



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

16 November 2020

County Development Plan Review,
Planning Policy and Projects Unit,
Tipperary County Council,
Civic Offices,
Nenagh,
Co. Tipperary
E45A099.

Re: Issues Paper for the Tipperary County Development Plan 2022 – 2028

A chara,

Thank you for your authority's work in preparing the issues paper for the Tipperary County Development Plan 2022–2028. The Office acknowledges and welcomes the publication of this paper and your authority's work more broadly in advancing the review of the Tipperary County Development Plan (the plan).

The Office acknowledges that this will be the first development plan made for the combined functional area of the former north county and south county local authority areas. Whilst this will present unique challenges, it will undoubtedly also provide new opportunities for the planned development of County Tipperary.

The issues paper is to be commended for the overall format, including good graphics and images, and concise length which facilitates accessibility to the public. The Office also recognises the positive approach to public engagement taken by your authority, including video promotion, youth engagement, public engagement with planning officials on five occasions, use of social media and engagement through local media. Notwithstanding the limitations imposed by the Government's response to the Covid-19 pandemic, your authority should satisfy itself that the approach taken complies with the provisions of section 11(3)(b) of the Planning and Development Act 2000, as amended (the Act),

In accordance with the provisions of section 31AM of 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 *Regional Spatial and Economic Strategy for the Southern Regional Assembly* (RSES);
- Ministerial guidelines issued 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 broad areas for your authority to consider in formulating the draft development plan.

These observations are offered without prejudice to any 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.

Core Strategy and Settlement Hierarchy

The formulation of the core strategy in accordance with section 10 of the Act is the most significant element in developing the planning authority's draft development plan. A key function of any core strategy is to focus on a preferred approach to both the spatial pattern and quantity of housing delivery over the lifetime of the plan.

The National Policy Objectives (NPOs) under the NPF, and Regional Policy Objectives (RPOs) under the RSES will therefore, to a large extent, determine the approach of the planning authority to the preparation of the plan, including the core strategy and the associated settlement hierarchy. The NPF Implementation Roadmap and the relevant Specific Planning Policy Requirements (SPPRs) contained in section 28 Ministerial guidelines, will also be key determinants in making the core strategy for the functional area.

The determination of a justified settlement hierarchy is a central part of the core strategy. This, in part, will be determined by the NPF and RSES. Three settlements – Clonmel (RPO 17), Nenagh (RPO 20) and Thurles (RPO 21) – have been designated as key towns for the county under the RSES, the most for any county. RPO 11 supports the planning authority in targeting 30% growth to 2040¹ for all key towns, subject to capacity analysis, which shall be determined under the core strategy.

¹ Note, the 30% growth rate in the RSES and the NPF (NPO 9) refers to the growth rate to 2040 over the 2016 baseline census of population.

In view of the relatively limited population growth target for Tipperary County, it will be a challenge to provide a balanced level of growth across the settlement tiers if each key town pursues maximum growth. However, the RSES suggests a different focus for Clonmel, as a self-sustaining regional economic driver and one of six larger key towns in the SRA, compared to the sub-regional influence of the Nenagh and Thurles as smaller key towns.

Section 3.5 *Key Towns* of the RSES indicates that Clonmel, as a major centre for delivery of public services, should plan for population growth in excess of 30% by 2040. Nenagh and Thurles are intended, subject to capacity analysis, to contribute to the strengthening of the urban structure. Although the planning authority will need to plan for significant growth for Nenagh and Thurles, it can be inferred that a lower level of growth would be appropriate.

The lower tier settlements, including rural towns, villages and the open countryside, will necessarily be determined by the planning authority in accordance with section 3.3 *A Tailored Approach*, under the RSES. The RSES also requires, under the tailored approach, the identification of settlements which form part of networks of towns and villages which share geographic and economic resources and contribute specialisms which, if combined, can provide a strategic opportunity to drive the regional economy. The issues paper recognises the opportunity to plan for groups or networks of towns and villages with similar strengths and specialisms, which when combined, provide opportunities for our communities.

No reference is made, however, to regional networks for collaboration and growth. In this regard, the planning authority should consider how best the Limerick-Waterford Transport and Economic Network/Axis, encompassing the towns of Clonmel, Carrick-on Suir, Cahir and Tipperary (RPO 30, refers), and other networks can best be reflected into core strategy.

The Office notes with concern that over the last 10 years, approximately 80% of all new homes in the county were built in the open countryside². At the same time, the population of many of the county's larger settlements, including Clonmel, Carrick on Suir, Tipperary Town and Templemore, have experienced population decline with evident long-term implications for their viability.

The forthcoming Tipperary County Development Plan is therefore a timely opportunity for analysis and evidence-based policy development in relation to implementable measures to turn around the trend above and, in particular, to rejuvenate smaller towns and villages where, often, the only significant level of new housing provision is from the social housing sector.

In devising the core strategy to 2028, the planning authority should be cognisant that the exceptional growth rates (in excess 30%) allowed for under NPO 9 refer to growth to 2040, over the 2016 census of population baseline.

² CSO data indicates that in County Tipperary, almost 64% of all new residences constructed between 2011 and 2016 were located in the open countryside outside of any villages or town.

It will be essential that the core strategy for the county is implementable. The planning authority should therefore be mindful to identify key locations and opportunity sites, which are capable, in terms of physical and social infrastructure, of delivery over the lifetime of the plan period, in a manner that supports the achievement of wider national and regional planning policies and objectives.

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

Compact Growth, Regeneration and Zoning

Compact Growth

The NPF signals the Government's intention to secure a more sustainable and compact urban development patterns into the future (NPO 3a). For Tipperary County, at least 30% of all new homes targeted in settlements will need to be delivered within the existing 'built-up footprint' through infill development and use of brownfield sites (NPO 3c; RPO 35).

In this regard, the RPOs under section 3.11 of the RSES are of particular relevance to the planning authority's core strategy, including the requirement for specific objectives setting out the achievement of urban infill/brownfield development (RPO 34), in addition to RPO 35. In order to facilitate the implementation of these RPOs, it is recommended that the development plan defines those areas of settlements which will contribute to the target, having regard to the definition of brownfield and the range of infill development in the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (2009) (SRDUA).

It will be imperative for the development plan to consider and ensure the practical implementation of the objectives for compact growth and regeneration, including through active land management (ALM) measures in accordance with the provisions of the NPF and the RSES. The identification of opportunity sites for sensitive infill and redevelopment opportunities that hold a reasonable prospect of being actioned over the lifetime of the plan would be expected to play an important role in the ALM approach.

It is essential that the land use zoning proposed under the development plan is consistent with compact growth objectives of the NPF and the RSES. Zoning should flow from a core strategy which is consistent with the provisions of the NPF and the NPF Implementation Roadmap. It should be based on an evidence-based housing occupancy rate for the county, consistent with the NPF, informed by a Housing Need Demand Assessment (HNDA), and consistent with all relevant section 28 guidelines and Strategic Planning Policy Requirements (SPPRs).

The HNDA should identify the level of housing expected to be delivered in the various urban and rural parts of the county, including one-off housing (NPO 21), taking account of both historical trends and the policies above. The HNDA should inform the level of zoning requirements for residential development in settlements. The HNDA and the development plan would also be expected to consider, specifically, the range of housing needs of the elderly (NPO 30), in view of the growing proportion of the county's elderly population (c.28% of whom live alone, according to the issues paper).

The application of appropriate residential density to the different settlement tiers in accordance with the provisions of the SRDUA will naturally limit the quantum of land required to accommodate population growth. The application of an occupancy rate or household size at county or sub-county level will be a determining factor for the overall demand for housing over the plan period. In the absence of relevant section 28 guidelines, the Office considers it essential that the rate(s) selected is fully supported in an evidence-based approach.

The Office would welcome a more flexible approach to zoning for rural villages in order to ensure rural villages provide for attractive options for housing as a realistic alternative to one-off housing in the open countryside (RPO 27). However, the approach proposed must also be cognisant of the need to be consistent with national and regional objectives for compact growth and justified on an evidence-based approach.

A key element in implementing compact growth will be the resolution of any legacy over-zoning issues that may exist in the making of the new plan. In this regard, the Office would commend the authority in the approach taken to land use zoning in the draft Cahir Local Area Plan 2020-2026.

Regeneration

The issues paper highlights the well-developed network of 126 towns and villages providing homes, services and jobs for communities across the county. It is regretful that many of the larger towns have experienced population decline during the period 2011-2016, whilst depopulation and decline of rural towns and villages has been a common experience across the state.

The plan will therefore need to consider how best it can prioritise the regeneration and rejuvenation of rural towns and villages in line with the detailed recommendations of RPO 26, and how regeneration might build on the existing asset base³ of those settlements. Given the historic in character and strong structure, many of the county's settlements offer the basis of high quality urban environments subject to investment in public realm improvements.

³ E.g. built and natural heritage; services

The Office welcomes the recognition in the issues paper of the importance of addressing quality of life issues for these settlements to encourage people to live in towns and villages as an alternative to one-off rural housing in the open countryside (RPO 27).

The development plan should support an appropriate level of growth in small towns and villages through land activation approaches and supportive works (NPO 18a), and the proactive facilitation of the building of homes in such locations. This can be facilitated through the provision of serviced sites, with appropriate infrastructure, in line with the programme for 'new homes in small towns and villages' intended to be developed by the Department of Housing, Local Government and Heritage (NPO 18b; RPO 26 and RPO 216). This can be expected to have amenity, social and economic benefits for all existing residents of these settlements. In this regard, the Office would commend the planning authority for its work in producing the '*Design and Best Practice Guidelines for Cluster Housing Schemes in Rural Villages*' (2018).

In a positive feedback loop, attracting populations back to these settlements will make it more cost effective for the planning authority to provide higher quality facilities and services, which in turn will make them more attractive places to live.

The identification of an appropriate core strategy and settlement hierarchy, with provision for compact growth consistent with the objectives of the higher order plans and strategies, as set out above, will also assist the planning authority in achieving the obligations on in terms of climate action under section 10(2)(n) of the Act.

Economic Development & Employment

A vital aspect of the development plan will be the promotion and nurturing of the county's economic and employment base and ensuring, as much as is feasible, that it is resilient to economic structural changes (RPO 75), such as the current Covid-19 crisis. In this regard, it will be important to consider how active alignment of the development plan with the county's Local Economic Community Plan (LECP) might be achieved.

Development of the strategic employment areas, including Ballingarane Park in Clonmel (specifically identified in the RSES), facilitated by an economic funding package, has the potential to be significant employment driver for the towns and the wider county area. The guiding principles and RPOs relating to enterprise development under section 4.7 *Placemaking for Enterprise Development* of the RSES will provide clear direction for the approach to enterprise development in the development plan, in addition to the principles underlying the regional economic strategy (RSES section 4.2). The guiding principles will assist the planning authority in identifying strategic employment locations for the other settlements.

Whilst the Office notes the opportunities to build on economic interactions, highlighted in the issues paper, provided by the county's location proximate to the metropolitan areas of Limerick and Waterford, the planning authority should be mindful that the approach to economic development should follow the settlement hierarchy (RPO 62).

The planning authority should consider how potential economic opportunities could be developed through the Limerick-Waterford Transport and Economic Network/Axis identified in the RSES (RPO 30), which would complement and build on the connectivity to and influence of the metropolitan area strategic plans (MASPs) on Tipperary County, as identified in the issues paper.

The Office would support a coordinated focus on tourism, including through the network approach (green- and blueways - Lough Derg and Bulter's Way, identified in the issues paper) building on work already done to promote this sector through the Tipperary Tourism Strategy 2016-2021.

The retail sector forms a critical element of any economy, especially for the key towns, and performs an essential service for settlements within most tiers. It would appear that no county retail strategy has been prepared for Tipperary County, which is one of four major inputs into the drafting of the plan. The most recent retail strategies for the former separate authorities date from 2011 (North Riding) and 2010 (South Riding), informed by separate Joint Retail Strategies focused on Limerick and Waterford, respectively.

In view of the amalgamation of the former separate authorities, the planning authority should be guided, as much as is feasible, by the requirements of the *Retail Planning Guidelines (2012)* concerning the preparation of a retail strategy for the county as part of the development plan review process.

The RSES recognises the importance of the retail sector for services, regeneration of town and village centres, enterprise, and employment creation. In this regard, a key factor in the viability of local retail businesses within rural towns and villages is the maintaining of a local residential population in those settlements within walking/cycling distance, in tandem with public realm improvements.

Given the rural character of the county, it will be important that the development plan provides, as much as is feasible, for the enhancement, facilitation and support of rural enterprise. This may include diversification of the rural economy (NPO 21) through inter alia, tourism, the agri-food sector and extractive industries (NPOs 22-23 and RPOs 48-50) and through facilitation of delivery of the National Broadband Plan (NPO 24, and RPOs 46 and 136).

The planning authority will be aware of the many natural advantages of the county in the area of the agri-food and tourism sectors, and the issues paper highlights the progress being made in the county regarding renewable energy, all of which should be supported through a clear strategy in the development plan.

A development plan which can provide more employment and services closer to where its population lives will help avoid longer distance commuting and will also facilitate a greater proportion of trips to work by active modes. This will therefore assist the planning authority in achieving its obligations in terms of climate action under section 10(2)(n) of the Act.

Transport & Connectivity

As noted in the issues paper, the RSES provides a framework for the integrated development of sustainable transport infrastructure, including walking, cycling and public transport, necessary to facilitate modal shift from the private car to active and sustainable modes.

In this regard, the regional policy objectives relating to the integration of transport planning with spatial planning policies under section 6.3.5 of the RSES, and transport investments priorities under section 6.3.6 of the RSES, in particular, should be addressed in the plan review process.

A thoroughly-considered, integrated land use transport approach (RPO 151), with appropriate local planning objectives (RPO 152), will be essential if the planning authority is to attain sustainable and compact settlements which meet the '10-minute' town concepts in line with RPO 176 and referenced throughout the RSES.

The Office would encourage the planning authority to actively promote modal shift in the development plan through the inclusion of a sustainable transport strategy for the county, with aims, objectives, policies and measures to implement same. The planning authority is advised to consult with the National Transport Authority (NTA) in this regard.

Regarding rail transport, it is important that any ambitions to increase its modal share are based on improvements to infrastructure and services that are form part of the infrastructural investment plans of Irish Rail, the NTA or otherwise.

It would also be appropriate to consider both county and settlement walking and cycling strategies (RSES table 6.1) as part of the plan-making process. County strategies should consider the potential for the integration of existing and future proposed greenways and blueways in the region with settlements and facilities across the county (RPO 174, RPO 46) to improve pedestrian and cycle safety for rural residents, rather than solely as tourism assets.

Ensuring that all settlements including rural towns and villages are walkable, with appropriate scaled footpaths and pedestrian facilities, will have benefits in terms of pedestrian and cycle safety and also the quality of the urban environment of the settlements of all sizes. A clear commitment to the implementation of the *Design Manual for Urban Roads and Streets* (2019) in the required locations will assist sustainable and active transport modes.

Local transport plans (LTPs) should be expedited for the key towns in accordance with the RSES, and the planning authority should also consider, in consultation with the NTA, whether it is necessary to prepare LTPs for other settlements.

The planning authority should investigate, in conjunction with the Department of Transport, Tourism and Sport (DTTAS) and the NTA, how the development plan might best facilitate and improve the existing public transport services, and/or promote new transport services.

Regarding the wider area, including rural towns and villages and the open countryside, the further development of the Local Link Rural Transport Programme by the NTA (RPO 172), including a commitment to its better integration, will be important in providing improved connectivity and reducing isolation of some rural populations, and facilitating modal shift away from the private car.

Compliance with this approach will assist the planning authority in preparing a development plan that meets the mandatory objective under section 10(2)(n) of the Act.

In addition, the planning authority should ensure that the capacity of the national road network is maintained and protected through compliance in the development plan with the requirements of the *Spatial Planning and National Road Guidelines for Planning Authorities* (2012), including protecting relevant corridors for national road schemes.

Infrastructure and services

The planning authority will be required to apply a standardised tiered approach to zoning (TAZ) (NPO 72a-c) and not to zone lands that cannot be serviced during the life of the development plan (TAZ methodology, Appendix 3 of the NPF).

Other mechanisms to prioritise the delivery of zoned lands for development (NPO 73a-73c) will also be important considerations for the planning authority and in any future submissions of the Office. These requirements are also supported by the tailored approach under section 3.3 of the RSES. Proactive engagement with utility providers will be crucial to implementation of the TAZ. In this regard, the planning authority should be mindful that the Clonmel Water Resource Zone and Water Treatment Plan are currently being assessed by Irish Water.

As the planning authority will be aware, a significant opportunity is currently available to ensure alignment between planning and infrastructure, whereby plans at local level may be supported by capital investment⁴, where aligned with the objectives and policies of the regional and national level plans. It is the objective of the RSES (RPO 9 and RPO 11) to take a holistic approach to delivery of infrastructure, generally, and specifically in relation to the key towns.

⁴ National Development Plan 2018 - 2027

In this regard, a central element of the NPF relates to the renewal and consolidation of underutilised parts of key towns and rural towns and villages (NPO 3c). These areas can avail of existing infrastructure, or enable the investment in infrastructure for sustainable urban and rural development.

However, it is important that any strategy for the prioritisation of provision of water/wastewater infrastructure is based on the growth strategy objectives under the NPF and the RSES, as referred to above. RPO 213 provides that investment in Rural Wastewater and Treatment Programmes will be subject to settlement hierarchies and core strategies set out in the development plan.

It will be important for the planning authority to engage with relevant infrastructure/utility providers, including Irish Water, including on IW's '*Small Towns and Villages Growth Programme*', during the plan-making process to ensure the objectives of the development plan can be fully implemented.

The planning authority should consider, at an early stage, how infrastructure capacity issues may affect the future implementation of the programme of 'new homes in small towns and villages' intended to be developed by the Department of Housing, Local Government and Heritage. The potential benefits of ecosystem services referred to under the RSES (section 5.2) should also be considered in the development plan.

Services, such as education and other community facilities, are critical to the quality of life and to the vitality and viability of settlements. The planning authority should consider how best such essential services can be accommodated in a flexible manner in its approach to future land use zoning, including in the existing built up area and areas proposed for regeneration, in discussion with the Department of Education and other providers.

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

Climate Action

In view of the Government's Climate Action Plan 2019 and the objectives of the NPF and the RSES to transition to a low carbon economy and reduce carbon emissions and energy use, the Office supports the planning authority's emphasis on climate action as a central issue to the preparation of the forthcoming development plan.

As the planning authority will be aware, the Office is required under section 31AM(2)(a) of the Act to address, in particular, the legislative and policy matters within the scope of section 10(2)(n) in its evaluations and assessments of the development plan.

This subsection concerns the inclusion of objectives for the promotion of sustainable settlement and transport strategies for urban and rural areas, which include the promotion of measures to reduce energy demand, to reduce greenhouse gas (GHG) emissions (climate change mitigation) and to adapt to climate change through the location, layout and design of new development.

The development plan should provide sufficient clarity and certainty in terms of these measures in order to direct any future local area plans made consequent to the forthcoming development plan and, in this regard it would be appropriate to include a climate action strategy as part of the development plan. The planning authority is also strongly advised to bring forward all land use zoning objectives into the county development plan.

Regarding climate change mitigation measures pertinent to section 10(2)(n) of the Act, the objectives of the RSES under section 6.35 *Regional Policy Objectives for the Integration of Transport and Spatial Planning Policies* (in addition to NPOs 28, 30, 54 and 64) and under section 1, *Climate Action and Transition to a Low Carbon Economy* in Chapter 5, are particularly relevant. As noted, above, the objective (RPO 176) to attain compact settlements within the '10-minute' town concept is also consistent with the requirement for sustainable settlement and transport strategies under section 10(2)(n) of the Act.

It is an objective of the RSES to ensure effective coordination of climate action with the Climate Action Regional Offices (CARO) and local authorities in the development and implementation of climate mitigation and adaptation measures (RPO 88). The Office would advise that the planning authority engages with the Eastern and Midland CARO in this regard.

Consultation with utility and service providers, including the OPW and Irish Water, will also be of particular importance.

The Office understands that forthcoming updates to the section 28 *Development Plan Guidelines* will initiate a process of enhanced guidance for the preparation of plans. This will include guidance on the requirements under section 10(2)(n) of the Act.

Renewable energy

Similarly, the promotion of renewable energy sources within the county in accordance with the section 28 *Wind Energy Development Guidelines 2006* (subject of Circular Letter PL 5/2017) or any replacement guidelines issued by the Minister, will also be critical to ensure Ireland meets its national targets and commitments to increase renewable energy supply and reduce greenhouse gas emissions.

The Office notes from the issues paper the significant progress made by the planning authority in facilitating renewable energy, and commends the planning authority's contribution to the national renewable energy targets to date.

The planning authority should, however be mindful not to include restrictions on wind energy development (or other renewable energy infrastructure), such as separation distances from residential or other properties/structures, which are not otherwise provided for under the relevant guidelines.

The Office supports the facilitation, through the forthcoming development plan, of the Bioeconomy Research Centre at the National Bioeconomy Campus in Lisheen, which has the potential to develop positive links to the county's agricultural base.

Environment, Heritage and Amenities

The development plan will play a central role to the protection of environmental assets, including landscape, natural ecosystems and biodiversity, and in particular ground and surface waters in line with the requirements of the Water Framework Directive.

The Office welcomes the recognition of the vulnerability of water resources to development given the critical nature of the resource. The issues paper recognises agriculture as having the greatest impact on water quality. However the development plan should also address, through appropriate objectives, policies, standards and measures, the significance of the potential threat to water resources from the extensive level of one-off housing served by on-site wastewater treatment systems.

Summary

In conclusion, the Office commends your authority on the range of key issues considered in its background papers and the approach taken to public engagement through the preparation of a well-considered, formatted and accessible issues paper.

Without prejudice to extensive legislative and policy requirements that must be implemented through the development plan, the Office would advise that your authority to pay particular attention to the following issues in the formulating of the development plan.

- In view of the high rate (80%) of new residences being constructed in the open countryside and the decline of many of your county's largest settlements, your planning authority should determine what objectives and detailed measures will be necessary to address current deficiencies in the development plan, and to ensure that the core strategy to be adopted under the forthcoming development plan can and will be implemented effectively over the plan period;
- Specific and measurable objectives for urban infill/brownfield development will be key (RPO 34), allied to specific rejuvenation priorities (RPO 35), to ensure the achievement of compact growth and regeneration under the NPF and the RSES, including the requirement that at least 30% of new homes be provided on brownfield land or as infill development. In this regard, it would be advisable for the development plan to define, in plan, those areas of settlements which will contribute to the target, having regard to the definition of brownfield and the range of infill development in the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (2009);
- The importance of resolving any legacy issues of over-zoning of lands that may exist within your functional area as well as deriving the requirement for land use zoning objectives for residential development from anticipated levels of housing provision in urban and rural areas (avoiding double counting) over the lifetime of the plan;
- The coordination of economic, commercial and employment growth with population growth for the county, supported by the identification of strategic employment sites for the county's key settlements through the development plan review process, consistent with the guiding principles under section 4.7 of the RSES, in addition to measures to enhance, facilitate and support of rural enterprise and to support regional economic networks in accordance with RPO 30;
- The preparation of a retail strategy for the county should be considered as part of the development plan review process, guided, as much as is feasible, by the requirements of the *Retail Planning Guidelines* (2012);
- It is critical that the plan includes practical and measurable objectives for promoting sustainable settlement and transport strategies, reductions in greenhouse gas emissions,

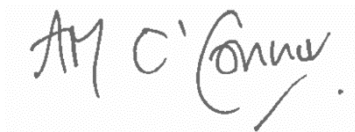
reduced energy usage and adaptation to the effects of climate change, in particular, through the location, layout and design of new development, including targets for modal change over the plan period and provisions for monitoring over the plan period.

In this regard, the Office would advise that climate mitigation and adaptation measures are mainstreamed into the development plan and that the plan provides sufficient clarity in terms of objectives and measures proposed under section 10(2)(n) to inform future LAPs within your functional area. Accordingly, the Office would advise that the development plan include a clear sustainable transport strategy and a climate action strategy and that all land use zoning is included at development plan stage.

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

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

Yours sincerely,

A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive, slightly slanted style.

Anne Marie O'Connor

Deputy Planning Regulator and Director of Plans Evaluations
