

11<sup>th</sup> September 2023

Planning Section,  
Tipperary County Council,  
Civic Offices,  
Limerick Road,  
Nenagh,  
Co. Tipperary,  
E45 A099

**Re: Draft Nenagh Local Area Plan 2024 - 2030**

A chara,

Thank you for your authority's work on preparing the Draft Nenagh Local Area Plan 2024-2030 (the draft LAP).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authority has put into the preparation of the draft LAP against the backdrop of an evolving national and regional planning policy and regulatory context and the need to balance competing pressures within an increasingly complex system.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the draft LAP under the provisions of sections 31AO(1) and 31AO(2) of the *Planning and Development Act 2000*, as amended (the Act) and this submission has been prepared accordingly.

The Office's evaluation and assessment has had regard to the current county development Plan, the Regional Spatial and Economic Strategy (RSES) for the Southern Region, and relevant section 28 guidelines.

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.

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

## **Overview**

The Office commends the significant work of the planning authority in preparing a comprehensive draft LAP for Nenagh. The draft LAP includes several supporting documents, including a Serviced Land Assessment (SLA) (Appendix 1), Local Transport Plan (LTP) (Appendix 2), Regeneration Sites (Appendix 3) and the relevant statutory reports including Natura Impact Report, SEA Report and Strategic Flood Risk Assessment (SFRA), which are welcomed by the Office.

The Office considers the draft LAP to be generally consistent with the regional policy objectives of the RSES for the Southern Region, particularly in respect of its overall strategy to promote compact growth, target town centre renewal and promote more sustainable travel patterns.

The Office also welcomes the strategic aims and vision of the draft LAP which have been informed by collaboration and consultation with relevant stakeholders and the general public.

The commitment of your authority to town centre is clear, as evidenced by the town centre regeneration strategy set out in chapter 3. Indeed, significant progress in this regard has already been made in developing the Martyr's Road Masterplan and securing funding for the Sustainable Energy Centre of Ireland (SECOE), as well as public realm works.

In general, the actions of the *Climate Action Plan 2023* and the *Tipperary County Development Plan 2022-2028* (the Development Plan) core ambitions have also been well incorporated into the draft LAP as they relate to spatial planning locally within the town, including compact growth, sustainable mobility, sustainable transport measures, town-centre first, nature-based solutions, and flood risk and water management.

The Office has however, identified a number of areas where further consideration is required to ensure that zoned land can be serviced and is well located in terms of proximity to facilities and amenities and sustainable transport options, consistent with the policy of the Development Plan and national and regional policy for compact and sustainable growth.

The capacity constraints in the Nenagh Wastewater Treatment plant (WWTP) will also be a significant issue pending the planned upgrade works, and the LAP should provide clarity for developers and the community in this regard. Consultation with Uisce Éireann regarding interim measures will be required to avoid ad-hoc solutions which could adversely affect water quality and human health.

Given the significant extent of land zoned for residential development in the draft LAP and the capacity constraints over the plan period, the Office would also caution against extensive land use zoning proposals for residential development through material alterations.

The Office also has concerns regarding the Strategic Flood Risk Assessment (SFRA) which has not been carried out in accordance with *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) (Flood Guidelines) and will require a review of affected zoning objectives.

It is within this context the submission below sets out five (5) recommendations and two (2) observations under the following seven (7) themes:

<b>Key theme</b>	<b>Recommendation</b>	<b>Observation</b>
<a href="#">Consistency with the development plan and core strategy, zoning and compact growth</a>	<a href="#">Recommendation 1</a>	-
<a href="#">Tiered approach to zoning and infrastructural capacity</a>	<a href="#">Recommendation 2</a>	-
<a href="#">Economic development and employment</a>	<a href="#">Recommendation 3</a>	-
<a href="#">Flood risk management</a>	<a href="#">Recommendation 4</a>	-
<a href="#">Transport and mobility</a>	<a href="#">Recommendation 5</a>	<a href="#">Observation 1</a>
<a href="#">Implementation and monitoring</a>	-	<a href="#">Observation 2</a>
<a href="#">General and procedural matters</a>	-	-

## **1. Consistency with development plan and core strategy, residential zoning and compact growth**

Section 19(2) of the Act requires a local area plan to be consistent with the objectives of the development plan and its core strategy. This requirement also applies under section 20(5) of the Act.

The Development Plan core strategy identifies a requirement for an additional 664 housing units over the plan period in Nenagh (up to 2028). The draft LAP sets out in chapter 2, the development strategy for the town. It identifies a need for 44.4 ha of zoned land in Nenagh to accommodate the predicted housing requirement of 886 units to 2030. It is understood that the land use zoning requirement was adjusted to consider the Development Plan framework and to apply two additional years to 2030. The Office is satisfied that the population and housing growth for the plan period is consistent with the Development Plan.

The Office notes that the current land use zoning proposals for residential development exceed the core strategy housing target for Nenagh due to historical legacy zonings for residential development. In this context, the Office considers that in general terms, the draft LAP provides a reasonable approach to ensure a sufficient supply of zoned land.

With the exception of the instances identified below, the majority of the lands proposed to be zoned New Residential are well located, contiguous to the existing built up footprint and within the CSO settlement boundary. It is also noted that an LTP was undertaken to inform the zoning provisions of the draft LAP and that a suite of active travel measures and other sustainable transport objectives are proposed to enhance connectivity between the proposed residential areas and the town centre.

The draft LAP also includes a detailed SLA in accordance with NPO 72 which is commendable. The draft LAP states that the zoning framework has been informed by the SLA and also wider objectives including the need to promote compact growth and a town centre first approach as well as the SFRA.

The Office has, however identified a number of instances where sites identified for **New Residential** are proposed at a significant distance away from the town centre. Such lands, which are divorced from the urban core, have the potential to undermine the principles of compact growth.

Furthermore, it is noted that in some cases, Strategic Reserve lands have been identified closer to the built up area than sites identified as New Residential, for example, sites 38 and 39. The proposed land use zoning approach may, therefore, give rise to the potential leapfrogging of lands.

In this context, the planning authority is required to review the land use zoning approach to ensure that the most sequentially appropriate sites that promote consolidated forms of development and compact growth in line with NPO 3c and NPO 6 of the NPF are given priority.

Furthermore, on review of the SLA and the zoning map, the Office has particular concerns regarding the following sites which would be more appropriately zoned as Strategic Reserve or Town Environs for the reasons set out below:

- **Site 16 (2.14 ha – T2) and Site 17 (1.37 ha – T2):** both of these sites are located on the western periphery of the settlement and are identified as T2 lands. Given the distance of these lands from the urban core, the location of sequentially preferable sites, and the fact that they are designated T2 lands, consideration should be given to designating these lands as Strategic Reserve.
- **Site 30 (2.16 ha 0 T2):** this site is located on the southern periphery of the town. It is immediately adjacent to an area identified as being located within flood zone A. Given the distance of these lands from the urban core, the location of sequentially preferable sites, and the fact that they are designated T2 lands, consideration should be given to designating these lands as Strategic Reserve.

Furthermore, on review of the SLA and the zoning map the Office has concerns regarding the number of smaller peripheral sites zoned **Existing Residential** in the environs of the town. For example, the small cluster of 4 no. rural dwellings zoned Existing Residential to the far eastern periphery of the town along the R491 just inside the LAP boundary and site 37 which is an isolated dwelling surrounded by land zoned Town Environs.

It is considered that these small pockets of isolated one-off dwellings: undermine the principles of compact growth and sequential development criteria; result in dispersed patterns of residential development which are not contiguous to the urban envelope; and exacerbate ribbon development and urban sprawl.

Furthermore, the approach to zone individual dwelling houses has the potential to undermine the overall policy intent of the Town Environs land use zoning objective as it raises unreasonable expectations about further one-off housing and subdivision in isolated areas which are divorced from the built up area. It is also considered that this approach undermines the policy approach to one off housing in the town environs set out in section 5.2.3 and Policy 5.3 of the draft LAP.

## Anomalies

It is also noted that there are some anomalies between the zoning map and the SLA which need to be clarified and amended as necessary. These can be summarised as follows:

- There appears to be an inconsistent approach adopted in the SLA regarding the identification of sites as complying with the sequential criteria. The planning authority are requested to review this, in particular in relation to sites 11, 12, 13, 14, 22, 23, 24, 26 and 29.
- A number of sites are identified on the SLA Table as New Residential but are zoned Existing Residential on the zoning map including sites 13, 14, 15, 19, 21, 22, 29 and 36.
- Site 20: Part of this site is undeveloped but is zoned Existing Residential.
- Site 25 and 26: Boundaries identified as New Residential on the SLA map are inconsistent with the zoning map.
- Site 32 and 34: The SLA table recommends these sites be rezoned. However, zoning map illustrates these sites as remaining as Existing Residential.
- Site 40: The boundary of this site does not appear to correlate with the land use zoning map whereby this site is partially zoned Strategic Reserve and New Residential.

### Recommendation 1 – Residential Zoning Objectives

Having regard to the provision of new homes at locations that can support compact and sustainable development, the co-ordination of land use zoning, infrastructure and services, and in particular to:

- the core strategy of the Tipperary County Development Plan 2022-2028 and the otherwise sufficient supply of land zoned for residential use;
- NPO 3c, NPO 6, RPO 3, RPO 20 and RPO 35 for compact growth;
- the policy and objective for a sequential approach to development in section 6.2.3 of the *Development Plans, Guidelines for Planning Authorities (2022)*;
- *Local Area Plans, Guidelines for Planning Authorities (2013)*, chapter 6; and

- NPO 72 for tiered approach to zoning,

the planning authority is required to:

- (i) review the land use zoning approach in respect of Existing Residential development and Strategic Reserve lands to ensure that the most sequentially appropriate sites that promote consolidated forms of development and compact growth are given priority;
- (ii) delete the New Residential zoning objective for sites 16, 17 and 30. Consideration should be given to amending the zoning to either Strategic Reserve or Town Environs;
- (iii) amend the Existing Residential land use zoning objectives on lands associated with the isolated pockets of rural dwellings predominately located to the peripheries of the LAP boundary to Town Environs to ensure consistency with the approach to one-off housing in the town set out in section 5.2.3 and Policy 5.3 of the draft LAP; and
- (iv) review the SLA Table 1 and Map in Appendix 1 of the draft LAP, the zoning map and the written statement to ensure consistency and accuracy, particularly with regard to sites identified as New Residential and which are identified as Existing Residential on the zoning map; that the site boundaries of the SLA map are consistent with the extent of New Residential lands identified on the zoning map and that there is a consistent approach regarding the identification of sites as sequentially appropriate.

## **2. Tiered approach to zoning and infrastructural capacity**

Strategic Objective SO – 2 of the Development Plan commits to facilitating and promoting the development of Nenagh as a Key Town and an economic driver with significant population and service centre for the Southern Region.

The SLA states that a recent update to the capacity register conducted by Uisce Éireann has indicated that there is currently no additional wastewater treatment capacity in the Nenagh WWTP. The update confirms that there will be an additional 19,000PE available once the Nenagh WWTP has been upgraded.



The Office understands, however, that Uisce Éireann has identified additional capacity to accommodate a certain level of growth in the interim period until the upgrade works are completed.

It is important, however, that clarity is be provided in the LAP regarding the nature and extent of this significant infrastructural constraint for both developers and the community.

It is also critical that the LAP sets out a clear policy framework to ensure that ad-hoc solutions that would have negative environmental and health impacts, for example the use of on-site treatment systems, are avoided.

### Recommendation 2 – Infrastructure Capacity

Having regard to the co-ordination of land use zoning, infrastructure and services, and in particular to:

- the significant infrastructural constraints associated with the existing Nenagh Waste Water Treatment Plant and the timetable for upgrade works;
- the core strategy of the Tipperary County Development Plan 2022-2028 (the Development Plan) and Objectives SO-2 and 4 – A;
- *the Development Plans, Guidelines for Planning Authorities (2022)* and Sections 6.1 and 6.2 of the *Local Area Plan Guidelines for Planning Authorities (2013)*;
- NPO 72a-c for tiered approach to zoning; and
- NPO 63 for the sustainable use and development of water services infrastructure, and section 15.2.2 and objective 15 – A of the Development Plan,

the planning authority is required to set out a clear policy framework on this matter addressing the potential constraints to development over the plan period and measures to ensure that ad-hoc wastewater treatment on an individual site basis is avoided.

The planning authority should consult with Uisce Éireann regarding this recommendation.

### **3. Economic development and employment**

The Office welcomes the strong emphasis on enterprise and employment in the draft LAP. Given Nenagh's designation as a Key Town, it hosts a strong employment base and economic profile with capacity for future growth.

In relation to the future zoning of employment lands, ensuring that the economic strategy of the LAP is translated into appropriate land-use zoning proposals is an important consideration in the plan making process. The evidence-base and rationale underpinning the zoning of employment uses should be clear and strategic in nature and should seek to cater for the sustainable delivery and provision of employment led uses as well as supporting a live-work community. In this regard, the LAP should be grounded upon an up-to-date evidence base that relies on sound datasets in order to provide an accurate and reliable spatial analysis of employment typologies, their location, concentration and future growth areas.

The land use zoning strategy for employment and enterprise is underpinned by the associated Serviced Land Assessment contained in Appendix 1 of draft LAP which provides details on the infrastructural and servicing capacity of zoned lands for employment related uses. The Office notes that the draft LAP has comprehensively considered the established pattern of development, particularly in consolidating and supporting the organic growth of existing employment / industrial areas.

Having regard to the SLA in respect of the Gortlandroe Industrial Park, the Office notes that this is a large strategic landbank that will facilitate the expansion of the business park with access from the Gortlandroe and Drommin Road. Considering the significant scale of the land bank (c. 35 ha) and its proximity to the national road network, the Office recommends that the planning authority gives further consideration to the intended phasing approach for these lands as well as the proposed delivery of sustainable transport measures in accordance with the LTP to ensure that development occurs in an appropriate and sequential manner in accordance with the principles of sustainable development.

The Office also has concerns regarding the lands zoned for employment located to the east of the town identified as Site 6 in the SLA. This site is peripherally located with no access to the foul sewer network and no active travel infrastructure. No adequate

justification has been provided to support this particular zoning. Furthermore, significant capacity for organic growth for employment development to the east of the town is provided on site 5. In this regard, the Office recommends that the planning authority gives consideration to the rezoning of this site as Town Environs to provide a more compatible land use zoning within a rural setting on the far eastern fringe of the town.

### Recommendation 3 - Employment Zoning Objectives

Having regard to:

- section 6.2.5 of the *Development Plan Guidelines for Planning Authorities* (2022) that the evidence and rationale underpinning the zoning of land for employment purposes must be clear and strategic in nature;
- RPO 151, RPO 154 and National Strategic Outcome 1 for Compact Growth, and NPO 74 to secure alignment with delivery of National Strategic Outcomes;
- the location of employment in areas that can support more sustainable transport options in accordance with NPO 54 for climate action and the sequential approach and accessibility set out in section 1.4 of Appendix A of the *Development Plans, Guidelines for Planning Authorities* (2022), *Climate Action and Low Carbon (Amendment) Act 2021* and the *Climate Action Plan 2023* and the goals of the *National Sustainable Mobility Policy* (2022); and
- NPO 72a-c and Appendix 3 of the NPF and the co-ordination of land use zoning, infrastructure and services,

the planning authority is required to:

- (i) review the proposed phasing approach to the delivery of the Gortlandroe Industrial Park to ensure that development is delivered in an appropriate and sequential manner. The planning authority should also consider the intended movement patterns to / from and within the site in accordance with the adopted LTP, as well as activation measures to ensure that the site is comprehensively developed as a major employment location in tandem with appropriate active travel measures; and

(ii) omit the Employment zoning objective for Site 6 and consider amending the zoning objective to Town Environs.

#### 4. Flood risk management

The Office welcomes the preparation of a SFRA to inform the draft LAP. The inclusion of objective 8D in relation to the proposed flood relief scheme in Nenagh is also welcomed. However, the SFRA has been informed by incorrect mapping which underestimates the extent of the flood zones affecting the town due to the following errors:

- the flood zones indicated on the flood zone maps have excluded areas benefitting from flood defences from the flood zone contrary to section 2.25 of Flood Guidelines that the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity. The likelihood and extent of this residual risk, therefore, needs to be considered; and
- the 1% AEP extents for the National Indicative Fluvial Mapping Programme have not been used to inform the flood zone mapping, i.e. Flood Zone A. This means that lands in the town at most risk for flooding are not included in the flood maps.

The planning authority is also advised to review the flood zone designations for a number of sites specifically contained in Appendix 3: Schedule of Regeneration Sites which identify the following sites as being within flood zone B when they are contained in flood zone A, these include:

- *the Coalyard;*
- *Typone;*
- *Martyr's Road; and*
- *Dublin Road.*

It is further noted that not all of the lands zoned as Existing Residential development have been included in the plan-making Justification Tests. In this regard, the planning

authority should ensure that justification tests are completed for all land zonings that overlap with flood zones.

Finally, the draft LAP states that ‘*Overlays Land Use Zoning and National CFRAM potential future scenario mapping have been included in the SFRA*’. While future scenario mapping for the National CFRAM Study has been provided in the SFRA, it has not been overlaid with the land use map, and this should be addressed in the SFRA to provide clarity.

#### Recommendation 4 - Flood Risk Management

Having regard to flood risk management, and in particular to:

- RPO 114 and RPO 116; and
- NPO 57 and *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) as amended by *Circular PL 2/2014*,

the planning authority is required to:

- (i) review and update the Strategic Flood Risk Assessment to ensure that the flood zone mapping estimates the full extent of potential flood risk and excludes the presence of flood defences in accordance with the guidance set out in section 2.25 of the guidelines. Clarity should also be provided in the SFRA regarding residual risk for lands that are considered to benefit from existing defences;
- (ii) review and update the Strategic Flood Risk Assessment to ensure that the 1% AEP extents are used to inform the flood zone mapping, i.e. Flood Zone A;
- (iii) having regard to the corrected flood zone mapping, review the flood zone designations for **all** sites contained in Appendix 3: *Schedule of Regeneration Sites*. The planning authority’s attention’s is specifically drawn to the following sites which are located within flood zone B when they should have been located in flood zone A:
  - *The Coalyard*;

- *Typone;*
  - *Martyr's Road; and*
  - *Dublin Road.*
- (iv) review the methodology and approach included in the SFRA to ensure that justification tests are completed for all land zonings that overlap with flood zones and to ensure that such tests are only carried out when avoidance and substitution of the of the flood risk is not possible; and
- (v) ensure that overlays of land use zoning and National CFRAM potential future scenario mapping are included in the SFRA.

Consequent to the above, the planning authority is required to omit or amend zonings that do not meet the Justification Test in accordance with the provisions of the aforementioned Guidelines.

The planning authority should consult with the Office of Public Works regarding this recommendation.

## 5. Transport and mobility

The Office welcomes the preparation of the LTP consistent with RPO 11 of the RSES.

It is noted however, that while policies and objectives supporting the LTP have been included in chapter 6 of the draft LAP, including Policy 6.2 which supports the implementation of the active travel and demand management measures identified in the LTP, improved integration and synergy could be provided between the LAP and the LTP, together with a clearer policy approach to provide more explicit support to the proposed interventions.

This could, for example, be provided by the introduction of clear policies to ensure compliance with the active travel and other interventions detailed in figures 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 6.8 of the LTP. This would give greater weight and statutory effect to the proposals of the LTP. The LAP should also provide clearer mapping of the interventions required to support the delivery of the LTP.

The Office notes that many of the proposed initiatives and priorities outlined in the LTP have not been clearly translated into the draft LAP. In this regard, it is crucial that the

draft LAP reflects the guiding principles of the LTP to ensure that a cohesive overall land use strategy for the town is set out.

### Recommendation 5 - Local Transport Plan

Having regard to:

- NPO 27 and RPO 152 which seek to prioritise walking and cycling; and
- RPO 157 for local transport plans, and the policies, objectives and measures emerging from local transport plans,

the planning authority is required to include specific actions in the written statement of the LAP with respect to the key actions identified in the Nenagh Local Transport Plan (LTP) 2024 – 2030 in order to clearly outline the guiding principles for improved permeability and sustainable land use and transportation management for Nenagh and to ensure that a cohesive land use strategy for the town is clearly set out.

Policy 6.5 of the draft LAP supports the development of the following new inner relief roads:

- the Thurles Road (R498) to the Dublin Road (R445);
- the Dublin Road (R445) to the Borrisokane Road (N52); and
- the Thurles Road (R445) to the Limerick Road (R445).

The Office notes and supports the policies in relation to the development of the new routes. It is recommended that the planning authority gives consideration to including the indicative alignment of these schemes on the draft LAP zoning map for clarity.

### Observation 1 – Transport and Mobility

Having regard to the provision of sustainable transport options, and in particular to:

- NPO 27, NPO 54 and NPO 64;
- RPO 20, RPO 157 and RPO 168; and

- the Nenagh Local Transport Plan (LTP) 2024 – 2030,

the planning authority is requested to:

- (i) review chapter 6 – Transport and Connectivity to provide clearer policies, objectives and mapping regarding the delivery and phasing of the key infrastructural requirements of the LTP, particularly those interventions and measures required to enhance active travel and promote demand management; and
- (ii) consider including **on the land use zoning map** the indicative route alignment of the proposed:
  - the Thurles Road (R498) to the Dublin Road (R445);
  - the Dublin Road (R445) to the Borrisokane Road (N52) and
  - the Thurles Road (R445) to the Limerick Road (R445).

## 6. Implementation and monitoring

The draft LAP includes proposals for monitoring and evaluation in chapter 10. It is detailed that monitoring procedures will be developed in line with section 16.3 and objective 16.1 of the Development Plan. A general objective is included to undertake a programme of monitoring and evaluation of the LAP over its lifetime in accordance with the monitoring framework and methodology prepared for the Development Plan. The Development Plan includes a generalised strategy to monitor objectives and that strategic policy objectives will be assessed through the consideration of progress under key performance indicators with data compiled from records in house and from national datasets.

The *Local Area Plan Guidelines for Planning Authorities* (2013) advise that local area plans should include an implementation and infrastructural delivery schedule which would require planning authorities to work closely with all relevant departments, agencies and stakeholders involved in securing the delivery of the formulation, adaptation, implementation and monitoring of the policies and objectives of the local area plan.

The draft LAP does not provide any tangible indicators for monitoring the objectives of the LAP, just a broad statement of intent aligned with a generalised approach in the



Development Plan. It is considered that a more bespoke approach, specific to this LAP, should be adopted. In particular, the Office draw's attention to the requirement to include indicators that are aligned with reporting for other related national policies (e.g. climate change, water quality) or for the purposes of monitoring the SEA. Notably, additional / supplementary indicators can be identified and utilised by the planning authority for specific objectives. In this regard, the planning authority should consider how it will analyse the annual plan monitoring data and also the progress of the LAP objectives in order to establish the status of the effectiveness of the LAP in achieving the proposed objectives.

### Observation 2 – Monitoring and Implementation

Having regard to section 6.5 of the *Local Area Plan Guidelines for Planning Authorities* (2013) the planning authority is advised to include a clear implementation and infrastructural delivery schedule in the LAP to ensure that the implementation of the policy objectives of the local area plan will take place and to ensure that development progress is consistent with the core strategy of the Development Plan.

## 7. General and procedural matters

In respect of more minor matters, the Office draws your attention to the following matter for your consideration:

- greater clarity could be provided on the land use zoning map regarding the colour tones used to distinguish between sites zoned for Mixed Use, Amenity, Open Space and Recreation and Town Environs. The colour tones used to identify these zonings may give rise to confusion in identifying the specific land use objective(s).

## 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 20 of the Act must summarise these recommendations and the manner in which they will be addressed. Where your authority decides not to comply with the recommendations of the Office please outline the



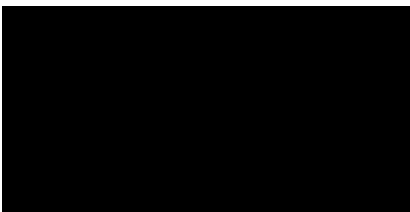
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Planning Regulator

reasons for the decision in the Chief Executive's report or the minutes of your Council meeting.

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

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**Anne Marie O'Connor**

Deputy Regulator and Director of Plans Evaluations

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