

Sub 36

Deirdre Skelly

From: OPR Plans <plans@opr.ie>
Sent: Tuesday 10 August 2021 15:55
To: cdp
Subject: EXTERNAL - OPR Submission on MAs to Draft Longford CDP 2021-2027
Attachments: 2021.08.10 OPR Submission on MAs to Longford County Development Plan 2021-2027.pdf

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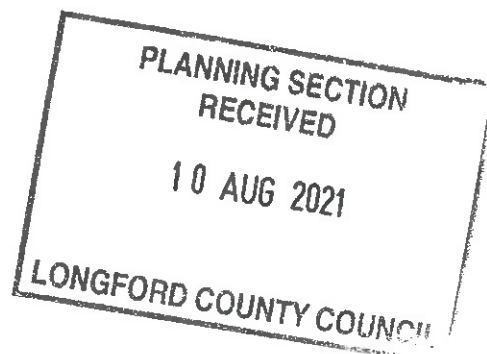
A chara,

Please see attached the OPR submission on the Material Alterations to the Draft Longford County Development Plan 2021-2027.

Kind regards,
Seán Woods
Executive Officer, Statutory Plans Evaluation

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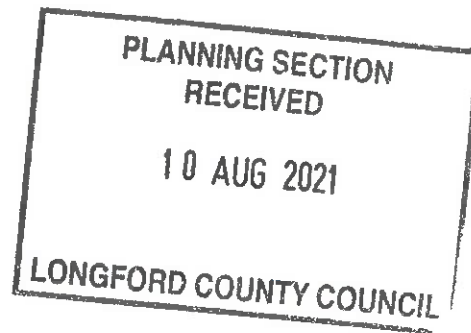
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10th August 2021

Administrative Officer,
Review of County Development Plan,
Forward Planning Department,
Áras An Chontae,
Longford County Council,
Great Water Street.
Longford,
N39 NH56

Re: Material Alterations to Draft Longford County Development Plan 2021-2027

A chara,

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

The Office commends your authority's evident commitment to maintain the progress of the plan-making process in the face of considerable restrictions resulting from public health advice, which drew upon the hard work and professionalism of staff and the engagement of the authority's members.

The Office has evaluated and assessed the material alterations to the draft Plan under the provisions of sections 31AM(1) and (2) of the *Planning and Development Act 2000* (the Act), as amended, and within the context of the Office's earlier recommendations and observations.

In this regard, the Office welcomes the majority of the material alterations in particular the revisions to the settlement hierarchy and the future distribution of population and housing across same, and the alterations which in general reduce the



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quantum of land zoned to be more consistent with the anticipated future growth of settlements.

Overview

As outlined in the submission of the Office to the draft Plan, the Office considered the draft Plan to be generally consistent with the policies in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area. It recommended a number of amendments to enhance its alignment with national and regional policies, and for consistency with *Section 28 Guidelines*.

The Office acknowledges that the material alterations have addressed many of the issues raised in the Office's submission and welcomes, in particular, the proposed material alterations to the settlement strategy including the designation of Granard as a Self-sustaining Growth Town at tier 2. The planning authority has appropriately revised the allocation of population growth across the settlement hierarchy to achieve a more appropriate balance, and to ensure that the growth ambitions for the key town of Longford can be realised.

In particular, the Office commends the planning authority for its significant efforts in addressing the legacy of excessive zoned land in the county. The material alterations significantly reduce the extent of residential zoned land and strategic residential reserve land in the settlements. Although concerns remain with the extent of strategic residential reserve land zoning in Ballymahon, the Office notes the clear efforts of your authority in respect of other settlements, including the omission of the Site Resolution Objective zoning from all settlements.

The Office also positively notes that the settlement hierarchy in respect of Rural Longford has been amended and that an additional Tier (Serviced Rural Villages) has been added to the settlement hierarchy to include the four villages of Abbeyshrule, Ardagh, Ballinamuck and Clondra (Tier 5). This material alteration seeks to support Development Plan Objective CPO 4.15 which supports housing and repopulation taking place in a consolidated, sustainable, and sequential manner, and

promotes the provision of serviced sites in order to attract people to build their own homes.

While the planning authority is strongly commended for amending the rural typology mapping as requested under Recommendation 8(a), the Office notes that the planning authority has reverted to the rural housing policy provisions contained in the Longford County Development Plan 2015 - 2021, which are not based on the core consideration of demonstrable economic or social need to live in a rural area.

The Office has also identified a small number of proposed amendments that are inconsistent with national and regional policy relating to residential zonings in Drumlish and Clondra and the Strategic Residential Reserve zoning in Ballymahon. These are addressed in the recommendations below.

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

The planning authority will note that recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under Section 28. As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.



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The submission below sets out seven recommendations and three observations under following eight key themes:

1. Residential Land Supply
2. Zoning
3. Rural Housing
4. Flood Risk Management
5. Strategic National Road Network
6. Climate Action
7. Economic Development
8. Built Heritage

1. Residential Land Supply

The Office is mindful of the fact that one of the core strategic aims of the draft Plan (Aim 3) is *“to identify the appropriate quantum, location and phasing of development considered necessary to provide for future population growth over the plan period in accordance with National Planning Framework and Eastern and Midland Regional Spatial and Economic Strategy”*. Notwithstanding Recommendation 4b of the Office’s submission on the draft Plan (18 January 2021), the revised core strategy continues to provide for the quantum of land zoned for new residential use only and does not provide the quantity in hectares for land zoned for a mix of residential and other uses.

The land use zoning matrix (Appendix 2) confirms that residential use is either permitted or open for consideration on land zoned for town centre; strategic residential reserve; and light industrial/commercial servicing. A proportion of these ~~lands are capable of accommodating residential use and have not been factored into~~ the land requirement and associated supply, defining the Core Strategy.

The Chief Executive's Report (Section 5.3.2) details the response to the Core Strategy issues which were raised by the Eastern and Midland Regional Assembly at draft Plan stage, which similarly reflected the concerns of the Office as detailed under Recommendation 4b of the Office's submission on the draft Plan. In response, the Chief Executive's Report confirms that it was proposed to amend the table to provide for an additional column indicating amongst other things, the quantum of land in hectares zoned mixed use and town / village centre including Opportunity Sites; the potential number of residential units to be delivered on mixed use and town / village centre zoning including Opportunity Sites (according to applicable densities); and the number of residential units that can be accommodated on brownfield / infill sites for each relevant settlement.

This recommendation in the Chief Executive's report does not appear to have been included in the material alterations to the draft Plan and the Office remains concerned that such an omission may have direct implications on the extent of New Residential land that is zoned to accommodate future population growth and housing need.

MA Recommendation 1

MA Recommendation 1 - Core Strategy

The planning authority is required to amend the core strategy table to ensure it complies with Section 10(2A)(c) and 10(2A)(d) of the Act and the *Guidance Note on Core Strategies* (2010). In this regard, an additional column is required in table 4.12 to quantify in hectares the land zoned for a mix of residential and other uses including an appropriate proportion of town centre; light industrial/commercial servicing, and Canal Redevelopment Areas, all of which either permit residential use or provide for it to be open for consideration in the draft Plan.

2. Zoning

The Office commends the planning authority for proactively addressing the legacy of over zoning in the county, by proposing a number of material amendments which



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significantly reduce the extent of residential and strategic reserve land, along with consideration of a sequential approach to the zoning of lands, particularly in the settlements of Edgeworthstown and Ballymahon.

Notwithstanding such endeavours, there still remains significant land zoned for Strategic Residential Reserve in Ballymahon, which equates to 4.5 times (c. 29 hectares) the extent of new residential zoned land required (c. 6 hectares) for the Plan period. The extent of such landuse zoning in Ballymahon, associated with a policy objective that can facilitate residential development in exceptional circumstances, has the potential therefore to distort the core strategy and the delivery of compact and coordinated growth in settlements.

In respect of Observation 1 of the OPR submission on the draft Plan, the Office notes that the planning authority did not make changes to the Strategic Residential Reserve zoning objective to clarify 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 as recommended by the Chief Executive.

Furthermore, material amendment AP.1C.5 proposes, inter alia, to change land identified as parcel numbers 4 and 5 and 6 from New Residential to Strategic Residential Reserve zoning. Having regard to the quantity of land zoned for Strategic Residential Reserve purposes relative to the quantum of land required to facilitate growth over the plan period in Ballymahon, and the location of parcel numbers 4 and 5, the Office advises that the zoning of the aforementioned should be reconsidered.

MA Recommendation 2

MA Recommendation 2 - Strategic Residential Reserve Land Use Zoning

Having regard to the quantum of land that continues to be zoned as Strategic Residential Reserve in Ballymahon, its position in the settlement hierarchy and anticipated future growth and national policy objectives promoting compact growth



and sequential development in particular National Policy Objective (NPO) 3c and NPO 72 (a, b and c), the planning authority is required to:

Amend the Strategic Residential Reserve Zoning Objective to clarify that no residential development proposals will be considered by the planning authority, until after the full lifetime period of the development plan 2021-2027 consistent with the recommendation of the Chief Executive in response to Observation 1 of the Office.

Alternatively, the planning authority may make the following changes to land affected by the material alterations:

- (i) amend the zoning of land parcel 4 in Ballymahon which is proposed for rezoning to strategic residential reserve as part of Material Amendment AP.1C.5 to 'No Zoning'; and
- (ii) amend the zoning of land parcel 5 in Ballymahon which is proposed for rezoning to strategic residential reserve as part of Material Amendment AP.1C.5 to 'No Zoning'.

A number of additional material amendments also insert additional 'Residential' and 'New Residential' zonings for Tier 4 Towns & Villages and Tier 5 Serviced Villages. The Office considers that the following proposed amendments to land use zonings are not justified due, in particular, to the incomplete application of the requirements under *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009), including the plan-making Justification Tests, and/or because they are inconsistent with the objectives under the NPF and RSES for compact growth (NPO 3c and RPO 3.2).

- Material Amendment AP.1D.15 proposes to zone significant additional 'residential' zoned land in Drumlish (Parcels 6 – 20). Located substantially removed from the town centre to the north west and south west, the zoning appears to be piecemeal in nature, incorporating existing one off housing and is in general isolated from other zoned land. There is no coherent land use strategy in defining such land for 'residential use', which could in the future



benefit from further development and intensification of use. Further parcel 32 has been zoned 'residential', surrounded by land zoned as Strategic Residential Reserve and located within an area identified as being subject to flooding and no Justification Test has been undertaken in support of such zoning.

- Material Amendment AP.1E.18 proposes to zone parcel 1, for *New Residential* zoning in Clondra by extending the settlement boundary to the north. The amended Strategic Flood Risk Assessment (and Strategic Environmental Assessment) confirm that this site is located in a flood risk area, and it is noted that no Justification Test has been undertaken in support of such zoning. It is further noted that the *Constrained Land Use* zoning was not updated on the revised map for Clondra.

MA Recommendation 3

MA Recommendation 3 - Residential zoning including Flood Risk management

Having regard to National Policy Objective NPO 3c and the section 28 guidelines *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009), the planning authority is required to omit the following which are included as proposed material amendments to the land use zoning objectives included in Volume 2 Appendices Longford Settlement Zonings:

- omit the rezoning of parcels 6 – 20 to residential in Drumlish which are proposed as part of Material Amendment AP.1D.15 as they are not justified and would be contrary to compact growth and sequential development of the settlement;
- omit the rezoning of parcel 32 to residential in Drumlish which is proposed as part of Material Amendment AP.1D.15 as the land is located in an area that is at risk of flooding; and



- (iii) omit the rezoning of parcel 1 to new residential in Clondra which is proposed as part of Material Amendment AP.1E.18 as the land is located in an area that is at risk of flooding.

2.1 Tiered Approach to Zoning

Recommendation 6 of the Office's submission on the draft Plan requested the planning authority to demonstrate that a tiered approach to zoning (TAZ) in accordance with NPO 72a, NPO 72b and NPO 72c 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.

The Office notes that the planning authority has endeavoured to comply with Recommendation 6 of the Office's submission on the draft Plan, by including a working draft of the Infrastructure Assessment Report (IAR) in Appendix 3 of the Material Alterations Report. Further, new text is proposed in Section 4.3.1 of the draft Plan which explains how the IAR process has influenced and amended zoning in the draft Plan. However, the IAR does not classify the zoned lands in line with the methodology under Appendix 3 of the NPF and does not conclusively distinguish between zoned land that is available for development and zoned land that requires significant further investment in services for infrastructure for development to be realised.

A comprehensive IAR prepared in accordance with Appendix 3 of the NPF is intended to provide all stakeholders, including elected members with relevant information to determine which areas to be zoned can readily be implemented to accommodate the delivery of housing and employment development targets under the plan. It is also intended to highlight those areas where there are infrastructural and services capacity constraints that will need to be resolved before such development can be delivered and the cost of same. This evidence-based approach is therefore intended to support the planning authority in devising an implementable strategy.

However, there are practical obstacles, in terms of statutory time limits and statutory limits on what amendments can be made at this stage of the plan preparation process. Accordingly, a practical option would be to require the planning authority to include an objective to finalise the IAR and implement the TAZ through the local area plan preparation process, perhaps through the phasing and sequential development of those lands according to the availability or feasibility of delivering services.

MA Recommendation 4

MA Recommendation 4 - Infrastructure Assessments

Having regard to NPO 72, the planning authority is required to insert an objective as a minor amendment to the development plan committing to the preparation of detailed infrastructure assessments, consistent with NPO 72 and the methodology for a Tiered Approach to Zoning under Appendix 3 of the NPF, to inform the development strategy for future Local Area Plans in the county such as for Longford Town (policy objective CPO 4.8).

3. Rural Housing

The Office commends the planning authority for making significant progress in addressing Recommendation 8a of the OPR submission on the draft Plan. References to the previous rural typologies contained in the draft Plan (i.e. Structurally Weak Rural Areas and Stronger Rural Areas as well as the high amenity Broad Zone areas) have been removed from the rural housing policy framework and Figures 4.5 and 4.6 have been amended to reflect two rural typologies only, in accordance with NPO19.

However, it is noted that proposed Material Amendment CH 4.16 seeks to amend the local need criteria in policy objective CPO 4.22 in the draft Plan to reflect the provisions of the current County Development Plan, until such time as appropriate rural guidance is issued and to insert a new policy objective in the draft Plan which commits to a review of rural housing policy in line with the Development Plan

Guidelines or other relevant Guidelines issued by the Minister in this area having regard to NPO 19 of the NPF.

Notwithstanding the commitment in section 4.8.12 '*...to manage sustainable growth in designated 'Rural Areas Under Strong Urban Influence' and facilitate the provision of single houses in the countryside based on the core consideration of demonstrable economic or social requirement to live in a rural area...*', proposed Material Amendment CH 4.16 does not adequately respond to the changed policy context arising from the NPF and the RSES contrary to the provisions of Section 27(1) of the Act. In particular, RPO 4.80 requests that local authorities manage urban generated growth in Rural Areas Under Strong Urban Influence by ensuring that in these areas the provision of single houses in the open countryside is based on the core consideration of demonstrable economic or social need to live in a rural area, and compliance with statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.

MA Recommendation 5

MA Recommendation 5 - Rural Housing Policy

Having regard to National Policy Objective (NPO) 19 of the *National Planning Framework*, Regional Policy Objective (RPO) 4.8 of the *Regional Spatial and Economic Strategy*, and section 4.8.12 of the draft Plan which states '*The Council will manage sustainable growth in designated 'Rural Areas Under Strong Urban Influence' and facilitate the provision of single houses in the countryside based on the core consideration of demonstrable economic or social requirement to live in a rural area...*', the planning authority is required to review the changes proposed to policy objective CPO 4.22 (Material Amendment CH 4.16) to ensure that references to landowners and family members is related to social and economic need having regard to NPO19, and ensure that commensurate controls are included such that the dwelling is the first home.



4. Flood Risk Management

The amended Strategic Flood Risk Assessment (SFRA) states that there are no longer new residential or strategic residential reserve lands zoned, which are subject to flooding. Notwithstanding such statement, the SFRA subsequently confirms that land zoned 'New Residential' zoning in Clondra (Material Amendment AP.1E.18) would not be in compliance with the *Planning System and Flood Risk Assessment Guidelines* and *Circular PL 2/2014*, but yet continues to be zoned (see MA Recommendation 3).

The Office notes the addition of Table 6: 'Justification of the Constrained Land Use Approach for Previously Developed Lands' which covers the individual settlements. As such, plan-making Justification Tests have not been undertaken for existing developed land in flood zones as required by the *Guidelines* and *Circular PL 2/2014*. The planning authority is advised that where the Constrained Land Use approach is being relied upon, development must be limited to minor development. Alternatively a plan-making Justification Test should be carried out and satisfied prior to the adoption of the plan where future development (for vulnerable development) of areas at a high or moderate risk of flooding is to be considered.

MA Recommendation 6

MA Recommendation 6 - Flood Risk Management

Having regard to the *Flood Risk Management Guidelines* (2009), as revised, and *Circular PL 2/2014*, the planning authority is required to either:

- (i) amend Objective CPO 5.108 to clarify that future development is limited to minor development where plan-making Justification Tests have not been undertaken and the *Constrained Land Use* applies; or
- (ii) review the Strategic Flood Risk Assessment in accordance with the application of the sequential approach, and the Justification Test where appropriate, and having regard to potential climate change effects. This review may entail the deletion of zonings where they fail to satisfy the plan-making Justification Test to ensure consistency with the guidelines.



5. Strategic National Road Network

Observation 6 of the Office's submission on the draft Plan advised the planning authority to review and strengthen the policy objectives for national roads to ensure that adequate policy is in place to maintain the strategic function, capacity and safety of the county's national roads network. Further the planning authority was requested to ensure that any changes were 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).

While draft Plan Objectives CPO 5.15 and 5.16 have been amended taking into account the recommendations of Transport Infrastructure Ireland and also the future development of the County, a new policy objective has been introduced under Material Amendment CH 5.10 which seeks to apply a less restrictive approach to non-residential development of strategic or national importance or extensions to such developments accessing onto the National Road Network.

It is considered that Material Amendment CH 5.10 does not accord with Section 2.6 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012), which states, "a less restrictive approach may be adopted in the case of developments of national and regional strategic importance, which by their nature are most appropriately located outside urban areas, and where the locations concerned have specific characteristics that make them particularly suitable for the developments proposed."

Material Amendment CH 5.10 omits the wording underlined in the extract above and instead restricts development solely to that of national and regional strategic importance.

MA Observation 1

MA Observation 1 – Access to National Roads

The planning authority is requested to fully comply with Observation 6 of the Office's submission on the draft Plan and make minor amendments to the policy objective proposed under Material Amendment CH 5.10 to ensure it fully accords with Section 2.6 of the Section 28 Ministerial Guidelines '*Spatial Planning and National Roads Guidelines for Planning Authorities*' (DoECLG, 2012), ensuring that developments of national and regional strategic importance are only permitted access onto national roads where by their nature they are most appropriately located outside urban areas, and where the locations concerned have specific characteristics that make them particularly suitable for the developments proposed.

6. Climate Action

Further to Observation 7 of the Office's submission on the draft Plan, the Office acknowledges the planning authority's position regarding the absence of revised Development Plan Guidelines to support the preparation of the draft Plan.

Notwithstanding, the Office continues to consider it appropriate that the outcomes of any future guidelines be reviewed by the planning authority over the lifetime of the plan and that any steps considered necessary to review the Plan be taken on foot of this.

The Office notes that amendment CH 3.3 does provide a new objective in the draft Plan which seeks to, "*create an 'Implementation Plan' of adequate detail that will allow for continued monitoring of Local Authority actions, responsibilities and progress specifically related to Climate Action*". While this new objective is welcomed along with the consideration of climate action as a cross cutting theme within the draft Plan, the Office considers that a commitment to ensure that 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, is necessary.

MA Observation 2

MA Observation 2 – Climate Action

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 reminded that an objective should be included as a minor amendment to the draft Plan 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.

7. Economic Development

The Office notes the significant policy changes proposed in respect of facilitating economic development and in particular FDI and /or IDA Ireland affiliated enterprises, including amendments CH 8.3 and CH 8.4. Positively, the policies seek to collaborate with agencies to identify key strategic employment landbanks and landing space within the county principally to accommodate prospective Foreign Direct Investment (FDI) employment and/or IDA Ireland affiliated enterprises. This approach is supported by the Office.

Although the accommodation of FDI and IDA affiliated enterprises in County Longford within the draft Plan is important and is to be welcomed, it is necessary that a 'plan led' approach to development is considered in the first instance and consideration is given to the location of such sites within settlement boundaries on suitably zoned land.

There continues to be extensive Industrial/Commercial/Warehousing use zoned land in settlements in the county including Longford, Edgeworthstown and Granard, extensive industrial / alternative energy land in Lanesborough and strategic industrial reserve land in Granard. It is important, therefore, that consideration is given to



sequentially preferable sites in advance of more peripheral locations in accordance with (NPO3c; NSO1 and RSO2).

MA Observation 3

MA Observation 3 – Location of Strategic Employment

Having regard the extent of land zoned for Industrial/Commercial/Warehousing purposes within the top tier settlements, extensive land zoned for Industrial / Alternative Energy in Lanesborough, national and regional policy objectives to provide for compact growth (NPO 3c) and the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012), the planning authority is requested to make minor amendments to the policy objectives proposed as part of Material Amendment CH 8.3 and CH 8.4 to ensure that priority is given to sites and landbanks within settlement boundaries in the first instance and only where it can be demonstrated that no alternative landbank / landing space can be suitably identified, will a location outside of a defined settlement be considered.

8. Built Heritage

The Office notes that a number of properties are proposed for deletion from the Record of Protected Structures as part of the material alterations including, inter alia Danesfort House, Curry; Houricans, Granard; and John O'Hara's, Granard (Material Amendments AP.6.2, AP.6.4 and AP.6.5)

Page 96 of the Strategic Environmental Assessment (SEA) for relevant proposed material alterations states the following in respect of such changes to the Record of Protected Structures:

Proposed Material Alterations AP.6.2, AP.6.4, AP.6.5 propose the removal of architectural heritage from the Record of Protected Structures in the absence of evidence demonstrating that this heritage does not warrant the protection afforded by inclusion on the Record. In the absence of evidence to the contrary, it must be assumed, taking a precautionary approach, that removal

of these structures would be likely to result in significant adverse effects on the County's architectural heritage.

In respect of built heritage in rural towns, the NPF states '*Investment in our towns and villages through regeneration, public realm improvements and the appropriate adaptation and re-use of our built heritage, are key factors in developing, promoting and investing in a sense of place and aligning the objectives of creating high quality with that of spatial planning.*'

Having regard to the information contained on the National Inventory of Architectural Heritage about the relevant structures and the SEA for the relevant Material Amendments, the Office considers that the deletions from the Record of Protected Structures are not evidence based and should be reconsidered.

MA Recommendation 7

MA Recommendation 7 - Record of Protected Structures

Having regard to National Policy Objective 17 of the National Planning Framework, the National Inventory of Architectural Heritage and Strategic Environmental Assessment (SEA) for relevant proposed material alterations, the planning authority is required to omit the deletion of the following properties from the Record of Protected Structures (RPS):

- (i) RPS No. 212 – Danesfort House, Curry (Material Amendment AP.6.2);
- (ii) RPS No. 328 – Houricans, Granard (Material Amendment AP.6.4); and
- (iii) RPS No. 345 – John O'Haras, Granard (Material Amendment AP.6.5)

The planning authority is advised to consult with the Department of Housing, Local Government and Heritage regarding the above and any other changes proposed to the Record of Protected Structures.



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Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under Section 12 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process of making the plan, your authority must notify this Office within five working days of its decision in relation to the draft Plan. In particular, where your authority decides not to comply with the recommendations and observations 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.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations