

7<sup>th</sup> November 2023

Planning Section,  
Mayo County Council,  
Aras an Chontae,  
Castlebar,  
Mayo,  
F23 WF90.

**Re: Draft Westport Local Area Plan 2023-2029**

A chara,

Thank you for your authority's work in preparing the Draft Westport Local Area Plan 2023-2029 (the draft LAP).

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

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

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

The Office's evaluation and assessment has had regard to the Mayo County Development Plan 2022-2028 (the Development Plan), the Northern and Western Regional Spatial and Economic Strategy (RSES) and relevant section 28 guidelines.

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

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

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

## **Overview**

The Office welcomes the preparation of the draft LAP, having regard to the statutory requirements under section 19 of the Act. Westport has been identified as a place of strategic potential under the RSES and the LAP will play an important role in ensuring the sustainable development and expansion of the settlement over the forthcoming years.

The Office considers the draft LAP to be generally consistent with the regional policy objectives of the RSES, particularly in respect of its overall strategy to promote compact growth, target town centre renewal and promote more sustainable travel patterns. The commitment of your authority to town centre regeneration is clear, as evidenced by the town centre regeneration strategy set out in Chapter 4. It is noted that the planning authority has received Rural Regeneration and Development Funding for Phase 1 of the regeneration of the Sisters of Mercy Convent site for the development of a new town library, civic office and a community building. This is to be commended and will contribute to the long term sustainable regeneration of the town centre.

The Office has however, identified some areas where further consideration is required to ensure that residential zoned land is well located in terms of proximity to facilities and amenities and sustainable transport options, consistent with the policy of the Development Plan and national and regional policy for compact and sustainable growth. Greater clarity is also required in the draft LAP regarding appropriate residential densities that accord with the provisions of the development management guidelines set out in the Development Plan and relevant section 28 ministerial guidelines.

Westport, in conjunction with Castlebar, will play a key role in driving economic development in the county. While the ambitions of the planning authority in this regard

are welcomed, the Office considers that no clear evidence base has been provided regarding the extent of land zoned for enterprise and employment purposes in the draft LAP or to set out a clear strategy for the plan period.

The Office welcomes the preparation of the Westport Local Transport Plan (LTP). However, it would have been preferable if the timing of the LTP had been co-ordinated in advance of the draft LAP process so that it could fully inform the zoning strategy and policies and objectives in the draft LAP. The material alterations stage will, however, provide an opportunity for changes that ensure better alignment between the final LTP and LAP. The Office has also determined that some changes will also be necessary to ensure the transport strategy and associated objectives take account of current national transport policy.

In addition, it will be necessary for the planning authority to review its Strategic Flood Risk Assessment (SFRA) for the draft LAP and to reconsider the details of related objectives and policies accordingly.

It is within this context the submission below sets out four (4) recommendations and two (2) observations under the following seven (7) themes:

<b>Key theme</b>	<b>Recommendation</b>	<b>Observation</b>
<a href="#">Consistency with the Regional, Spatial and Economic Strategy</a>	-	-
<a href="#">Consistency with Development Plan, core strategy and residential zoning</a>	<a href="#">Recommendation 1</a>	-
<a href="#">Transport and mobility</a>	<a href="#">Recommendation 2</a>	-
<a href="#">Climate action</a>	-	-
<a href="#">Economic Development and Employment</a>	<a href="#">Recommendation 3</a>	-
<a href="#">Flood risk management</a>	<a href="#">Recommendation 4</a>	<a href="#">Observation 1</a>
<a href="#">Implementation and monitoring</a>	-	<a href="#">Observation 2</a>

### **1. Consistency with the Regional, Spatial and Economic Strategy**

The Office considers the draft LAP to be generally consistent with the regional policy objectives of the RSES for the Northern and Western Region.

## 2. Consistency with Development Plan, core strategy and residential zoning

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

The Development Plan core strategy identifies a requirement for an additional 285 housing units over the plan period in Westport (up to 2028). The extent of zoned land required to accommodate this growth is 17.13 ha. The draft LAP sets out in Chapter 2 the development strategy for the town. It identifies that there is 19 ha of zoned land in Westport to accommodate the predicted housing requirement. This includes lands zoned New Residential as well as town centre, opportunity sites and infill lands. While it is considered that the draft LAP could be more ambitious regarding the potential of infill and town centre/opportunity sites to accommodate residential development, the Office is generally satisfied that the population and housing growth for the plan period is consistent with the Development Plan.

It is noted that the planning authority had a significant legacy issue to address given that there were extensive tracts of land zoned New Residential under the Westport Town and Environs Development Plan 2010-2016. The zoning map for the draft LAP has provided a more focused approach to zoning which reflects national and regional policy for compact and sustainable growth. In this context, the approach adopted in the draft LAP to ensure a sufficient supply of zoned land and compliance with the core strategy is acceptable. The Office notes, that having regard to the provision of sustainable densities in accordance with the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns & Villages (2009)* (Residential Development Guidelines), that there is more than sufficient land zoned to meet the projected housing targets.

In general, the majority of the lands proposed to be zoned New Residential are well located, contiguous to the existing built up footprint and within the CSO settlement boundary. It is also noted that the LTP has been undertaken and that a suite of active travel measures and other sustainable transport objectives are proposed to enhance connectivity between the proposed residential areas and the town centre.

The Office has however, concerns regarding New Residential site 6. It is located on the periphery of the settlement, on the northern outskirts of the town. The Office considers

that that it is important that the LAP adopts a clear sequential approach to the zoning of lands that seeks to consolidate the physical extent of the town, so that lands identified for residential development in proximity to the town core are prioritised over more remote lands, promoting compact growth in accordance with National Policy Objective (NPO) 3 and Regional Policy Objective (RPO) 3.2. It is considered that the site 6 lands have poor accessibility and do not contribute to the sustainable compact development of the town. In this context, the planning authority is required to omit this zoning.

The draft LAP includes a Settlement Capacity Assessment (SCA) in Appendix 1 which is welcomed. It is detailed that the New Residential sites have a cumulative area of 23.99 ha. This does not however align with Table 2.1 of the draft LAP. This anomaly needs to be addressed and the planning authority should ensure there is consistency between the core strategy table and the SCA.

In terms of residential density, it is noted that the housing yields set out in Table 2.2 regarding the projected population increase and housing requirements to 2028 are predicated on a density of 15 uph. This is inconsistent with the Residential Development Guidelines. While it is reasonable for the draft LAP to provide a tailored approach to the consideration of residential densities, it is nonetheless important that the residential densities within the ranges advised in the aforementioned Residential Development Guidelines are applied to support national and regional policy objectives for compact growth which can be more effectively served by social and physical infrastructure and facilitate active mobility across the town.

The density of 15 uph also to conflicts with sections 2.8.5 and 6.4.2 of the draft LAP which states that the LAP adopts a site specific approach to development densities that accords with the provisions of the development management guidelines set out in the Development Plan and relevant section 28 ministerial guidelines. The density outlined would also be contrary to policy DSP 2 of the draft LAP which seeks to support the compact growth of Westport to ensure that new development proceeds in a sustainable manner and at an appropriate scale, density and in line with the core strategy.

## Recommendation 1 – Residential Zoning Objective and Density

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

- the sufficient supply of land zoned for residential use commensurate with the core strategy of the Mayo County Development Plan 2022-2028;
- the policies and objectives of the Mayo County Development Plan 2022-2028, including SSO 2 to ensure the growth of Westport takes place in an orderly and sustainable fashion and SSO 3 to require sustainable, compact and sequential growth in Westport;
- Policy DSP 2 of the draft LAP to support the compact growth of Westport to ensure that new development proceeds in a sustainable manner and at an appropriate scale, density and in line with the core strategy;
- NPO 3c, RPO 3.1 and RPO 3.2 for compact growth;
- the policy and objective, a sequential approach to development in section 6.2.3 of the *Development Plans, Guidelines for Planning Authorities (2022)*;
- *Local Area Plans Guidelines for Planning Authorities (2013)*, chapter 6; and
- NPO 35 residential density and the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns & Villages (2009)* concerning the application of recommended residential density standards,

the planning authority is required to:

- (i) omit the New Residential zoning objective for site 6;
- (ii) delete reference to 15 uph in Table 2.2 and ensure that the densities promoted in the draft LAP are consistent with those set out in the guidelines; and
- (iii) review the Settlement Capacity Table and Map in Appendix 1 of the draft LAP, the zoning map and written statement to ensure consistency and accuracy regarding the quantum of land zoned New Residential.

### 3. Transport and mobility

The Office welcomes the preparation of the LTP for Westport, and that the draft LAP has been informed by the emerging proposals in the LTP. This approach has the potential to deliver an integrated approach to land use planning for Westport and, in tandem with compact growth, help it achieve a shift from private car transport to active sustainable modes and to public transport, consistent with RPO 6.30. A significant shift to active and sustainable modes will be necessary to enable Ireland to achieve its mandatory climate action targets under the *Climate Action and Low Carbon Development (Amendment) Act 2021*, which is to reduce Greenhouse Gas emissions by 51% by 2030 with a commitment to achieve carbon neutrality by 2050.

It is also noted that Westport was one of three locations designated as a Smarter Travel Area in 2012, and as a result, significant funding was harnessed to develop and enhance more sustainable modes of transport in the town. The measures set out in the LTP will augment the works already undertaken and further assist in the transition to more sustainable modes which is welcomed by the Office.

The Office considers however, that it would have been preferable for the LTP to have been prepared in advance of the draft LAP so that it could have fully informed the strategic zoning objectives, policies and objectives of the draft LAP. The lack of an iterative approach leads to obvious gaps and a misalignment between the proposals set out in the LTP and their integration in the draft LAP. It is considered that there needs to be better integration between the draft LAP and the final LTP and a clearer policy approach that provides more explicit support to the key proposals therein.

It is noted that while objectives MTO8 and 9 set out some of the proposed interventions referred to in the LTP, many are not detailed. Greater clarity is also required regarding the phasing and build out of lands with the delivery of active travel measures and the provision of public transport improvements outlined in the LTP to support such development, as well as other measures including the reduction of on street parking. This is a matter that should be addressed prior to the adoption of the final LAP to ensure that there is full alignment between the objectives of the LTP and the objectives of the LAP. This would give greater weight and statutory effect to the proposals of the LTP.

It is also noted that while there is a general objective (MTO8) to encourage mode shift, specific targets are not set out in the draft LAP and this is a matter that is required to be addressed to ensure consistency with MTO7 of the Development Plan.

Furthermore, the draft LAP does not refer to relevant current national transport policies, including the *National Sustainable Mobility Policy (2022)* and the *National Investment Framework for Transport in Ireland (2021)*, nor is there any reference to the *National Cycle Manual (2023)*. The Office would welcome reference to same in the draft LAP in order to ensure their implementation.

## Recommendation 2 – Transport and Mobility

Having regard to the need to provide an appropriate integration between the Local Transport Plan and the draft LAP, and in particular:

- MTO1 of the Development Plan to prepare and commence implementation of local transport plans (LTPs);
- Policy MTO7 of the Development Plan to establish modal shift targets and a monitoring regime to increase the usage of sustainable modes of transport in Westport, as informed by LTPs;
- RPO 6.26 - preparation and implementation of LTPs;
- NPO 27 for the integration of safe and convenient alternatives to the car, and NPO 54 for climate action; and
- *National Sustainable Mobility Policy (2022)* and *National Investment Framework for Transport in Ireland (2021)*,

the planning authority is required to:

- (i) review Chapter 7 Movement and Transport, to provide clearer policies and objectives regarding the delivery and phasing of the key infrastructural requirements of the LTP, particularly those interventions and measures required to enhance pedestrian movement and cycling in the town and reduce on street parking;
- (ii) reference current national transport policy - *National Sustainable Mobility Policy (2022)*, the *National Investment Framework for Transport in Ireland*

(2021) and current national infrastructure design standards - the *National Cycle Manual* (2023); and

(iii) set out clear modal share targets and a regime for monitoring same, consistent with the final LTP.

#### **4. Climate action**

The draft LAP includes a dedicated chapter to climate action which is to be commended. A suite of policies and objectives regarding climate action are set out. The Office welcomes that considerations regarding climate mitigation and adaption are integrated in the draft LAP. The Office notes that there is a reference to the *Climate Action Plan 2019* in section 11.6.1. All references should be updated in the final LAP to refer to the *Climate Action Plan 2023*.

#### **5. Economic development and employment**

The RSES identifies Westport as a settlement with strategic development potential which will enable it to be a regional driver. The draft LAP targets a minimum of 678 additional jobs by 2028. While the Office notes the ambitions of the planning authority to fulfil the strategic objectives of the RSES, there are concerns regarding the lack of any clear evidence to underpin the areas of land zoned Enterprise and Employment in the draft LAP. No analysis has been carried out to justify the quantum, location or servicing capacity of the lands. An infrastructural capacity assessment has not been provided, as required under NPO 72.

The *Development Plans, Guidelines for Planning Authorities* (2022) (Development Plans Guidelines) note in section 6.21 that where land use zoning is being undertaken as part of the preparation of an LAP, the specified approach to zoning, as detailed in the Guidelines, should be followed by the planning authority. Section 6.2.5 of the Development Plans Guidelines sets out specific guidance regarding zoning for employment uses and it is detailed that the evidence and rationale underpinning the zoning of land for employment purposes must be clear and strategic in nature. It is stated that the development plan should provide an overview of the existing quantum and rate of take up of zoned employment land, both developed and undeveloped, and should include relevant servicing information.

The Office considers that the draft LAP lacks an appropriate strategic assessment regarding the extent of lands zoned for enterprise and employment purposes in the draft LAP. No information has been provided regarding the extent of land already developed, nor has a distinction been made regarding different employment characteristics and requirements, for example, low intensity uses such as warehousing, logistics etc. versus higher intensity uses, such as offices. No detail has been provided regarding the capacity of infill town centre sites to contribute towards the employment needs which would contribute to the regeneration of the town centre in line with the Government's *Town Centre First: A Policy Approach for Irish Towns (2022)* policy. Nor has there been any assessment of the infrastructural capacity of the locations identified.

The Office has particular concern regarding the proposed extension to the Westport Industrial Estate noted under section 5.5.3 of the draft LAP. These lands are to be accessed from the N59 at a location where the 100 km/h speed limit applies and have the capacity to accommodate a significant intensity of employment. The LTP indicates limited active travel measures to serve these lands.

In the absence of an evidence base to support the zoning, the Office is concerned that these lands, accessed from the N59, could generate significant additional traffic with the potential to undermine the carrying capacity of this strategic road infrastructure. This would be contrary to the guidance set out in section 2.5 of the *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)* which states that it should be the policy of the planning authority to avoid the creation of any additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 km/h apply. This concern has also been raised by TII and the NTA.

In light of the above, the Office considers that the draft LAP needs to provide a focused and evidence-based approach to employment zonings in the interest of efficiency and of maximising return on infrastructural investments. The planning authority must also demonstrate that the land can be serviced and an infrastructural capacity analysis should be carried out to support all employment and enterprise zonings. Further consideration is also required as to how active travel measures to serve the Westport Industrial Estate lands can be enhanced.

### Recommendation 3 – Enterprise and Employment Zoning

Having regard to the need to provide lands for economic and employment development that are appropriately located and serviced and to ensure the carrying capacity of strategic road infrastructure is protected and, in particular:

- section 6.2.5 of the *Development Plans, Guidelines for Planning Authorities* (2022), that the evidence and rationale underpinning the zoning of land for employment purposes must be clear and strategic in nature;
- NPO 72 a-c and Appendix 3 of the *National Planning Framework* and the co-ordination of land use zoning, infrastructure and services;
- National Strategic Outcome 2 Enhanced Regional Accessibility and NPO 74 to secure alignment with delivery of National Strategic Outcomes;
- policies MTP 20 and 23 of the Development Plan regarding the capacity, efficiency and safety of national roads and policy MTO 24 to avoid the creation of additional direct access points from new development adjoining national roads or the generation of additional traffic from existing direct accesses to national roads to which speed limits greater than 60 km/h apply;
- RPO 6.5 national roads; and
- section 2.5 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012),

the planning authority is required to:

- (i) provide a robust evidence-based justification for the extent, location and infrastructural capacity of enterprise/employment zoned land in the town having regard to the guidance and methodology set out in the *Development Plans, Guidelines for Planning Authorities* (2022).

The assessment should identify the quantum and rate of take up of existing employment lands; distinguish between the different typologies of commercial/industrial land-uses that will generate different employment; should include relevant servicing information; and should consider the

potential of the town centre and identified opportunity sites to contribute to future employment land needs.

Where necessary, the planning authority should reconsider and appropriately prioritise and/or reduce the provision of such land to align with the evidence-based assessment.

Particular regard should be had to the potential of the proposed extension to the Westport industrial Estate to undermine the carrying capacity, safety and strategic function of the N59;

- (ii) provide a Settlement Capacity Assessment to include all undeveloped employment zoned lands in the draft LAP area. Where lands are not serviced or serviceable within the plan period they should not be zoned for employment development;
- (iii) demonstrate that appropriate sustainable active travel measures to serve the Westport Industrial estate lands can be provided; and
- (iv) where the requirements under (i) and (iii) cannot be met, the additional land zoned Employment and Enterprise at the Westport Industrial estate should be omitted.

## 6. Flood risk management

The planning authority has carried out an SFRA for the draft LAP which is welcomed. The Office notes however, that a fully scaled and detailed overlay map of the land use zoning and the flood extent maps has not been provided. While Figure 8.1 in the SFRA indicates the land use zoning with the flood zones, the map is of insufficient scale and detail and has a poor resolution. The Office considers that clearer mapping is required to identify the areas at flood risk in the town. In this regard, it is considered that a composite map should be provided which overlays the zoning map with the flood risk map.

The Office notes that the OPW has identified in its submission that National Coastal Flood Hazard Mapping has not been used to inform the SFRA and the definition of flood zones. The OPW also note that Preliminary Flood Risk Assessment data has been superseded. It will be necessary for the SFRA to be reviewed in this regard to ensure the correct extent of flood zones are detailed. It is also considered that the LAP should

include a specific objective to support the design, planning and implementation of the Part 8 Flood Relief Scheme Westport (Cois Abhainn and Ashwood).

The Office also has concerns regarding the commentary in the Justification Tests and the robustness of the overall assessment. NPO 57 and RPO's 3.10 and 3.11 seek to ensure that flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) (Flood Guidelines) which were amended by *Circular PL 2/2014*.

Justification Tests should only be carried out for zoned land that is at risk of flooding that is located in the core urban area where it can be clearly established that the zoning is necessary to fulfill the criteria set out under part 2 of the Justification Test and, in particular, that it will facilitate compact growth and regeneration. It is not applicable to sites located in peripheral areas.

In a number of instances, the SFRA does not provide a robust assessment that sites are in compliance with criteria 2 (iii) and (iv). If it cannot be demonstrated that all criteria of the Plan Making Justification Test have been satisfied, limitations to development should be incorporated into the LAP by means of a policy objective. The OPW has also highlighted that, in some instances, notably Westport House, that the criteria set out under the Justification Test are not consistent with those set out in box 4.1 of the Flood Guidelines.

Furthermore, the SFRA provides no assessment as to whether lands zoned Existing Residential or lands zoned Enterprise and Employment have been assessed in accordance with the criteria of the Plan Making Justification Test. For these areas, there is an absence of appropriate policies or objectives in the draft LAP restricting development of less or highly vulnerable development to Flood Zone C. Similarly, the draft LAP would benefit from specific policies regarding appropriate mitigation measures applicable to lands zoned Town Centre and Educational that overlap with Flood Zones A and B.

In terms of areas zoned Agriculture, the SFRA incorrectly identifies agricultural development as a water compatible development. However, land and buildings used for agriculture are defined as less vulnerable development under Table 3.1 of the Flood

Guidelines. It would be appropriate in this context, to include a specific objective in the draft LAP limiting residential or farm building development in flood zone areas.

The Office notes that the OPW has identified in its submission a number of inconsistencies in the SFRA, including incorrect referencing. The SFRA should be updated in this regard to address these inconsistencies.

#### Recommendation 4 – Flood Risk Management

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

- RPO 3.10, RPO 3.11 and NPO 57 flood risk management; and
- the *Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)* (Flood Guidelines) as amended by *Circular PL 2/2014*,

the planning authority is required to:

- (i) overlay the extent of Flood Zones A and B on the land use zoning maps in the draft LAP to provide for greater transparency and to inform zoning decisions;
- (ii) ensure that the SFRA has been prepared in accordance with the Flood Guidelines and is based on the most up to date mapping sources including the National Coastal Flood Hazard Mapping;
- (iii) review the methodology and approach to the Justification Tests included in the SFRA to ensure that all sites fully comply with the criteria set out in Box 4.1 of the aforementioned Flood Guidelines; and in particular, the Justification Tests should:
  - only apply to land use zonings within or adjoining the urban centre and not peripheral areas. Zonings should only be assessed against the criteria of the plan-making Justification Test when avoidance and substitution have not been possible. The planning authority is required to omit or amend zonings that do not meet the Justification Test in accordance with the provisions of the aforementioned Flood Guidelines;
  - ensure that the wording of the criteria utilised is fully consistent with Box 4.1 of the Flood Guidelines; and

- provide appropriate policy objectives in the draft LAP that limit development to only water-compatible development within Flood Zone A and less vulnerable development in Flood Zone B, unless sites first pass the plan-making Justification Test; and
- (iv) provide a specific objective to support the implementation of the Part 8 Flood Relief Scheme Westport (Cois Abhainn and Ashwood).

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

In relation to surface water management, the Office welcomes the inclusion of policy IESP 2 which encourages the use of Sustainable urban Drainage Systems in public and private development and within the public realm. However, the Office considers that to ensure best practice, that additional text should be included that surface water designs shall take account of the *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)*.

#### Observation 1 – Surface Water Management

The planning authority is advised to review Policy IESP 2 to include specific reference that surface water designs shall take account of the *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)*.

## 7. Implementation and monitoring

The Office welcomes the planning authority's commitment to plan implementation and monitoring of the LAP, in Chapter 13.

The Office notes however, that no tangible indicators are provided, just broad statements of intent. The *Local Area Plans Guidelines for Planning Authorities (2013)* strongly advise that LAPs should include an implementation and infrastructural delivery schedule which would require planning authorities to work closely with all relevant departments, agencies and stakeholders involved in securing the delivery of the formulation, adaptation,

implementation and monitoring of the policies and objectives of the LAP. The Office considers that greater clarity in this regard is required. For reference, the office considers the approach taken in the Limerick Development Plan 2022-2028 to be good practice.

### Observation 2 – Monitoring and Implementation

Having regard to section 6.2 of the *Local Area Plans Guidelines for Planning Authorities* (2013), the planning authority is advised to include a clear implementation and infrastructural delivery schedule in the draft LAP to ensure that the implementation of the policy objectives of the draft LAP will take place and to ensure that development progress is consistent with the core strategy of the Development Plan.

### Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the chief executive of your authority prepared for the elected members under section 20 of the Act must summarise these recommendations and the manner in which they will be addressed. Where your authority decides not to comply with the recommendations of the Office please outline the reasons for the decision in the Chief Executive's report or the minutes of your Council meeting.

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

Is mise le meas,



**Anne Marie O'Connor**

Deputy Regulator and Director of Plans Evaluations