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Rialaitheora Pleanála  
Office of the  
Planning Regulator

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**Re: Draft Longford County Development Plan 2021 – 2027**

A Chara,

Thank you for your authority's work in preparing the Draft Longford County Development Plan 2021- 2027 (the Draft Plan).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable work your authority has undertaken in the preparation of the Draft Plan against the backdrop of an evolving national and regional planning policy and regulatory context. In particular, the Office commends the preparation of a Housing Need Demand Assessment (HNDA) to inform the Core Strategy and Housing Strategy in Appendix 2.

More recently, you will have been notified of the Ministerial Circular relating to *Structural Housing Demand in Ireland and Housing Supply Targets*, and the associated Section 28 Guidelines: *Housing Supply Target Methodology for Development Planning*. The planning authority will, therefore, be required to review the Draft Plan, and in particular the Core Strategy, in the context of this guidance which issued subsequent to the Draft Plan. Further advice in relation to this matter is provided below.

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As your authority will be aware, one of the key functions of the Office includes strategic evaluation and assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. In this regard, the Office has evaluated and assessed the Draft Plan, under the provisions of sections 31AM(1) and (2) of the Act.

## **GENERAL COMMENTS**

The Draft Plan is being prepared at a crucial time following the preparation of the National Planning Framework (NPF) and the Eastern and Midland Regional Assembly Regional Economic and Spatial Strategy (RSES) which seek to promote the rebalancing of regional development in a sustainable manner. Longford as a key employment centre with strong retail, administrative and service functions and a young population is well placed to provide a high quality of life for its residents in a sustainable manner.

The Office supports the overall intended strategic approach of the Draft Plan in terms of the primary focus of population and economic growth on the designated Key Town of Longford, and indeed considers that this role, together with other larger towns in the county, can be further strengthened in your plan. The key challenge for the planning authority will be to deliver and implement a plan that ensures growth takes place in a compact and sequential manner, facilitating active and sustainable transport modes.

In achieving this objective, County Longford has a number of issues which the draft plan needs to adequately address, including:

- an apparent historical over supply of zoned land (both residential and employment) within settlements which has been partially but not fully addressed.
- a legacy of unfinished housing estates, often on the outer edges of settlements, which you have addressed through the Site Resolution Zoning and supporting objectives. It will be important, however, that these legacy issues do not determine future development by establishing an accepted pattern of development in inappropriate locations.
- high levels of housing in the open countryside compared to its towns and villages. Facilitation of continued urban generated rural housing has the potential to undermine the vitality and vibrancy of small towns and rural villages, to contribute to unsustainable travel patterns, and adversely affect the natural environment. In this respect, the policy framework for rural housing must be clear, transparent and implementable.



It is within the above context the submission below sets out 12 recommendations and 11 observations under following seven key themes:

1. Core strategy and settlement hierarchy;
2. Compact growth, regeneration and tiered approach to land use zoning;
3. Rural housing and regeneration;
4. Economic development and employment (including retail);
5. Sustainable transport and accessibility;
6. Climate action and energy;
7. Environment, heritage and amenities; and
8. General and procedural matters

## **1.0 CORE STRATEGY AND SETTLEMENT HIERARCHY**

### **1.1 Recent Revisions to Policy Context**

Subsequent to the publication of the Draft Plan, you will have been notified of the Ministerial Circular relating to *Structural Housing Demand in Ireland and Housing Supply Targets*, and the associated Section 28 Guidelines: *Housing Supply Target Methodology for Development Planning*.

Notwithstanding that the plan review process has commenced for County Longford, the Guidelines specify that it will be necessary to demonstrate the manner in which the Core Strategy and other elements of the plan are consistent with the NPF 50:50 City housing demand projection scenario identified by the ERSI (Appendix 1 Table 10) subject to the methodology set out in Section 4.0 of the Guidelines and adjusted for your plan period.

#### ***Recommendation 1:***

*The planning authority is required to review the proposed Core Strategy and HNDA and to revise as necessary to comply with the requirements of the Section 28 Guidelines: Housing Supply Target Methodology for Development Planning and Appendix 1 of the accompanying Ministerial Circular.*



## 1.2 Settlement Hierarchy

### Hierarchical Structure

The NPF and RSES only identifies Longford Town as a designated Key Town in the RSES with the lower tiers to be defined in the Draft Plan. The Office notes that a significant change to the existing settlement hierarchy is proposed in the Draft Plan. Granard, previously a Tier 2 Key Service Town in the existing Development Plan, has now become a Tier 3 Self Sustaining Town. Edgeworthstown and Ballymahon previously a Tier 3 Service Town and Tier 4 Local Service Town respectively have now become Tier 2 Self Sustaining Growth Towns. Notwithstanding the rationale provided for such a change in the Draft Plan, the Office has significant concerns with the revised settlement hierarchy, particularly having regard to the spatial, service and infrastructure attributes of Granard and the RSES Retail Hierarchy for the region<sup>1</sup>.

In consideration of this issue, regard has been had to the following matters:

- Both Edgeworthstown and Ballymahon have lower jobs to resident workers ratios of 0.81 and 0.73 respectively, in contrast to the high jobs to resident workers ratio of 2.35 associated with Granard.
- The importance of Granard is recognised within the RSES Retail Hierarchy, where Granard is designated as a Level 3 Sub County Town. Further within the Longford Retail Strategy, Granard is identified as a 'Key Service Centre', higher in the county retail hierarchy than both Edgeworthstown and Ballymahon.
- The location of Granard in a rural area identified as being 'Structurally Weak' (refer to Figure 4.5 in Draft Plan) in the north east of the county, and its potential to support and provide services to its rural hinterland area.
- There are current capacity constraints associated with wastewater treatment in Edgeworthstown and Ballymahon although the Draft Plan does state that Irish Water has committed to upgrading both treatment plants over the lifetime of the plan, but not before 2024. In contrast there is infrastructural capacity for further development within Granard, particularly in relation to wastewater treatment where there is considerable capacity to accommodate additional growth.

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<sup>1</sup> Table 6.1, page 137 of the RSES for the EMRA



NPO7 requires a tailored approach to urban development with a particular focus on encouraging population growth in strong employment and services centres, reversing the decline of smaller centres, addressing the legacy of rapid unplanned growth, and supporting a continuation of balanced population and employment growth.

Accordingly, it is considered that Granard should be elevated to a Self-Sustaining Growth Town in the county settlement hierarchy, and Ballymahon and Edgeworthstown should be designated as Self Sustaining Towns. This revised structure would enable Ballymahon and Edgeworthstown to balance housing delivery with driving investment in services, employment growth and infrastructure. Further, this revised approach will best assist in devising a Core Strategy in accordance with the legislative requirements, the national and regional policy requirements and the requirements of Section 28 guidelines.

**Recommendation 2:**

*Having regard to Table 4.2 (Settlement Hierarchy) and Table 4.3 (Settlement Typologies and Policy Responses) of the RSES and the settlement strategy objectives set out under Regional Policy Objectives 4.1 and 4.2, the Planning Authority is required to:*

- a. Re-designate Granard as a Self-Sustaining Growth Town having regard to its current designation as a Tier 2 Key Service Town, its designation in the regional retail hierarchy in the RSES as the only Level 3 Sub County Town, its high ratio of jobs to resident workers and geographic location within the county;*
- b. Reconsider the positioning of Ballymahon and Edgeworthstown in the settlement hierarchy and the justification for designating these settlements as Self Sustaining Growth Towns (tier 2) rather than Self Sustaining Towns (tier 3).*

Distribution of Population Growth

From the evaluation undertaken by the Office, it is evident that the distribution of population growth across the settlement hierarchy does not provide a strategy that sufficiently reflects the policies and objectives of the NPF and RSES on compact growth and reversal of rural decline in villages, as set out in NPOs 9, 16, 18a; and Regional Policy Objectives (RPOs) 4.63, 4.77 and 4.78.

Section 4.3 of the RSES states:



*'Towns in the lower tiers should provide for commensurate population and employment growth, providing for natural increases and to become more economically self-sustaining, in line with the quality and capacity of public transport, services and infrastructure available...'*

In particular, the Office makes the following specific comments in respect of the rates of population increase that are provided for across the settlement hierarchy:

- The Core Strategy allocates a lower population growth rate for Longford Town (19.3%) compared to settlements at Tiers 2, 3 and 4 of the settlement hierarchy, including Edgeworthstown (23.4%) and Ballymahon (25.75%). As Longford Town is the only Tier 1 settlement and a designated Key Town with significant potential for compact growth<sup>2</sup>, it is considered that it should be allocated a higher population growth rate if it is to grow in line with the objectives set out in Section 4.6 and RPO 4.63 of the RSES.
- The Core Strategy projects that the population of Lanesborough will grow by 38.5% between 2016 and 2027 contrary to NPO 9 which contains an objective to limit the growth of such settlements to 30%. While it is acknowledged that Lanesborough has been identified for targeted 'catch up investment' and has secured funding for regeneration schemes in accordance with RPO 4.77, the growth rate for the town is considered excessive.
- The 6 no. Tier 4 Category Towns & Villages, have been allocated significant population growth, with all but one village (Legan) afforded population growth rates of between 20 – 22.5%, in excess of the Key Town of Longford (19.3% growth). The Office considers these growth rates and associated extent of residential land use zonings to be unbalanced in the context of the Key Town of Longford and unsustainable with regard to the existing level of available services and facilities.
- The Office considers that there is scope to reconsider the approach to Towns and Villages and to allow for a greater degree of flexibility in how the future development of groups of smaller settlements is managed and monitored. In this regard, consideration could be given to aggregate projected population in accordance with Section 10 (2A)(f)(vi) of the Act.
- There is a need to separate serviced rural settlements and clusters from open countryside in Tier 5 (dealt with under rural housing below).

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<sup>2</sup> Variation no. 2 to the Longford County Development Plan 2015-2021



**Recommendation 3:**

*Having regard to recommendation 2 and the National Policy Objectives (NPO) for Planning for the Future Growth of and Development of Rural Areas of the NPF, in particular NPOs 15, 16 and 20, the Planning Authority is required to review the overall allocation of population growth across the settlement hierarchy to achieve a more appropriate balance and distribution of growth, including to:*

- a. Increase the proportion of growth to Longford Town to facilitate a higher rate of population growth in line with its designation as a Key Town and the objectives set out in Section 4.6 and Regional Policy Objective 4.63 of the Regional Spatial and Economic Strategy;*
- b. Consider a modest increase in the growth allocation to Granard on the basis that it should be designated as a Tier 2 Self Sustaining Growth Town as detailed under Recommendation 2 and having regard to NPO9;*
- c. Reduce the population growth rate of 38.5% provided to Lanesborough over the plan period to a level commensurate with the town's services, infrastructure and position in the settlement hierarchy, and to ensure consistency with NPO 9 of the NPF to limit population growth to 2040 to 30% above the 2016 population baseline figure.*
- d. Consider providing aggregate figures in the (revised) Core Strategy for Tier 4 individual villages and smaller towns, rather than detailed figures for each settlement.*
- e. Provide a clear evidence-based approach to determine the demand for one off rural housing in the open countryside over the plan period as required under NPO 20 and under the Sustainable Rural Housing Guidelines for Planning Authorities (2005)*

**1.3 Residential Land Supply**

The RSES requires a robust evidence based analysis of demand, past delivery and potential with respect to the development of core strategies. An analysis of land supply in the Draft Plan has identified two key issues: the quantity of land zoned for residential development; and the lack of information regarding a tiered approach to zoning (TAZ).

Quantity of Zoned Land



As previously noted, County Longford has a historic legacy of excessive land use zoning, particularly in relation to residential zoned lands which is inconsistent with the policy framework in the NPF and RSES. While the Office supports the clear effort of your authority to address this issue, our evaluation indicates that the quantity of land zoned for residential use, or a mixture of residential and other uses, remains in excess of the population and housing growth targets set out in the Core Strategy. In particular, it would appear that provision has been made for a 25% headroom, which is not justified in policy terms.

The quantity of land zoned for development purposes in the Draft Plan will, however, need to be reviewed (and possibly reduced) in light of the revised Core Strategy arising from the: Housing Supply Target Guidelines (Recommendation 1).

Having regard to certain gaps in the information provided in the Draft Plan, further information will be required to provide greater clarity and transparency regarding the potential quantity of land required to meet the housing supply targets in each settlement to demonstrate consistency with Section 10(2A) of the Act and the provisions of the NPF and RSES for compact growth and sequential development, including:

- the quantity of land zoned in each settlement including the projected residential yield from land zoned for a mix of residential and other uses and Site Resolution Objective lands, and
- the basis upon which the land requirement is calculated using densities consistent with the *Sustainable Residential Development in Urban Areas Guidelines*. The Office notes that these recommended densities are not currently reflected in the Draft Plan. Whilst it is reasonable for the Draft Plan to provide a tailored approach to the consideration of residential densities for settlements depending on their size and character/function, it is nonetheless important that the Draft Plan provides for higher residential densities within the ranges advised in the Guidelines to support national and regional policy objectives for compact growth.

**Recommendation 4:**

*In accordance with Section 10(2A)(c) and 10(2A)(c) of the Planning and Development Act 2000, (as amended) and having regard to the Guidance Note on Core Strategies 2010, the Planning Authority is required to provide the following information in Table 4.12 of the (revised) core strategy:*

- a. *The Housing Supply Targets for each settlement over the plan period*





- b. *The quantity in hectares of proposed residential zoned land and land zoned for a mix of residential and other uses including an appropriate proportion of Site Resolution Objective areas which are permitted to accommodate residential use in the Draft Plan for each settlement.*
- c. *The density assumptions used to estimate the quantity of zoned land arising from NPF housing supply targets in the revised Core Strategy. These densities should comply with the recommended residential densities for large towns, small towns and villages in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2012).*

The Office also notes that there is a significant quantity of land zoned as 'Strategic Residential Reserve' in the Draft Plan which "seeks to provide for the longer-term housing requirements of the town" and which vastly exceeds the quantity of land zoned for new residential development. While it is acknowledged that this arises in most part from the legacy of over-zoning, the location of this land in most instances, is at remote locations on the fringes of towns and villages, well removed from town / village cores and is contrary to national and regional objectives to provide for compact growth (NPO3c; NSO1 and RSO2). In other instances, including at locations in Granard, Longford Town, Edgeworthstown and Ballymahon, land adjoining the town core has been zoned as Strategic Residential Reserve with New Residential zoning located further from the centre. This is contrary to the development of zoned land in a sequential manner. There are also significant areas of land zoned Strategic Residential Reserve in Ballymahon and Drumlish which are located in areas that are at risk of flooding.

Given the nature, extent and location of the lands concerned, the wording supporting the Strategic Residential Reserve objective in the Draft Plan would benefit from additional clarity to make it clear that such lands will not be considered for development under the lifetime of the proposed development plan. The development of such lands during the period of the proposed plan would not be consistent with national and regional policy objectives concerning compact growth and would be inconsistent with the Core Strategy proposed under the Draft Plan.

Having regard to the foregoing, it is possible that there may be implications for the total area of lands zoned for residential and mixed residential lands. The planning authority should



address any issues arising from the foregoing to ensure consistency with the objectives of the NPF and the RSES for compact growth.

**Recommendation 5:**

*Having regard to the quantity of land zoned for residential purposes, the Planning Authority is required to:*

- a. Reconsider and appropriately reduce the provision of all zoned residential land, and land zoned for a mix of residential and other uses, to align with the quantity of land necessary to accommodate housing supply targets in the (revised) Core Strategy.*
- b. Review the quantity of land zoned strategic residential reserve to reflect the longer term NPF population targets to 2040. As a minimum all land zoned as Strategic Residential Reserve and located in an area subject to flooding should be omitted in accordance with the provisions of The Planning System and Flood Risk Management Guidelines for Planning Authorities.*
- c. Adopt a sequential approach to the zoning of lands in accordance with RPO 4.2, such that lands in proximity to the town core are zoned for new residential use. Particular regard should be had to lands in Edgeworthstown and Ballymahon, where land in proximity to the town core has been identified as Strategic Residential Reserve and land further removed has been zoned as new residential.*

**Observation 1:**

*The Planning Authority is requested to clarify the specific wording supporting the Strategic Residential Objective in Volume 2 Appendix of the Draft Plan to ensure that no residential development proposals will be considered by the planning authority, on lands identified as Strategic Residential Reserve until after the full lifetime period of the development plan 2021-2027.*

**Tiered Approach to Zoning**

The Draft Plan (section 2.1.5) suggests rather than states categorically that the tiered approach to zoning (TAZ) has been applied, as required by the NPF (NPO 72a, NPO 72b and NPO 72c refer) and Section 10(2A)(d)(ii) of the Act. In addition, no infrastructural assessment report is attached to the Draft Plan and it is not evident which lands are already serviced or



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can connect to services, and what lands are to be provided with full services within the life of the plan to accommodate the population growth proposed under the Core Strategy.

**Recommendation 6:**

*The planning authority is required to demonstrate that the tiered approach to zoning required under the NPF (policies NPO72a, NPO72b and NPO72c refer) has been applied which should have regard to the provisions of an Infrastructural Assessment Report, details of which must be included in the Development Plan, all in accordance with the methodology set out in Appendix 3 of the NPF.*

## **2.0 COMPACT GROWTH AND REGENERATION**

The Office welcomes the strong policy commitment to the regeneration and renewal of towns and villages in the County. The Draft Plan appropriately supports a range of site activation measures including Vacant Site Levy, use of CPO powers and other incentives such as development contributions where appropriate, and the preparation of masterplans and action plans for town centre renewal. This could be further strengthened by establishing measurable targets (perhaps by settlement at the upper levels) and timelines against which the implementation can be monitored and measured.

The Core Strategy Table (Table 4.12) in the Draft Plan individually allocates 30% of future housing requirements within the top four tiers to land within the existing built up footprint<sup>3</sup> in accordance with NPO 3c and RPO 3.2. Whilst it is acknowledged in Section 6.4.1 of the Draft Plan that Longford County Council will over the lifetime of the Plan, establish a database of strategic brownfield and infill sites, it is noted that the Draft Plan does not at this stage quantify the infill and brownfield lands within the larger settlements, necessary to accommodate the 30% growth. This will impede the monitoring of the plan and it will be difficult to establish if the 30% target has been achieved at the end of the plan period.

The Draft Plan does identify brownfield lands known as Site Resolution Objective lands in some of the towns including Longford, Ballymahon, Aughnacliffe, Drumlish and Keenagh, but these lands have not been quantified. It would appear that these lands partially represent

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<sup>3</sup> This means within the existing built-up footprint of all sizes of urban settlement, as defined by the CSO in line with UN criteria i.e. having a minimum of 50 occupied dwellings,



unfinished housing estates and in some instances include extensive greenfield areas, largely situated on the periphery of town and village cores. Whilst the identified lands in Drumlish appear to have been developed, the lands in smaller settlements such as Aughnacliff also include extensive areas of undeveloped land which appear to be in excess of Core Strategy requirements.

The Office recognises the benefits in ensuring that unfinished housing estates are completed and acknowledges that a balanced approach must be adopted in the management of such estates. It is however considered that the quantity and location of lands identified as Site Resolution Objective should be more fully considered such that they comply with the housing requirements provision set out in the Core Strategy, support compact growth and meet the brownfield definition as set out in the Sustainable Residential Development in Urban Area Guidelines.

#### **Recommendation 7:**

*The Planning Authority is required to:*

- a. *Define those areas of settlements which will contribute to the cumulative delivery of 30% of all new homes within the built-up footprint of existing settlements, inclusive of land zoned as Site Resolution Objective.*
- b. *Evaluate the extent and location of lands identified as Site Resolution Objective and demonstrate consistency with the housing and population requirements set out in the Core Strategy and policy promoting compact growth through application of the brownfield definition as set out in the Sustainable Residential Development in Urban Area Guidelines. This may necessitate a reduction in the Site Resolution Objective boundary applied to individual sites, particularly in instances where extensive greenfield land is included within the zoning objective.*

## **2.2 Flooding**

It is evident from the SFRA that flood risk is a significant issue in the county. Some residential land use zoning provisions particularly relating to Site Resolution Objective and Strategic



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Residential Reserve are located within flood risk zones, including for example, an area of land in Longford Town zoned "Site Resolution Objective". The inclusion of such land within the landuse zoning map has been rationalised in the Draft Plan on the basis that the land has been afforded a 'Constrained Land Use' designation (on a separate map to the landuse zoning map). This designation is intended to limit new development but does facilitate existing development uses that may require small scale development such as small extensions. However, in a lot of instances it is noted that this designation applies to extensive greenfield sites, identified as Strategic Reserve and Site Resolution Objective, where there are no existing development uses.

The SEA also notes that a justification test has not been undertaken as required by The Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014.

#### **Observation 2:**

*The Planning Authority is advised to review the Strategic Flood Risk Assessment (SFRA) to ensure consistency with the Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014. The land use zoning objectives under the Draft Plan are also required to be reviewed and amended, having regard to the revised SFRA. For land that is deemed to be of moderate or high flood risk and is sequentially preferable and could contribute to compact growth, it will be necessary to undertake a Justification Test within the context of the SFRA. The Office of Public Works should be consulted in relation to the matters raised in this recommendation.*

### **2.3 Standards and Guidelines**

The Draft Plan makes reference to a number of relevant Development Management Standards applicable to development projects and which support the overall objectives in the Draft Plan, including the objective to achieve greater compact growth. However, the Office has a number of concerns relating to specific Guidelines and standards as follows:

- While it is noted that the Draft Plan does refer to the *Urban Development and Building Heights Guidelines for Planning Authorities (2018)* in Section 16.4.5.9 under DMS16.54, it does not refer to the Specific Planning Policy Requirements (SPPRs) 1 – 4. CPO 6.4 promotes increased urban densities and building heights at suitable locations in accordance with the settlement hierarchy and whilst two criteria are advanced in the



consideration of development proposals including DMS16.20 and DMS16.21, no reference is made to the Guidelines.

- The plot ratio standards in Section 16.4.5.4 are considered low and could militate against the principle of promoting appropriate density and compact growth in Longford Town. It is considered that the plot ratio standards should be removed from the Draft Plan with individual development proposals being assessed on performance based criteria dependent on location and individual site characteristics in accordance with the provisions of NPO13.
- While section 16.4.5.10 promotes apartment developments in appropriate locations subject to the design criteria as set out in the *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities*, it is noted that DMS 16.5 discourages the provision of large-scale apartment complexes except in exceptional circumstances whilst DMS16.58 promotes studio apartments of 40sqm floor area contrary to the Guidelines. The table in the Draft Plan also omits reference to one bed apartments, thereby suggesting that one bed apartments are not promoted in the Draft Plan. The Office considers that apartment provision should be more proactively promoted in the Draft Plan in accordance with the SPPR's stated in the Guidelines.
- The Draft Plan does not set out car parking standards based on performance criteria dependent on location but rather promotes a blanket standard across the county. This provision does not align with NPO 13. Further, the cycle parking of 1 space per dwelling / apartment also appears to conflict with the apartment Guidelines.

**Observation 3:**

*The Planning Authority is advised to:*

- a. *Provide relevant information to show that the Draft Plan and Housing Strategy are consistent with the specific planning policy requirements (SPPRs) specified in the 'Urban Development and Building Heights Guidelines for Planning Authorities' (2018) by more fully demonstrating consistency with SPPR 1 and explicitly addressing SPPR 2, SPPR 3 and SPPR 4;*
- b. *Amend the Draft Plan's policies on apartment development to be fully consistent with the relevant SPPRs in the 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' (2018). In this regard, policy DMS16.5 should be deleted and policy DMS16.58 amended to ensure consistency with SPPR3, and adequate reference to one bed apartments included.*



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- c. *Review the car parking standards promoted in the Draft Plan to ensure that appropriate maximum standards are included for both residential and commercial developments in urban areas in accordance with NPO 13.*
- d. *Remove the plot ratios promoted in Section 16.4.5.4 of the Draft Plan and instead state that individual development proposals will be assessed on performance based criteria dependent on location and individual site characteristics in accordance with the provisions of NPO 13.*
- e. *Amend the bicycle parking requirement in the Draft Plan to ensure compliance with the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, which requires one space per apartment bedroom.*

### **3.0 RURAL HOUSING AND RURAL REGENERATION**

Longford is a predominantly rural county and it is important that the countryside continues to be a living and lived-in landscape, focusing on the requirements of rural economies and rural communities as recognised by the NPF.

At the same time, it is imperative that development plan policy protects against ribbon and over-spill development from urban areas, and supports the National Strategic Outcomes of compact growth, sustainable mobility, transition to a low carbon and climate resilient society and sustainable management of environmental resources.

Consistent with national and regional policy objectives, the Draft Plan seeks to manage and negate the pressure for overspill urban generated rural housing particularly in locations in proximity to the principle larger towns such as Longford Town. This is of particular importance to County Longford having regard to the high levels of rural housing growth experienced in the county during the last inter census period comparative to urban housing growth<sup>4</sup>.

The Office particularly welcomes the policy emphasis on housing within Serviced Rural Villages and the promotion of serviced sites as a viable and attractive alternative to housing in the open countryside (CPO4.15 and CPO 4.19).

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<sup>4</sup> The CSO reports that 51.91 % of all homes constructed in Longford since 2011 consist of one-off housing<sup>4</sup> whilst the Draft Plan confirms that between 2012 and 2019, 64.1% of housing planning permissions in County Longford have been in the open countryside for one-off rural housing



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The Office notes that the Draft Plan identifies rural area types, based upon section 3.2 of the *Sustainable Rural Housing Guidelines for Planning Authorities* (2005). Namely, much of the county is designated as either 'Areas under Strong Urban Influence' as 'Stronger Rural' or as 'Structurally Weak'. The rural housing policy also identifies a 'Broad Zone Rural Area' which is of *'high amenity value and recreational potential associated with the major rivers and lakes in the County as well as the Royal Canal and areas of outstanding landscape quality in the northern fringes of the County'*.

NPO 19, however, makes a distinction between only two types of areas for rural housing: (i) areas under urban influence and (ii) rural areas elsewhere, and recommends a policy approach for each area.

Leaving aside the 'Broad Zone Rural Area'; the geographical and spatial extent of the rural area classification appears to be based on population levels at Electoral District (ED) level and those ED boundaries. These definitions and spatial extent do not appear to reflect commuting flows or proximity and accessibility to large towns, which are asset criteria which the Draft Plan suggests has informed its 'compact growth' model for the settlement hierarchy (Table 4.2 refers). Whilst commuting is not the only criteria consideration of relevance, it is considered relevant in the context of a rural county which displays high levels of rural housing and associated car-dependency and has a number of national roads including the N4, N5 and N55. In particular it is considered that the area east of Edgeworthstown along the N4 may need to be revisited within the context of its rural area classification.

The housing need criteria likewise makes no distinction between 'Rural Areas Under Strong Urban Influence' and 'Stronger Rural Areas' and 'Broad Zone Rural Areas' as required under NPO19. The qualifying social and economic criteria for prospective applicants, seeking planning permission to build one-off rural housing within 'Rural Areas Under Strong Urban Influence', appears to be the same and is set out under Policy CPO4.22. In addition to the lack of distinction between the different areas, the qualification criteria are not consistent with the core consideration of demonstrable economic or social need to live in a rural area as required under NPO 19.

## **Recommendation 8**





*The planning authority is required to revise the Draft Plan's policy in respect of Housing in the Open Countryside (sections 4.8.11 and 4.8.12) to ensure consistency with NPO19 including:*

- (a) to revise the rural typologies including mapping (Figures 4.5 and 4.6) to comply with NPO 19. The identification of areas under urban influence should be based on clear criteria including realistic commuter catchments of the larger towns and centres of employment (both inside and beyond the county boundaries) and main commuting routes including the N4, N5, and N55.*
- (b) Amend the rural housing policy objectives and the specific criterion demonstrating social or economic need to reside in that area in Chapter 4, such that policy measures for rural one-off housing in 'Rural Areas Under Strong Influence' are distinct and separate to other defined areas including 'Stronger Rural Areas', in compliance with NPO19.*
- (c) revise the policy framework for rural areas under strong urban influence and delete aspects, including references to bloodline / family ties, that are not consistent and based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans as set out in National Policy Objective 19..*

It is also advisable that the planning authority include provision for monitoring residential development permitted as single rural houses as is proposed for individual settlements under CPO 4.47.

The Office welcomes the identification of development boundaries for the rural clusters within the County. It is noted, however, that development boundaries applied to the rural clusters often do not reflect the extent of established settlement on the ground and could result in ribbon development extending on the approach roads to such clusters contrary to the *Sustainable Rural Housing Guidelines for Planning Authorities (2005)*.

**Observation 4:**

*The Planning Authority is advised to review the development boundaries applied to un-serviced rural clusters to reflect the extent of the established settlement; and promote a sequential approach to development to ensure compact growth and avoid ribbon development consistent with the guidance in Sustainable Rural Housing Guidelines for*



*Planning Authorities (2005). Provision for monitoring residential development permitted as single rural houses as is proposed for individual settlements should also be provided for under CPO 4.47.*

#### **4.0 ECONOMIC DEVELOPMENT AND EMPLOYMENT**

The Office welcomes the approach to economy and employment under the Draft Plan, which aims to encourage employment growth and economic activity, and promote Longford as a local and regional centre of trade, business and tourism, consistent with the provisions of the RSES. The relevant chapter also appropriately addresses the potential economic development of lower tier settlements and the rural economy. In particular, it highlights the significant implications for County Longford arising from the Just Transition process, particularly given the closure of the power station in Lanesborough. However, the quantity and location of employment zoned land throughout the settlements is of some concern in terms of promoting compact growth and sustainable transport.

The Office also welcomes the inclusion of the Longford Retail Strategy as part of the Draft Plan contained in Volume 3 Annexes. However, within the Retail Strategy there are two fundamental concerns, including an apparent conflict between the proposed retail and settlement hierarchies; and the extent and spatial location of land zoned for employment purposes, which has the potential to accommodate significant convenience and comparison retail development in out of centre locations.

##### **4.1 Quantity and Location of Employment Zoned Land**

The Draft Plan has four different employment land use typologies, each permitting different employment uses. It is noted that only two of the four different land use typologies are included in the Land Use Zoning Matrix. Accordingly, the difference between the land use typologies is not clear and requires further consideration and standardisation in the Draft Plan. In this regard there is an opportunity to rationalise and reduce the number of employment zonings in the Draft Plan thereby ensuring greater clarity and consistency.

Upon review of the Draft Plan and in the absence of an appropriate evidence-based approach to justify employment land use zonings, it would appear to the Office that the land proposed for employment purposes (including Strategic Industrial Reserve) in the settlements of



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Longford, Edgeworthstown, Ballymahon, Granard and Drumlish is significant in the context of anticipated population growth in the county and the need / demand arising for same.

The spatial location and quantity of land zoned for employment uses should be reviewed having regard to principles of compact growth and sequential approach to development, and to the *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)*.

Further, it is noted that some of the land identified as Strategic Industrial Reserve and areas of other similar economic / employment zonings ('Industrial / Alternative Energy' and 'Airport Development Objective') are also located within a flood risk zone. In the absence of a Justification Test (SFRA confirmed Justification Test was not necessary) such zoning is inconsistent with the Flood Risk Management Guidelines for Planning Authorities.

**Recommendation 9:**

*The Planning Authority is required to*

- a. *Provide an evidence-based justification for the quantity and location of all employment generating land use zonings (or for the inclusion of a very significantly reduced area) and must reconsider the location and appropriately reduce the provision of all zoned employment generating land uses, in particular where:*
  - i. *A sequential approach to the zoning of such lands has been undertaken such that there are other more suitable lands in proximity to the town core which could accommodate new employment generating uses.*
  - ii. *Conflicts arise with Section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) concerning potential adverse impacts on the capacity of national roads and associated junctions, with specific reference to the location of land adjacent or close to existing, new or planned national roads/motorways*
  - iii. *Conflicts arise with the The Planning System and Flood Risk Management Guidelines for Planning Authorities, where land deemed to be of moderate or high flood risk and has been zoned for employment generating purposes (see also Observation 2), unless such land is sequentially preferable and could contribute to compact growth, in which case it will be necessary to*



*undertake a Justification Test within the context of the Strategic Flood Risk Assessment (SFRA).*

- b. Omit all land zoned as Strategic Industrial Reserve where such land is deemed to be of moderate or high flood risk.*
- c. Omit land zoned for employment generating purposes in Edgeworthstown and Drumlish, where such land is deemed to be of moderate or high flood risk, unless such land is sequentially preferable and could contribute to compact growth and such provision has been examined in the SFRA.*
- d. Refine and further clarify the landuse zoning objectives and associated permitted uses for the 'Airport Development Objective' land in Abbeyshrule and ensure that only appropriate employment uses, (exclusive of any retail, hotel or showroom use) are permitted to locate on such land.*
- e. Reduce and standardise the employment land use typologies contained in the Draft Plan, in the interest of transparency and clarity,*

#### **4.2 Retail Development**

The proposed retail hierarchy as detailed in Table 5.2 of the Longford Retail Strategy (LRS) appears to be in conflict with the settlement strategy proposed in the Draft Plan such that Granard has been identified as a Tier 3 Self Sustaining Town in the Settlement Strategy which only supports contained growth. In contrast it is identified as a Key Service Centre in the Longford Retail Strategy with potential to accommodate large to medium convenience and medium scale comparison retail uses. Similarly, Edgeworthstown and Ballymahon identified as Self Sustaining Growth Towns in the Settlement Strategy are identified as Service Centres in the Retail Strategy and are restricted to accommodating medium scale convenience and small to medium scale comparison including tourism related comparison. In the interest of achieving sustainable growth in line with development plan objectives, it is necessary that both the settlement and retail hierarchy align.

In respect of employment landuse zonings supporting retail uses, it is noted that the land use zoning objective for 'Industrial / Commercial' permits convenience, comparison and retail warehousing deeming such uses to be either permissible or open for consideration. Industrial/commercial landuses within settlements are generally on edge or out of centre locations, and in some instances are located on or in proximity to National Roads. Having regard to the need to prioritise retail provision within town cores and to adopt a sequential approach to development as set out in the *Retail Planning Guidelines 2012*, along with the



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need to preserve the capacity of the national road network as set out in Section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)*, it is considered that the extent and scale of retail uses permitted or open for consideration under employment generating zonings must be reconsidered.

Similarly, and notwithstanding the information contained as part of the Draft Plan and Retail Strategy at Annex 7, it is considered that further clarification should be provided regarding the need for the quantity of additional retail floorspace, having regard to the the (revised) Core Strategy and the level of vacant retail floorspace available.

**Recommendation 10:**

*The Planning Authority is required to*

- a. Review and amend the quantity of additional retail floorspace, having regard to the the (revised) Core Strategy and the level of vacant retail floorspace available.*
- b. Ensure that the position of Granard within both the Settlement Hierarchy and the Retail Hierarchy align, with specific reference to Table 6.1 of the RSES. In consideration of this recommendation, regard should be had to Recommendation 2 above.*
- c. Review and omit the provision of comparison and convenience retail uses within all employment generating land uses on edge and out of centre sites, including Industrial/Commercial landuse; Industrial/Commercial/Warehousing landuse and Light Industrial / Commercial/ Servicing landuse, unless such land is sequentially preferable and could contribute to compact growth and such provision has been justified in the Longford Retail Strategy;*
- d. Provide a new policy objective in the Plan to reference the explicit presumption against out of town retail centres located adjacent or close to existing, new or planned national roads/motorways in accordance with the provisions of the Retail Planning Guidelines, 2012.*

**5.0 TRANSPORT AND ACCESSIBILITY**



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The Office welcomes promotion in the Draft Plan of the need to pursue integrated landuse and transportation to facilitate compact growth and particularly acknowledges the objectives of the Draft Plan to contribute towards a low carbon society in tandem with public transit improvements as an alternative modal choice to the private car in line with Government's transport policy, Smarter Travel: A Sustainable Transport Future, A New Transport Policy for Ireland 2009 – 2020. However, it is unclear from the settlement hierarchy and zoning strategy (referred to above) or from the generalised policies set out in Chapter 5 of the Draft Plan, how the proposed settlement strategy or any specific measures will reduce travel demand or maximise the efficiency of the transport networks and public transit systems, in the manner envisaged under the Government's Smarter Travel policy.

### **5.1 Settlement Hierarchy & Sustainable Transport**

The Office notes that a key priority for the Draft Plan (Section 5.2) is the development of a sustainable transport system and promoting measures to increase the use of public transport, while also increasing the modal share for walking and cycling in towns and villages across the County. However, the Draft Plan does not provide baseline figures for the existing modal split for existing settlements. Including baseline figures would enable the setting of achievable targets for modal change for individual settlements (e.g. Longford, including as part of the Local Transport Plans) and/or by settlement type (self-sustaining growth towns, etc.).

Relevant baseline data is available through the Census POWSCAR. Modal share targets should be provided on an individual basis for higher order growth towns. An aggregated level might be more appropriate for the 'Towns and Villages' and, for the 'Rural Area' (inclusive of Service Rural Villages and Clusters) as defined in the settlement hierarchy. This is particularly important in the context of Longford where Census 2016 data reveals a higher car dependency for commuting than the national average, and where the Plan acknowledges that just 1.7% of work commuters availing of public transport compared to 9.3% nationally.

It is noted that a Local Area Plan for Longford Town (CPO 4.8 and CPO 5.9) will be prepared within two years of adoption of the Development Plan and that such preparation will be informed by a Local transport Plan.

In addition to the LTP for Longford Town, the integrated landuse and transport planning in higher order settlements, should consider pursuing sustainable transport patterns such as the '10 minute' neighbourhood (promoted in the RSES) where community services and facilities



are encouraged and facilitated within accessible walking and cycling distances in order to achieve modal shifts and greater use of walking and cycling.

As outlined in recommendations 4, 9 and 10 above, the quantity of lands zoned for residential and employment / industrial uses including strategic reserve and the locations of same at the edge of settlements may undermine other policy objectives to achieve compact and sequential growth with lower transport demands in the plan.

In the absence of clear direction as to what the planning authority intends to achieve in terms of sustainable transport for urban and rural areas over the plan period, including the setting of targeted objectives and associated policies and measures, it is considered that the Plan does not contain a sufficiently clear, sustainable transport strategy consistent with the requirements of section 10(2)(n) of the Act, and which endeavours to contribute to the Government's Smarter Travel Policy of reducing car commuting from 65% - 45% whilst promoting modal shifts to public transport, walking and/or cycling.

**Recommendation 11:**

*The Planning Authority is required to review its approach to sustainable movement and accessibility under Chapter 5 of the Draft Plan to provide for sustainable transport strategies for the county's urban and rural areas, consistent with section 10(2)(n) of the Act and in light of the recommendations made relating to the quantity and location of zoned land (Recommendations 4, 9 & 10). The Draft Plan should include targeted objectives of what the plan intends to achieve in terms of sustainable transport over the plan period, in respect of the various transport modes and the priorities for same under Government transport policy including setting modal share targets.*

**5.2 DMURS**

Specific reference in the Draft Plan is noted and welcomed relating to street and road design and the Design Manual for Urban Roads and Streets (DMURS) to; 'ensure the sustainable efficient movement of people and goods within the County', However, it is noted that Policy Objective CPO7.6 states that it is an objective to only 'have regard to' DMURS. Such an approach is considered inconsistent with the objective of RPO 9.10 to support a shift to sustainable modes of transport and use of innovative design solutions to reduce car dependency.



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## Observation 5

*The Planning Authority is advised to review Policy Objective CPO 7.6 (and/or the provisions of Chapter 7 generally) and Development Management Standards DMS 16.5, DMS 16.7 and DMS 16.112, so to comply with the provisions and application of the Design Manual for Urban Roads and Streets (DMURS) for new development.*

### 5.3 Spatial Planning and National Roads Guidelines for Planning Authorities (2012)

The Office acknowledges the policy objectives for national roads contained in Chapter 5 of the Draft Plan. Specifically, Policy Objective CPO5.17 seeks to protect routes of strategic importance within the county. However, having regard to the *Spatial Planning and National Roads - Guidelines for Planning Authorities 2012*, it is considered that there is scope to strengthen and expand on the policy objectives for national roads, particularly in relation to avoiding the creation of new accesses and the intensification of existing accesses to national roads where a speed limit greater than 50 kph applies.

#### **Observation 6:**

*The Planning Authority is advised to review and strengthen the policy objectives for national roads (CPO5.17, CPO5.15, CPO5.16, CPO5.59) to ensure that adequate policy is in place to maintain the strategic function, capacity and safety of the county's national roads network in accordance with national policy and guidance including the Strategic Investment Framework For Land Transport (DTTaS, 2014), Smarter Travel (DTTaS, 2009) and the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). In this regard, the planning authority should consult with Transport Infrastructure Ireland.*

## 6.0 CLIMATE ACTION AND RENEWABLE ENERGY

### 6.1 Climate Action

The efforts that the planning authority has made to include policies and objectives supporting climate change in the Draft Plan is acknowledged and commended. Further, the Office notes





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that the planning authority has correctly considered climate change as a cross cutting theme across all chapters of the Draft Plan and this is a welcomed approach.

At the same time, the manner of addressing climate change in statutory development plans is the subject of ongoing policy development. Accordingly, it would be prudent to include an objective in the Draft Plan to the effect that an assessment will be undertaken in relation to the implications of the introduction of such future policy mechanisms, with a view to varying the plan as made to ensure consistency with relevant climate assessment and development plan guidelines.

**Observation 7:**

*Given the importance attributed to climate action by Government, as evidenced by, inter alia, the publishing of the Climate Action Plan 2019, the planning authority is advised to include an objective to consider a variation of the development plan within a reasonable period of time, or to include such other mechanism, as may be appropriate, to ensure the development plan will be consistent with the approach to climate action recommended in the revised Development Plan Guidelines as adopted or any other relevant guidelines.*

**6.2 Renewable Energy**

The provisions and range of policies and objectives supporting renewable energy development under Chapter 5 Transport, Infrastructure, Energy and Communications of the Draft Plan are acknowledged. Whilst the Draft Plan does not contain a separate renewable energy strategy or wind energy strategy, the Office notes that the Draft Plan does have a policy objective that states that a renewable energy strategy for the county will be prepared within the lifetime of the plan (CPO 5.129).

However, the Draft Plan does not identify how the county will contribute to realising national climate change and renewable energy targets including specific targets in megawatts for wind energy potential in the county as required by the Specific Planning Policy Requirement (SPPR) in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017). In identifying the potential contribution of your County, it is considered that further scope for renewable energy, and in particular wind energy, may be possible in Longford.



It is also important that consistency is achieved across county boundaries when identifying areas for wind energy development potential. In this regard, the Office would highlight the potential role of the Regional Assembly to co-ordinate wind energy and other renewable energy sources across the region, having regard to RPO 7.35 to identify Strategic Energy Zones as areas suitable for larger energy generating projects. In relation to the Draft Plan, it is noted that lands identified in the Draft Plan identified as 'Non-Preferable Areas' for wind farm potential to the north of the settlement of Lanesborough are identified as 'most favoured' areas for wind energy development potential in the Roscommon County Development Plan 2014-2021.

**Recommendation 12:**

*In accordance with the provisions of section 28(1C) of the Act, the planning authority is required to amend the Draft Plan in order to fully implement the Specific Planning Policy Requirement contained in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change. This will require the planning authority to indicate how the designation of areas for renewables development under the policies and objectives of the plan will contribute to meeting national renewable energy targets including specific targets in megawatts for wind energy potential in the county. In the absence of any nationally determined targets for County Longford specifically, you are advised to demonstrate appropriate metrics in this regard, which could include Longford's share of estimates of additional national renewable electricity target (4GW) as defined by the % of national land area represented by the county, linked back to the cumulative renewable energy production potential of the areas designated for renewables development.*

## **7.0 ENVIRONMENT, HERITAGE & AMENITIES**

Chapter 12 Natural Heritage and Environment addresses the mandatory objectives relating to the protection and conservation of the natural environment, including objectives to protect the water resources of the county through compliance with policies including the Water Framework Directive and to improve air quality. The Draft Plan also provides a framework for identification, assessment, protection, management and planning of landscapes



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having regard to the European Landscape Convention. The Office considers these provisions to be satisfactory.

Section 10(2)(o) of the Act requires public rights of way to be located on both a map and on a list appended to the development plan. The Draft Plan addresses Section 10(2)(o) by identifying walking trails and routes on the map in Volume II Appendix 8: Green Infrastructure. In order to align with the provisions of the Act, however, the development plan is required to include a list and provide the location of public rights of way in the county. The planning authority's attention is drawn to the approach followed in the Westmeath draft County Development Plan which is considered to provide a good example of how this requirement can be addressed.

**Observation 8:**

*To ensure compliance with Section 10(2)(o) of the Act, the planning authority is required to include a list and provide the location of public rights of way in the county.*

## 8.0 GENERAL AND PROCEDURAL MATTERS

**Observation 9:**

*In accordance with section 28 (1B) of the Act, the Planning Authority is required to provide a Statement of Compliance with Ministerial Guidelines to demonstrate how the planning authority has implemented the policies and objectives of the Minister contained in the guidelines or if applicable, that the planning authority has formed the opinion that it is not possible, because of the nature and characteristics of the area or part of the area of the development plan, to implement certain policies and objectives of the Minister contained in the guidelines.*

**Observation 10:**

*The Planning Authority is requested to address a number of inconsistencies in the Draft Plan including:*

- a. *Section 4.8.10 of the Draft Plan in relation to Towns and Villages states that this tier of the Settlement Hierarchy comprises of eleven towns and villages, but the Core*



*Strategy Table only lists six towns and villages whilst the Core Strategy Map identifies ten.*

- b. There are inconsistencies between the Core Strategy map and table such that the villages of Ballinamuck, Carriglass, Ardagh, Clondra and Abbeyshrule are identified as 'Towns and Villages' on the Core Strategy Map but yet are identified in the Settlement Hierarchy in Table 4.11 under the Rural Tier as 'Serviced Rural Villages', save for Carriglass which is identified as a Rural Settlement Cluster.*
- c. The Landuse Zonings Categories and Objectives Table detailed in Volume 2 Appendices of the Draft Plan (pp.2) contains a number of landuse zoning categories which are not used in the zoning maps. It would appear that there are a number of zoning categories, for example Hi-Tech/Light Industrial/Employment Generating, which are not allocated in the Draft Plan and therefore should be removed from the text. Further, there is an opportunity to rationalise and reduce the number of employment zonings in the Draft Plan thereby ensuring greater clarity and consistency (Recommendation 9(e)).*

**Observation 11:**

*To enhance transparency and provide for greater consistency with commonly accepted practice, the Planning Authority is requested to:*

- a. Overlay the flood risk maps on the zoning maps for each settlement to provide for greater transparency regarding flood risk and the need for site specific flood risk assessments outlined in the SFRA.*
- b. Use a standard colour for different landuse zonings across all settlements thereby ensuring consistency for the user. For example, the town centre zoning in Granard is afforded a yellow colour whilst town centre zonings in other settlements are a grey colour.*

**SUMMARY**

The Office requests that your authority addresses the recommendations outlined above. The report of the Chief Executive of your authority prepared for the Elected Members under Section 12 of the Act must summarise these recommendations and the manner in which they will be addressed.



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Your authority is required to notify this Office within **five working days** of the decision 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 shall inform the Office and give reasons for this decision.

The Office acknowledges that meeting the requirements of the above recommendations and observations will require a lot of work. That work is required and should be prioritised to ensure that this Office can conclude that its adoption is in alignment with your authority's wider statutory obligations.

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*.

Yours sincerely,

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Anne Marie O'Connor  
Deputy Regulator and Director of Plans Evaluations

