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Via online portal: <u>www.carrickjointplan.ie</u>

03/10/2024

RE: CARRICK-ON-SHANNON JOINT LOCAL AREA PLAN (JLAP) 2025-2031

A Chara,

I refer to your notification on 14 August 2024 of the publication by Leitrim County Council and Roscommon County Council of the Draft Carrick-on-Shannon Joint LAP (JLAP) and thank you for the opportunity to make this submission.

Background

In December 2023, the Northern and Western Regional Assembly ('the Assembly') made a submission to the Issues Paper (Pre-Draft Consultation) to the Carrick-on-Shannon Joint Local Area Plan. It is worth highlighting a number of issues which were referenced by the Assembly within that submission:

- It was important for Leitrim & Roscommon County Councils to set out a plan which can deliver on the ambitions of the Regional Spatial and Economic Strategy ('the RSES'), and which seeks to increase the delivery of units on Phase 1 Residential lands that are serviced/serviceable lands, as demonstrated through a capacity audit and, in the process, identify the current barriers which are creating impediments to new housing delivery.
- The progress of the N-4 upgrade, inclusive of the by-pass of Carrick-on-Shannon, is outlined as a regional priority within the RSES, (Rf. RPO 6.7). It may be conceivable the project can advance to construction during the lifetime of the JLAP, which would potentially open up new opportunities for Carrick-on-Shannon in modal shift and may allow additional road-space to be utilised for modes other than the private car.







• The Key Priorities for Carrick-on-Shannon as outlined within the RSES will require elaboration, particularly the potential expansion of the Carrick Business Campus and the potential future incremental development of an opportunity site to the east of the town. The blue and green economy presents opportunities for communities, and these should be explored within the plan.

The Regional Spatial and Economic Strategy (RSES) identifies Carrick-on-Shannon as a **Key Town, and the narrative associated with this delineation is as follows within Sec. 3.8**.

KEY TOWN: Carrick on Shannon is Leitrim's County Town and whilst it is the smallest of the Support Towns, it plays a strategic role in the region. Carrick on Shannon is considered to punch well above its weight and size, and it has more than 2,500 employees working in the town and has a jobs-to-resident workers ratio of 1.7. **NWRA - RSES - 2020-2032**

Description of the Plan

Volume 1 of The Carrick-on-Shannon Local Draft JLAP comprises 10 chapters, which includes 5 Appendices:

Appendix 1: Land-use Zoning Maps Appendix 2: Settlement Capacity Audit Appendix 3: Protected Structures Appendix 5: Social Infrastructure Audit Appendix 6: Local Transport Plan

The Local Transport Plan (LTP) for Carrick-on-Shannon is incorporated as Appendix 5 within the Draft JLAP.

The environmental reports include a Strategic Environmental Assessment (SEA), and Non-Technical Summary, Appropriate Assessment (AA) Screening and Strategic Flood Risk Assessment (SFRA).

The Core Document runs to 76 pages, and both local authorities are commended for producing a compact and workable document. The Plan is focused on Town Centre First and Regeneration, Compact Growth, and Economic Development with the identification of 7 opportunity sites, as set out in Chapter 2.

The various chapters in the Local Area Plan are presented consistently, coherently, concisely, and they follow a logical progression. Climate Action is given prominence in Chapter 1: Introduction and Chapter 5: Climate Action and Flood Risk.





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However, action and mitigation themes are cross-cutting in a number of areas thereafter, across the Draft Plan. There are chapters on Town Centre First (2), Regeneration, Economic Development and Tourism (3), Homes and Communities (4), Climate Action and Flood Risk (5), Movement and Transport (6), Social and Community Infrastructure (7), Built and Natural Heritage (8), Land Use Strategy (9), and Implementation (10).

Each chapter provides a short discussion on relevant issues and concludes with a series of policies and objectives. This approach leads to a Plan which is compact, but comprehensive.

Focus of Submission

This submission will examine the Carrick-on-Shannon Draft JLAP in the context of its consistency with relevant objectives in the RSES. The Carrick-on-Shannon Local Area Plan includes the Key Future Priorities for Carrick-on-Shannon, as set out in Section 3.8 of the RSES, *Key Towns*.

KEY FUTURE PRIORITIES:

- Develop and expand the potential of the Carrick Business Campus and explore the opportunity to attract people intensive use of the modern existing buildings.
- Deliver support to existing businesses in Carrick-on-Shannon to ensure their continued existence and expansion.
- Promote research and development opportunities, building the capacity of the region.
- Promote the potential of the Metropolitan Area Network fibre optic cable managed by eNET. This provides Next Generation Access Fibre Network that offers speeds of up to 100Mbps.
- Progress the sustainable development of the serviced strategic employment land that is available to the east of the town.
- Development of the tourism offer and the thriving Purple Flag Status of the town that supports a variety of support enterprises in the surrounding countryside.
- Deliver on the Blueway development under the Upper Shannon Erne Future Economy project (USEFE); It will develop tourism in the rural areas of Cavan, Leitrim, Longford and Roscommon, connecting 22 towns and villages located alongside the River Shannon and the Shannon-Erne Waterway. Influence and assist with the broader economic development and job creation in the region. Carrick-on-Shannon is strategically located within this Blueway

(Extract from RSES)





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Issues and Considerations

It is noted that this is the first JLAP for Carrick-on-Shannon and the Assembly acknowledges the diligence and cooperation by both County Councils in its preparation.

There is, via the Roscommon and the Leitrim County Development Plans, a high level of policy consistency with the RSES, with the respective Local Authorites adopting an approach which clearly delineates Carrick-on-Shannon as the economic and social drivers for County Leitrim and North County Roscommon into the medium term, with Core Strategy Growth allocations which reflect this hierarchy.

In overall terms, the JLAP could benefit from a **clear vision statement** as part of the introduction.

It is also the view of the Assembly that the vision should address the provision of key enabling infrastructure, which could be encompassed at the outset in a single location, or table.

I. Enabling infrastructure

There is no comment in the Draft JLAP on Services – such as Wastewater Treatment, Wastewater Capacity, Water Supply Capacity, Roads Infrastructure, Active Travel Projects, Fibre Optics, Metropolitan Area Network, MAN etc.

As referenced above, a table or list of **key enabling infrastructure projects** should be incorporated. Timelines should also be included with the table. Such an addition to the JLAP would assist the reader in understanding a clear and coherent vision, alongside the critical enabling projects / aims necessary to realise the advancement of Carrick-on-Shannon.

There is no reference to the existence, identification and zoning of areas necessary for C&D landfill/reuse facilities. The plan would benefit from consideration of same.

II. Employment and Economic Development

The JLAP references the Carrick Business Campus, in section 3.1: Economic Development Strategy in the following terms: 'The key business supports in the town include the Leitrim Enterprise Office, the Chamber of Commerce, the Carrick Business Campus, INTREO and the Hive which provides enterprise support for digital technologies'

Furthermore, ED2 represents a specific objective which supports the RSES priorities:





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ED2 - Promote and facilitate Carrick-on-Shannon town as a destination for enterprise and new economic growth

The plan references 'the zoning of land to the east of the town facilitates one of the key future priorities for the town of Carrick-on-Shannon as identified in the RSES which is to facilitate the sustainable development of a new regionally significant opportunity site.' This relates to a significant tract of land zoned Phase 2 Enterprise and Employment.

Objective ED 3 relates:

Ed 3 - Facilitate the development of lands zoned Phase 2 Enterprise and Employment lands subject to:

a) All lands zoned Enterprise and Employment have been developed; or
b) A development proposal for the entire lands to be developed as part of a single planning application and subject to the availability of the necessary infrastructural capacity.

While this is a phased approach to zoning objective, it is envisaged that it has the potential to deliver economic growth and employment for the Key Town of Carrick-on-Shannon, and it aligns with the future priorities of the town as per the RSES.

MT2 relates to access for the eastern area of the towns Industrial and Enterprise zone.

Tourism: There is strong emphasis on the tourism function of the town in the Draft JLAP. The text in section 3. 1 of the plan correctly points out that the JLAP complies with the RSES 3.10 in this regard. Objective ED 1 in specific supports the RPO.

The delivery of Upper Shannon Erne Future Economy project (USEFE) is addressed in the JLAP is addressed in Section 3.3.1 and ED 6.

There are crosscutting Placemaking, Built and Natural Heritage and Movement and Transport objectives which will support the town maintaining and growing this function as an attractive tourist destination.

III. Core Strategy and Housing Targets

Section. 4.2 of the JLAP outlines the future demographic ambitions / Core Strategy Allocations for Carrick-on-Shannon. Table 2.1 in the Plan outlines a figure of 426 units (362 units for Carrick-on-Shannon and 64 units for Cortober) at varying densities with 130 of those units to be delivered on brown field sites.

It is stated that the Core Strategies of Leitrim and Roscommon have informed the housing allocation. The overall population increase forecast via the lifetime of this Plan is 1,150. This





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is a fairly substantial estimate, running at 25% within the period to 2031. This would comprise a rate of increase of more than double the current trend. It is questionable if this ambition is achievable, particularly given the notably low level of housing output over recent years, which is further elaborated upon in this report at 'Demographics', below.

The figure of 64 units for Cortober comes from *Table 2.2 Core Strategy Allocations from the Roscommon County Development Plan 2022-2028).*

The figure of 362 units for Carrick-on-Shannon comes from *Table 2.6: Yield of available lands* zoned for Residential or Mixed Use in Leitrim County Development Plan 2023-2029.

The zoned land requirement figures for Carrick-on-Shannon are omitted (TBD) from the JLAP Core Strategy table. There is no information regarding the densities across the Core Strategy table. (Table 2.1) Also a figure for the projected residential units in 'Town Core' and 'Outer Core' should be factored into the Core Strategy.

Demographics: Section 1.1, Overview addresses the population of Carrick-on-Shannon. The CSO Census 2022 saw the town population (BUA) grow to 4,743. The CSO 2016 population figure for the town (4,062) was for the 'settlement' boundary which was a different boundary for the population figures.

Taking this realignment of the boundaries into account for Carrick-on-Shannon still gives a population increase of 10.7%. 'Allowing for the change in boundaries the population of Carrick-on-Shannon has increased by approximately 436 people between 2016 and 2022 giving a comparison population of 4,498 which is a population increase of 10.7%.' (Section 1.1 of JLAP).

The future ambitions for the Town / overall growth rate for Carrick-on-Shannon during the lifetime of this Plan, are not outlined within the Core Strategy Table 2.1.

It is considered that the Core Strategy should at a minimum reference the Growth Ambitions for Carrick-on-Shannon as a Key Town in the RSES and provide commentary on the current and future growth trajectory in terms of its consistency or otherwise with Sec. 3.4 of the Regional Strategy which envisages an uplift across all designated Key Towns of 30% to 2040. This to include a clear core strategy table, which sets out the area and quantum of housing to be delivered on lands zoned 'Town Core' and 'Outer Core', 'Existing Residential' and 'New Residential', with appropriate indicative densities that demonstrate anticipated yield.

The target for housing completions for the plan are 462 units. The housing completions for Carrick-on-Shannon for the year 2022 amounted to 20 residential units, and there were 13







unit completions for 2023. Taking a figure of 20 units per annum, this would fall a long way short of the overall figure of 462 units over the life of the plan. Therefore, a programme of promoting enabling infrastructure as referenced above and conditions to promote housing development in an important factor and needs to be considered in any monitoring framework. There is no elaboration contained within the plan as to how the housing supply envisaged can be realised, given the current, extremely low base of productivity in new residential units being experienced in Carrick-on-Shannon, this Plan could benefit from such an activation roadmap.

Year	No. of completions	
2012	3	
2013	1	
2014	2	
2015	6	
2016	7	
2017	7	
2018	4	
2019	3	
2020	0	
2021	34	
2022	20	
2023	13	
<u>* Source CSO</u>		

Table 1: Carrick-on-Shannon - Housing Completion Figures 2012-2023 *

As outlined above in Table 1. the current housing output in Carrick on Shannon remains markedly low and therefore the Draft Plan as proposed should not in any way be curtailed in the zoning of residential land.

Further, due to the presence of OPW flood designation constraints on the settlement and its impact on suitable sites, the Plan in its current form contains a minimum residential allocation to enable Carrick on Shannon to grow in line with its ambitions as a Key Town in the RSES.

There are no refences to serviced sites in the JLAP. This proposition is considered to be inconsistent with RPO 3.7. It is suggested that targets and locations be identified for the provision of serviced sites.







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IV. **Place Making & Urban Regeneration**

Town Centre First Ethos is to the fore of the plan, with emphasis on Improving the Connection to the River Shannon and Improving Arrival Gateways and Promoting Town Centre Vitality and Activity, the stated primary goals. (Objectives TC 1- TC3)

High Quality public realm is emphasised under Objective TC4.

The Assembly welcomes the identification of 7 opportunity sites in the town, as part of the town centre and regeneration strategy and **Objective TC8**.

TC8 - Facilitate and promote the appropriate development of the Opportunity Sites

It is noted there are no opportunity sites identified on the Cortober side of the JLAP (Roscommon County Council administrative area.) The Assembly suggest that the respective Local Authority assume the responsibility for preparing a rolling program of masterplans within a 12 to 18 month timeframe of the adoption of the plan.

V. Social and Community Infrastructure

The JLAP reflects prominently the need for Social and Community Infrastructure in the town. The plan identifies a need for 'additional facilities particularly a community centre/town hall which the town is currently lacking', and SC5 relates; SC5 Support the development of a community centre/town hall to serve the residents of the town of Carrick-on-Shannon.

An indicative location (or potential locations) for same would be of benefit to the spatial plan for the JLAP.

VI. **Movement and Transport**

RPO 6.27 of the RSES sets out the aim of the collaborative preparation of Local Transport Plans for the Regions Key Towns, including Carrick-on-Shannon. The Assembly acknowledges the preparation and inclusion of the Carrick-on-Shannon LTP as part of the plan in Appendix 5 and as referenced in section 6.4. The LTP is a comprehensive document.

Active Travel Infrastructure is addressed by MT1. A list of projects proposed under Active Travel Infrastructure would also be welcome in this section, noting that this is included in the LTP, in Appendix 5.







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The *Strategic Function* of the N4 is highlighted under Section 6.2 & 6.3 of the JLAP, with associated Objectives in MT 3 & MT 4 and this aligns with continued prioritisation of this key transport corridor by the Assembly, as per RPO 6.7. of the RSES.

Owing to the potential for Rail / Rail Freight to extend across the network, to include Carrick-on-Shannon, there is merit in including a specific objective to Rail Travel improvements and expansion. Under Section 6.6: Public Transport, this objective could serve to recognise the important role of Carrick-on-Shannon in the provision of improvements to the Dublin - Sligo line, as identified in the All Island Strategic Rail Review 2024. *i.e.* The Final Package of Recommendations; *One train per two hours on regional routes including Galway-Limerick, Limerick-Cork, Limerick-Ballybrophy, Dublin-Sligo, Dublin-Westport/Ballina, and Greystones-Rosslare Europort.*

RPO 6.15 of the RSES represents the regional ambitions of the Assembly, with regard to Rail.

RPO 6.15 Promote enhancement of the capacity of the Sligo to Dublin rail line.

The plan outlines an objective to deliver a Public Transportation Hub for Carrick-on-Shannon, with objective MT 7. An indicative location or potential locations of same would be of benefit to the spatial plan for the JLAP.

VII. Monitoring and Implementation

The plan commits to overall monitoring of the JLAP in Section 10.

IM1 Develop and undertake a programme of monitoring and evaluation of the JLAP over its lifetime

The monitoring framework should include a programme of the clear identification of enabling infrastructure, as referenced above and the creation of the conditions to engender housing growth and economic development within the town over the lifetime of the plan.

RECOMMENDATIONS

1.(a) The JLAP would benefit from the Core Strategy incorporating some reference to the Growth Ambition for Carrick-on-Shannon as a Key Town in the RSES. Such a reference would enable the provision of a commentary on the current and future growth trajectory in terms of its consistency or otherwise with Sec. 3.4 of the Regional Strategy, which envisages an uplift across all designated Key Towns of 30% to 2040. This summary of Carrick-on-Shannon's sub-regional role should include a clear core strategy table, which sets out the area and quantum of housing to be







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delivered on lands zoned 'inner core', 'outer core 'existing residential' and 'new residential', with appropriate indicative densities that demonstrate anticipated yield.

b) The current residential zoning allocation is considered a minimum level to enable the town to realise its RSES ambitions as a Key Town.

- 2. The JLAP would be enhanced via the inclusion of a clear synopsis of the Critically Enabling Infrastructure necessary to enable Carrick-on-Shannon to fulfil its role as a Key Town, and such projects should be classified in terms of potential delivery timelines (e.g. Short / Medium / Long term).
- 3. In relation to 1 and 2 above, the JLAP would benefit from an element of commentary in respect of how the future supply of housing units can be increased given the current notably low supply base of residential units, and measures required to significantly increase overall delivery in both Local Authority Areas of Carrick-on-Shannon.
- 4. That the Core Strategy of the JLAP is revised to incorporate clear timelines across a range of objectives, projects and policy commitments.
- 5. Consideration should be given to the provision of a clear vision to be set out within Section 1 of the plan. This summary statement of the future vision for Carrick-on-Shannon should include reference to the pipeline supply and provision of key enabling infrastructure, which could be encompassed at the outset in a single location, or table.
- 6. Consideration should be given to the provision of serviced sites as a mechanism to deliver increased housing supply, as envisaged through RPO 3.7 of the RSES.
- 7. The Plan should consider Local Authority-led Masterplans for the identified opportunity sites, as applicable across the plan, rather than developer-led frameworks. In the absence of detailed Local Authority Masterplans or a commitment to prepare same, a number of Guiding principles for each site could, at a minimum, be outlined in the JLAP.
- 8. The Draft Local Transport Plan should be adopted in advance of or in tandem with the Local Area Plan and should align with the objectives of the Local Area Plan.
- Consider including locations / indicative locations for the Community Hall and Transportation Hub on the spatial plan appropriate or outline the process via which lands for this purpose will be identified.





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Conclusion

The Assembly note the Draft Carrick-on-Shannon JLAP generally reflects the key principles set out to enable the town to grow as a key settlement for the Northern and Western region. The incorporation of the above recommendations would assist in the delivery of strong policy alignment with the RSES. The Assembly finally note the advancement and adoption of the Local Area Plan for Carrick-on-Shannon will occur during a period of significant policy adjustment, with the impending National Planning Framework (NPF) revision to be followed by a review and update of the Regional Spatial & Economic Strategies. The Assembly looks forward to ongoing constructive collaboration with Leitrim and Roscommon County Councils in this regard.

I trust that the above is of assistance and the Assembly wish to thank both Leitrim and Roscommon County Councils for the opportunity given to provide this submission. If you have any queries in respect of the above, then do not hesitate to revert.

Mise le meas

Gerard Doyle

Gerry Doyle Assistant Director







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Submission Carrick on Shannon Draft JLAP

Final Audit Report

2024-10-03

	Created:	2024-10-03
	By:	Fiona Timoney (ftimoney@nwra.ie)
	Status:	Signed
	Transaction ID:	CBJCHBCAABAAMd3a4Oox0AhPhDU9WT-Y3njYUFOr8flj
I		

"Submission Carrick on Shannon Draft JLAP" History

- Document created by Fiona Timoney (ftimoney@nwra.ie) 2024-10-03 - 9:50:58 AM GMT
- Document emailed to Gerard Doyle (gdoyle@nwra.ie) for signature 2024-10-03 - 9:51:02 AM GMT
- Email viewed by Gerard Doyle (gdoyle@nwra.ie) 2024-10-03 - 12:49:48 PM GMT
- Document e-signed by Gerard Doyle (gdoyle@nwra.ie) Signature Date: 2024-10-03 - 12:50:42 PM GMT - Time Source: server
- Agreement completed. 2024-10-03 - 12:50:42 PM GMT