



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

16th June 2026

Forward Planning Section,
Offaly County Council,
Áras an Chontae,
Charleville Road,
Tullamore,
Co. Offaly,
R35 F893.

**Re: Proposed Variation No. 1 to the Offaly County Development Plan 2021-
2027**

A chara,

Thank you for your authority's work on preparing the Proposed Variation No. 1 (proposed Variation) to the Offaly County Development Plan 2021-2027 (Development Plan).

As Offaly County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is to evaluate and assess statutory plans to ensure consistency with legislative requirements and national and regional planning policy. The Office has undertaken this evaluation and assessment pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546, and this submission sets out the outcome.

In this context, the submission includes recommendations and observations. Recommendations arise where the Office identifies clear inconsistencies with legislative provisions or policy frameworks and are intended to be addressed to ensure compliance. Observations highlight areas where further clarification, justification, or refinement would strengthen the plan. The submission may also include advice to support the proper planning and sustainable development of the area.

Following adoption of the Variation, the Office will carry out a further assessment under section 63 of the Act.

1. Overview

The proposed Variation includes a number of changes to the Development Plan with regard to the implementation of the housing growth requirements and the following elements:

- housing growth requirements, core strategy, policy and zoning amendments;
- proposed Business or Technology Park comprising a new 29 ha strategic land bank at lands east of the N52 Ardan Townland, Tullamore;
- zoning amendments to incorporate changes to three new zonings at (i) Highfield Soccer Club, Birr Town (Strategic Residential Reserve to Open Space, Amenity and Recreation), (ii) at lands at Clonminch, Tullamore (Enterprise and Employment to Existing Residential) and (iii) Saint Cynocs Terrace, Ferbane Enterprise and Employment to Existing Residential; and
- proposed amendments to Wilderness Corridors in the current Development Plan to new policy objectives for Peatland and Nature Corridors.

The Office welcomes the Planning Authority's response to the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines) and notes the updated core strategy, which provides for 4,102 new homes and proposes the zoning of an additional 153 ha. 202 ha of Strategic Residential Reserve lands also remain across the county, including 180 ha in Tullamore.

The Office is satisfied therefore that this approach aligns with the Housing Growth Guidelines and provides sufficient flexibility and choice to support a strong pipeline of future housing delivery.

The Planning Authority's focus on the higher tier settlements identified in the Development Plan, particularly Tullamore, where existing and planned services and amenities can accommodate housing growth is also supported.

With the exception of the issues raised below, the proposed New Residential zoned land is also well located within each of the settlements, supporting the compact and sequential growth of these towns consistent with national and regional policy.

The Office also welcomes the clear and coherent presentation of the proposed Variation and supporting documents, particularly the use of tables and mapping to illustrate the Planning Authority's approach to the Housing Growth Guidelines. It commends the inclusion of a comprehensive Settlement Capacity Audit and Site Evaluation criteria, supported by detailed Physical and Social Infrastructure Maps and clear summary zoning maps showing existing and proposed zoning status and distances from the town/village cores.

The Office has however identified a number of issues in relation to flood risk management, several of which relate to residential zonings, which are required to be resolved prior to the adoption of the Variation.

The proposed strategic Business or Technology Park northeast of Tullamore (Amendment No. 2.1(j)) also raises issues that require further consideration to ensure integration with public transport, active travel and road networks, to safeguard the safety and strategic function of the N52, and to avoid potential conflicts with the N52 Tullamore to Kilbeggan Link Road project.

Finally, in relation to Amendments No. 4(a) to 4(h) concerning Peatland and Nature Corridors, the Office acknowledges the significant contribution that existing and planned renewable energy development in Offaly will make to meeting climate and renewable targets, as well as the Government's energy security policy objectives. In this context, the Planning Authority's intention to achieve a proportionate balance between supporting such development and providing a high-quality natural environment is acceptable in principle. However, to support the proposed locations and extent of the areas identified in this proposed Variation, the Office considers that the evidence base underpinning these policy amendments should be set out in greater detail to provide a clear and robust policy framework.

The following recommendations and observation set out below are intended to support the Planning Authority in further strengthening the proposed Variation and ensuring its effective implementation:

Subject	Recommendation	Observation
Flood risk management	Recommendation 1	-
Integration of transport and land use planning and strategic road network	Recommendation 2	-
Proposed Peatland and Nature Corridors and renewable energy	-	Observation 1

2. Flood risk management

The Office notes there are a number of benefiting lands or Arterial Drainage Schemes in the vicinity of six proposed zonings in this proposed Variation, and the Planning Authority needs to ensure access requirements are preserved for the maintenance of these channels. Furthermore, such lands are prone to flooding and as such site-specific flood risk assessments may be required in these areas at development management stage and, therefore, the Office recommends this should be addressed.

The Office notes that five proposed zonings include unmapped watercourses. Stage 1 and 2 flood risk assessments are required to identify potential flood sources and determine whether sufficient data exists to assess fluvial flood risk. Where risk is identified but flood zones cannot be established due to limited data, a Stage 3 flood risk assessment may be required in line with section 1.4 of technical appendix A of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

Accordingly, the Office recommends that the Planning Authority undertakes appropriate flood risk assessments for these five zonings, determines the need for Stage 3 flood risk assessment, and, where necessary, rezones lands to ensure compliance with the Flood Guidelines.

While the Office notes that two proposed zonings, Bana Site 1, Banagher and Clon Site 1, Clonbullogue, both appear to be located outside the present and future scenario flood risk extents, however, historic flood events mapping indicates overlap

with these lands. The Office therefore recommends that the Planning Authority reviews these sites, ensures all flood risks are fully assessed and avoided, and updates mapping where necessary.

In terms of climate change and future scenario mapping, the Office notes that proposed New Residential zoning at Shan Site 1, Shannonbridge overlaps with future scenario flood extent mapping. As such, the Office recommends that the Planning Authority sets out how the effects of climate change will be managed on this zoning. Furthermore, no future scenario mapping is available in the vicinity of Tull Site 2, Tullamore as part of the National Catchment Flood Risk Assessment and Management (CFRAM) Programme and therefore the Planning Authority is recommended to ensure that any future planning applications fully assesses the impact of climate change on flood risk in this area also.

Finally, the Office notes that flood mapping produced under the National CFRAM Programme is currently under review in Tullamore and Mucklagh. As such, a number of sites, including Tull Site 2, Tullamore and Muck Sites 1 and 2 at Mucklagh are likely to change as part of this update and the Planning Authority is recommended to note and review in due course.

Recommendation 1 - Flood Risk Management

Having regard to flood risk management, and having considered:

- NPO 78 of the NPF (avoid inappropriate development in areas at risk of flooding that do not pass the Plan Making Justification Test);
- RPO 7.12 of the RSES to seek to avoid inappropriate land use zonings and development in areas at risk of flooding in accordance with the requirement of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and
- the Flood Guidelines,

the Office recommends that the Planning Authority:

- (i) reviews and carries out site specific flood risk assessments where necessary on the following sites adjoining Arterial Drainage Schemes:

- a) Tull Site 2, lands north of Daingean Road, Tullamore;
 - b) proposed Business and Technology Park, lands east of the N52 Road, Tullamore;
 - c) Ferb Site 2, Ballycumber Road, Ferbane;
 - d) Muck Site 1, lands south of Lynally Grove, Mucklagh;
 - e) Muck Site 2, lands adjacent to Tegan Court, Mucklagh; and
 - f) Clon Site 1, Clonbullogue;
- (ii) carries out risk assessments to determine if Stage 3 flood risk assessments are required on the following proposed New Residential zonings which are located along either side of unmapped watercourses and which have no flood risk extents illustrated on the flood zoning mapping:
- a) Ferb Site 2, Ballycumber Road, Ferbane;
 - b) Ferb Site 4, Aghaboy Road, Ferbane;
 - c) Kill Site 1, Killurin Road, Killeigh;
 - d) Mone Site 2, Main Street, Moneygall; and
 - e) Clon Site 1, Clonbullogue.
- If required, the Planning Authority should undertake Stage 3 flood risk assessments and, if necessary, rezone lands for an appropriate use consistent with the Flood Guidelines;
- (iii) reviews flood risks where historic flood events have been identified to overlap proposed zonings at Bana Site 1, Banagher and Clon Site 1, Clonbullogue and amends land use zonings so that highly vulnerable development is not permitted on lands that have been shown to flood in the past;
- (iv) reviews Shan Site 1, Shannonbridge, which overlaps with future scenario mapping and sets out how the effects of climate change will be managed; and
- (v) ensures the management of surface water run-off in the development of key sites is in accordance with Sustainable Urban Drainage Systems (SuDs)

including nature-based solutions. These sites should be identified in the Strategic Flood Risk Assessment and necessary guidance provided on the applicability of different SuDs techniques.

The Planning Authority should consult with Office of Public Works in addressing this recommendation.

3. Integration of transport and land use planning and strategic road network

The Office notes Amendment No. 2.1(j) which proposes the zoning of a new strategic Business or Technology Park northeast of Tullamore, at Ardan.

This proposed zoning objective does not form part of the Local Transport Plan (LTP) for Tullamore. The Office notes however that the LTP identifies an indicative cycle route extending to the southern boundary of the lands as a long-term measure. In the context of the proposed rezoning. The Office considers that further clarity is needed on how the development of these lands will integrate with the wider built-up area, particularly in terms of connectivity and access.

These lands are also located adjacent to the N52 Ardan roundabout on the northern edge of Tullamore where both Regional Policy Objective (RPO) 8.2 of the Regional Spatial and Economic Strategy (RSES) and the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) require planning authorities to control access to national roads and carefully manage development at and around junctions to protect the safety, capacity, and strategic function of the national road network.

In light of the above, the Planning Authority should include measures to ensure that the proposed Business or Technology Park zoning is well integrated with existing or planned public transport, active travel and road networks, and does not undermine the strategic function and safety of the N52. This may comprise of measures directly included within the Variation, or the inclusion of a site-specific objective relating to the delivery of active travel measures in the short to medium term. Engagement with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) is advised in relation to this matter.

The Office also notes that there are road upgrades and improvements planned in the vicinity of the proposed zoning, which will be highly significant in terms of the

economic and social functioning of the area. As the Planning Authority will be aware, the N52 Tullamore to Kilbeggan Link Road project is identified as one of the 'Road Projects to be advanced for future construction' in the National Development Plan Review 2025: Securing Ireland's Future, Sectoral Investment Plan: Transport (2025). It is critical therefore that such measures are supported and aligned with land use zoning to ensure that conflicts are avoided. Any potential conflicts between the proposed zoning and the N52 Tullamore to Kilbeggan Link Road project should be assessed and resolved prior to adoption of the variation. Engagement with TII is advised as part of this process.

Recommendation 2 - Integration of Transport and land use planning

Having regard to the need to maintain the carrying capacity and safety of the strategic road network, and having considered the following:

- NPO 107 of the NPF relating to the alignment of the National Planning Framework First Revision (2025) and the National Development Plan, National Strategic Outcomes (NSO) 1 Compact Growth, NSO 2 Enhanced Regional Accessibility, NSO 4 High-Quality International Connectivity and NSO 5 Sustainable Mobility of the NPF;
- RPO 4.69 of the RSES to support the role of Tullamore as a major employment centre with support for the provision of enabling and facilitative infrastructure;
- RPO 8.1 and RPO 8.3 of the RSES relating to promoting the integration of transport and land use planning;
- RPO 8.2 of the RSES relating to the capacity and safety of the region's strategic land transport networks;
- RPO 8.10 of the RSES which supports the appraisal and or delivery of road projects including the N52 Tullamore to Kilbeggan listed in table 8.4 of the RSES;
- sections 2.5 and 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) (National Roads Guidelines), to protect the

safety, capacity, and strategic function of the national roads, junctions and interchanges;

- section 2.9 of National Roads Guidelines in respect of the protection of alignments for future national road projects;
- roads objectives SMAO-11 relating to the continued upgrading and improvement of national secondary roads including the N52 and SMAO-18 relating to the protection of the study areas, route corridor options and preferred routes for national road schemes of the Offaly County Development Plan 2021-2027 (Development Plan); and
- the sustainable transport policies set out in chapter 8 of the Development Plan including SMAP-22, SMAP 23, SMAP 24, SMAP 25 and SMAP 30,

the Office recommends that the Planning Authority:

- (i) includes a site-specific objective for Amendment No. 2.1(j) the proposed Business or Technology Park at Ardan, Tullamore to include reference to the provision of a new access and traffic and transportation framework which integrates the new zoning with existing and proposed active travel and public transport networks; and
- (ii) reviews the proposed zoning under Amendment No. 2.1(j) relating to the proposed Business or Technology lands at Ardan, Tullamore and take all necessary measures to ensure compatibility with the delivery and implementation of the proposed N52 Kilbeggan to Tullamore Link Road.

The Planning Authority should engage with the National Transport Authority and Transport Infrastructure Ireland in relation of the above.

4. Proposed Peatland and Nature Corridors and renewable energy

The Office welcomes the proposed Amendments No. 4(a) to 4(h) relating to Peatlands and Nature Corridors. In this regard, the Office acknowledges the Planning Authority's contribution to the delivery of renewables to date and its emergence as a national leader in the delivery of green energy.

Notwithstanding this, and the work that has been undertaken by the Planning Authority in the preparation of this proposed Variation, there would be a benefit to setting out the evidence-led justification for the approach taken, including the location and scale of the areas identified, and how the renewable energy targets in section 3.2.7 (chapter 3, Climate Action and Energy) of the Development Plan will be achieved in light of the proposed changes.

It is also noted that section 3.2.7 of the Development Plan identifies that the renewable energy targets for Offaly County will be reviewed subsequent to the emergence of regional targets. As the Planning Authority is aware, the process to review the RSES for the Eastern and Midland Regional Assembly has commenced. This will include the preparation of a Regional Renewable Energy Strategy which will identify onshore wind and solar capacity allocations for each planning authority within the region, in accordance with National Policy Objective (NPO) 74 of the National Planning Framework First Revision (2025) (NPF). As the proposed Variation is being prepared without the RSES review having concluded, the Office highlights that there will be a need for a review, and potentially vary the Development Plan, to ensure material consistency with the emerging RSES and NPO 75 of the NPF.

Observation 1 - Proposed Peatland and Nature Corridors and renewable energy

Having regard to the national requirement for a sustainable renewable energy supply and the transition to a low carbon and climate resilient society, and having considered:

- the Climate Action and Low Carbon Development Act 2015, as amended and the Climate Action Plan 2025;
- NPO 69 of the NPF to integrate climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions;
- NPO 70 of the NPF to promote renewable energy use and generation at appropriate locations;

- RPO 4.84 of the RSES relating to the rural economy, diversification initiatives including renewable energy;
- RPO 10.22 of the RSES relating to supporting the reinforcement and strengthening of the electricity transmission and distribution network with a focus on renewable energy;
- section 3.2.7 of the Offaly County Development Plan 2021-2027 (Development Plan), table 3.1 which sets out the renewable energy targets for the development plan period; and
- the Wind Energy Development Guidelines (2006),

the Planning Authority is advised to:

- (i) provide an evidence-led justification for the proposed amendments in the proposed Variation relating to the Peatlands and Nature Corridors, including the location and scale of the proposed areas;
- (ii) demonstrate that the renewable energy targets set out in table 3.1, section 3.2.7, chapter 3 of the Development Plan can be achieved in the context of the proposed Amendments No. 4(a) to 4(h) relating to Peatlands and Nature Corridors; and
- (iii) ensure compliance with renewable targets within the forthcoming review of the Regional Spatial and Economic Strategy (RSES) and the National Planning Framework First Revision (2025) (NPF). In this regard, the Planning Authority is advised to engage directly with the Eastern and Midland Regional Assembly in relation to the emerging renewable energy targets for Offaly County in order to ensure alignment of the Development Plan with the RSES, the review of the RSES and the NPF.

5. Summary

The Office requests that the Planning Authority addresses the recommendations and observation set out above.

As part of this process, the Chief Executive's report to the elected members, prepared under section 58(11) of the Act should summarise the Office's recommendations and outline how it is proposed to address them.

Following adoption of the Variation, the Planning Authority is required to:

- provide the Office with a copy of the adopted Variation, together with any submissions received from the Minister, the relevant Regional Assembly, and the NTA during the plan preparation process, within one week of the decision to adopt;
- inform the Office, as soon as practicable, where it decides not to comply with a recommendation, including the reasons for this decision; and
- publish notice of the Variation within one week of adoption, confirming that the Development Plan as varied will be available for inspection (online and at a specified location) no later than five weeks after adoption.

The Office looks forward to continued constructive engagement with the Planning Authority. If further clarification or discussion would be helpful, the Office would be pleased to assist and can be contacted at plans@opr.ie.

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Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015