the previous plan.

The Office notes that this site is less sequentially preferable to other sites and that the lands are located outside of the settlement boundary. Moreover, and as noted above, the draft LAP has provided sufficient land to meet anticipated development requirements set out in the core strategy in a sequential and coordinated manner.

In relation to infrastructure services the Office notes the following from the Uisce Éireann submission to the material alterations;

*Depending on the scale of development proposed on this site and along this road, there may be a need for network upgrades to improve network performance in this area of Roscommon.*

Furthermore, the subject site is located adjoining the N63, where a speed limit of 100kph applies. It is not clear that the site would with certainty be accessed



at an alternative location, and any entrance at this location would be inconsistent with the provisions of section 2.5 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012).

Overall the proposed material alterations, referred to above, risk undermining the positive policies, objectives and strategies in the draft LAP which promote compact development and urban regeneration in support of policy objectives CS 2.4, CS 2.5, CS 2.6 and TV 4.18 of the Development Plan, and RPOs 3.1 and 3.2 of the RSES.

As outlined in this submission, the proposed zonings do not represent sequential development, particularly within the context of achieving a compact settlement. The result is the zoning of land in excess of that which can reasonably be considered to be required to provide for the housing supply target consistent with the Development Plan core strategy. The sites have infrastructure deficits and it is not clear when these will be resolved.

Further, and in respect of MA 43 and MA 50, highly vulnerable New Residential zoned lands, which overlap with Flood Zones A and B have not been assessed against the criteria of the plan making Justification Test as required under the guidelines. This approach is not consistent with the requirements of the Guidelines, NPO 57 and RPO 3.10, and may place people and property at unnecessary risk from future flood events.

### MA Recommendation 1 – Land Use Zoning for Residential Use

Having regard to:

- Policy Objectives CS 2.4, CS 2.5, CS 2.6 and TV 4.18 of the Roscommon County Development Plan 2022-2028;
- RPO 3.1 and RPO 3.2 for compact growth;
- RPO 3.10 for Flood Risk Management and *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009);

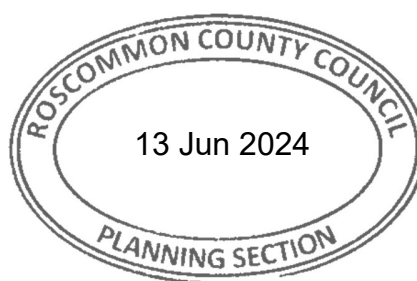




- the peripheral location of the lands and the policy and objective for the sequential approach to zoning in the *Development Plans, Guidelines for Planning Authorities (2022)*;
- RPO 6.5 and section 2.5 of the *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)*; and
- Policy Objective CS 2.4 of the Roscommon County Development Plan 2022-2028 for the co-ordination of land use zoning, infrastructure and services,

the planning authority is required to make the LAP without the following proposed material alterations:

- (i) Proposed Amendment – MA 30 – Amend Maps 1, 1A, 1B, 1C and 3 of the Draft Plan as follows:
  - a) Southernmost portion of land, Lisnamult: Zone the land as ‘New Residential’ instead of the ‘Unzoned’ identification in the Draft LAP;
  - b) In conjunction with the above amendment to land use zones, amend and update Table 11.1 Land Use Zoning Extents and Table 11.2 New Residential Lands on pages 64 and 65 respectively to reflect the altered land extents.
- (ii) Proposed Amendment – MA 31 – Amend Maps 1, 1A, 1B, 1C and 3 of the Draft Plan as follows:
  - a) Hawthorn Drive: Zone the land as ‘New Residential’ instead of the ‘Unzoned’ identification in the Draft LAP;
- (iii) in conjunction with the above amendments to land use zones, amend and update Table 11.1 Land Use Zoning Extents and Table 11.2 New Residential Lands on pages 64 and 65 respectively to reflect the altered land extents;
- (iv) Proposed Amendment – MA 43 – Amend Map 1, Map 1A, Map 1B, Map 1C, Map 2 and Map 3 to (a) extend the Draft LAP boundary to the south



at Ballinagard and (b) to zone the associated additional lands as New Residential;

- (v) Proposed Amendment – MA 46 – Amend Map 1, Map 1A, Map 1B, Map 1C, Map 2 and Map 3 to (a) extend the Draft LAP boundary to the north east at The Walk and Cloonybeirne and (b) to zone the associated additional lands as New Residential; and
- (vi) Proposed Amendment – MA 50 - Amend Map 1, Map 1A, Map 1B, Map 1C, Map 2 and Map 3 to (a) extend the Draft LAP boundary to the south at Ballinagard (Galway Road/N63) and (b) to zone the additional lands as New Residential.

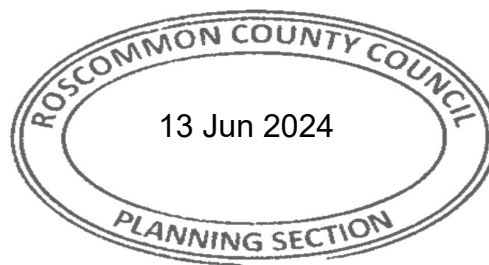
## 2. Regeneration

The Office was generally satisfied with the approach to regeneration and brownfield development, as contained in section 5.5 of the draft LAP which provided a framework to achieve a compact settlement in Roscommon Town consistent with RPO 3.9 and RPO 7.20. This included the identification of seven Opportunity Sites, four located inside the Town Core, and the balance situated in the Outer Core.

Overall this approach would facilitate the provision of approximately 180 units within the seven Opportunity Sites, using densities consistent with the (Residential Development and Compact Settlement Guidelines)..

Notwithstanding the positive approach in respect of achieving more compact settlements that encourage more active travel, the Office has concerns with proposed alterations MA 13, MA 14 and MA 15, which respectively omits Opportunity Sites no. 1, 3 and 4 from the draft LAP. The aggregate quantum of land removed for development potential is approximately 2.1 ha, which has the potential to deliver c. 80 housing units, all within the Town Core.

The Office is concerned, specifically in respect of MA 14 and MA 15 which omit Opportunity Sites 3 and 4 from the draft LAP, that the proposed alterations would undermine the very positive policies, objectives and strategies in the draft LAP,



promoting compact, sustainable mobility and the transition to a low carbon and climate resilient society.

## MA Recommendation 2 – Regeneration Sites

Having regard to:

- Regional Policy Objectives RPO 3.1, RPO 3.9, RPO 4.47 and RPO 7.20 for compact growth and regeneration;
- Policy objective TV 4.15 of the Roscommon County Development Plan 2022-2028; and
- Policy objectives RN 19 and RN 20 of Draft Roscommon Town Local Area Plan 2024-2030 (the draft LAP),

the planning authority is required to make the draft LAP without the following proposed material alterations:

- (i) Proposed Amendment MA 14 – Remove ‘OPPORTUNITY SITE NO. 3 – HENRY STREET – INFILL SITE’ (page 34) of the draft LAP, to reflect the removal of Opportunity Site No. 3 and re-number all subsequent Opportunity Sites accordingly; and
- (ii) Proposed Amendment MA 15 – Remove ‘OPPORTUNITY SITE NO. 4 – CASTLE LANE’ (page 35) of the draft LAP, to reflect the removal of Opportunity Site No 4 and re-number all subsequent Opportunity Sites accordingly.

### 3. Land use zoning for Employment

The Office broadly welcomes the policies and objectives with regard to regional and economic development and employment. However, the Office, in its submission to the draft LAP, raised concerns that the draft LAP did not provide sufficient clarity in relation to the delivery or implementation of the key future priorities, in particular those relating to compact growth, regeneration opportunities along Circular Road



and redevelopment opportunities along Racecourse Road. In this regard the Office welcomes the strengthening of the draft LAP with MA 6, MA 9 and MA 12.

Notwithstanding these positive proposed alterations, the Office has concerns with MA 45, which proposes to (a) revise the draft LAP boundary to the north east at Roxborough and (b) to zone the identified land portion as 'Strategic Industrial / Enterprise Zones.'

The proposed material alterations would zone land Strategic Industrial / Enterprise Zone in a piecemeal nature, in a peripheral location and removed from the town centre. The subject site, measuring approximately 4 ha, is sequentially less preferable compared to other employment zoned sites in the town, and is also located outside the CSO 2016 settlement boundary and would not be consistent with a compact pattern of development in accordance with the NSO for compact growth of the NPF. Moreover, the site was un-zoned and located outside the settlement boundary in the draft Plan and the previous plan and would be inconsistent with the Development Plans Guidelines advise that the '*...proposed employment zonings must have a credible rationale, particularly with regard to location and type of employment*'.

Furthermore, no infrastructure assessment has supported the rationale in relation to the proposed rezoning of the site in respect of proposed MA 45. In this regard the Office notes the following from the Uisce Éireann submission to the material alterations;

*the inclusion of this site does not appear to be in keeping with the principle of sequential growth. The site is currently served by a small diameter watermain; it is likely that an upgrade of 120m would be required to facilitate development, which would include a stream crossing.*

In addition to the above the Office notes that the site is accessed from a local rural road with no footpath or cycle path infrastructure, and there are no proposals in the draft LAP to extend the proposed walking and cycling network to the site the subject of MA 45.



The Office also notes that the OPW, in its submission to the proposed material alterations, has raised concerns with this proposed alteration. Further it is evident from the SFRA that a portion of the site, to the centre and north of the site is the subject of Flood Zone A and Flood Zone B, which is inconsistent with national policy to avoid placing people and property at unnecessary risk from future flood events, and is contrary NPO 57, RPO 3.10 and the Flood Guidelines.

The Office notes the Chief Executive's Report on Submissions Received on the Draft Roscommon Town Local Area Plan 2024 – 2030 (CE's Report draft stage), in recommending not to accept the MA 45, stated the following:

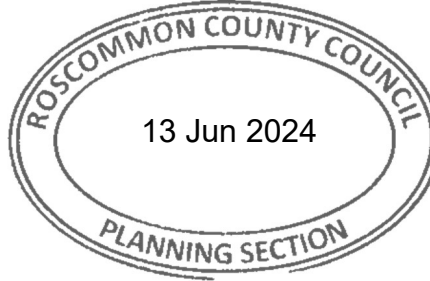
*The commitment of Roscommon County Council to facilitate industrial and enterprise related development within Roscommon is clearly demonstrated through the zoning of lands for 'Strategic Industrial/Enterprise' in more centrally located, serviced and accessible lands within the proposed LAP boundary, and supported by related text and policy objectives, principally set out in Chapter 6: Economic Development of the Draft LAP.*

The proposed employment land-use zoning, which would facilitate intensive employment development removed from the town centre, would work against the objectives of consolidation of the existing built urban footprint; conflicts with objectives in the draft LA to build a much stronger urban core and vibrant town centre; and is contrary to NPO 6, RPO 3.1 and Town Centre First and policy objective CS 2.4 of the Development Plan. In this regard, it is not clear that the draft LAP, with the proposed material alteration, contains an overall evidence-based strategy for employment uses which is consistent with the proper planning and sustainable development of the area.

**MA Recommendation 3 – Lands Zoned for Employment Uses**

Having regard to:

- an evidence-based rationale for both the requirement to zone lands and the location and type of employment in accordance with section 6.2.5 of the



*Development Plans, Guidelines for Planning Authorities (2022)* and the sequential approach to zoning for high intensity employment in accordance with Appendix A section 1.4;

- RPO 6.31 for integrating active travel to areas of high employment density;
- Policy objective CAEE 8.18 of the Roscommon County Development Plan 2022 – 2028, for the integration of transport and land use;
- the obligation under the Climate Action Plan and the Climate Action and Low Carbon Act 2015, as amended;
- the regeneration of towns under RPO 3.9 and *Town Centre First: A Policy Approach for Irish Towns (2022)*;
- RPO 3.10 for Flood Risk Management and *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*; and
- Policy Objective CS 2.4 of the Roscommon County Development Plan 2022-2028 for the co-ordination of land use zoning, infrastructure and services,
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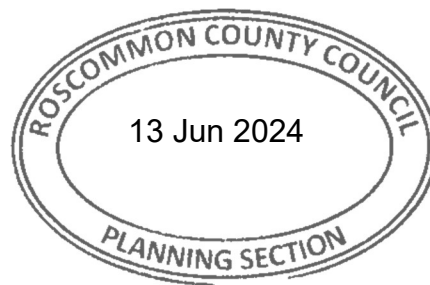
the planning authority is required to make the LAP without the following proposed material alteration:

- proposed amendment MA 45, which proposes to (a) revise the draft LAP boundary to the north east at Roxborough and (b) to zone the identified land portion as ‘Strategic Industrial / Enterprise Zones.’

#### 4. Land Use Zoning Matrix

Recommendation 5 of the Office’s submission to the draft LAP sought amendments to the land use zoning matrix to ensure consistency with policy objectives in the RSES and the Development Plan, in respect of compact growth and retail sequential developments. Overall the Office welcomes the proposed material alterations to address Recommendation 5 to the draft LAP.





However, Recommendation 5(i) required that multi-unit residential development is permitted in Principle on lands zoned Outer Core. Notwithstanding the CE's Report (draft stage) recommending to accept Recommendation 5(i), no corresponding proposed alteration is included in the proposed material alteration to the draft LAP. This will have to be considered by the Office in the context of its final assessment of the adopted LAP.

## **5. Transport and Accessibility**

The Office noted, in its submission to the draft LAP, Roscommon Town's designation as a Decarbonisation Zone within County Roscommon, and that section 9.2 of the draft LAP aims to provide a framework for the transition of Roscommon Town towards a low carbon and climate resilient settlement.

The effective integration of land use and transport planning provides opportunities for the delivery of accessibility, connectivity and sustainable modes of transport and to encourage travel modal shift away from private vehicular use towards sustainable travel modes of walking, cycling and use of public transport consistent with climate action objectives.

Recommendation 6 of the Office's submission to the draft LAP sought the integration of transport and sustainable mobility by preparing an LTP or refining RTAMS and ensuring that the preparation of the draft LAP is informed by an LTP, such that the policies and objectives of the transport assessment are integrated to the draft LAP.

The Office notes the recommendation in the CE's Report (draft stage), supporting Recommendation 6 of the Office's submission to the draft LAP and to incorporate RTAMS in to the draft LAP. This approach would be consistent with policy objectives ITC 7.5 and ITC 7.31 of the Development Plan and RPO 6.27 of the RSES which support the preparation of an LTP for Roscommon Town.

The Office notes the elected members' decision from the Special Meeting (23<sup>rd</sup> April 2024) not to accept the Chief Executive's recommendation and not to include the RTAMS as an appendix to the draft LAP. This will have to be considered by the Office in the context of its final assessment of the adopted LAP.



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## 6. Flood risk management

In general, the Office welcomed the approach by the planning authority in response to Recommendation 8 of the Office's submission to the draft LAP, which includes updated mapping to ensure accurate flood extends are included in the Strategic Flood Risk Assessment.

Notwithstanding the positive alterations to the draft LAP, the Office has concerns with regard to individual material alterations, specifically MA 45, MA 46 and MA 50, which includes land zoned New Residential and Strategic Industrial / Enterprise Zone on land designated Flood Risk A and Flood Risk B which is inconsistent with national policy, NPO 57, RPO 3.10 and the Flood Guidelines, which require avoiding placing people and property at unnecessary risk from future flood events.

These individual material alterations are addressed in section 1 and section 3 of this submission, in which case the planning authority is required to review this and take appropriate action. The Office considers that the planning authority should engage with the OPW in this regard.

## 7. Implementation and Monitoring

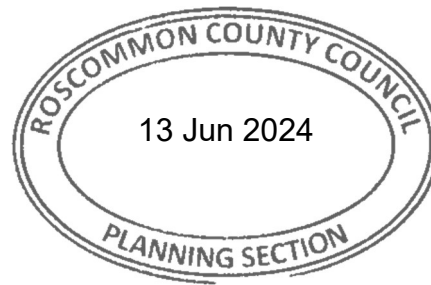
Section 6.5 of the *Local Area Plans, Guidelines for Planning Authorities (2013)* (LAP Guidelines) states that planning authorities are encouraged to periodically review the success or otherwise of the implementation of the policies and objectives of a local area plan by effective monitoring systems. Furthermore, the review of the development plan as required by section 15 of the Act, will provide an opportunity to review the policy objectives of the LAP, particularly where policy objectives overlap between the development plan and the adopted LAP.

In this regard the Office welcomes the respective introduction of MA 1.

MA 1 will enable the planning authority to determine whether it has successfully implemented key elements of the LAP consistent with the provisions of the Development Plans Guidelines (section 10.2) and the LAP Guidelines (section 6.2).



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## 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 20 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authorities are required to notify this Office within **five working days** of the making of the JULAP under section 31AO(5) of the Act. Where your authorities decide not to comply with the recommendations of the Office, or otherwise makes the JULAP in such a manner as to be inconsistent with the recommendations of the Office, the chief executive must also, in the notice letter, inform the Office accordingly and state the reasons for the decision of the planning authorities.

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](mailto:plans@opr.ie).

Is mise le meas,

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**Anne Marie O'Connor**

Deputy Regulator and Director of Plans Evaluations

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