

12 October 2020

Forward/Strategic Planning,  
Limerick City & County Council,  
Merchant's Quay,  
Limerick,  
V94 EH90.

**Re: Issues Paper for the Limerick Development Plan 2022-2028**

A chara

Thank you for your authority's work in preparing the *Limerick Development Plan 2022-2028 Issues Paper*. The Office acknowledges and welcomes the publication of this paper and your authority's work more broadly in advancing the preparation of the Limerick Development Plan (the plan).

In accordance with the provisions of section 31AM of the Planning and Development Act 2000, as amended (the Act), the Office is obliged to evaluate and assess development plans in the context of certain statutory parameters including:

- Matters generally to be contained in a development plan (section 10) and, in particular, section 10(2)(n) in relation to climate change;
- Consistency with the *National Planning Framework (NPF)* and the *Southern Regional Assembly Regional Spatial and Economic Strategy (RSES)*;
- Ministerial guidelines under section 28;
- Ministerial policy directives issued under section 29, and,
- Such other legislative and policy matters as the Minister may communicate to the Office in writing.

The Office has set out some comments for your authority to consider in formulating the draft plan.

These comments are offered without prejudice to any statutory observations and recommendations as may be forthcoming from the Office at future stages of the plan making process, and do not affect the obligation on your planning authority to comply with the relevant legislative requirements.

### **Consultation strategies**

The Office commends the planning authority for the innovative methods used to inform and engage the public about the review of the plan and overcome the limitations imposed by Covid-19.

In particular, the Office welcomes the use of social media, webinars, videos, virtual consultation and targeted youth engagement.

The Office also commends the planning authority for preparing thematic background papers on various topics to supplement the issues paper.

The Office would appreciate feedback on the effectiveness of the planning authority's consultation approach in due course.

### **Core Strategy & Settlement Strategy**

The formulation of the core strategy in line with section 10 of the Act is the most significant element in developing the planning authority's draft development plan.

The NPF and the RSES, in addition to relevant specific planning policy requirements (SPPRs) specified in Ministerial guidelines under section 28 of the Act, will be key determinants in making the core strategy for the planning authority's functional area.

The Office understands that forthcoming updates to the *Development Plan Guidelines* by the Department of Housing, Local Government and Heritage, in addition to the publication of guidance in relation to Housing Need Demand Assessment (HNDA), will provide enhanced guidance for the preparation of development plans and their core strategies.

As the planning authority will be aware, the NPF has a target population for the city and county of 229,000-235,500 by 2026 and 246,000-256,500 by 2031, which represents a population increase of up to 40,500 people by 2026 and up to 61,500 people by 2036 above its 2016 census figure.

The RSES<sup>1</sup> has a population projection for Limerick City and suburbs of 123,289 people in total by 2031, with a population projection of 21,611 people in total in the remaining metropolitan area of Limerick by 2031.

The overall population target for the city and county in the core strategy is required to be consistent with the NPF Implementation Roadmap 2018. The projected growth of settlements is also required to be consistent with the policy objectives of the NPF and the RSES, including for the Limerick-

---

<sup>1</sup> Table 1, page 286

Shannon Metropolitan Area Strategic Plan (MASP) concerning the distribution of population growth. In respect of the latter, the planning authority's attention is drawn to the national enablers<sup>2</sup> and guiding principles for future growth<sup>3</sup> for the Limerick-Shannon MASP contained in the RSES, and National Policy Objective (NPO) 68 of the NPF which states that a MASP may enable up to 20% of the phased population growth targeted in the principle city and suburban area, to be accommodated in the wider metropolitan area<sup>4</sup>.

One of the National Strategic Outcomes of the NPF is 'compact growth' which, from an urban development perspective, means '*...we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages and ensuring that, when it comes to choosing a home, there are viable attractive alternatives available to people*'<sup>5</sup>.

In respect of compact growth, the RSES makes a distinction between the targets for the built-up area of the city and other areas.

*'As required under the NPF 50% of all new housing within Limerick City is to occur within the existing city and suburbs footprint, through brownfield, infill and regeneration. Outside of Limerick City, 30% of all new homes that are targeted in settlements is to occur within their existing built-up footprints as per National Policy Objective 3 (c) of the NPF.'*<sup>6</sup>

Given the ambitious compact growth target for the city, the core strategy and settlement strategy will need to provide clarity on the anticipated delivery of housing and employment on greenfield and brownfield sites within the city's footprint and the remaining metropolitan area as it applies to County Limerick.

The Office welcomes the recognition of the need for compact growth, consolidation and regeneration of town and village centres, and the inclusion of the following question on page 11 of the Issues Paper:

*'What tools can be used to deliver compact growth on infill and/or brownfield sites in our city, towns and villages?'*

As acknowledged in the background paper on settlements and key facts, the settlement typology from the RSES will need to inform the settlement hierarchy and where growth will be prioritised in the forthcoming plan.

---

<sup>2</sup> Section 4.0, page 284 of the RSES

<sup>3</sup> Section 3.2, page 283 the RSES

<sup>4</sup> The application of NPO 68 will be subject to review by the MASP Implementation Group

<sup>5</sup> Page 139 of the NPF

<sup>6</sup> Page 286 of the RSES

In this regard, the Office advises that a significant proportion of the county's future population growth will need to be allocated to the MASP area, the key town of Newcastle West and larger settlements consistent with the RSES.

The Office notes that the process of reviewing the Clare County Development Plan 2017-2023 has commenced and that the timeframe for the preparation and adoption of a new plan will closely follow that for the Limerick Development Plan.

It will therefore be essential that the planning authority consult with Clare County Council regarding the preparation of its Housing Strategy and HNDA to ensure that the Limerick Development Plan and Clare County Development Plan contain an integrated and coordinated planning policy framework for the MASP area that is consistent with the projections and targets contained in the NPF and the RSES.

The Office will provide further practical advice and technical support in the working out of the core strategy parameters above, insofar as is possible within our statutory remit, as the planning authority may require.

### **Urban Regeneration**

The NPF recognises that the regeneration and rejuvenation of cities, towns and villages of all types and scale can play a role in making stronger urban places and contributing to compact growth.

Acknowledging that key towns and the MASP area are targeted to have a significant population increase over the plan period and beyond, the development plan and relevant local area plans (LAPs) will need to prioritise the development of opportunity sites close to town centres in the first instance.

While the increase in the population and population density of the overall city area between 2011 and 2016 is acknowledged, the Office notes that the population of the city centre and outer city areas declined between 2011 and 2016, while the population of the city's more suburban areas of the Southern Environs and Castletroy increased by 5.4% and 6.4% respectively over the same period<sup>7 8</sup>.

The Office notes the statement in Section 3.6 – Housing of the background paper on economic development and employment which describes the significance of the challenge for the city centre:

---

7 Page 12, Table 3 Background Paper – Settlement and Key Facts

8 Page 18, Background Paper – Economic Development and Employment

*'Data has shown that not only has there been a hollowing out of the city centre in terms of population but also in terms of appropriate office and housing space. If the city is to attract more people to live there, in order to grow and diversify Limerick's employment base, it means that housing options will need to be improved and provided as a matter of urgency.'*

Having regard to the above, as well as the city's targets for population increase and compact growth, the Office considers that one of key challenges for the plan is to demonstrate how it will implement objectives for infill development and regeneration in the inner core and city areas in particular.

The NPF supports the use of performance based standards<sup>9</sup> for infill/brownfield development, stating:

*'In particular, general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.'*

In this regard, there is an opportunity to review the current development management standards in the city and county plans, in particular the sections dealing with standards for residential and apartment development, to ensure they are consistent with the relevant section 28 guidelines and any future updates to these guidelines.

### **Economic Development & Employment**

The Office commends the planning authority for its recent investments and initiatives to stimulate economic rejuvenation in Limerick City and notes that a number of the key future growth enablers for the city contained in the NPF are related to the implementation of the *Limerick 2030* economic and spatial plan.

The Office considers that one of the key priorities for the forthcoming plan will be its ability to demonstrate how it can implement and measure the implementation of economic and regeneration objectives and initiatives contained in the NPF, RSES<sup>10</sup> and strategies such as *Limerick 2030*.

The Office notes the strategic importance of the Shannon Estuary and the strategic development locations such as Limerick Docks within Limerick City and County that are referred to in the Shannon Integrated Framework Plan (SIFP).

---

<sup>9</sup> Page 67 of the NPF

<sup>10</sup> Limerick Shannon MASP Policy Objectives

In this regard, the policies and objectives in the forthcoming plan should continue to support marine-related development, industrial development, an expanded city centre, and infrastructure upgrades consistent with the SIFP, as relevant<sup>11</sup>.

In respect of Newcastle West, the Office notes the importance of the Atlantic Economic Corridor ‘... to realise the full potential of the Newcastle West enterprise assets to support job creation, improve competitiveness, attract investment and create future economic growth’<sup>12</sup>.

The Office notes the statistics and information contained in the background paper on economic development and employment regarding the impacts of Covid-19 and acknowledges that this will present significant challenges for the retail and tourism industries in particular. Of particular concern is the implication for the core retail area of the city where commercial vacancy rates appear to have increased since 2018 (based on the Forward / Strategic Planning survey).

The Office notes that work is underway to prepare a joint retail strategy for the Limerick-Shannon metropolitan area and the remainder of counties Limerick and Clare. In this regard, the objectives for retail development in the forthcoming plan will need to support the objective in the RSES to reposition the city centre as the premier regional shopping destination at the top of the hierarchy<sup>13</sup>.

The Office considers that the plan should be proactive in identifying sites or opportunities to support economic development and employment consistent with national, regional and local policies, and in particular the principles in the section 28 guidelines on retail planning<sup>14</sup> and national roads<sup>15</sup>.

### **Key Town**

The designated key town of Newcastle West is targeted for a population increase of more than 30% by 2040<sup>16</sup>. This would increase the town’s population from 6,619 in 2016 to approximately 8,600 people by 2040.

The RSES identifies Newcastle West as part of a group of smaller key towns which are ‘*Strategically located urban centres with accessibility and significant influence in a sub-regional context*’. The RSES also identifies its location as an opportunity for future economic development and employment growth and highlights its strong sub-regional interdependencies with Listowel, Rathkeale, and Abbeyfeale<sup>17</sup>.

---

11 Section 2.2.3 of the Background Paper - Economic Development and Employment and page 127 of the RSES

12 RPO 22, page 81 of the RSES

13 Section 8.7, page 300 of the RSES

14 Guidelines for Planning Authorities Retail Planning (2012)

15 Spatial Planning and National Roads Guidelines (2012)

16 Page 46 of the RSES

17 Page 80 of the RSES

The Office notes that the Newcastle West Local Area Plan 2014-2020 (extended to April 2024) has 88.3 ha zoned residential (phase 1) and 55.98 ha zoned residential (phase 2) which could accommodate population growth far in excess of the target in the RSES. In light of this, the Office advises the planning authority to prioritise the review of the LAP and clearly outline in the core strategy how the 30% target for compact growth will be achieved.

The Office notes that there is currently no spare capacity in the waste water treatment plant serving the town, and that a project to upgrade the plant and provide capacity for growth is included in Irish Water's 2020-2024 Investment Plan.

Given the town's significant recent growth<sup>18</sup> and the policies supporting further growth consistent with its designation as a key town, the Office advises the planning authority to work collaboratively with Irish Water to resolve the existing infrastructural constraints.

Regional Policy Objective (RPO) 157 states that it is an objective to prepare a Local Transport Plan (LTP) for all Key Towns which is identified as key infrastructural requirement for Newcastle West. The Office advises that the preparation of a LTP for Newcastle West in conjunction with the National Transport Authority (NTA) and other stakeholders should be prioritised and advanced in tandem with the preparation of a new LAP.

The Office also advises that the development plan specifies what other settlements or areas within the city and suburbs require a LTP and indicate their priority and timing.

### **Local Area Plans**

The Office notes the large number of existing LAPs that apply to settlements at tiers 3 and 4 of the county settlement hierarchy and that they are largely outdated e.g. Askeaton LAP and Cappamore LAP.

In this regard, the Office advises the planning authority to limit the number of development plan objectives requiring the preparation of a LAP, especially for the smaller towns/villages or where limited growth is anticipated having regard to section 19(1)(bb) of the Act. The Office welcomes the intent of the planning authority to incorporate a number of the LAPs for smaller settlements into the forthcoming plan and to review the LAPs for Killmallock, Abbeyfeale, Rathkeale, Adare, Patrickswell, Croom, Askeaton and Castleconnell.

The Office advises that the planning authority ensure that the quantum of land zoned for housing in existing settlement plans and LAPs is aligned with the proposed housing allocation from the

---

<sup>18</sup> Page 31 of the Background Paper – People and Places indicates that the population increased from 3,618 to 6,619 between 1996 and 2016

forthcoming core strategy. The Office notes that the core strategy in the Limerick County Development Plan 2010-2016 allocates significant additional population to most of the tier 3 and 4 settlements. In this regard, the planning authority's attention is drawn to NPO 9 of the NPF.

The Office can provide further advice to the planning authority on these matters if required.

### **Transport & Infrastructure**

The Office commends the planning authority for the comprehensive nature of the background paper on connectivity and infrastructure, and endorses the following statement:

*'The integration of land-use planning with transportation and Infrastructure is essential for delivering sustainable development. Reducing the need to travel long distances by private car and increasing the use of sustainable and healthy alternatives can bring multiple benefits to the environment and our communities.'*<sup>19</sup>

In view of greenhouse gas (GHG) emissions from transport (which are second only to agricultural emissions in terms of national emissions<sup>20</sup>) and the energy use for transport (highest energy use by sector, accounting for 43% total final consumption in 2017), it will be essential for the planning authority to achieve a significant modal shift in the city and county in order to meet the requirements under section 10(2)(n) of the Act.

While the Office notes that the trends for walking and cycling to work are more positive than compared to the national average, there is scope to reduce the reliance on the private car. In this regard, the Office welcomes the acknowledgment of the issue and challenge in Section 3.6 of the background paper on connectivity and infrastructure:

*'Limerick, similar to the national experience is not achieving the targets of sustainable travel as adopted by Government in 2010... The challenge for the Limerick Development Plan is to assist a societal shift in thinking of depending on the private car for commuting to the more environmental, active and sustainable travel modes of walking, cycling or future self-propelled means such as scooter networks.'*

As the planning authority will be aware, the NTA has prepared the Draft Limerick-Shannon Metropolitan Area Transport Strategy (MATS). A key issue for the forthcoming plan will be the alignment of the plan with the overall vision and objectives of the MATS<sup>21</sup>, including commitments to the supporting measures and implementation actions contained in the final strategy.

---

19 Page 3, Background Paper - Connectivity and Infrastructure

20 EPA: [www.epa.ie/ghg/currentsituation/](http://www.epa.ie/ghg/currentsituation/)

21 Section 6.3.6.4 out the RSES outlines the priorities for the Limerick Shannon MATS



This will be essential to ensure that the potential for increased trips by walking, cycling and bus are realised and will require ongoing collaboration with the NTA, Transport Infrastructure Ireland (TII) and Clare County Council.

In view of the above, the Office would encourage the planning authority to include modal shift targets to be achieved over the plan period, aligned to relevant implementation measures, in order to achieve meaningful improvements in GHG emissions and energy use in line with section 10(2)(n) of the Act.

As the planning authority will be aware, the county has a number of national roads that form part of the EU's TEN-T transport network which provide access to other cities, regional centres, ports and airports. A key issue for the forthcoming development plan is to ensure that policies protect the strategic function of national roads, maximise the benefits of existing and planned public transport investment, and that planned improvements to the national road network are not eroded by a growth in demand for car travel, especially for short distances, in the absence of long term public transport infrastructure.

The plan should ensure that the route corridor planning and options for the M20 (Limerick to Cork), N21/N69 (Limerick to Adare to Foynes), N21 (Abbeyfeale), N21 (Newcastle West Bypass) and N24 Cahir to Limerick Junction are protected, and that local policies and development management standards regarding access to national roads including exceptional circumstances are consistent with the *Spatial Planning and National Road Guidelines (2012)*. RPO 167 provides details on national road projects identified in the National Development Plan and other projects.

Commitment to the proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019) in the required locations, consistent with RPO 151, will also assist in delivering sustainable and active transport modes, in addition to improvement in the street environment and overall quality of life of urban areas and settlements of all sizes.

The Office notes the conclusion from the background paper on connectivity and infrastructure regarding water and waste water infrastructure:

*'There are large numbers of settlements in Limerick that have limited water services infrastructure. Many settlements have no existing water or waste water treatment capacity and this will prove significantly challenging in the preparation of the proposed Development Plan, to comply with the requirements of the National Planning Framework.'*

While it is acknowledged that the city's water and waste water infrastructure has capacity to accommodate growth, it is noted that a number of the waste water treatment plants in the county's settlements are overloaded or have limited capacity and issues in terms of meeting the requirements of the EPA's licencing agreements.

This will require the planning authority to work proactively with Irish Water to progress projects that deliver infrastructure for the county's settlements and support development in strategic locations such as Newcastle West consistent with the RSES.

Further, the Office advises the planning authority to consider the above infrastructure issues using the tiered approach to land zoning set out in the NPF. In this regard, the planning authority's attention is drawn to the requirement of NPO 72a which states:

*'Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.'*

Further information regarding the above is provided in Appendix 3 of the NPF: *A Methodology for a Tiered Approach to Land Zoning*.

### **Rural Development**

The Issues Paper acknowledges the demand for rural one-off housing in the rural hinterland and the need to balance this demand.

The Office notes the issue of population decline in many of the smaller towns and villages<sup>22</sup> and the difficulty of securing the development of adequate capacity in infrastructure and supply of wastewater and water supplies.

The Office also notes the references to vacant houses in rural areas and the potential to reoccupy these homes.

*'Vacancy in one off rural houses is also a key issue for rural areas and has a significant impact on the rural landscape, particularly in isolated areas, there is significant potential to reoccupy these rural houses to meet the demands for individuals, who wish to live in rural locations.'*<sup>23</sup>

---

<sup>22</sup> Figure 5, page 8, Background Paper – People and Places

<sup>23</sup> Page 31 of the Background Paper – People and Places

Having regard to the above, it is important that the forthcoming plan provides the appropriate balance between policies supporting rural housing in appropriate locations and those that proactively address issues of town/village decline and compact growth. In this regard, the plan's policies will need to demonstrate consistency with NPO 19 and NPO 20. The Office advises that the projected need for single housing in the countryside in the HNDA consider the current supply of vacant houses referred to in the background paper on people and places.

Furthermore, the plan will need to consider the practical implementation of appropriate policy objectives through suitable land activation approaches and proactive facilitation of the building of homes within the existing footprint of rural settlements through measures such as site acquisition and serviced sites, consistent with NPO 18a and NPO 18b.

Such initiatives have the potential to alleviate pressure on the open countryside through provision of a desirable alternative to one-off housing for families who would like to reside close to the facilities, services and amenities available in rural villages and towns whilst maintaining ties to the wider rural community.

### **Strategic Flood Risk Assessment**

The planning authority will be aware of the need to prepare a Strategic Flood Risk Assessment (SFRA) as part of the forthcoming draft development plan, consistent with *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*.

In this regard, the Office advises against the use of information from the Office of Public Work's (OPW) Preliminary Flood Risk Assessment (PFRA) and arterial drainage benefitting land maps to inform the SFRA. The planning authority will need to take account of OPW Flood Relief Schemes and undertake adequate flood risk assessment to determine if there is sufficient information to inform zoning decisions or if further more detailed analysis is required.

### **Climate Action and Energy**

The planning authority will be aware that the Office's evaluation of the plan is required under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n) of the Act.

Having regard to the *Climate Action Plan 2019* and to the objectives of the NPF and the RSES, the county's transition to a low carbon economy and the overall reduction in carbon emissions will become a central issue in the preparation of the plan.

In this regard, the Office endorses the statement on page 24 of the background paper on Environment, Heritage, Landscape & Green Infrastructure:

*‘Perhaps the most pertinent issues facing the future of Limerick City and County is the need to respond to climate change and to ensure that our policies will be of sufficient quality to guide land use planning in such a fashion as to ensure that our heritage and environment will be able to respond to future challenges within the plan period.’*

The challenge for the plan in responding to climate action is acknowledged in section 2.3.6 of the background paper on Strategic Environmental Assessment Scoping Document:

*‘This is the most pressing challenge facing the plan in that reducing carbon production is key in reducing GHG emissions, so the goal of a low carbon economy is a central one for the plan. As we have seen above there is likely to be challenges to this as traditional development patterns often run against this requirement.’*

Regarding climate change mitigation measures pertinent to section 10(2)(n), section 6.3.3 – A Transport Vision for the Southern Region and RPO 151 in the RSES are of relevance regarding the integration of land use and transport planning.

The Office commends the planning authority for providing information on the location and output (in megawatts) from existing wind farms and permitted solar farms across the county<sup>24</sup> and endorses the statement on page 21 of the background paper on Energy, Climate Change, Flooding and Transition to a Low Carbon Economy:

*‘The proposed Limerick Development Plan 2022 - 2028 needs to continue to support investment in sustainable energy production and infrastructure provision in Limerick to meet local and national needs.’*

The promotion of renewable energy sources within the county in accordance with the section 28 *Wind Energy Development Guidelines* (2006), Circular Letter PL 5/2017: *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update on Review (July 2017)*, or any replacement guidelines issued by the Minister for Housing, Local Government and Heritage, will also be critical to ensure Ireland meets its national targets and commitments to increase renewable energy supply and reduce greenhouse gas emissions.

In this regard, the attention of the planning authority is drawn, in particular, to the SPPR under the aforementioned interim guidelines. This requires, inter alia, that the planning authority indicate how the implementation of its development plan over its effective period will contribute to realising overall

---

<sup>24</sup> Section 2.7 of the Background Paper - Energy, Climate Change, Flooding and Transition to a Low Carbon Economy

national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts).

### **Summary**

In summary, the Office commends your authority for the preparation of this Issues Paper and for the comprehensive information provided in the various background papers and for the innovative approach to engage and inform the local community.

The Office advises your authority to pay particular attention to the following issues in the formulation of the county development plan:

- National and regional objectives for population growth, compact growth and regeneration in determining the core strategy, including the settlement hierarchy for your functional area. In this regard, the Office advises that a significant proportion of the county's future population growth should be directed to the MASP area, the key town of Newcastle West and larger settlements consistent with the RSES. This settlement hierarchy should also inform the quantum of land zoned for residential development in other settlements, with the allowance allocated to the rural remainder.
- Consultation with Clare County Council regarding the preparation of its Housing Strategy and HNDA to ensure that the Limerick Development Plan and Clare County Development Plan contain an integrated and coordinated planning policy framework for the MASP area.
- The Office's welcomes the intent to incorporate existing settlement plans and LAPs into the new plan. In this regard, your authority should ensure that the quantum of land zoned for housing in existing settlement plans and LAPs is aligned with the proposed housing allocation from the forthcoming core strategy and deals appropriately with any existing surplus residential zoned lands and is consistent with tiered approach to zoning set out in the NPF.
- The plan should clearly demonstrate how it can implement and measure the implementation of economic and regeneration objectives and initiatives contained in the NPF, RSES and strategies such as *Limerick 2030*.
- The need to prioritise the preparation of a LAP for Newcastle West consistent with the policy objectives including population growth target in the RSES and informed by a LTP prepared in consultation with the NTA, TII and other relevant stakeholders.

- The need to collaborate with Irish Water regarding infrastructural constraints in the county's settlements and in particular the lack of waste water capacity in the key town of Newcastle West.
- The inclusion of specific policies and implementation measures that encourage infill/brownfield development in the city and county's towns and the building of homes within the footprint of rural settlements. These policies and implementation measures should be specific, targeted, and measurable (i.e. include monitoring measures).
- The development of rural housing policies that are consistent with NPOs 18 and 19 of the NPF, and which distinguish between areas under strong urban influence and elsewhere, and support the regeneration of rural towns and villages by directing residential development to serviced areas and facilitating more sustainable transport patterns.
- The need for consultation with transport agencies including the NTA and TII, and neighbouring planning authorities, during the preparation of land use and transport plans, and to ensure that policies and development management standards regarding access to national roads including exceptional circumstances are consistent with the *Spatial Planning and National Roads Guidelines (2012)*.
- The promotion of sustainable settlement and transport strategies for urban and rural areas with measures to reduce GHG emissions, reduce energy usage and to adapt to climate change. The plan should include targets for modal shift over the plan period aligned to specific implementation and monitoring measures.
- The promotion of renewable energy sources within the county in accordance with the relevant section 28 guidelines.

The Office looks forward to reviewing the plan and is committed to continued positive engagement with your authority in the implementation of national and regional policies at county and local level.

Please feel free to contact 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 by emailing [plans@opr.ie](mailto:plans@opr.ie).

Yours sincerely,

A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive style with a diagonal slash at the end of the name.

---

**Anne Marie O'Connor**

Deputy Planning Regulator & Director of Plans Evaluation