



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

OPR Ref: IP-022-23

14th August 2023

Planning Department,
Clare County Council,
Áras Contae an Chláir
New Road,
Ennis,
County Clare
V95 DXP2.

**Re: Pre-Draft Issues Paper for the Shannon Town and Environs Local Area Plan
2024 - 2030**

A chara,

Thank you for your authority's work in preparing the Issues Paper for the proposed Shannon Town and Environs Local Area Plan 2024 - 2030 (the Issues Paper). The Shannon Town and Environs Local Area Plan 2024 - 2030 (the LAP) is a mandatory local area plan under section 19(1)(b)/(bb) of the *Planning and Development Act 2000*, as amended (the Act).

The Office welcomes the timely commencement of the plan-making process, through the publication of the Issues Paper, in view of the provisions under sections 18(4)(b) and 19(2B) and in view of the recent adoption of the Clare County Development Plan 2023 – 2029 (the Development Plan) on 20th April 2023.

The Office acknowledges your authority's work, more broadly, in advancing the preparation of the LAP.

As section 20(1) does not prescribe the requirements for public consultation at pre-draft stage for LAPs, the planning authority is commended for publishing an Issues Paper, engaging proactively with the public and notifying the Office of the intention to prepare the LAP. The future LAP has the potential to deliver on key objectives of the Development Plan, including housing, employment and services.



In accordance with the provisions of section 31AO of the Act, the Office is obliged to evaluate and assess local area plans in the context of certain statutory parameters including:

- matters generally within the scope of section 19;
- consistency with the objectives of development plan, its core strategy, the *Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly* (the SRA);
- consistency with the transport strategy of the National Transport Authority (NTA);
- ministerial guidelines made under section 28;
- ministerial policy directives issued under section 29; and
- such other matters as the Minister may prescribed under section 262 or otherwise prescribe.

The Office has set out some broad issues, relevant to the preparation of most, if not all LAPs, in addition to some specific issues of particular relevance to the preparation of this LAP, under the following (ten) 10 themes:

1. [Strategic policy framework](#)
2. [Development plan and core strategy](#)
3. [Zoning, compact growth and infrastructural services](#)
4. [Regeneration](#)
5. [Education, social and community amenities](#)
6. [Economic development and employment](#)
7. [Transport and mobility](#)
8. [Climate change and flood risk management](#)
9. [Environment, built and natural heritage](#)
10. [Implementation and monitoring](#)

The Office's comments are offered without prejudice to any observations and recommendations as may be forthcoming from the Office at future stages of the plan-making process. They do not affect the obligation on your planning authority to comply

with the relevant legislative requirements, or to be consistent with the fullness of the detailed policy context of the higher order plans and strategies and Ministerial guidelines.

1. Strategic Policy Framework

The planning authority will be aware that section 20(5) of the Act requires the LAP to be consistent with the objectives of the RSES, in addition to the *Project Ireland 2040: National Planning Framework* (NPF), the Specific Planning Policy Requirements (SPPRs) of section 28 guidelines and the relevant development plan.

The provisions of the RSES have generally been transposed through the Development Plan. Therefore, in ensuring consistency with the Development Plan and core strategy, the planning authority can ensure that the LAP is also generally consistent with the RSES and NPF. However, the Office would encourage the planning authority to liaise with the SRA in preparation of the draft LAP to ensure consistency with the RSES, particularly where clarity is required on the regional policy objectives and guiding principles set out therein including for the Limerick-Shannon Metropolitan Area Strategic Plan (MASP).

Shannon Town and Environs is essential to the future economic development of the Mid-West Region and the Limerick - Shannon metropolitan area (LSMA), and as a nationally and internationally important centre for employment, connectivity, international trade, and foreign direct investment.

The Issues Paper demonstrates a clear understanding of the role of the settlement within the wider county and regional context. The NPF recognises the LSMA growth potential with existing third level institutions and international airport and port facilities and aims to build on these strengths while improving liveability.

It is an objective of the RSES to strengthen the role of the LSMA area as an international location of scale, a complement to Dublin and a primary driver of economic and population growth. The RSES also recognises that Shannon is central to delivering on the ambition for the LSMA area's economic development and success.

The MASP area represents a significant opportunity for Shannon to expand as a globally recognised centre of excellence for software engineering / aviation / logistics. The RSES recognises the strategic location of Shannon which represents a gateway to the west of Ireland as well as long established synergies with Limerick City and the role, function and

service of Shannon International Airport and its surrounding employment / industrial environment.

2. Development plan and core strategy

Section 19(2)(b) of the Act requires the LAP to be consistent with the objectives of the development plan and its core strategy. A key message of the section 28 *Local Area Plan Guidelines for Planning Authorities* (2013) (LAP Guidelines) is that consistency between local area plans and the core strategy of development plans is an essential requirement, particularly in relation to the quantum and location of lands identified for development.

The Office would therefore caution against the introduction of any objectives that would conflict with the detailed provisions of the core strategy identified for Shannon and the housing supply target for the settlement.

The Issues Paper states that Shannon has a 2022 population of 10,256 people which would represent a 5.2% increase between 2016 and 2022. While this is broadly in line with the 7% population increase for County Clare over the same period, it is not commensurate with the recent low level of housing activating in Shannon Town. Specifically, the Office notes that information on housing completions¹ over the last five years indicate that only 129 units have been completed since 2018, of which a significant number were social housing. Should this trend continue², Shannon would fall well short of its core strategy housing supply target of 552 units for the Development Plan-period of 2023 to 2029.

Furthermore, the RSES identifies significant population growth exceeding 30% by 2040 for Shannon which will not be achieved without a significant increase in housing completions.

In this regard, the local authority should ensure that the LAP contains a sufficient supply of appropriately zoned and serviced land to meet Shannon's housing supply target while also facilitating sufficient choice for development appropriate to the scale and nature of the town.

The Office notes that the associated population base for Shannon must also be considered in the context of its estimated daytime population of approximately 18,000

¹ Housing Delivery Tracker - <https://storymaps.arcgis.com/stories/ab12ed6d50a540e2891170c24955ff49>

² Average of 26 housing units per annum

people with over 8,000 working within the Shannon Free Zone. It will be of critical importance for the emerging LAP to try and encourage more of the working population to live in the town and bring about real change.

The Office also notes that objective CDP 4.4 of the Development Plan requires the preparation of the LAP to have regard to the Shannon Town Centre Masterplan (January 2022) (Masterplan).

3. Zoning, compact growth and infrastructural services

The objectives of the LAP are required to be consistent with the policy objectives of the RSES, including, in particular the specific policy objectives for the Limerick–Shannon MASP in Volume 2.

The Office notes that land-use zoning objectives have not been provided for Shannon in the Development Plan. That said, the recently adopted Masterplan sets out a vision, strategy and most significantly, commitment for the proper planning and sustainable development of the town centre area over a 15-year period. It is understood that the Masterplan provides the basis for funding applications under the Urban Regeneration and Development Fund to support urban renewal and public realm improvements. Such initiatives will support compact growth (RPO 35) and regeneration (MASP Policy Objective 10) of the town core. Therefore, it is important that the LAP is informed by the Masterplan and reinforces its recommendations where appropriate.

Delivering compact growth will play a central role to the achieving the National Climate Objective and the Government's obligatory target of 51% for Greenhouse Gas (GHG) emissions reduction by 2030 and for a carbon neutral economy by 2050.

In relation to the provisions and / or standards for residential density or building heights the LAP should have regard to relevant section 28 guidelines, including *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns and Villages* (2009), *Urban Development and Building Heights Guidelines for Planning Authorities* (2018), and *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (2020) and should be consistent with any SPPRs therein.



The planning authority will also need to ensure consistency with the provisions for the tiered approach to zoning under NPO 72 a-c of the NPF. This will require the carrying out of an infrastructure assessment for the town in accordance with Appendix 3 of the NPF and with section 4.5.2, Settlement Capacity Audit, of the *Development Plans, Guidelines for Planning Authorities (2022)* (the Development Plans Guidelines).

4. Regeneration

Both the NPF (NPOs 6, and 35) and RSES (RPOs 7 and 10) place a strong emphasis on the opportunities for urban regeneration to create attractive, liveable, well-designed, high-quality urban places. Regeneration and revitalisation of settlements through the reuse of brownfield sites and vacant / underutilised buildings will play a crucial role in mitigating climate change and in achieving the Government's obligatory target of 51% for GHG emissions reduction by 2030 and for a carbon neutral economy by 2050.

The Office appreciates the challenges facing the town centre which are in part due to its origins as a 1960s new town with segregated land uses and an urban environment that prioritises private car movement and abundant parking.

In this regard, the Office commends the local authority on its recent initiatives to support the town's regeneration namely the purchase of the One Shannon Hub site for a multi-functional civic and community facility and opening of the Shannon Town Park Project.

The Office also notes that the Masterplan identifies other key intervention areas including an Innovation Campus, new town square and potential for a main street along the R471.

In this regard, the Office encourages the local authority to set out clearly the intended mechanisms which will help to deliver further town centre regeneration and urban renewal in line with the Masterplan's objectives to provide for a variety of uses and cultural offering and a more pedestrian friendly environment with improved linkages to the employment lands and surrounding residential areas.

Further, the successful implementation of the Masterplan will be fundamental to the sustainable growth of Shannon and will be a key enabler for the emerging LAP objectives

and aspirations. In this regard, the Office welcomes the implementation commitments outlined in the Masterplan which include³ among others;

- *consult and engage with key stakeholders and interests, and obtain endorsement;*
- *establish a Dedicated Implementation Company, e.g., DAC, or other delivery vehicle with a sole focus on driving the implementation of the masterplan;*
- *design a comprehensive engagement strategy that enables a collaborative approach for the next stages of developing the project; and*
- *Clare County Council to acquire ownership of strategic enabling sites in the town centre, in particular the site proposed for the One Shannon Hub.*

It is understood that a significant land bank to the north of the town centre has been identified as an Innovation Campus which seeks to provide for a centre of innovation comprising a mix of uses including hotel / apart-hotel, education facilities, shops and residential along the northern street frontage. In this regard, the Office considers that a primary focus of the expansion lands should be to forge a strong relationship with good pedestrian and cycling connectivity to the existing town centre. Given the scale and extent of the proposals indicated within the expansion lands it will be of critical importance that the LAP ensures that sustainable mobility and pedestrian movements in and around the town to the new innovation campus are prioritised.

An evidence-based approach should be taken in order to identify specific regeneration sites, or vacant or underutilised buildings, generally, in accordance with the guiding principles of the RSES for urban infill and regeneration, where applicable.

The designation of regeneration areas in the LAP is a requirement for the implementation of the Vacant Site Register under the *Urban Regeneration and Housing Act 2015*.

The LAP should align with the objectives of the regeneration strategy of the Development Plan and agreed Masterplan in order to focus development on the key regeneration sites identified. There is pressing need to implement a strong policy framework to support the utilisation of existing buildings, brownfield / infill sites, and derelict and underutilised sites. Proactive land activation measures, including the planning authority's powers in respect of

³ Shannon Town Centre Masterplan: Implementation Stages

land acquisition / compulsory purchase, derelict sites and the vacant land, among others, should be considered.

Also important in this respect is the Government's *Town Centre First: A Policy Approach for Irish Towns* (2022) (Town Centre First) which policy envisages plans as central to informing the future direction of towns and the priority investment interventions supported through Town Centre First aligned funding streams.

The identification of intended sources of funding to facilitate, support or complement key regeneration projects, such as the recently announced Croí Cónaithe (Towns) Fund Scheme (2022), is a further land activation measure to be considered in the LAP.

5. Education, social and community

Access to quality childcare, education and health services is a National Strategic Outcome of the NPF. In this regard, the LAP should be consistent with NPO 31, which seeks to align population and employment growth with investment in childcare and education facilities on well-located sites within or close to the existing built-up areas to meet the diverse needs of local populations. The LAP should also be consistent with the objectives of the RSES for education facilities. It should also have regard to the provisions for social audits under the Development Plans Guidelines or civic infrastructure audits under the LAP Guidelines.

It is an objective of the NPF to ensure the creation of liveable places that are home to diverse and integrated communities (NPO 4) and provide improved integration and greater accessibility in delivering sustainable communities and associated services (NPO 28). This includes planning for the housing / transport / accessibility and leisure needs of an aging population (NPO 30) and for the Traveller community taking account of the local authority's *Traveller Accommodation Programme 2019-2024*. The LAP should also be consistent with the objectives of the RSES for social and community facilities.

The Office notes that the Clare Local Economic and Community Plan (LECP) is currently being prepared following the closure of the public consultation period on 23rd June 2023. The NPF expects the local authority's LECP should also inform the LAP to provide for the co-ordinated spatial planning of community services for the area.

Having regard to NPO 33 which prioritises new homes that can support sustainable development at an appropriate scale of provision relative to location, it is important that the

LAP takes an integrated approach to the planning of education, social and community facilities and amenities. The LAP should consider the capacity of existing facilities, including community centres, leisure, amenity and cultural facilities to serve existing and future residents.

Specifically, in relation to schools, the planning authority should consult with the Forward Planning and Site Acquisitions Section of the Department of Education.

6. Economic development and employment

The LAP Guidelines state that LAPs should include objectives to promote local economic development and employment growth by focusing on issues such as the creation of vibrant and dynamic city and town centres where local businesses thrive.

The RSES recognises Shannon to be of central importance in delivering the ambition for the Limerick - Shannon MASP as a centre for international business, aviation, aerospace and attracting sectors such as Connected and Autonomous Vehicles (CAV) and Lifesciences. The RSES further recognises Shannon as a major employment location providing for industrial, manufacturing, warehousing / distribution and transport with Shannon International Airport acting as an international gateway to the west of Ireland. The Office encourages the local authority to continue to support this significant regional strength particularly in line with RSES policy objective 3(a) which seeks to support and promote Shannon as a centre for research and development.

The NPF, RSES and the LAP Guidelines emphasise the need to take an evidence-based approach to the inclusion of objectives for employment and other commercial uses. As stated above, the NPF expects that the local authority's LECP would inform the LAP to provide for the co-ordinated spatial planning for the area.

The LAP is required to be consistent with any objectives of the RSES concerning strategic enterprise / employment sites or in respect of development type or location-specific development. In this regard, both the RSES and the Development Plan Guidelines recognise accessibility as a central consideration in selecting employment zonings and the transport provision of potential locations for development needs to be strategically considered, including through the application of the sequential approach.



The Office notes that the *Mid-West Regional Enterprise Plan to 2024* for the mid-west provides funding opportunities for the development and implementation of collaborative and innovative enterprise projects that can make a significant impact on enterprise development in the region. In this regard, the LAP should ensure the local authority fulfils its commitment set out under objective CDP 6.2 of the Development Plan which states:

It is an objective of Clare County Council and LEO Clare: to collaborate with all relevant stakeholders in proactively progressing the delivery of actions set out in the Regional Enterprise Plan to 2024 for the mid-west.

The facilitation of retail facilities will also need to be considered to provide for the anticipated population growth. Regard should be had, in particular, to the sequential approach to the location of retail development and other provisions of the *Retail Planning Guidelines for Planning Authorities* (2012), and the position of the settlement in the retail hierarchy of the Development Plan.

That being said, a primary focus of the emerging LAP should seek to support a live-work model given the significant day-time population fluctuation for Shannon. The relationship between the strategic employment lands and the town core should be promoted through urban regeneration / renewal and connectivity to support the revitalisation of the town centre consistent with the Masterplan objectives.

An integrated approach to land use and transport planning for enterprise, employment and commercial development will also play an important role in mitigating climate change and in achieving the Government's obligatory target of 51% for GHG emissions reduction by 2030 and for a carbon neutral economy by 2050.

7. Transport and mobility

The Climate Action Plan 2023 identifies the need to drive implementation and acceleration of measures to reduced car kilometres, guided by the National Sustainable Mobility Policy (2022) (NSMP), in addition to the proposed National Demand Management Strategy. The NSMP commits to delivering an additional 500,000 daily sustainable journeys by 2030 and a ten percent reduction in kilometres driven by fossil fuelled cars by 2030.

An integrated approach to land use and transport planning will be central to achieving these targets. In addition to the above, the LAP should be informed by the guiding

principles and be consistent with the RPOs of the RSES relating to integration of land use and transport planning, where applicable.

The Office welcomes the modal share breakdowns which are provided in the Issues Paper. Notably, Shannon has the highest percentage share of sustainable transport modes with over 45% of people walking for education trips and almost 10% using public transport. Shannon's modal share percentage 23.7% is significantly higher than the national average of 14%. The Office encourages the planning authority to build on these successes and seek to enhance the connectivity / permeability of Shannon Town particularly between the town core from the surrounding employment lands and residential areas.

RPO 157 indicates that a Local Transport Plan (LTP) should be prepared for Shannon which forms part of the metropolitan area and as a complement to the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS). The preparation of an LTP for Shannon should also be consistent with Measure SM1 of LSMATS. In addition, section 14.5 Metropolitan Towns of LSMATS states;

It is envisaged that over the lifetime of the Strategy, improvements to the road network within the Metropolitan towns will largely consist of streetscape and public realm enhancements. The focus for these areas will generally be to overcome the challenges posed by a legacy of dispersed development and poorly defined centres.

The local authority should ensure that relevant policies and / or objectives from LSMATS are integrated as part of the LAP such as the delivery of the N19 Airport Access Scheme.

The Office notes that an LTP will be prepared in conjunction with the LAP in accordance with TII / NTA Areas Based Transport Assessment Guidance (ABTA). The LTP should set out an ambitious but realistic modal shift targets for the town and inform the objectives, policies and measures in the LAP so that targets can be achieved.

The alignment of settlement and land use patterns to an integrated transport strategy can provide opportunities to reduce car dependency and enable a modal shift in favour of sustainable transport methods.

While Shannon appears to be performing well in respect of its utilisation of sustainable transport modes particularly for commuters to employment land banks and the airport, it is

important for the LAP to address the movement of people around the town and the infrastructural relationship between the employment lands and the town core as well as the surrounding established residential areas. Enhanced permeability and connectivity measures should be further explored as part of the LAP to ensure that the town centre and expansion lands including the Innovation Campus sufficiently integrate into the urban environment.

Shannon is not currently served by rail infrastructure however there may be potential to provide a 10km spur off the Limerick to Ennis railway line. The Office notes that there is an infrastructural safeguard incorporated into the Development Plan to potentially accommodate this. In this regard, the LAP should retain this high level objective and identify any implementation measures that may assist in the delivery of this objective.

The proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019), including in particular filtered permeability, will ensure that over time the area will better accommodate pedestrians and cyclists, in addition to public transport where available. Similarly, the implementation of the NTA's Permeability Best Practice Guide will also ensure enhanced pedestrian and cycle routes within the area of the LAP.

8. Climate change and flood risk management

It is a National Strategic Outcome of the NPF to transition to a low carbon climate resilient society. It is an objective (NPO 52) of the NPF to ensure that the planning system responds to national environmental challenges and that development occurs within environmental limits. The NPF acknowledges climate change as a national environmental challenge and it is an objective (NPO 54) to reduce Ireland's carbon footprint in support of national targets for climate policy mitigation and adaptation, including targets for GHG emissions reduction.

The Office commends the local authority in relation to its recent pre-draft consultation to inform the Clare Climate Action Plan (LACAP). The pre-draft consultation paper is extremely comprehensive and sets out a range of issues that the LACAP will address including statistical data on Clare's GHG emissions, decarbonisation ones, climate change risks and future climate risks. Notably, the highest record temperature recorded in County Clare was recorded at Shannon Airport in 2018 as well as the longest recorded heatwave lasting a total of 10 days of temperatures over 25 degrees.

It is understood that the Clare LACAP will actively translate national climate policy to local circumstances and Clare County Council will be responsible for reducing GHG emissions in managing assets and infrastructure.

The Office welcomes the intention to publish the draft LACAP in Q3 of this year which is broadly in line with the target for completing the LAP. In this regard, the LAP should align any emerging policies and / or objectives relation to climate change resilience and adaptation with the forthcoming objectives, strategies and targets that will transpire as part of the LACAP.

The effective implementation of climate mitigation objectives through the LAP, consistent with national and regional policy objectives and guiding principles identified by the Office under each of the themes above, will be critical to the achievement of the Government's GHG emissions reduction targets.

Further, the emerging LAP should set out how the town intends to address national targets and commitments to increase renewable energy supply and reduce GHG gas emissions taking account of the County Clare's Renewable Energy Strategy and Wind Energy Strategy as well as the *Clare Climate Change Adaptation Strategy 2019 – 2024* and the forthcoming LACAP. The Renewable Energy Strategy for County Clare confirms that Shannon town has been the subject of a detailed energy needs study and energy modelling which has identified an existing energy use breakdown of 57% thermal and 43% electric industrial, commercial and residential sectors. The existing LAP identifies Shannon Town as potentially suitable for a Combined Heat and Power System.

In terms of climate adaptation, flood risk management is the most critical climate change adaptation measure to be addressed in the LAP, informed by Strategic Flood Risk Assessment (SFRA). The planning authority should ensure that it has regard to the detailed requirements and provisions of section 28 *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009), including the staged approach to flood risk assessment and, in particular, the application of the sequential approach and the requirement to carry out the plan-making justification test.

The planning authority should overlay the flood risk zones on any proposed land use zoning maps, to illustrate the potential flood risk arising and to demonstrate how the sequential approach has been applied. The planning authority is also requested to make a



copy of digital mapping data available to the Office and to the OPW to facilitate assessment. Further, the planning authority is advised to liaise with the OPW in the carrying out of SFRA to avoid issues arising at draft LAP stage. This will be of particular importance where land use zoning objectives are proposed to be included.

In accordance with NPO 57, the LAP is required to integrate sustainable water management solutions, such as Sustainable Urban Drainage Systems (SuDS). In this regard the Office would draw the planning authority's attention to *Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design, Best Practice Interim Guidance Document (2022)* which was issued by the Department of Housing, Local Government and Heritage after the adoption of the Development Plan.

9. Environment and natural and built heritage

The planning authority is the competent authority for the purposes of Strategic Environmental Assessment (SEA) and Appropriate Assessment. The planning authority will be aware of its obligations and responsibilities under the SEA Directive and under the Habitats Directive.

The Office notes that the Shannon Estuary which is located c. 1km to the south of the town forms the largest estuarine complex in Ireland. It is one of Ireland's most important sites for over-wintering wildfowl and waders. A number of objectives have been outlined in the Development Plan in relation to conservation and environmental protection of which the LAP should have regard to including the Development Plan's Objective 11.2 which supports the implementation of the *inter-jurisdictional Strategic Integrated Framework Plan (SIFP)* for the Shannon Estuary, whereby all developments should incorporate the mitigation measures contained in the SIFP to ensure the integrity of the Natura 2000 network.

The planning authority is required to consider the revised section 28 *Strategic Environmental Assessment Guidelines for Regional Assemblies and Planning Authorities (2022)*. It should also consider the *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)*, as revised.

The Office also notes that Shannon Town allows for large corridors of unbuilt areas to establish a green network to improve connectivity between these spaces, protecting

natural habitats as indicated in the Masterplan. The Masterplan aims to strengthen these corridors by establishing seamless green connections to the Shannon Estuary and the wider River Shannon. The emerging LAP should explore implementation measures to deliver these improved connections in line with the Green Infrastructure Framework for Shannon Town.

The planning authority should ensure the LAP is consistent with objectives of the NPF concerning environmental protection such as NPO 52, NPO 57 and NPO 58, in addition to the objectives or guiding principles of the RSES.

Regarding built-heritage, NPO 17, the RSES and several section 28 guidelines (LAP Guidelines and the Development Plans Guidelines, among others) recognise that protecting, conserving and managing sites and features of special interest, in addition to public realm improvements, can instigate a heritage-led regeneration of settlements to generate economic benefits in terms of tourist footfall, improved retail environment and improved quality of life. The re-use of built heritage will contribute to compact growth and regeneration and to climate change mitigation having regard to embodied carbon.

Although the key built-heritage related objectives and policies are contained in the Development Plan, the planning authority should consider what location specific objectives or measures would assist in the protection or improvement of built heritage over the period of the LAP. In this regard the planning authority should have regard to the *Architectural Heritage Protection Guidelines for Planning Authorities (2004)*, as amended.

10. Implementation and monitoring

The NPF and the RSES place increased emphasis on and recognise the importance of monitoring the implementation of statutory strategies and plans, as a measure of plan effectiveness and to continually update a relevant evidence base to inform future planning strategies.

The Office notes that an implementation strategy has been outlined in detail in the Masterplan. The effective implementation and delivery of the Masterplan will be critical to ensure the effective implementation of the LAP. In this regard, the LAP should align the implementation and monitoring objectives with the approaches set out in the Masterplan particularly in respect of the identification of landownership in the town core as well as the regular engagement and collaboration with relevant stakeholders.

The planning authority will be aware of its duty and function under section 15(1) and 15(2) of the Act, to secure the objectives of the relevant development plan and to report on progress achieved. As the implementation of the objectives of the LAP derive from the objectives of the Development Plan, the obligations under the aforementioned subsections are also relevant to the LAP.

Summary

In summary, the Office commends your authority for the preparation of this Issues Paper in particular the medium and long term approaches set out in the Masterplan which aim to revitalise the vibrancy, viability and sustainable growth of Shannon Town and Environs. The Office advises your authority to pay particular attention to the following issues in the preparation of the LAP:

- ensure that all lands zoned for residential and other development are serviced, or will be serviceable, during the plan period, and are consistent with the principles of compact growth and the sequential approach to development;
- actively seek to deliver on the objectives and approaches set out in the Masterplan to bring about real change for Shannon Town in order to make it a more attractive destination in which to live, work and do business;
- advance the detailed design brief for the One Shannon Hub;
- clearly set out the intended mechanisms including land activation measures which will help to deliver town centre regeneration and urban renewal for Shannon Town Centre;
- ensure that the draft LAP is consistent with Development Plan Objective CDP5.10 regarding the council's *Traveller Accommodation Programme 2019 – 2024* including any specific recommendations or needs identified for Shannon Town;
- ensure that the LTP is used to inform zoning and other objectives in the LAP, and ensure that sustainable mobility and pedestrian movements in and around the town and to the new innovation campus are prioritised and improved. The planning authority is advised to consult with NTA and TII in the preparation of the LTP; and



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- the planning authority should engage with the OPW at an early stage of the plan preparation process to ensure that any land use zoning proposals and/or policies and objectives are based on an accurate and up-to-date evidence base in relation to flood risk management.

The Office looks forward to reviewing the future draft LAP and is committed to continued positive engagement with your authority in implementation of national and regional policies at the 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 the undersigned or at plans@opr.ie.

Is mise le meas,

A handwritten signature in black ink that reads "AM O'Connor".

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations
